# Environmental Restoration Damages: A New Trend of Regulating Cleanups Through Private Lawsuits

*Jon Rauchway & Shannon Stevenson, Davis Graham & Stubbs LLP*

**Rocky Mountain Mineral Law Foundation**
**Annual Institute**

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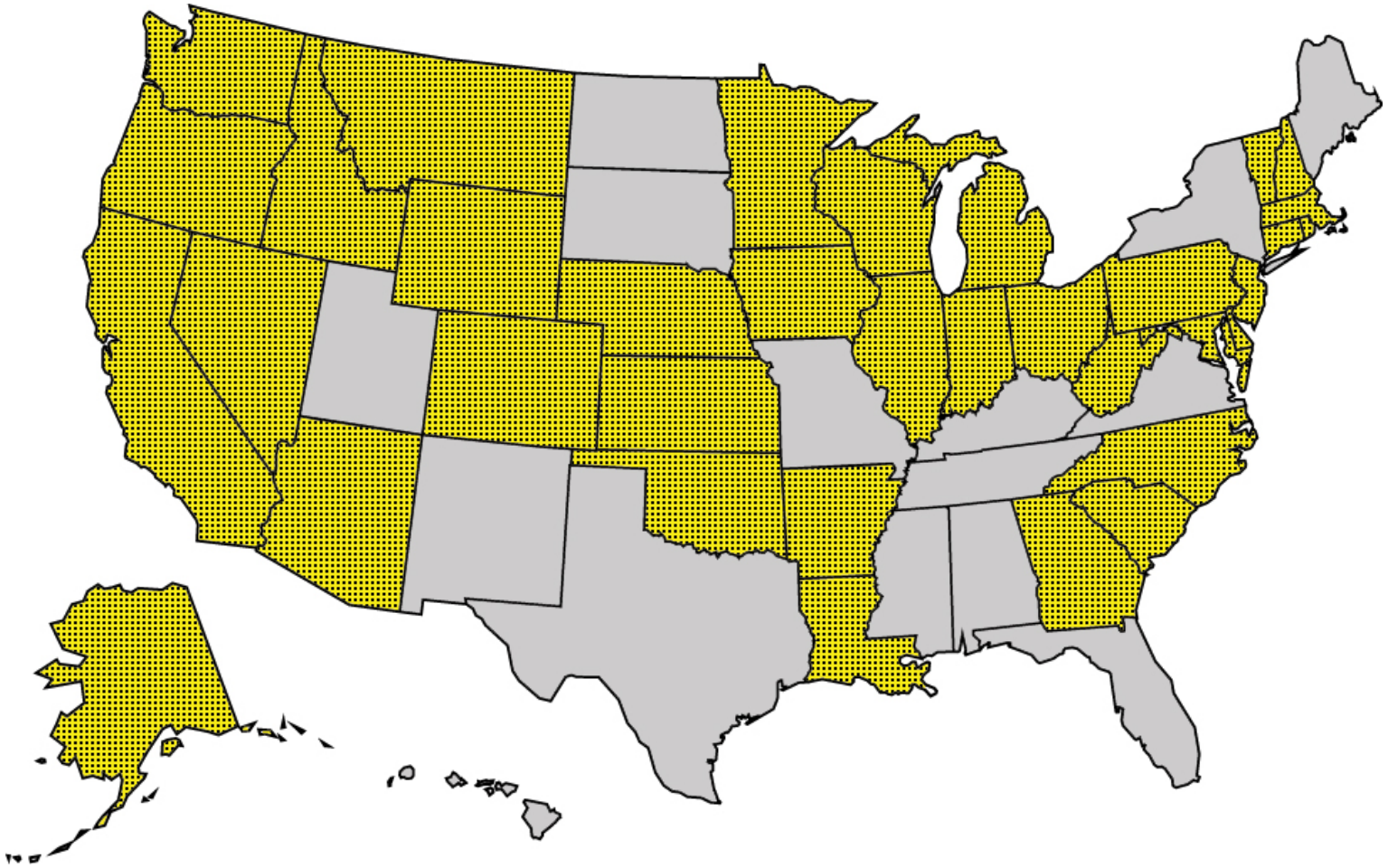
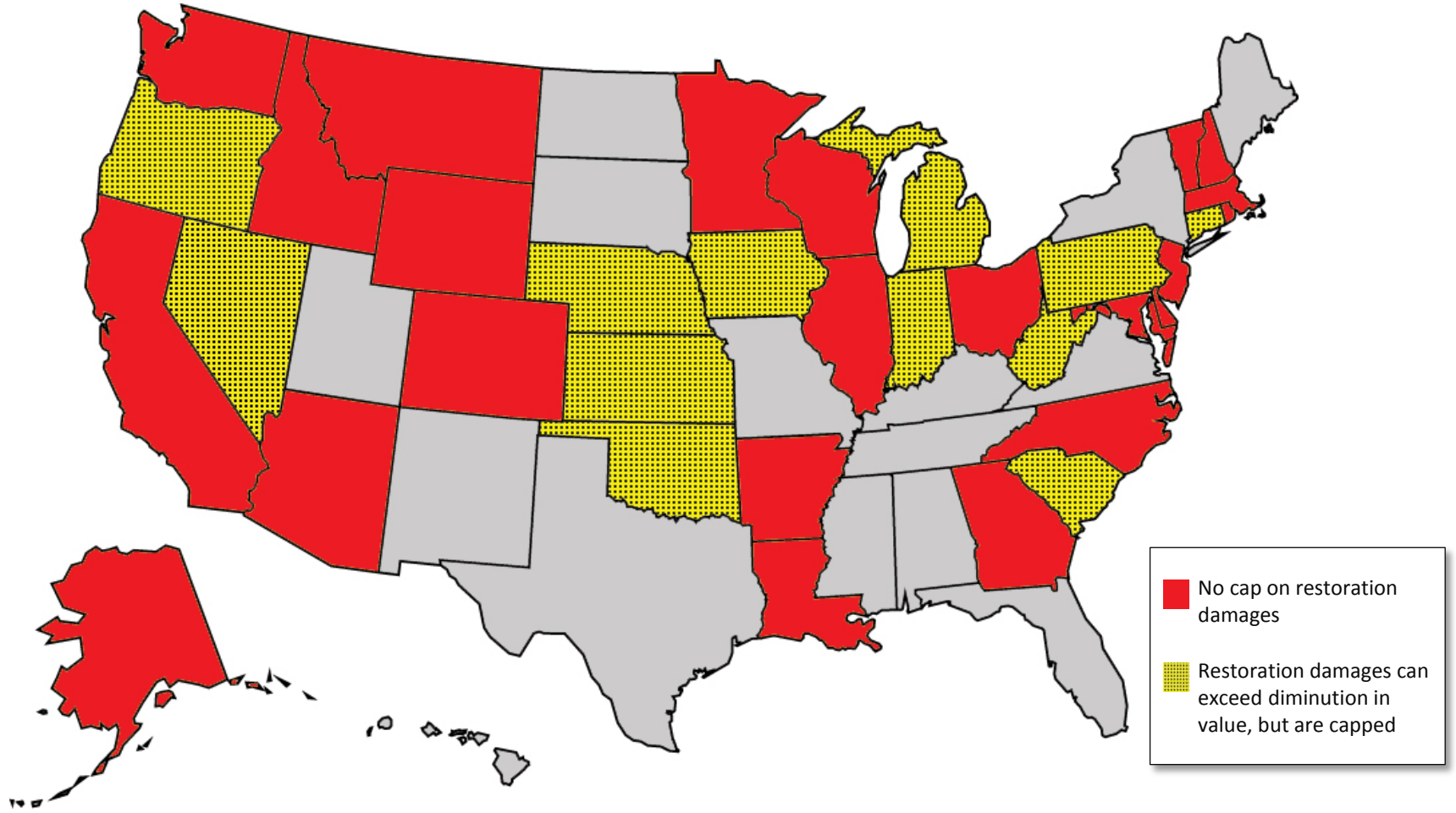
# ENVIRONMENTAL RESTORATION DAMAGES: THE BASICS

