

interest may be affected by the proceeding and who desired to participate as a party to the proceeding to file a petition to intervene in accordance with the provisions of 10 CFR § 2.714 by March 3, 1982.

Pursuant to this notice, the Coalition for Safe Power (Coalition) and the Forelaws on Board (FOB) filed on March 6, 1982, a "Request for Hearings and Amended Petition for Leave to Intervene" (Coalition Petition).

The Coalition alleges that it is a nonprofit, citizens organization founded to work for safe energy. Its work includes research and education and it has represented its members in various proceedings, including four proceedings before the Commission. The Coalition asserts a continuing intervenor status in this proceeding derived from its prior status as a party to the proceeding before the change of site. Coalition Petition, pp. 2-3.

In stating the interests that may be affected by this proceeding, the Coalition alleges that it has members who are ratepayers of Applicants, who work, live, recreate, and travel in the environs of the proposed Skagit/Hanford site, and who eat foodstuffs grown in the vicinity potentially impacted by construction and operation of the project. At least one member resides within a 20-mile radius of the proposed site. Coalition Petition, p. 3. It claims that construction and

operation of the project may affect the interests of its members and staff by contaminating the air, food, and water used by them, by jeopardizing recreation on the Columbia River, by damaging or destroying their livelihood, homes, and property, and by imposing economic burdens on members, including those members who are also ratepayers. The petition also states that part of the Coalition's work is conducted in Richland, Washington, approximately sixteen miles from the proposed site. Coalition Petition, pp. 3-4. The petition includes affidavits from three members who have authorized the Coalition to represent them in various NRC proceedings, including proceedings involving the Skagit/Hanford Nuclear Project.

It is Applicants' position that the Coalition has failed to meet the requirements of 10 CFR § 2.714 and Section 189a of the Atomic Energy Act of 1954, as amended, in that it has failed to allege a sufficient basis for standing to intervene as a matter of right on its own behalf or on behalf of its members; that petitioner's purported representation of one individual local member is but a device employed to represent the Coalition's interest rather than the interest of the individual member; and that an insufficient basis is established for the grant of discretionary intervention.

II. Argument

- A. The Coalition Petition does not provide a sufficient basis for standing of the Coalition to intervene as a matter of right on its own behalf.

The Commission's regulations establish the requirements for intervention in NRC proceedings and set forth specifically the criteria for establishing standing. The petitioner is required to

" . . . set forth with particularity the interest of the petitioner in the proceeding, how that interest may be affected by the results of the proceeding, including the reasons why petitioner should be permitted to intervene, with particular reference to the factors in paragraph (d) of this section, and the specific aspect or aspects of the subject matter of the proceeding as to which petitioner wishes to intervene." 10 CFR § 2.714(a)(2).

Paragraph (d) of § 2.714 requires the petitioner to state the nature of the petitioner's right under the Atomic Energy Act to be made a party to the proceeding, the nature and extent of the petitioner's property, financial or other interest in the proceeding, and the possible effect of any order which may be entered in the proceeding on the petitioner's interest.

The Commission has held that, in determining whether a person has an interest which may be affected by a proceeding, "contemporaneous judicial concepts of standing should be used." Portland General Electric Co. (Pebble Springs Nuclear Plant, Units 1 and 2), CLI-76-27, 4 NRC 610, 614 (1976); Northern States Power Co., (Tyrone Energy Park, Unit 1),

CLI-80-36, 12 NRC 523, 526, 527 (1980). To have standing, a person must allege that he will be injured in fact as a result of the proceeding and must allege that his interests fall within the zone of interests protected by applicable statutes. Pebble Springs, supra, 4 NRC at 613-14. Since the Coalition has not demonstrated that it will be injured in fact as a result of this proceeding, it has no standing to intervene in this proceeding on its behalf.

The Coalition has not identified any interest of the Coalition as an entity that could be affected by the outcome of this proceeding. (In fact, it states that "[t]he interests of the Coalition are, in large part, predicated on the interests of its members," Coalition Petition, p. 3.) The Coalition's purpose is "to work for safe energy." Coalition Petition, p. 2.

To the extent that the Coalition may be attempting to assert standing based upon its interest in safe energy, it must fail. The Supreme Court has rejected such grounds for standing, reasoning that:

". . . a mere 'interest in a problem,' no matter how longstanding the interest and no matter how qualified the organization is in evaluating the problem, is not sufficient by itself to render the organization 'adversely affected' or 'aggrieved' within the meaning of the APA. The Sierra Club is a large and long-established organization, with a historic commitment to the cause of protecting our Nation's natural heritage from man's degradations. But if a 'special interest' in this subject were enough to entitle the Sierra Club to commence this litigation, there would appear to be no objective basis upon which to disallow a suit by any other bona fide

'special interest' organization however small or short-lived. And, if any group with a bona fide 'special interest' could initiate such litigation, it is difficult to perceive why any individual citizen with the same bona fide special interest would not also be entitled to do so." Sierra Club v. Morton, 405 U.S. 727, 739-40 (1972).

