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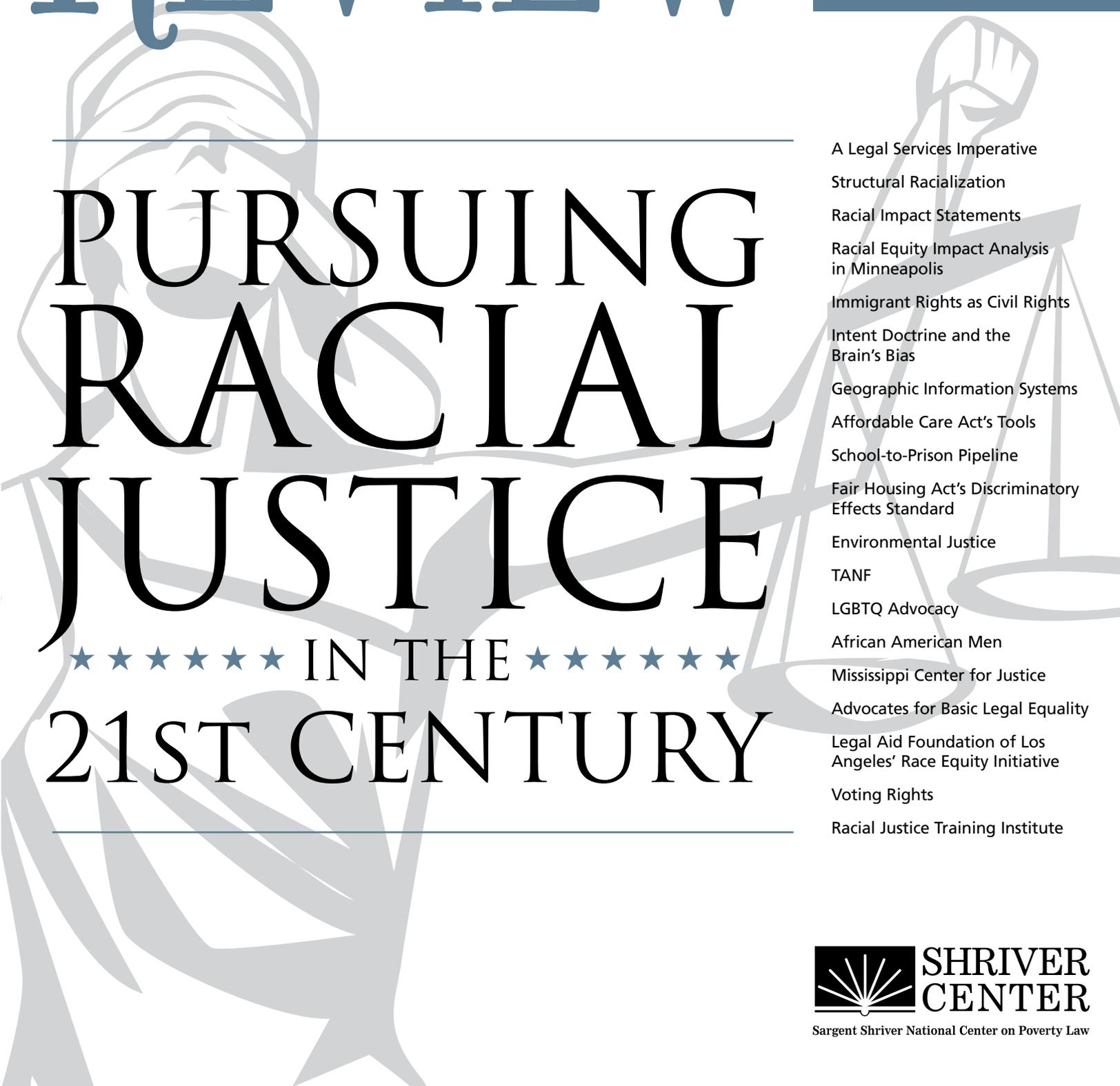
Journal of  
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## PURSUING RACIAL JUSTICE

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21ST CENTURY

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# LAYING TRACKS TO ENVIRONMENTAL JUSTICE



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**“H**ow much more do we as black people have to give up?” Patricia Brown expressed her Englewood community’s exasperation with Norfolk Southern railroad’s systematic buying and demolishing of homes.<sup>1</sup> Norfolk Southern plans to add 84 acres to its 104-acre rail yard in the Englewood neighborhood of Chicago. Railroads use rail yards, or intermodal yards, to transfer cargo from train to truck or vice versa. This rail yard expansion will displace more than four hundred Englewood families and expose the remaining residents and the larger surrounding community to more diesel pollution.<sup>2</sup>

Norfolk Southern justifies its Englewood rail yard expansion by projections of increased demand for freight cargo and estimates that it will add roughly four hundred jobs and have a regional economic impact of \$1.6 billion by 2030.<sup>3</sup> With national cargo volumes expected to rise, numerous railroads have proposed rail yard expansions and new rail yard construction.