- Standard measure of property damages is diminution in market value
- Restoration damages are essentially cost-of-repair damages
  - Common law rule: cannot exceed diminished value of property
  - Restatement rule: can exceed diminished value in special circumstances
- In environmental context, restoration usually means costly removal of all non-naturally occurring “contaminants”

# STATES THAT PERMIT RESTORATION DAMAGES TO EXCEED DIMINUTION IN VALUE



# OF THOSE STATES, THESE STATES HAVE NO CAP ON RESTORATION DAMAGES

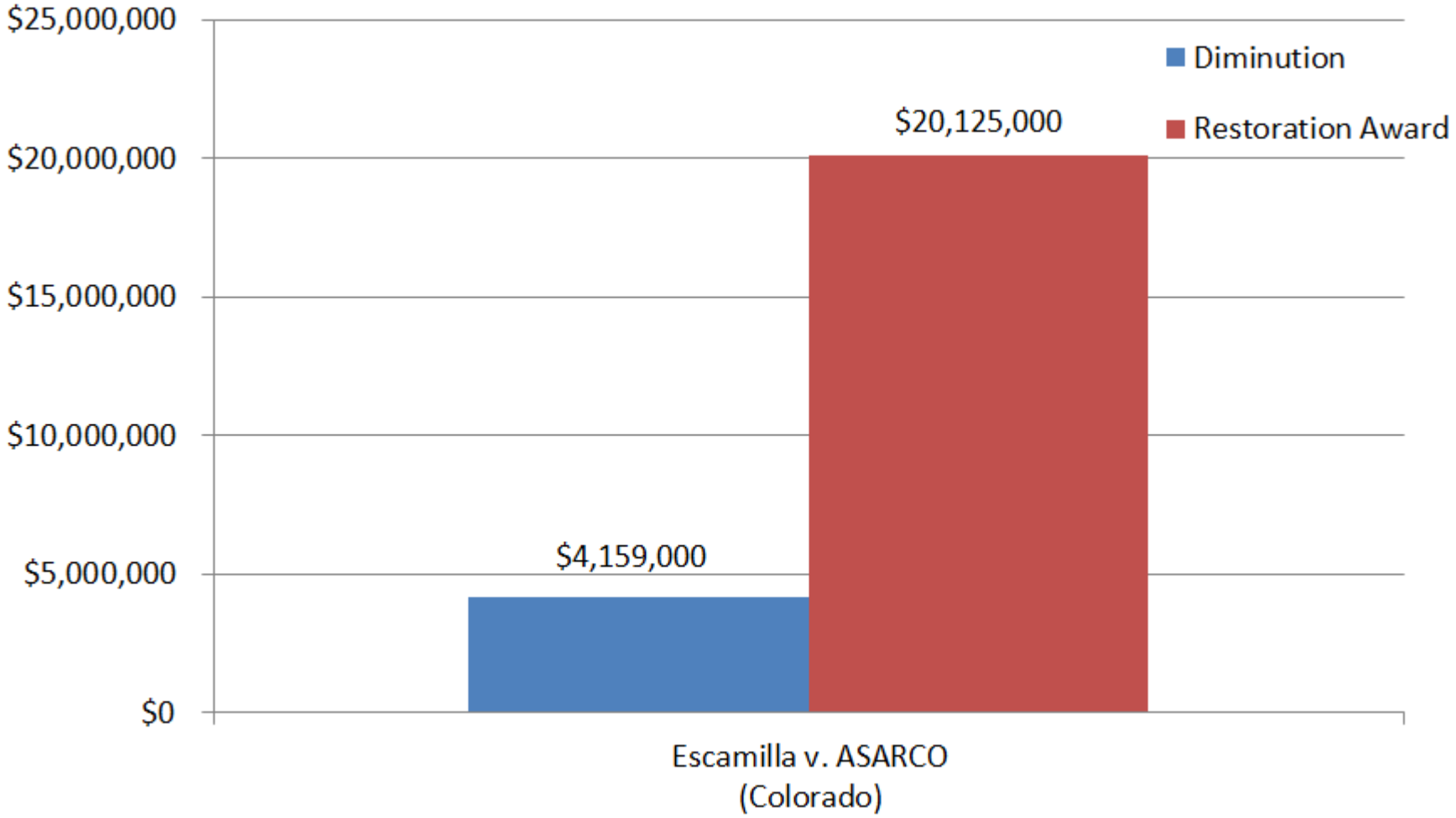


# ENVIRONMENTAL RESTORATION DAMAGES: THE REQUIREMENTS

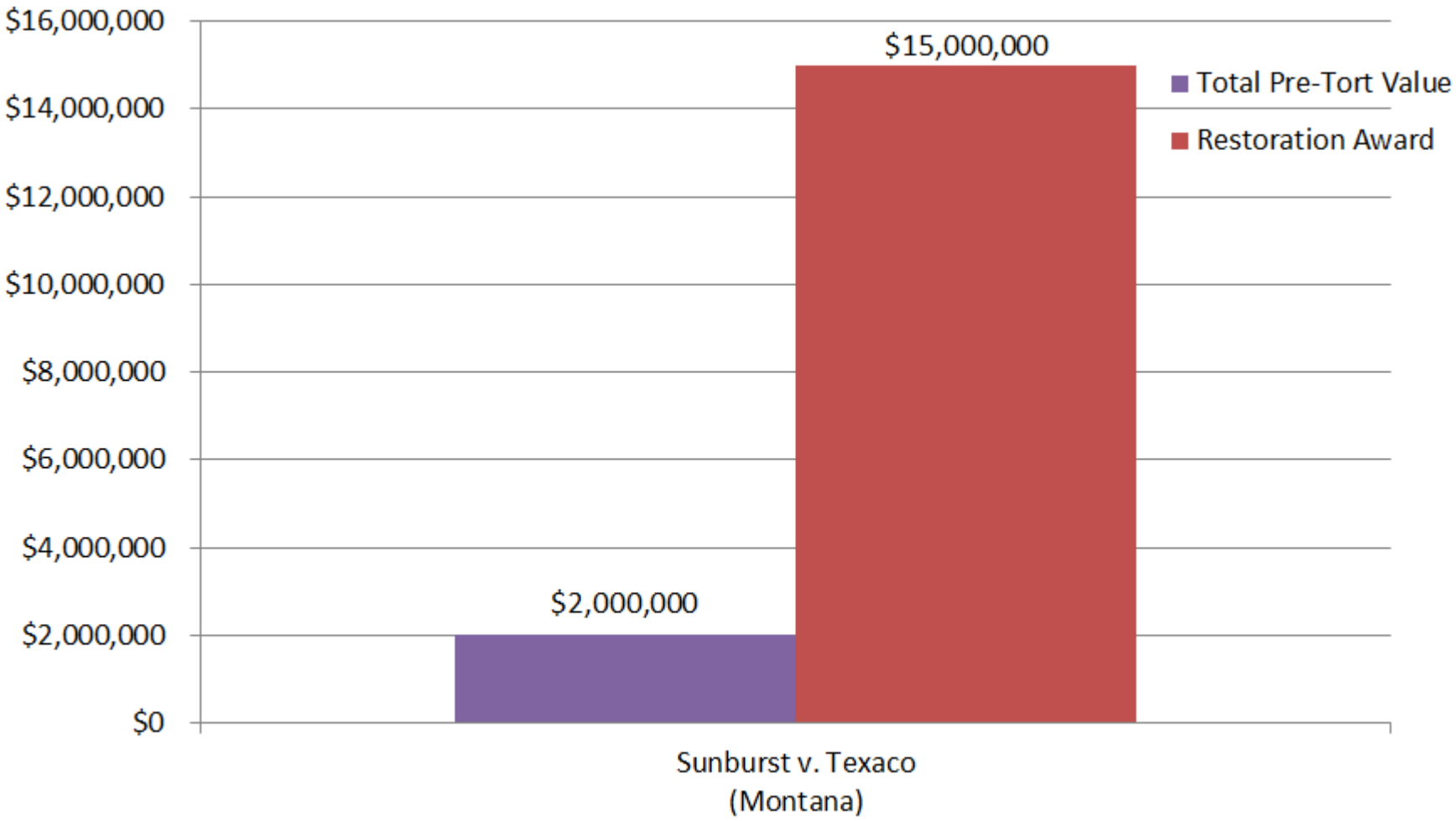
- "Reasons personal"
  - Special circumstances or unique property
  - Diminished value would be inadequate compensation
- Genuine intent to use award for restoration
  - Proof that plaintiff actually will perform restoration with proceeds of award
  - No windfall recoveries
- Restoration awards must be reasonable

# WHAT IS REASONABLE?

# DIMINUTION IN VALUE VS. RESTORATION AWARD



# TOTAL VALUE VS. RESTORATION AWARD



# EXAMPLE: RESTORATION DAMAGES CASE

- Hydrocarbons from gasoline refinery migrated into groundwater under town
- Plaintiffs' properties worth $2 million
- Jury awarded $15 million in restoration damages
- Montana Supreme Court affirmed

[*Sunburst Sch. Dist. No. 2. v. Texaco, Inc.*, 165 P.3d 1079 (Mont. 2007)]

# EXAMPLE: RESTORATION DAMAGES CASE

- Oil terminal on lease property
- Uncontaminated property value: $108,000
- Jury-awarded restoration damages: $33 million
- The Louisiana Supreme Court affirmed

[*Corbello v. Iowa Production*, 850 So.2d 686 (La. 2003)]

# EXAMPLE: RESTORATION DAMAGES CASE

- Smelter impacted residential community with metals
- Diminished value of properties: $3.5-5 million
- Jury-awarded restoration damages: $20 million
- Trial court approved the award, not appealed

