



March 20, 2015

**VIA U.S. CERTIFIED MAIL, RETURN RECEIPT REQUESTED**

Secretary Sally Jewell  
U.S. Department of the Interior  
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Secretary Tom Vilsack  
U.S. Department of Agriculture  
1400 Independence Avenue, SW  
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Chief Tom Tidwell  
USDA Forest Service  
1400 Independence Avenue, SW  
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Steve Beverlin, Forest Supervisor  
Malheur National Forest  
P.O. Box 909  
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**Re: Notice of Intent to Sue or to Supplement Complaint to Add Violations of the Endangered Species Act Regarding the Impacts on Bull Trout from Authorized Grazing on the Malheur National Forest: Violations of Endangered Species Act Sections 7(a)(2), 9, and Failure to Reinitiate Formal Consultation**

Dear Madams and Sirs:

As a courtesy, the Oregon Natural Desert Association and the Center for Biological Diversity (hereafter collectively "ONDA") provide notice of intent to amend and/or supplement the causes of action in their complaint in *Oregon Natural Desert Association v. U.S. Forest Service*, No. 3:03-cv-213-PK (D. Or. filed Feb. 18, 2003), or to bring a new action against you, for violations of the Endangered Species Act ("ESA"), 16 U.S.C. §§ 1531-44, relating to the Forest Service's authorized livestock grazing on the Malheur National Forest ("MNF" or "Forest").

This letter describes, to the best of our knowledge, the Forest Service's violation of ESA § 7(a)(2) in its 2011, 2012, 2013, 2014, and ongoing management of grazing on the MNF, the Forest Service's violation of the take prohibition in ESA § 9 in its 2011, 2012, 2013, 2014, and ongoing management of grazing in the MNF, and the Forest Service's and U.S. Fish and Wildlife Service's ("USFWS") failure to reinitiate formal consultation despite exceeding the amount or extent of incidental taking described in the relevant Incidental Take Statement ("ITS") in the USFWS's biological opinion for 2012–2016 livestock grazing management on the MNF's Prairie City and Emigrant Ranger Districts (FWS reference 01EOW00-2012-F-0101) (hereafter referred to as the "2012–2016 BiOp"). ONDA is entitled to amend or supplement its complaint in *ONDA v. USFS* pursuant to Federal Rule of Civil Procedure 15(d). We ask that you take immediate action to prevent and remedy these violations of the ESA.

## BACKGROUND

The Malheur and North Fork Malheur Wild and Scenic Rivers and many of their tributaries within the Malheur River Basin are home to populations of bull trout. The bull trout was listed as a threatened species under the ESA in 1998. The Malheur and North Fork Malheur rivers and their tributaries serve as critical habitat for bull trout.

Throughout its range, the bull trout is threatened by the combined effects of habitat degradation, fragmentation, and alterations associated with dewatering, road construction and maintenance, mining, and grazing. The bull trout also is threatened by the blockage of migratory corridors by dams or other diversion structures, poor water quality, incidental angler harvest, entrainment into diversion channels, and introduced nonnative species.

Buchanan *et al.* (1997)<sup>1</sup> classified bull trout in the North Fork Malheur River as "of special concern" and in the Upper Malheur River as at "high risk" of extinction. Categories of increasing extinction risk ranged from "low risk of extinction" to "probably extinct." At the time of listing, the USFWS considered all bull trout subpopulations in the Malheur Recovery Unit as "depressed."

Bull trout live in the North Fork Malheur River subbasin and in the upper Malheur River mainstem and tributaries upstream of the town of Drewsey. They are considered two distinct local populations because of their geographic isolation from construction of dams without fish passage on the mainstem Malheur River and North Fork Malheur Rivers.

On the North Fork Malheur River, spawning and rearing takes place in the mainstem and tributaries upstream of Crane Crossing in the North Fork Malheur River. The fish typically move upstream from overwintering areas in Beulah Reservoir into the river from mid-April until late May, although some have been observed in the river by mid-March. By June, the fish generally

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<sup>1</sup> Buchanan, D., M. Hanson, and R. M. Hooten. 1997. Status of Oregon's bull trout distribution, life history, limiting factors, management considerations and status. Oregon Department of Fish and Wildlife, Portland, Oregon.

are well distributed in the North Fork Malheur between Beulah Reservoir and the spawning areas. By early August the majority of fish have moved upstream of the Crane Creek confluence and some will have moved into spawning tributaries by mid-July. The peak migration into spawning tributaries occurs by mid to late-August. The peak in adult downstream migration from spawning tributaries occurs in late September and bull trout return to the reservoir between late October and mid-December.