Under the current, inadequate legal regime, rail yard expansions and their accompanying increases of diesel pollution threaten community health. Advocates around the nation are searching for ways to promote environmental justice in the face of increased diesel pollution. A look at the Englewood case and two cases involving com-

<sup>1</sup>Antonio Olivo & Dahleen Glanton, *End of the Line for a Pocket of Englewood?*, CHICAGO TRIBUNE, Sept. 18, 2011, <http://bit.ly/16Eaner>.

<sup>2</sup>Jon Brozdowski, *Unwelcome Expansion into Englewood*, CHICAGO WEEKLY, May 9, 2013, <http://bit.ly/1couKky>.

<sup>3</sup>Antonio Olivo, *Pollution Concerns Delay Englewood Rail Yard Expansion*, CHICAGO TRIBUNE, Feb. 28, 2013, <http://bit.ly/17TQH7w>.

munities near rail yards in the greater Los Angeles area underlines the need for persistent and flexible advocacy.<sup>4</sup>

### Diesel Pollution and Environmental Justice

Communities near rail yards breathe air polluted by diesel engine emissions. Diesel engines emit fine particulate matter (particles that are 2.5 microns or less in diameter), nitrogen oxides, and volatile organic compounds. Fine and ultra-fine particles cause the greatest health concern because they lodge in lungs and cause disease.<sup>5</sup> Diesel exhaust causes cancer and other health problems such as asthma, bronchitis, and heart attacks, the International Agency for Research on Cancer (part of the World Health Organization) concluded.<sup>6</sup> For example, the California Air Resources Board's health risk assessment concluded that exposure to diesel particulate matter dramatically increases the chance of developing cancer for communities closest to the Hobart rail yard near Los Angeles.<sup>7</sup> While no Illinois agency has completed comparable studies, environmental groups recently produced rail yard air pollution mapping based on available facts about the expected diesel vehicle traffic for the expanded Englewood rail yard.<sup>8</sup>

The demographics of the neighborhoods surrounding the rail yards attest that race and income still determine the degree of exposure to environmental harm across the United States.<sup>9</sup> In Englewood 44 percent of residents live below the poverty line, and 98 percent of the population is African American.<sup>10</sup> In Southern California, home to the busiest container ports in the country, San Bernardino, Commerce, West Long Beach, and Wilmington are just a few of the communities in close proximity to intermodal rail yards. Commerce is 96.9 percent people of color with 14.5 percent of families and 15.8 percent of individuals living below the poverty line. The area of Long Beach closest to a rail yard is 89.1 percent people of color with 17.7 percent of families and 21.1 percent of individuals living below the poverty line.<sup>11</sup>

### Rail Yard Pollution Reduction

Although technology can reduce diesel air pollution and stringent limits apply to new locomotives, less stringent requirements apply to older locomotives that are permitted to remain in operation for decades.<sup>12</sup> Recognizing that the impact of diesel vehicles and the health effects of the status quo can be reduced, Sustainable Englewood, a community

<sup>4</sup>See Helen Kang, *Fighting for Environmental Justice Takes Long-Lasting Coalitions*, 45 CLEARINGHOUSE REVIEW 158 (July–Aug. 2011) (discussing collaboration between city politicians and community representatives that led to closure of power plant); see also Luke W. Cole & Caroline Farrell, *Structural Racism, Structural Pollution and the Need for a New Paradigm*, 20 WASHINGTON UNIVERSITY JOURNAL OF LAW AND POLICY 265, 279–81 (2006) (laying out theoretical perspectives of environmental justice movement that should influence environmental decision making).

<sup>5</sup>U.S. Environmental Protection Agency, Diesel Particulate Matter (July 23, 2013), <http://1.usa.gov/1coy7aW>.

<sup>6</sup>See, e.g., Press Release, International Agency for Research on Cancer, IARC: Diesel Engine Exhaust Carcinogenic (June 12, 2012), <http://bit.ly/13ngLbh>.