[*Escamilla v. ASARCO, Inc.*, No. 91-CV-5716 (Colo. Denver Dist. Ct. Apr. 23, 1993)]

# DEFENSES – STANDING

- Plaintiffs cannot recover damages to property that occurred before they owned the property
- Plaintiffs cannot recover damages to restore resources they do not own

# DEFENSES – STATUTE OF LIMITATIONS

- Plaintiffs usually must bring a lawsuit once the facts creating their claim exist (i.e., as soon as their property is contaminated)
- Exception: Discovery Rule
- Exception: Continuing Tort Theory
  - But damages may be limited to "look-back period"

# DEFENSES – NO REASONS PERSONAL

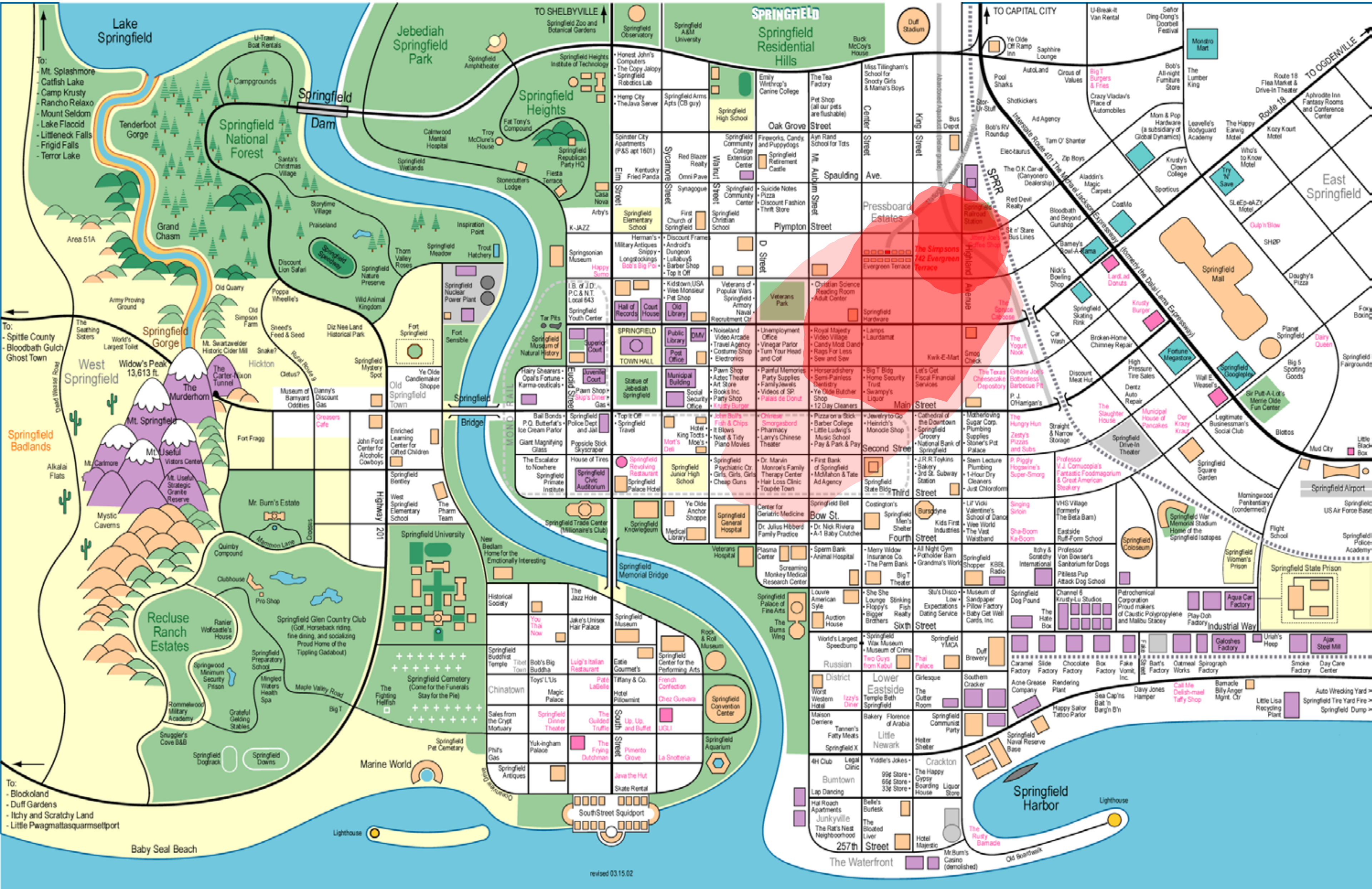
- Intent to sell the property
- Commercial property
- Entity plaintiffs