Spawning in the North Fork Malheur subbasin begins in late August and peaks in September. The redds incubate all winter. Spawning has been documented in the mainstem North Fork Malheur upstream of the mouth of Deadhorse Creek and in the following tributaries: Horseshoe Creek, Swamp Creek, Sheep Creek, Elk Creek, Crane Creek, and Little Crane Creek.

Stream temperatures and the quality of habitat are the major limiting factors within the North Fork Malheur River watershed. Primary effects from grazing are related to vegetation removal and hoof action along the banks and areas of saturated soils. Cattle trampling redds also is a problem.

In the Upper Malheur River, bull trout spawning and juvenile rearing occurs in the river and tributaries upstream of the confluence of Big Creek. Streams where redds have been identified include Snowshoe Creek, Meadow Fork Big Creek, Lake Creek, Summit Creek, and Big Creek. Timing of bull trout spawning in the Upper Malheur population is similar to the North Fork Malheur population, with the peak occurring in mid-September.

Stream temperatures and the quality of habitat are the major limiting factors within the Malheur River watershed. Primary effects from grazing are related to vegetation removal and hoof action along the banks and areas of saturated soils.

One common factor contributing to the threatened status of bull trout is livestock grazing. The fish requires stable stream channels, clean spawning and rearing gravel, and complex and diverse cover. Livestock grazing degrades habitat in many ways including by removing riparian vegetation, destabilizing stream banks, widening stream channels, promoting incised channels, lowering water tables, reducing pool frequency, increasing soil erosion, and altering water quality. These effects reduce cover, increase summer water temperatures, promote formation of anchor ice in winter, and increase sedimentation into spawning and rearing habitats.

Livestock also can harm bull trout by directly trampling on redds (nests), which contain thousands of eggs. A single trampling incident can kill a majority of those eggs, as well as cause non-lethal take. Further, wading livestock can harm the fish by crushing or dislodging vulnerable alevins and fry, which remain in the gravels near the redd for weeks after hatching. Livestock may also displace larger juvenile fish from protective streamside cover, increasing the risk of predation. Livestock in and around streams can harass spawning adult fish, causing them to dart or drift from their nests, disrupting their spawning activities, and forcing them to expend vital energy. For these reasons, biologists caution that livestock should not have direct access to spawning streams, particularly during spawning and incubation periods.

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## LEGAL BACKGROUND

The Endangered Species Act requires the Forest Service to consult with USFWS to insure that authorized livestock grazing actions are “not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification” of critical habitat. 16 U.S.C. § 1536(a)(2). The Forest Service’s duty to comply with § 7(a)(2) remains in force even after the issuance of a biological opinion (“BiOp”) or Letter of Concurrence (“LOC”).

If a proposed action “may affect” a listed species or its critical habitat, the Forest Service must consult with USFWS. 50 C.F.R. § 402.14(a). For actions “not likely to adversely affect” (“NLAA”) listed species or critical habitat, the Forest Service may seek “informal” consultation with USFWS. *See id.* § 402.14(b). The Forest Service’s NLAA determination becomes final for consultation purposes only when USFWS concurs in a written LOC. *Id.* §§ 402.13, 402.14(b)(1).

For actions “likely to adversely affect” (“LAA”) listed species or critical habitat, the Forest Service must engage in “formal” consultation with USFWS. *See id.* § 402.14(a). Formal consultation results in a biological opinion from USFWS determining whether the action is likely to jeopardize the listed species or adversely modify its critical habitat. 16 U.S.C. § 1536(b)(3)(A).