<sup>7</sup>Hobart rail yard's closest neighbors are exposed to an increased risk of 250 chances in a million of developing cancer, and this raises their air pollution cancer risk from 1,000 chances to 1,250 chances in a million (WEI LI ET AL., AIR RESOURCES BOARD, CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY, HEALTH RISK ASSESSMENT FOR THE BNSF RAILWAY HOBART RAILYARD 63–64 (Nov. 2, 2007), <http://bit.ly/17iQskg>).

<sup>8</sup>See Michael Hawthorne, *Freight Yard Expansion Could Pose Lung Hazard*, CHICAGO TRIBUNE, July 17, 2013, at 1, 11 (Environmental Law and Policy Center's maps showing air pollution projections and proximity to schools and hospitals).

<sup>9</sup>See generally Commission for Racial Justice, United Church of Christ, *Toxic Wastes and Race in the United States* (1987), <http://bit.ly/17U9XBQ>; ROBERT D. BULLARD ET AL., JUSTICE AND WITNESS MINISTRIES, UNITED CHURCH OF CHRIST TOXIC WASTES AND RACE AT TWENTY 1987–2007 (March 2007), <http://bit.ly/14037dO>.

<sup>10</sup>Local Initiatives Support Corporation Chicago's New Communities Program, Englewood Seeks Turnaround After Long Slide (n.d.), <http://bit.ly/1bphlBV>; *id.* Englewood Maps and Data (n.d.), <http://bit.ly/150MH8r>.

<sup>11</sup>Plaintiffs' First Amended Complaint ¶ 15, *Center for Community Action and Environmental Justice v. Union Pacific Corporation*, 2012 WL 2086603 (C.D. Cal 2012) (No. CV 11-08608), appeal docketed, No. 12-56086 (9th Cir. June 11, 2012).

<sup>12</sup>See 40 C.F.R. § 1033.101 (2013) (clean air standards for locomotives).

organization, retained as counsel Northwestern University School of Law Bluhm Legal Clinic's Environmental Advocacy Center. In Los Angeles the Natural Resources Defense Council and its partners searched for innovative strategies for greater environmental protection in communities surrounding rail yards. Both highlight key tools shaped by the environmental justice movement: (1) community involvement, (2) data relating to environmental exposure, and (3) a legal or political hook. Chicago environmental groups pursued negotiations and political pressure to obtain pollution reduction. The Los Angeles environmental coalition put the issue in front of the courts. The tools used in each case merit consideration even while the outcomes remain uncertain.

**Secure Voluntary Commitments from the Railroad.** Sustainable Englewood, represented by Northwestern Law's Environmental Advocacy Center, and the Environmental Law and Policy Center (a public-interest legal organization) first looked for a legal hook to protect the residents of Englewood from the expanding environmental injustice. However, rail yards are largely unregulated because railroads generally receive unique treatment under the Interstate Commerce Commission Termination Act of 1995 and the Clean Air Act.

The Interstate Commerce Commission Termination Act affords the Surface Transportation Board exclusive jurisdiction over railroad regulation to prevent states from imposing undue economic burdens.<sup>13</sup> The railroad industry has used the Act to prevent state and local governments from applying a wide range of state laws to railroads.<sup>14</sup> Although the Act limits the Surface Transportation Board's authority over certain railroad facilities and track operations, includ-

ing rail yards, it also prevents any other entity from exercising that regulatory authority.<sup>15</sup> The Surface Transportation Board may not regulate rail yard activity, but local actors may not step in either. The Clean Air Act also contains potential loopholes for rail yard air pollution, as discussed below.

Recognizing the constraints imposed by the special status of rail yards, the Chicago advocates looked for another approach to reduce the expected increased pollution. Strategically they understood that the City of Chicago wanted to further its position as a freight hub and that Norfolk Southern had momentum toward rail yard expansion; the advocates just wanted to reduce its effects. As part of a proposed agreement introduced by Mayor Rahm Emanuel's office, Norfolk Southern will pay \$1.1 million for 105 vacant city-owned lots. Norfolk Southern also will contribute \$3 million to an infrastructure fund to support local economic development initiatives, including light industrial businesses near the rail yard. The City Council's role in passing ordinances for public land sale was an opportunity for leverage.