# DEFENSES – ENVIRONMENTAL REGULATION

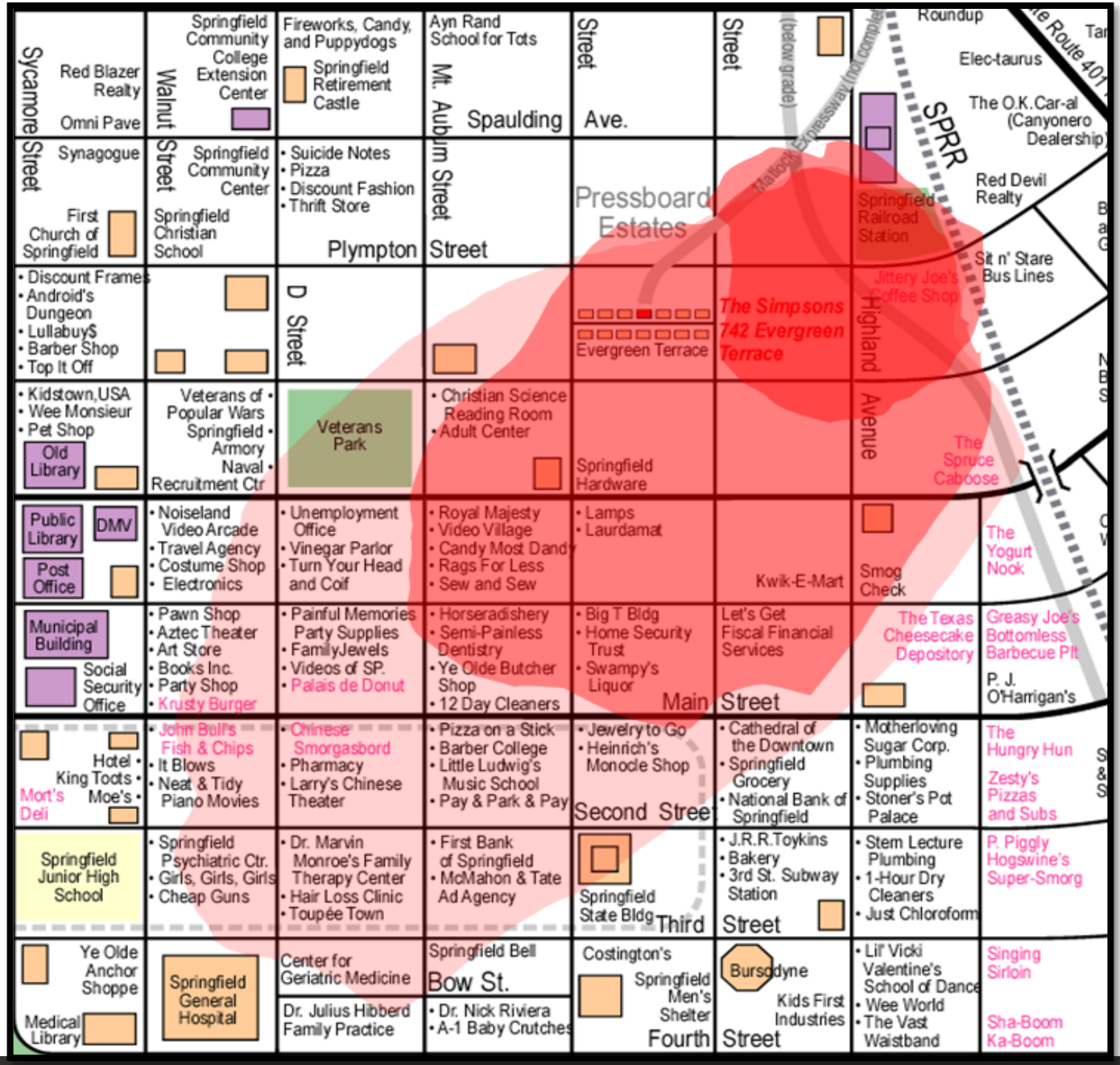
- CERCLA
  - Section 113(h)
  - Section 122(e)(6)
- State remediation statutes
- Administrative deference doctrines

# HYPOTHETICAL EXAMPLE I: GROUNDWATER PLUME IN SPRINGFIELD

- Hydrocarbon plume from 50-year-old rail yard, still operating
- Plaintiffs seek restoration of groundwater to its pre-industrial condition
- Plaintiffs include a local school district, a church, the county, and owners of residential and commercial property
- State regulator investigating, but has not yet chosen a remedy