This holding is applied in NRC proceedings. See, for example, Pebble Springs, supra, 4 NRC at 613; Allied-General Nuclear Services (Barnwell Fuel Receiving and Storage Station), ALAB-328, 3 NRC 420, 421-22 (1976); and Nuclear Engineering Co. (Sheffield, Illinois, Low-Level Radioactive Waste Disposal Site), ALAB-473, 7 NRC 737, 742 (1978). Thus, it is clear that the Coalition's interest in safe power does not provide a basis for standing on its own behalf.

Additionally, the Coalition asserts a "continuing intervenor status derived from its admission as a party in the original Skagit Nuclear Project proceedings," claiming that the Coalition was "admitted without regard to the location of the proposed site." Coalition Petition, p. 3. The notice of hearing for this proceeding does not bestow automatic intervenor status upon parties to the proceeding prior to the change of site. In fact, the notice expressly requires that "[a]ll persons previously admitted as intervenors in this proceeding who wish to further participate with respect to the amended application, shall submit an amended petition for leave to intervene that conforms to the requirements described

above." 47 Fed. Reg. at 5556.¹ The requirements referred to are those in 10 CFR § 2.714. Thus the Coalition must have an interest which may be affected as a result of construction or operation of the project at the Hanford site in order to participate as a matter of right. Status as a party in the proceeding at the previous site gives no standing as of right in the proceeding now.

The Coalition also asserts that it was originally admitted to the Skagit proceeding "without regard to the location of the proposed site," and therefore that the change in the proposed site should not alter its status. Coalition Petition, p. 3. However, a review of the previous intervention of the Coalition reveals that the Board granted intervention to the Coalition

¹This is consistent with past Commission practice. Wisconsin Electric Power Co. (Haven Nuclear Plant, Units 1 and 2), "Notice of Receipt of Amended Application for Construction Permits and Facility Licenses and Hearing on Amended Application for Construction Permits" (March 3, 1978), pp. 10-11; Public Service Electric and Gas Co. (Hope Creek Generating Station, Units 1 and 2), "Notice of Receipt of Amended Application for Construction Permits and Facility Licenses and Notice of Hearing on Amended Application for Construction Permits" (December 5, 1973), p. 8, 38 Fed. Reg. 33791, 33792 (1973). In the Hope Creek proceeding, an earlier party was not permitted to participate for failing to requalify as an intervenor. Public Service Electric and Gas Co. (Hope Creek Generating Station, Units 1 and 2), "Memorandum and Order" (April 3, 1974), pp. 3-5, described in LBP-74-79, 8 AEC 745, 747-48 (1974).

"based upon the assertion of interest as ratepayers." Tr. 4834 (May 12, 1976). The Licensing Board did not explicitly admit the Coalition without regard to the location of the proposed site and, in any case, the Appeal Board and the Commission subsequently ruled that status as a ratepayer does not confer standing to intervene. Portland General Electric Co. (Pebble Springs Nuclear Plant, Units 1 and 2), ALAB-333, 3 NRC 804, aff'd, CLI-76-27, 4 NRC 610 (1976).

Finally, to the extent that the Coalition is claiming standing based upon the allegation that its work is in part conducted in Richland, Washington, the Coalition has not laid a sufficient foundation for such a claim. It has failed to identify the nature, duration, or frequency of such work, and it has failed to specify how such work would be affected by construction or operation of the Skagit/Hanford Nuclear Project. In fact, there is reason to believe that the Coalition's connection with Richland is very tenuous.² Such contacts would be "de minimis and insufficient to confer standing in this proceeding as a matter of right." Houston Lighting and Power Co. (South Texas Project, Units 1 and 2), LBP-79-10, 9 NRC 439, 457, aff'd ALAB-549, 9 NRC 644 (1979).

In view of the above, it is apparent that the Coalition has not demonstrated standing to intervene in this proceeding on its own behalf.