Sustainable Englewood's press conference at City Hall, in February 2013, drew public and media attention to its health concerns. Englewood residents and environmental groups explained that lead and diesel pollution in the area had led to a higher rate of severe asthma among children than elsewhere in the city. They called for guarantees from Norfolk Southern that diesel trucks entering the yard be fitted with emission controls. In response, the City Council's Housing and Real Estate Development Committee delayed the approval of the land sale, thereby allowing Sustainable Englewood time to negotiate with Norfolk Southern to secure more protection for the community.

<sup>13</sup>Interstate Commerce Commission Termination Act of 1995 § 102, 49 U.S.C. § 10501(b).

<sup>14</sup>See, e.g., *Texas Central Business Lines Corporation v. City of Midlothian*, 669 F.3d 525 (5th Cir. 2012); *Association of American Railroads v. South Coast Air Quality Management District*, 622 F.3d 1094 (9th Cir. 2010); *Soo Line Railroad Company v. City of Minneapolis*, 38 F. Supp. 2d 1096 (D. Minn. 1998); *Norfolk Southern Railway Company v. City of Austell*, 1997 WL 1113647 (N.D. Ga. Aug. 18, 1997); but see *Florida East Coast Railway Company v. City of West Palm Beach*, 266 F.3d 1324 (11th Cir. 2001); *In re Appeal of Vermont Railway*, 769 A.2d 648, 503 (Vt. 2000).

<sup>15</sup>49 U.S.C. § 10906 (commonly understood to include rail yards).

Sustainable Englewood demanded that Norfolk Southern protect quality of life and public health, develop high-quality green space in the neighborhood, create buffer zones, and foster community goals for local economic development.<sup>16</sup> Sustainable Englewood requested specific measures for reducing diesel pollution:

1. Diesel particulate filter retrofits (for pre-2007 engines) on trucks,
2. Best-available particulate matter control technology for all locomotive engines and freight handling equipment at the yard,
3. Reducing diesel pollution from construction of the yard expansion itself, and
4. Monitoring, testing, and health impact analysis including testing for lead, air quality monitors in the neighborhood and in schools and community centers, and increased capacity and equipment for treating asthma at local hospitals and clinics.<sup>17</sup>

The Englewood negotiations are ongoing. To date, Norfolk Southern has committed to retrofit thirty-four diesel engine hostlers with pollution-reducing technology over ten years, to provide land for new green space, to install electric plug-in equipment to reduce diesel train idling at the rail yard, and to improve green space. While the public land sale advanced through the Housing and Real Estate Committee in March 2013, advocates continue to look for opportunities to push Norfolk Southern to reduce pollution further.<sup>18</sup>

**Pursue Injunctive Relief in Federal Court.** With diesel pollution spewing from seventeen rail yards in California, environmental justice organizations have sought an effective pollution reduction strategy. Millions of people live very close to two Southern California rail yards: the Los Angeles–Long Beach port’s Intermodal Container Transfer Facility and the Burlington Northern Santa Fe rail yard in San Bernardino. Indeed, the west side of San Bernardino has the highest cancer risk from rail yard pollution of any community in the state.<sup>19</sup>

The Center for Community Action and Environmental Justice, East Yard Communities for Environmental Justice, and Natural Resources Defense Council sued Burlington Northern Santa Fe and Union Pacific railways under the citizen suit provision of the Resource Conservation and Recovery Act.<sup>20</sup> They presented a novel theory that the diesel particulate matter emitted from the Burlington Northern Santa Fe rail yard’s vehicle emissions constitutes waste covered by the Resource Conservation and Recovery Act and poses an “imminent and substantial endangerment” to neighboring residents.<sup>21</sup>

Defendant railroads moved to dismiss this lawsuit; they argued that the application of the Resource Conservation and Recovery Act to diesel exhaust would conflict with the Clean Air Act’s comprehensive regulation of diesel exhaust.<sup>22</sup> The railroads also contended that diesel emission does not fit within the meaning of a solid or hazardous waste under the Resource Conservation and Recovery Act.

<sup>16</sup>See Sustainable Englewood, Current Project: Getting Englewood a Fair Deal on the Expansion of the Norfolk Southern Rail Yard (n.d.), <http://bit.ly/14j2KhC>.

<sup>17</sup>Sustainable Englewood Initiatives, Community Demands (n.d.), <http://bit.ly/14j2KhD> (click on “About the Community’s Demands”).