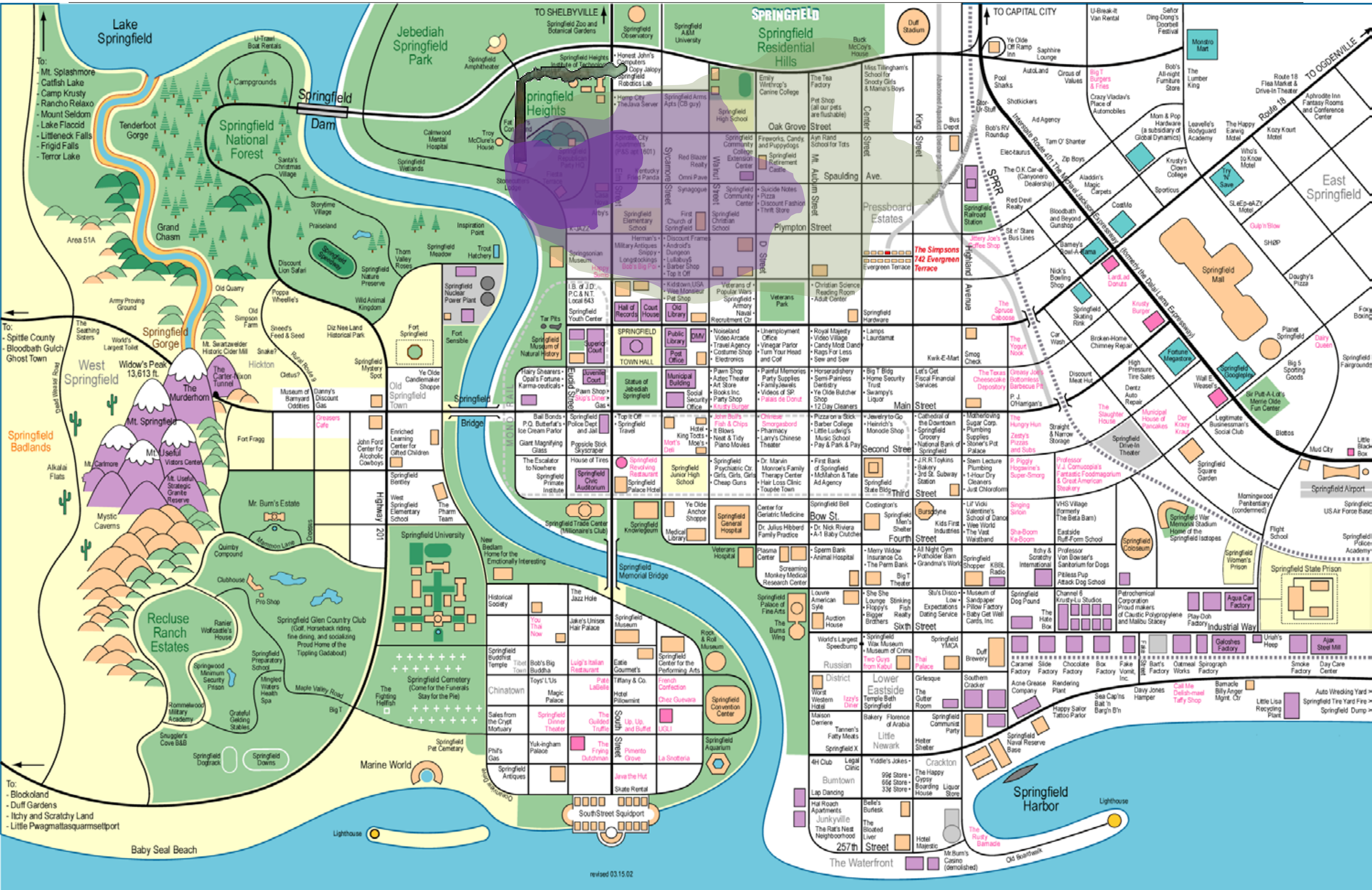


Lake Springfield
To:
- Mt. Splashmore
- Catfish Lake
- Camp Krusty
- Rancho Relaxo
- Mount Seldom
- Lake Flaccid
- Littleneck Falls
- Frigid Falls
- Terror Lake
Springfield Dam
Springfield National Forest
Jebediah Springfield Park
Springfield Heights
TO SHELBYVILLE
SPRINGFIELD
Springfield Residential Hills
Duff Stadium
TO CAPITAL CITY
TO OGDENVILLE
Route 18
East Springfield
Springfield Mall
Pressboard Estates
The Simpsons 742 Evergreen Terrace
Evergreen Terrace
Highland Avenue
Oak Grove Street
Spaulding Ave.
Plympton Street
Main Street
Second Street
Third Street
Bow St.
Fourth Street
Sixth Street
257th Street
Elm Street
Sycamore Street
Walnut Street
Mt. Auburn Street
Center Street
King Street
D Street
Euclid Street
South Street
Industrial Way
Grand Chasm
Area 51A
Springfield Gorge
West Springfield
Springfield Badlands
Mt. Springfield
The Murderhorn
Mt. Useful
Mt. Carlmore
Mystic Caverns
Alkali Flats
Tenderfoot Gorge
To:
- Spittle County
- Bloodbath Gulch
- Ghost Town
Widow's Peak 13,613 ft.
Hickton
Old Springfield Town
Springfield Bridge
Springfield University
Springfield Glen Country Club
Recluse Ranch Estates
Springfield Cemetery
Marine World
Baby Seal Beach
To:
- Blockoland
- Duff Gardens
- Itchy and Scratchy Land
- Little Pwagmattasquarmsettport
Springfield Memorial Bridge
Chinatown
Russian District
Lower Eastside
Little Newark
Junkyville
Crackton
The Waterfront
Springfield Harbor
Springfield State Prison
Springfield Airport
Lighthouse
Old Boardwalk
SouthStreet Squidport
Springfield Nuclear Power Plant
Springfield Elementary School
Springfield Town Hall
Springfield General Hospital
Springfield High School
Moe's
Kwik-E-Mart
Krusty Burger
revised 03.15.02


Sycamore Street
Red Blazer Realty
Omni Pave
Walnut Street
Springfield Community College Extension Center
Fireworks, Candy, and Puppydogs
Springfield Retirement Castle
Ayn Rand School for Tots
Mt. Auburn Street
Spaulding
Street
Ave.
Street
(below grade)
Mallock Expressway (not complete)
Roundup
Route 401
Elec-taurus
The O.K. Car-al (Canyonero Dealership)
SPRR
Red Devil Realty
Springfield Railroad Station
Sit n' Stare Bus Lines
Jittery Joe's Coffee Shop
Synagogue
First Church of Springfield
Springfield Community Center
Springfield Christian School
• Suicide Notes
• Pizza
• Discount Fashion
• Thrift Store
Plympton
Street
Pressboard Estates
• Discount Frames
• Android's Dungeon