If a no jeopardy or no adverse modification conclusion is reached, USFWS must include an Incidental Take Statement identifying areas where members of the particular species are at risk, if take may occur. 16 U.S.C. § 1536(b)(4), 50 C.F.R. § 402.14(g)(7). The ITS functions as a safe harbor provision immunizing persons from § 9 liability and penalties for takings committed during activities that are otherwise lawful and in compliance with its terms and conditions. 16 U.S.C. § 1536(o). If the terms and conditions of the ITS are disregarded and a taking does occur, the action agency or the applicant may be subject to civil and criminal penalties under § 9.

An ITS (1) specifies the amount or extent of the impact on the species of any incidental taking, (2) specifies Reasonable and Prudent Measures to minimize such impact, and (3) sets forth the Terms and Conditions that must be complied with to implement the Reasonable and Prudent Measures. 50 C.F.R. § 402.14(i)(1)(i), (ii), (iv). In order to monitor the impacts of incidental take, the Forest Service “must report the progress of the action and its impact on the species to the Service as specified in the incidental take statement.” *Id.* § 402.14(i)(3).

If during the course of the action, the amount or extent of incidental taking specified in the ITS is exceeded, the action agency “must reinitiate consultation immediately.” *Id.* § 402.14(i)(4). *See also id.* § 402.14(i)(4) (listing the circumstances under which reinitiation must occur). Letters of Concurrence may also include reinitiation triggers. While formal consultation is taking place on the proposed action, 16 U.S.C. § 1536(d) prohibits any irreversible or irretrievable commitment of resources by the government agencies.

Section 9 of the ESA prohibits any person from “taking” a threatened or endangered species. 16 U.S.C. § 1538(a)(1); *see also* 50 C.F.R. § 17.31. “Take” is defined broadly under the ESA and its regulations to include harassing, harming, wounding, killing, trapping, capturing, or

collecting a protected species either directly or by degrading its habitat sufficiently to impair essential behavior patterns. 16 U.S.C. § 1532(19).

## **VIOLATIONS OF THE ENDANGERED SPECIES ACT**

The USFWS 2012–2016 BiOp, dated September 6, 2012, covers the Deardorff, Rail, Hot Springs, Flag Prairie, Spring Creek, North Fork, Ott, Bluebucket, Logan Valley, Summit Prairie, McCoy, Dollar Basin, Star Glade, and Central Malheur allotments. The consultation covers the “grazing program” for these areas as an inclusive whole.

The BiOp includes an Incidental Take Statement. The ITS’s Terms and Conditions include requirements with respect to trampling of bull trout redds and percent bank alteration, as well as monitoring and reporting requirements. 2012–2016 BiOp at 77–85. The BiOp states that “[w]henever the amount or extent of incidental take is exceeded, **any operations causing such take must cease**, pending reinitiation of consultation with the Service.” *Id.* at 85 (emphasis added). The “operations” consulted on are the grazing program for fourteen allotments on the Prairie City and Emigrant Creek Ranger Districts.

The USFWS’s September 6, 2012 document also concurs with USFS’s NLAA determination for seven allotments. 2012–2016 BiOp at 2–12. For each allotment, the LOC is premised on the Forest Service maintaining specific measures intended to minimize impacts to bull trout. These measures include limits on livestock numbers and grazing levels, timing restrictions, fencing and other barriers to critical areas including maintaining existing fences before and during grazing periods, move triggers, endpoint and other use standards, and monitoring and field inspections including spawning surveys.

The limit for allowable incidental take with respect to redd trampling identified in the BiOp’s ITS, which is the same as the trigger for reinitiation, is: “One bull trout redd observed to have been trampled per year is the maximum amount of take anticipated to occur as a result of the proposed action.” 2012–2016 BiOp at 78. The extent of take limitations for habitat impacts focus on bank alteration, setting out a series of “overages” with respect to measured bank alteration. *Id.* at 80. Exceeding any of the specified limits, including “any commensurate mixed combination” of the limits “will trigger the reinitiation provisions of this opinion.” *Id.*

The BiOp also sets out detailed, non-discretionary Terms and Conditions. 2012–2016 BiOp at 80–84. These Terms and Conditions include monitoring and inspections including spawning surveys, notifications and remedial actions where habitat impact limits are exceeded, and reporting requirements. *See id.* The BiOp also includes a Term and Condition that the MNF shall provide to USFWS an End of Year Report every year by February 15. *Id.* at 83.