²In a letter dated March 4, 1982 from the Coalition to F. Theodore Thomsen, counsel for Applicants, the Coalition described its work in Richland as follows, in objecting to Thomsen's suggestion that the Coalition use the copy of the PSAR for the Skagit/Hanford Nuclear Project which has been placed in the local Public Document Room in Richland:

"You have suggested that we use the copy of the PSAR in the Richland Library. This solution is clearly not one that is acceptable. Our staff works out of Portland, Oregon, some two hundred miles from Richland. Although we do visit the Local Public Document Room there on a regular basis, it is a great inconvenience and not on a day-to-day basis."

To the same effect, see the following statement by the Coalition on page 2 of the "Request For A Hearing" dated February 22, 1982 filed by the Coalition in regard to the Commission's "Order Extending Construction Completion Date" for Washington Public Power Supply System Nuclear Plant No. 2 (Locket No. 50-397; 47 Fed. Reg. 4780, February 2, 1982):

"The Coalition's work itself is conducted in part in Richland, Washington due to the location of the Local Public Document Room there."

If the principal contact the Coalition has with the Richland area is to visit the Local Public Document Room for the purpose of opposing nuclear projects in the vicinity, then standing based on this contact is a bootstrap operation and provides no basis for standing.

- B. The Coalition Petition does not provide a sufficient basis for the Coalition to represent the interests of its unnamed members.

An organization whose members are injured may represent those members in NRC proceedings. Public Service Co. of Indiana (Marble Hill Nuclear Generating Station, Units 1 and 2), ALAB-322, 3 NRC 328, 330 (1976). Standing in this representative capacity, however, turns on "whether the organization has established actual injury to any of [its] . . . members." Simon v. Eastern Kentucky Welfare Rights Organization, 426 U.S. 26, 40 (1976).

In regard to the unnamed members which the Coalition seeks to represent, the alleged injuries are various generalized adverse health, environmental, and economic effects, including "excessive economic burdens on members who are ratepayers."³

³It is well established that the economic interest of a ratepayer is not sufficient to allow standing to intervene as a matter of right since concern about rates is not within the scope of interests sought to be protected by the Atomic Energy Act, Kansas Gas & Electric Co. (Wolf Creek Generating Station, Unit 1), ALAB-424, 6 NRC 122, 128 (1977); Tennessee Valley Authority (Watts Bar Nuclear Plant, Units 1 and 2), ALAB-413, 5 NRC 1418, 1420-21 (1977); Detroit Edison Co. (Greenwood Energy Center, Units 2 and 3), ALAB-376, 5 NRC 426, 428 (1977); Public Service Co. of Oklahoma (Black Fox Nuclear Power Station, Units 1 and 2), LBP-77-17, 5 NRC 657, 659 (1977). Nor is such interest within the zone of interests protected by the National Environmental Policy Act. Watts Bar, *supra*; Portland General Electric Co. (Pebble Springs Nuclear Plant, Units 1 and 2), ALAB-333, 3 NRC 804, 806 (1976).

Coalition Petition, p. 4. As the Appeal Board has pointed out

" . . . the test is whether a cognizable interest of the petitioner might be adversely affected if the proceeding has one outcome rather than another. And, to repeat, no such interest is to be presumed. There must be a concrete demonstration that harm to the petitioner (or those it represents) will or could flow from a result of unfavorable to it--whatever that result might be." (Emphasis added.) Nuclear Engineering Co., supra, 7 NRC at 743.

Since the Coalition has failed to identify its members and failed to demonstrate the personal interest of each member that might be adversely affected by a possible outcome of this proceeding, it is impossible to verify whether each of these members has standing to intervene in this proceeding.

Consequently, the Coalition has not presented the requisite showing to enable it to intervene in a representative capacity on behalf of these unnamed members. See Houston Lighting and Power Co. (Allens Creek Nuclear Generating Station, Unit 1), ALAB-535, 9 NRC 377, 389-97 (1979).

- C. The Coalition's purported representation of named individual members is but a device employed to pursue the Coalition's interest rather than the interests of the individual members.

The Coalition Petition includes affidavits from three members authorizing the Coalition for Safe Power⁴ to

⁴The Coalition Petition does not identify any member of the FOB who has an interest that could be affected by this proceeding, who deems himself potentially affected by this proceeding, and who has authorized the FOB to represent his interests. Consequently, the position of FOB is insufficient to confer standing, and FOB's participation should be denied.

represent their interests in a variety of matters before the NRC. Two of the affidavits are from members who reside, respectively, in Yakima, Washington (approximately 60 miles from the proposed site, according to the Coalition), and Portland, Oregon (approximately 170 miles from the proposed site). These distances are beyond the 40 to 50-mile radius which the NRC has utilized as the outer boundary for determining whether a person may qualify for standing based upon location of residence and allegations of injury from construction and operation. Watts Bar, supra, 5 NRC at 1421 n. 4; Northern States Power Co. (Prairie Island Nuclear Generating Plant, Units 1 and 2), ALAB-107, 6 AEC 188, 190 (1973); Cleveland Electric Illuminating Co. (Perry Nuclear Power Plant, Units 1 and 2), LBP-81-24, 14 NRC 175, 178-79 (1981); Houston Lighting and Power Co. (South Texas Project, Units 1 and 2), LBP-79-10, 9 NRC 439, 443-44 (1979).