• Lullabuy$
• Barber Shop
• Top It Off
D Street
Evergreen Terrace
The Simpsons
742 Evergreen Terrace
Highland Avenue
• Kidstown, USA
• Wee Monsieur
• Pet Shop
Old Library
Veterans of Popular Wars
Springfield Armory
Naval Recruitment Ctr
Veterans Park
• Christian Science Reading Room
• Adult Center
Springfield Hardware
The Spruce Caboose
Public Library
DMV
Post Office
• Noiseland Video Arcade
• Travel Agency
• Costume Shop
• Electronics
• Unemployment Office
• Vinegar Parlor
• Turn Your Head and Coif
• Royal Majesty
• Video Village
• Candy Most Dandy
• Rags For Less
• Sew and Sew
• Lamps
• Laurdamat
Kwik-E-Mart
Smog Check
The Yogurt Nook
Municipal Building
Social Security Office
• Pawn Shop
• Aztec Theater
• Art Store
• Books Inc.
• Party Shop
• Krusty Burger
• Painful Memories Party Supplies
• FamilyJewels
• Videos of SP.
• Palais de Donut
• Horseradishery
• Semi-Painless Dentistry
• Ye Olde Butcher Shop
• 12 Day Cleaners
• Big T Bldg
• Home Security Trust
• Swampy's Liquor
Main Street
Let's Get Fiscal Financial Services
The Texas Cheesecake Depository
Greasy Joe's Bottomless Barbecue Pit
P. J. O'Harrigan's
Hotel
King Toots
Mort's Deli
Moe's
• John Bull's Fish & Chips
• It Blows
• Neat & Tidy Piano Movies
• Chinese Smorgasbord
• Pharmacy
• Larry's Chinese Theater
• Pizza on a Stick
• Barber College
• Little Ludwig's Music School
• Pay & Park & Pay
• Jewelry to Go
• Heinrich's Monocle Shop
Second Street
• Cathedral of the Downtown
• Springfield Grocery
• National Bank of Springfield
• Motherloving Sugar Corp.
• Plumbing Supplies
• Stoner's Pot Palace
The Hungry Hun
Zesty's Pizzas and Subs
Springfield Junior High School
• Springfield Psychiatric Ctr.
• Girls, Girls, Girls
• Cheap Guns
• Dr. Marvin Monroe's Family Therapy Center
• Hair Loss Clinic
• Toupée Town
• First Bank of Springfield
• McMahon & Tate Ad Agency
Springfield State Bldg
Third Street
• J.R.R. Toykins
• Bakery
• 3rd St. Subway Station
• Stem Lecture Plumbing
• 1-Hour Dry Cleaners
• Just Chloroform
P. Piggly Hogswine's Super-Smorg
Ye Olde Anchor Shoppe
Medical Library
Springfield General Hospital
Center for Geriatric Medicine
Dr. Julius Hibberd Family Practice
Springfield Bell
Bow St.
• Dr. Nick Riviera
• A-1 Baby Crutches
Costington's
Springfield Men's Shelter
Fourth Street
Bursoddyne
Kids First Industries
• Lil' Vicki Valentine's School of Dance
• Wee World
• The Vast Waistband
Singing Sirloin
Sha-Boom Ka-Boom