### **I. Unlawful Take**

The BiOp includes an Incidental Take Statement authorizing take of bull trout. Because the exempted take has been exceeded and the ITS itself is invalid, the Forest Service’s authorization of grazing, which had caused and continues to cause take of bull trout, violates the ESA.

It has come to our attention that the take exempted in the ITS has been exceeded, and that take has occurred on allotments that are not covered by the ITS, meaning there is no exempted take. Specifically, there have been numerous, repeated instances of livestock trampling bull trout redds and spawning grounds over the past several years in the areas covered by the 2012–2016 BiOp. Upper Little Crane Creek (Flag Prairie and Spring Creek allotments) in particular appears to have suffered repeated such incidents, with known (“observed”) trampling occurring in at least 2011 and 2013. The North Fork Malheur River and/or its tributaries (River Pasture, Flag Prairie Allotment) appear to have suffered such incidents in September 2014. There may be other such instances of which ONDA is not yet aware.

In 2011, the Oregon Department of Fish and Wildlife informed USFWS that it had seen cows in the Upper Little Crane enclosure “for the last couple of years.” At an August 31, 2011 field review, USFWS noted that “fresh cattle sign was everywhere” even though cattle were supposed to have been out of the pasture by August 15; that cattle “were in the enclosure, had been everywhere and use was extremely heavy”; that “[a]lmost every access point had been trampled, bank alteration was heavy, and almost every available spawning bed was trampled”; and that “it will be very difficult to identify a redd due to all the hoof trampling.” The report concluded, “after walking the 1.6 miles I can honestly say that very little of this enclosure is impenetrable. Cattle sign was everywhere.” USFWS, “Report on a spawning survey on the Upper Little Crane Creek” (2011).

In October 2011, a Bureau of Reclamation fishery biologist noted in an email to USFWS, following a second round of spawning surveys, “While we did not see any cattle inside the enclosure, the impacts were very evident. Lots of sheer [*sic*] damage along the banks. Lots of trampling. I believe Little Crane Creek numbers were down this year and were likely a result of all of those cattle! Disappointing.”

In November and December of 2012, the agencies’ Level 1 Team expressed “growing concern” about “the frequency of unauthorized use or trespass into vacant allotments that were not consulted on in recent 2012–2016 consultation effort.” USFWS also was concerned that several incidents of unauthorized use had occurred where the MNF did not contact USFWS, including on the Lower Middle Fork (Deadwood and Big creeks), Blue Mountain (Clear Creek), and Sullens (Bridge and Clear creeks) allotments. In other places, such as on the Rail Creek Allotment, livestock “were likely within the headwater portions of the upper John Day for much of the growing season (after August 18th) based on livestock presence and observed use along riparian areas of the John Day River” and that “there would have been the potential for harassment of adult bull trout when livestock were in the stream. This is a MSRA [most sensitive riparian area] site.” The USFWS notified the MNF in writing in December 2012 that USFWS has not been receiving timely notifications of situations where unauthorized livestock use or trespass has been documented in pastures containing bull trout streams.

In 2013, the Forest Service documented that the Oregon Department of Fish and Wildlife identified eight redds in Little Crane Creek on August 28, 2013 as part of the state agency’s annual spawning survey. On September 12, 2013 USFWS and USFS could locate only five of them “of which all were trampled. Many of the older redds could not be identified, due to the

amount of hoof action within the spawning gravels. We also observed 15 new redds of which 4 of those were trampled. The total amount of observed trampled redds was 9.” The Forest Service document stated that the redd trampling occurred on the Spring Creek Allotment, which “falls under a Letter of Concurrence which has no ‘Take’ coverage and although the action that occurred was not part of the proposed action it is connected in that the rationale of the ‘Not Likely to Adversely Affect’ determination call was partially based on not grazing Critical Habitat (Little Crane Creek) after August 15.”