<sup>18</sup>E.g., on August 15, 2013, Sustainable Englewood and its attorney persuaded the City Plan Commission to delay its approval of a tax increment financing district change from residential to industrial based on procedural and substantive concerns (see Chicago Plan Commission, Tentative Agenda (Aug. 15, 2013), <http://bit.ly/19Jz7YQ>).

<sup>19</sup>See David Danelski, *San Bernardino: Rail Yard Pollution Is More Toxic than in Other Areas*, PRESS-ENTERPRISE (May 11, 2011), <http://bit.ly/19JzKl4>; see also HECTOR CASTANEDA ET AL., AIR RESOURCES BOARD, CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY, HEALTH RISK ASSESSMENT FOR THE BNSF RAILWAY SAN BERNARDINO RAILYARD (June 11, 2008), <http://bit.ly/15wbqho>.

<sup>20</sup>Resource Conservation and Recovery Act of 1976 § 7002, 42 U.S.C. § 6972(a)(1)(B); *Center for Community Action and Environmental Justice*, 2012 WL 2086603, at \*2.

<sup>21</sup>Plaintiffs’ First Amended Complaint ¶ 15, *Center for Community Action and Environmental Justice*, 2012 WL 2086603.

<sup>22</sup>*Center for Community Action and Environmental Justice*, 2012 WL 2086603, at \*3.

Plaintiff environmental groups responded that diesel particulate matter was subject to the Act because diesel exhaust included gaseous and solid components, and the solid particles settled into water and land near the rail yards. Plaintiffs contended that the relevant Clean Air Act provisions created an unintentional and inappropriate loophole for rail yards. Under this regime, California may not regulate locomotives, the primary diesel particulate matter source in rail yards, and the U.S. Environmental Protection Agency (EPA) may regulate locomotives but not rail yards, as they are indirect sources.<sup>23</sup>

The U.S. District Court for the Central District of California adopted the railroads' arguments and dismissed the case. The plaintiffs' suggested application of the Resource Conservation and Recovery Act conflicts with the Clean Air Act, the court held. Diesel particulate matter does not constitute a "solid" under the Resource Conservation and Recovery Act because it is an uncontained gas, the court determined.<sup>24</sup>

The case is before the Ninth Circuit and has been fully briefed.<sup>25</sup> Advocates should pay close attention to this appeal. If the Ninth Circuit rules that rail yard vehicle emissions can be regulated under the Resource Conservation and Recovery Act, environmental justice organizations will have more tools for fighting diesel pollution.

**File a Title VI Complaint in Administrative Agencies.** Burlington Northern Santa Fe has proposed a new intermodal yard for the Long Beach area of Southern

California. The Southern California Intermodal Gateway project will add one million diesel truck trips and thousands of diesel train trips every year to the neighboring Wilmington and West Long Beach areas. The intermodal gateway project required approval by the Port of Los Angeles' Board of Harbor Commissioners; the port had initiated the project as a way to expand freight capacity and will dedicate public land for the intermodal gateway. This decision making offered an opportunity for community participation and a legal hook.

The California Environmental Quality Act, the state's mini-National Environmental Policy Act, required the board to prepare an environmental impact report for the Southern California Intermodal Gateway. The Natural Resources Defense Council, the East Yard Communities for Environmental Justice, the Coalition for Clean Air, and Century Villages at Cabrillo submitted comments during the environmental review.<sup>26</sup> The project would be located near schools, a facility for homeless children and veterans, and a care center. The advocates urged the board to move the intermodal facility to the dock and away from population centers. These predominantly Hispanic, working-class communities are already exposed to diesel particulate matter and other air pollution. Indeed, asthma rates among Long Beach children are already very high, with an estimated 14 percent suffering from asthma.<sup>27</sup>

The board expressly acknowledged that the Southern California Intermodal Gateway would cause significant harmful effects even after mitigation and

<sup>23</sup>Clean Air Act § 110, 42 U.S.C. § 7410(a)(5)(A)(ii). An indirect source is any "facility, building, structure, installation, real property, road, or highway which attracts, or may attract, mobile sources of pollution" (*id.* § 7410(a)(5)(C)).

<sup>24</sup>*Center for Community Action and Environmental Justice*, 2012 WL 2086603, at \*7. "Solid waste" means "any garbage, refuse, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations" (42 U.S.C. § 6903(27)). The diesel particulate matter includes the following substances listed under the Resource Conservation and Recovery Act: "arsenic, cadmium, nickel, inorganic lead, antimony compounds, beryllium compounds, cobalt compounds, manganese compounds, mercury compounds, phosphorus, and selenium compounds" (*Center for Community Action and Environmental Justice*, 2012 WL 2086603, at \*1).