The third affidavit is from M. Terry Dana, who resides in Richland, Washington. Like the affidavit of the member from the Yakima area, this affidavit appears to be a form affidavit that broadly authorizes the Coalition for Safe Power "to represent my interests before the Nuclear Regulatory Commission on any matter pertaining to nuclear units 1, 2 or 4 of the Washington Public Power Supply system, the Skagit/Hanford nuclear projects, units 1 and 2, and the construction or

operation of any other nuclear power facility at the Hanford Nuclear Reservation." The Dana affidavit was executed in January 1982, prior to the February 5, 1982, notice of this proceeding.

Conspicuous by their absence are any statements in this affidavit that particularize any interest of Dana that may be affected by this proceeding or that indicate that Dana has any understanding of the proceeding or considers himself potentially aggrieved by its outcome. Cf. Allens Creek, supra, 9 NRC at 393.

In fact, the form affidavit executed by Dana does not even purport to be addressed solely to concerns about the Skagit/Hanford Nuclear Project, but instead relates to "any matter" involving any one of a number of nuclear units, including the Skagit/Hanford Nuclear Project. In short, there is no indication that Mr. Dana considers himself to have any interest (other than a mere "interest in a problem") which may be affected by this proceeding.⁵

⁵We are fully aware of the Appeal Board holdings that persons who live in close proximity to a reactor site are presumed to have a cognizable interest in licensing proceedings involving that reactor. See, e.g., Virginia Electric & Power Co. (North Anna Nuclear Power Station, Units 1 and 2), ALAB-522, 9 NRC 54, 56 (1979). However, by the same token, we are also aware that the Appeal Board has held that mere proximity to a plant is not in and of itself a sufficient basis for standing. Virginia Electric and Power Co. (North Anna

Given the conspicuous absence of any identified interest of Dana which may be affected by this proceeding, it appears that the Coalition is not in fact attempting to represent any interest of Dana but rather that the Coalition is simply using his proximity to the project as an excuse to pursue its own academic interests. Consequently, the Coalition Petition should be denied for failure to demonstrate that the Coalition is representing any cognizable interest of Dana.

D. The Coalition should not be granted discretionary intervention.

The Coalition attempts to establish standing to intervene as a matter of right and does not request discretionary intervention. Nevertheless, the question arises as to whether the Coalition should be admitted as a party as a matter of the Board's discretion.

The Commission in the Pebble Springs decision listed six factors which should be considered in deciding whether to grant or deny discretionary intervention:

Nuclear Power Station, Units 1 and 2), ALAB-536, 9 NRC 402, 404 (1979); Allens Creek, *supra*, 9 NRC at 393; Barnwell, *supra*, 3 NRC 421-23. In a situation such as presented by the Dana affidavit, where an individual with unparticularized interests gives an organization carte blanche authorization to represent him in unspecified proceedings involving several plants, there is obviously compelling justification for requiring the individual to identify an interest which may be affected by a specific proceeding rather than relying upon mere proximity alone as a basis for his standing to intervene in that proceeding.

- (a) Weighing in favor of allowing intervention --
 - (1) The extent to which the petitioner's participation may reasonably be expected to assist in developing a sound record.
 - (2) The nature and extent of the petitioner's property, financial, or other interest in the proceeding.
 - (3) The possible effect of any order which may be entered in the proceeding on the petitioner's interest.

- (b) Weighing against allowing intervention --
 - (4) The availability of other means whereby petitioner's interest will be protected.
 - (5) The extent to which the petitioner's interest will be represented by existing parties.
 - (6) The extent to which the petitioner's participation will inappropriately broaden or delay the proceeding.

Pebble Springs, supra, 4 NRC at 616.

In regard to factor (a)(1), the Coalition states that its "participation in previous and on-going regulatory proceedings is indicative of its ability to assist in the development of a sound record due to its familiarity with the process and the issues, and its access to expert witnesses." Coalition Petition, p. 5. The Coalition specifically cites its contribution to the Trojan control building proceeding. Additionally, the Coalition states that its present participation in the Pebble Springs construction permit proceedings "would bring a thorough and contemporary

understanding to the Skagit/Hanford application." Coalition Petition, pp. 5-6.