# HYPOTHETICAL EXAMPLE II: SOIL CONTAMINATION IN SPRINGFIELD

- 100-year-old smelter, closed for 25 years, deposited metals in soils of surrounding area
- Superfund Site, EPA conducting CERCLA cleanup for last 24 years
- Plaintiffs all residential property owners
- Want contaminated soil removed so that properties are restored to pre-smelter conditions



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To:
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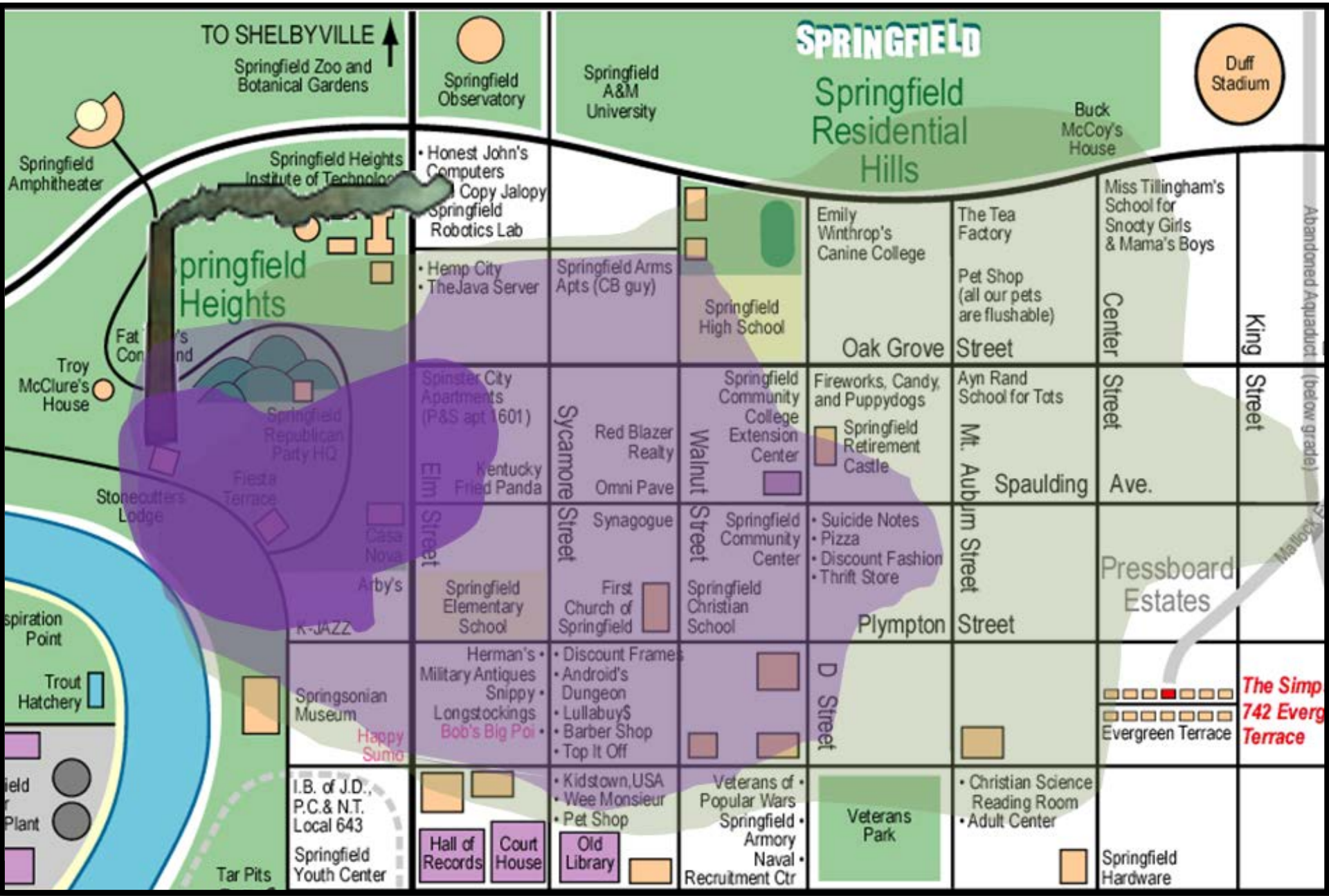
- Catfish Lake
- Camp Krusty
- Rancho Relaxo
- Mount Seldom
- Lake Flaccid
- Littleneck Falls
- Frigid Falls
- Terror Lake
U-Trawl Boat Rentals
Campgrounds
Springfield Dam
Tenderfoot Gorge
Springfield National Forest
Santa's Christmas Village
Storytime Village
Praiseland
Grand Chasm
Area 51A
Springfield Speedway
Discount Lion Safari
Springfield Nature Preserve
Wild Animal Kingdom
Thorn Valley Roses
Springfield Meadow
Trout Hatchery
Inspiration Point
Old Quarry
Army Proving Ground
Poppa Wheelie's
Old Simpson Farm
Sneed's Feed & Seed
Diz Nee Land Historical Park
Fort Springfield
Fort Sensible
To:
- Spittle County
- Bloodbath Gulch
Ghost Town
The Seething Sisters
World's Largest Toilet
Springfield Gorge
Mt. Swartzwelder Historic Cider Mill
Snake?
Hickton
Cletus?
Rural Route 9
Springfield Mystery Spot
West Springfield
Widow's Peak 13,613 ft.
The Carter-Nixon Tunnel
The Murderhorn
Dead Weasel Road
Museum of Barnyard Oddities
Danny's Discount Gas
Ye Olde Candlemaker Shoppe
Old Springfield Town
Springfield Bridge
Mt. Springfield
Springfield Badlands
Greasers Cafe
Fort Fragg
John Ford Center for Alcoholic Cowboys
Enriched Learning Center for Gifted Children
Alkalai Flats
Mt. Carlmore
Mt. Useful
Vistors Center
Mt. Useful Strategic Granite Reserve
Mystic Caverns
Mr. Burn's Estate
Mammon Lane
Croesus
Highway 201
Springfield Bentley
West Springfield Elementary School
The Pharm Team
Springfield University
Quimby Compound
Clubhouse
Pro Shop
Recluse Ranch Estates
Ranier Wolfcastle's House
Springfield Glen Country Club (Golf, Horseback riding, fine dining, and socializing Proud Home of the Tippling Gadabout)
Springfield Preparatory School
Springwood Minimum Security Prison
Mingled Waters Health Spa
Maple Valley Road
Rommelwood Military Academy
Grateful Gelding Stables
Big T
The Fighting Hellfish
Springfield Cemetery (Come for the Funerals Stay for the Pie)
Snuggler's Cove B&B
Springfield Dogtrack
Springfield Downs
Springfield Pet Cemetary
Marine World
To:
- Blockoland
- Duff Gardens
- Itchy and Scratchy Land
- Little Pwagmattasquarmsettport
Lighthouse
Baby Seal Beach
Jebediah Springfield Park
Springfield Amphitheater
Calmwood Mental Hospital
Troy McClure's House
Springfield Wetlands
TO SHELBYVILLE
Springfield Zoo and Botanical Gardens