In September 2014, during bull trout spawning season, adult bull trout were observed in the North Fork Malheur River on the Flag Prairie Allotment’s River Pasture. This was not expected based on the MNF’s prior statements that no fish occur here during spawning, and the resulting 2012–2016 BiOp which relied upon those statements. Subsequent field inspections revealed a downed fence and cows surrounding a known redd site. It is unclear whether agency personnel observed any trampled redds, but the record makes clear that such trampling appears likely to have occurred. Now that bull trout have been documented after August 15 in this area, the MNF must implement the BiOp’s Term and Condition number one, which requires minimizing incidental take from trampling by performing spawning surveys and protecting redds. It is unclear whether the Forest Service has done anything to comply with this requirement.

Also in 2014, the USFS reinitiated consultation with the USFWS following the Spring Creek Allotment trampling and habitat modification described above. On September 10, 2014, the USFWS issued a letter concurring with the Forest Service’s determination that the proposed action, as modified, for livestock management in the Spring Creek Allotment may affect, but is not likely to adversely affect, bull trout and bull trout critical habitat. (The concurrence purports or suggests that it is limited to the Spring Creek Allotment, despite the 2012–2016 BiOp covering livestock grazing as a program for all of the allotments listed above.) Despite the LOC, it remains unclear, based at least in part on chronic fence problems and scores of agency records documenting livestock at places and times where and when they should not be present, whether the enclosures and other fences are or will be functioning adequately to keep livestock from destroying bull trout and bull trout critical habitat once again this year.

In short, it appears that the Forest Service is regularly failing to keep livestock out of critical riparian areas during fish spawning periods, causing take to occur in excess of that exempted in the ITS, and causing unauthorized take on allotments not covered by the ITS, where no take is exempted, such as Spring Creek Allotment and others.

Additionally, allotments covered by the 2012–2016 BiOp have been subjected to alteration by hoof action and removal of vegetation in excess of levels allowed under the ITS. For example, livestock grazing on pastures on the Flag Prairie and North Fork allotments resulted in exceedences of bank alteration standards. ONDA cannot reasonably visit or monitor every stream on every allotment, but conditions on the allotments which we have visited, as confirmed by agency records obtained through the FOIA, suggest that the violations of the bank damage reinitiation triggers and bank alteration move triggers and endpoint indicators are pervasive. We have reason to believe that the allotments in violation of the bank alteration endpoint condition and incidental take limit/reinitiation trigger include the Dollar Basin, Star

Glade, Spring Creek, North Fork, Flag Prairie, and Ott allotments. Again, this has caused take in excess of that exempted in the ITS, and take on allotments not covered by the ITS.

Further, all take is unauthorized because the ITS itself is unlawful. The ITS states the amount/extent of exempted take in terms of “observed” redd trampling, 2012–2016 BiOp at 78. This fails to describe the amount/extent of the actual *impact on the species*, as required. Because the ITS is invalid, grazing that causes take of bull trout is unlawful.

It is likely that this unlawful take will continue in 2015 and future years if the agency once again allows grazing on the Spring Creek and other allotments with documented or suspected trampling problems.

## **II. Jeopardy and Adverse Modification**

The duty to comply with Section 7(a)(2) remains with the Forest Service even after the issuance of a BiOp or Letter of Concurrence. After completion of consultation, the action agency must determine whether and in what manner to proceed with the action in light of its Section 7 obligations and the BiOp. 50 C.F.R. § 402.15(a). An action agency “may not rely solely on a [] biological opinion to establish conclusively its compliance with its substantive obligations under section 7(a)(2).” *Pyramid Lake Paiute Tribe of Indians v. U.S. Dep’t of Navy*, 898 F.2d 1410, 1415 (9th Cir. 1990) (citation omitted). Here, the BiOp contains errors of such gravity that the Forest Service should have known not to rely upon it to fulfill its Section 7 obligations.

The BiOp failed to adequately analyze the baseline and fully assess the effects of grazing when added to that baseline on survival and recovery of bull trout and its critical habitat. For example, the BiOp does not include in the environmental baseline all current conditions and activities in the action area that have an impact on bull trout. The conclusions in the BiOp that effects to habitat are all insignificant are unreasonable and not supported by the best available science.

The BiOp also does not adequately analyze the direct and indirect effects of livestock trampling and harassing bull trout. And the BiOp relies heavily on the Forest Service’s grazing management strategy, including intensive monitoring and extensive fencing, but fails to acknowledge that these strategies have not been effective in the past. Reliance on measures that have failed in the past is unreasonable.