<sup>25</sup>*Center for Community Action and Environmental Justice v. BNSF Railway Company*, No. 12-56086 (9th Cir. June 11, 2012).

<sup>26</sup>Letter from David Pettit (Senior Attorney, Natural Resources Defense Council) et al. to Christopher Cannon (Director of Environmental Management, Port of Los Angeles) (Jan. 31, 2013), <http://bit.ly/14pKcW7>.

<sup>27</sup>City of Long Beach Department of Public Health and Human Services 13 (n.d.), <http://bit.ly/19JA2Zl>.

would disproportionately have an impact on low-income and minority communities, but it still approved the project.<sup>28</sup> On June 7, 2013, the Natural Resources Defense Council and its partners filed a complaint with the U.S. Department of Transportation's Office of Civil Rights under the department's implementing regulations for Title VI of the Civil Rights Act of 1964.<sup>29</sup> Title VI prohibits discrimination by any entity receiving federal funding.<sup>30</sup> Their administrative complaint alleges that the approval of the Southern California Intermodal Gateway by the board, and ultimately the City of Los Angeles, violated the Transportation Department's Title VI implementing regulations, which prohibit actions that have a "discriminatorily disparate impact."<sup>31</sup> They allege that the project was unnecessary, and even if it were necessary, the same objective could have been obtained through a nondiscriminatory alternative.<sup>32</sup>

Before 2001, the Natural Resources Defense Council might have brought a parallel Title VI environmental justice case in federal court. Title VI had become the tool of choice to enforce Pres. Bill Clin-

ton's Executive Order 12,898 entitled, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations."<sup>33</sup> However, no private right of action exists, the U.S. Supreme Court held in *Alexander v. Sandoval*, to enforce the disparate impact regulations promulgated by federal agencies in accordance with Title VI.<sup>34</sup>

After *Sandoval*, federal agencies became the sole enforcers of the antidiscrimination measures of the Title VI regulations. Federal agencies, particularly the EPA, have had an abysmal record of Title VI regulation enforcement.<sup>35</sup> This case gives the Transportation Department the opportunity to demonstrate a renewed commitment to environmental justice.



While the federal and state governments have not advanced environmental justice sufficiently, community organizations' persistence has built momentum and influenced the debate. As these rail yard cases progress, they likely will yield more lessons for other advocates to achieve their case-specific goals.

<sup>28</sup>Environmental Management Division, Los Angeles Harbor Department, Southern California International Gateway Project: Final Environmental Impact Report (Feb. 2013), <http://bit.ly/15ctkls>.

<sup>29</sup>Natural Resources Defense Council Administrative Complaint (U.S. Dep't Transp. Off. Civ. Rts. filed June 7, 2013). The Natural Resources Defense Council and its partners also filed in state court a lawsuit alleging that the Board of Harbor Commissioners violated the California Environmental Quality Act in numerous ways (see Complaint for Declaratory and Injunctive Relief, *Center for Community Action & Environmental Justice v. City of Los Angeles*, No. BS 148454 (Cal. Super. Ct. L.A. Cnty. June 7, 2013)). The City of Long Beach and Long Beach Unified School District filed similar lawsuits.

<sup>30</sup>Civil Rights Act of 1964 § 601, 42 U.S.C. § 2000d ("No person in the United States shall, on the ground of race, color, or national origin, ... be subjected to discrimination under any program or activity receiving Federal financial assistance."). See 49 C.F.R. § 21.5(b)(3) (2013) ("In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin").

<sup>31</sup>Natural Resources Defense Council Administrative Complaint, *supra* note 29, at 1.

<sup>32</sup>*Id.* at 16.

<sup>33</sup>Exec. Order No. 12,898, 59 Fed. Reg. 7629 (Feb. 11, 1994).

<sup>34</sup>*Alexander v. Sandoval*, 532 U.S. 275 (2001).

<sup>35</sup>Recently, however, the EPA recommitted to environmental justice (U.S. Environmental Protection Agency, Plan EJ 2014 (March 20, 2013), <http://1.usa.gov/175POIO>; see Press Release, Council on Environmental Quality, Obama Administration Advances Efforts to Protect Health of U.S. Communities Overburdened by Pollution (Aug. 4, 2011), <http://1.usa.gov/qPK19g>).



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