Needless to say, mere participation in a proceeding does not establish that a person has contributed constructively to that proceeding. For example, in the Trojan proceeding, the Coalition neither introduced any evidence nor presented any witnesses.⁶ Furthermore, with respect to its participation in Pebble Springs,⁷ it is difficult if not impossible to see how participation in that proceeding "would bring a thorough and contemporary understanding to the Skagit/Hanford application." Coalition Petition, pp. 5-6.

In short, the Coalition has not specified the nature of the evidence it desires to present, has not stated whether it intends to offer any expert witnesses, and has not identified any other specific means by which it might contribute to this proceeding. Since the burden is upon the petitioner to demonstrate an ability to contribute to a proceeding, Nuclear Engineering Co., supra, 7 NRC at 745, this factor must weigh heavily against the discretionary intervention of the Coalition.

⁶Portland General Electric Co. (Trojan Nuclear Plant), LBP-78-40, 8 NRC 717, 722-23 (1978); LBP-80-20, 12 NRC 77, 82-85 (1980).

⁷On March 5, 1982, a "Notice of Evidentiary Hearing" was issued in Pebble Springs which gave notice of an evidentiary hearing on alternative sites to begin on April 20, 1982.

In regard to factors (a)(2) through (b)(5), the Coalition has not particularized any cognizable interest of either itself or its identified members which may be affected by this proceeding. To the extent that the Coalition is relying upon its members' interests as ratepayers, such interests are not within the zone of interests protected by either the Atomic Energy Act or the National Environmental Policy Act. See n.3, supra. Consequently, this interest is not entitled to any deference in determining whether the Coalition should be afforded discretionary intervention. See Cleveland Electric Illuminating Co., supra, 14 NRC at 179; Detroit Edison Co. (Enrico Fermi Atomic Power Plant, Unit 2), LBP-78-11, 7 NRC 381, 388, aff'd ALAB-470, 7 NRC 473 (1978).

The Coalition has indicated its desire to litigate in general twenty-one issues, ranging from "National Defense" to "NRC Staff Ability to Adequately Evaluate Project." Litigation of such issues would inevitably delay the proceeding. Consequently, factor (b)(6) weighs against discretionary intervention, and such intervention should not be granted.

III. Conclusion

The Coalition has alleged that it has an organizational interest in the subject matter of this proceeding, that unidentified members will be injured by construction and

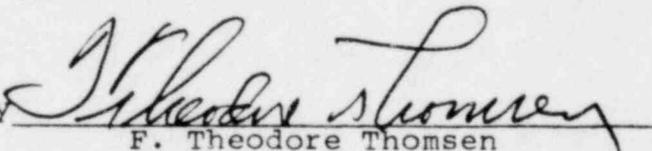
operation of the plant, and that three identified members with unparticularized interests have authorized the Coalition to represent them in NRC proceedings. Such allegations have been consistently rejected by the NRC as a basis for standing and intervention.

As the Coalition itself admits, it is not stranger to Nuclear Regulatory Commission proceedings, and it must be presumed that the Coalition Petition was prepared with full knowledge of NRC requirements. The Coalition Petition wholly fails to meet those requirements. The Coalition should be denied admission as a matter of right and should not be admitted as a matter of discretion.

DATED: March 22, 1982.

Respectfully submitted,

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
PUGET SOUND POWER & LIGHT COMPANY,) DOCKET NOS.
et al.)
)
(Skagit/Hanford Nuclear Project,) STN 50-522
Units 1 and 2) STN 50-523
_____)

CERTIFICATE OF SERVICE

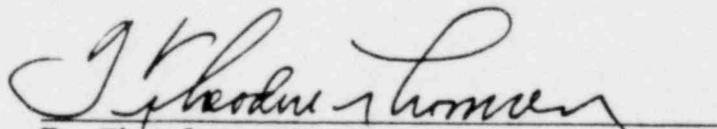
I hereby certify that the following:

APPLICANTS' ANSWER IN OPPOSITION TO REQUEST
FOR HEARING AND AMENDED PETITION FOR LEAVE
TO INTERVENE BY COALITION FOR SAFE POWER
AND FORELAWS ON BOARD

(March 22, 1982)

in the above-captioned proceeding have been served upon the persons
shown on the attached list by depositing copies thereof in the
United States mail on March 22, 1982 with proper
postage affixed for first class mail.

DATED: March 22, 1982


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DATE March 22, 1982

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