Because of these shortcomings and others, the Forest Service cannot rely on the BiOp to prevent jeopardy or adverse modification to bull trout. The Forest Service is continuing to violate its duty to prevent jeopardy and adverse modification by authorizing grazing in 2015 and future years that degrades habitat and directly impacts these fish by trampling redds and incubating eggs, and disrupting the normal behavior of adult and juvenile fish, and degrading critical habitat. Such effects impair the survival and recovery of these critically important populations, which in turn fails to ensure lack of jeopardy or adverse modification, in violation of the ESA.

For these reasons and others, authorizing grazing on allotments in reliance on the flawed BiOp, the Forest Service has failed to insure that the effects of its actions are not likely to



jeopardize the survival and recovery of bull trout or adversely modify its critical habitat, in violation of Section 7(a)(2).

### III. Reinitiation of Consultation

If during the course of the action the amount or extent of incidental taking specified in the ITS is exceeded, or the action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in the BiOp, the action agency must immediately reinitiate consultation. 50 C.F.R. §§ 402.14(i)(4), 402.16. Here, the Forest Service must reinitiate formal consultation with USFWS because the Service has violated Terms and Conditions of the ITS in the 2012–2016 BiOp.

The “amount or extent of incidental taking” has been exceeded first because, as described above, there have been documented and suspected instances of take in excess of the ITS. This includes trespass, direct trampling of redds in exceedance of the redd trampling limit, and documented instances of bank damage in excess of endpoint and take limit/reinitiation triggers. It also includes direct take such as redd trampling occurring where take was not expected or authorized.

Also, the MNF has failed to comply with all monitoring requirements in the 2012–2016 BiOp. That BiOp commits the MNF to a rigorous monitoring regime as well as heavy reliance on fencing and other structures, which are notoriously difficult to maintain. 2012–2016 BiOp at 81–83. While our field reviews suggest the Forest Service has implemented most of the promised range structures, many continue to fail year after year. The agency has not, however, complied with all its detailed monitoring requirements. For example, the Forest Service has still not yet established Designated Monitoring Areas (“DMAs”) in all critical habitat areas, which is a Term and Condition of the BiOp.

Also, the MNF fails, each and every year, including in 2014 and again in 2015, to provide the USFWS with a timely End of Year Report. The BiOp includes as a Term and Condition that the Forest Service shall provide the USFWS with the Report by February 15 of each year. 2012–2016 BiOp at 83. For all these reasons, the Forest Service must reinitiate formal consultation with USFWS on the grazing program covered by the 2012–2016 BiOp.

The MNF has acknowledged at least some of these standards violations and other problems in End of Year reports and other public documents. The USFWS also has documented these problems, repeatedly asking the Forest Service to strengthen its grazing standards and practices, to report problems in a timely fashion, and to comply with all of the terms of the BiOp. The USFWS also has documented unauthorized take and asked the Forest Service to take action to address that problem. However, the Forest Service and USFWS have not reinitiated or carried out formal consultation as required by law. The Forest Service must do so prior to authorizing further grazing. Until then, any ongoing grazing must cease.

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## PERSONS GIVING NOTICE

The addresses and phone numbers of the organizations giving notice are as follows:

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## RELIEF REQUESTED

As set forth above, the Oregon Natural Desert Association and the Center for Biological Diversity intend to pursue litigation in federal court and will seek injunctive, declaratory, and other relief, including an award of attorney fees, expert witness fees, and other expenses incurred in investigating and prosecuting this action. To avoid such litigation, the Forest Service should immediately close the Dollar Basin, Star Glade, Spring Creek, North Fork, Flag Prairie, Ott, and other allotments as necessary, to any further livestock grazing, until such time as the agency can ensure—beyond any reasonable doubt—that no further harm will occur to listed bull trout and their habitat. In addition, the Forest Service should agree not to graze the subject allotments in 2015 or future years until it is guaranteed that no further harm will occur to listed bull trout and their habitat.

If you have any questions, wish to discuss this matter further, or believe this notice is in error, please feel free to contact me at the address below. Thank you for your attention to this matter.

Sincerely,



Peter M. Lacy, Senior Attorney  
Oregon Natural Desert Association

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