Springfield Heights Institute of Technology
Springfield Heights
Springfield Observatory
Honest John's Computers
Copy Jalopy
Springfield Robotics Lab
Hemp City
The Java Server
Springfield A&M University
Springfield Arms Apts (CB guy)
SPRINGFIELD
Springfield Residential Hills
Springfield High School
Emily Winthrop's Canine College
The Tea Factory
Pet Shop (all our pets are flushable)
Oak Grove Street
Buck McCoy's House
Miss Tillingham's School for Snooty Girls & Mama's Boys
Duff Stadium
Spinster City Apartments (P&S apt 1601)
Springfield Republican Party HQ
Kentucky Fried Panda
Red Blazer Realty
Omni Pave
Springfield Community College Extension Center
Fireworks, Candy, and Puppydogs
Springfield Retirement Castle
Ayn Rand School for Tots
Spaulding Ave.
Stonecutters Lodge
Fiesta Terrace
Casa Nova
Arby's
K-JAZZ
Elm Street
Sycamore Street
Walnut Street
Mt. Auburn Street
Center Street
King Street
Synagogue
Springfield Community Center
Suicide Notes
Pizza
Discount Fashion
Thrift Store
Springfield Elementary School
First Church of Springfield
Springfield Christian School
Plympton Street
Pressboard Estates
Springsonian Museum
Happy Sumo
Herman's Military Antiques
Snippy
Longstockings
Bob's Big Poi
Discount Frames
Android's Dungeon
Lullabuy$
Barber Shop
Top It Off
D Street
Evergreen Terrace
The Simpsons 742 Evergreen Terrace
Springfield Nuclear Power Plant
Tar Pits
I.B. of J.D. P.C.& N.T. Local 643
Springfield Youth Center
Hall of Records
Court House
Old Library
Kidstown,USA
Wee Monsieur
Pet Shop
Veterans of Popular Wars
Springfield Armory
Naval Recruitment Ctr
Veterans Park
Christian Science Reading Room
Adult Center
Springfield Hardware
Springfield Museum of Natural History
Superior Court
SPRINGFIELD TOWN HALL
Public Library
DMV
Post Office
Noiseland Video Arcade
Travel Agency
Costume Shop
Electronics
Unemployment Office
Vinegar Parlor
Turn Your Head and Coif
Royal Majesty
Video Village
Candy Most Dandy
Rags For Less
Sew and Sew
Lamps
Laurdamat
Kwik-E-Mart
Hairy Shearers
Opal's Fortune
Karma-ceuticals
Juvenile Court
Pawn Shop
Skip's Diner
Gas
Euclid Street
Statue of Jebediah Springfield
Municipal Building
Social Security Office
Pawn Shop
Aztec Theater
Art Store
Books Inc.
Party Shop
Krusty Burger
Painful Memories Party Supplies
FamilyJewels
Videos of SP.
Palais de Donut
Horseradishery
Semi-Painless Dentistry
Ye Olde Butcher Shop
12 Day Cleaners
Big T Bldg
Home Security Trust
Swampy's Liquor
Main Street
Let's Get Fiscal Financial Services
MONO RAIL
Bail Bonds
P.Q. Butterfat's Ice Cream Parlor
Giant Magnifying Glass
Springfield Police Dept and Jail
Popsicle Stick Skyscraper
Top It Off
Springfield Travel
Hotel
King Todts
Moe's
Mort's Deli
John Bull's Fish & Chips
It Blows
Neat & Tidy Piano Movies
Chinese Smorgasbord
Pharmacy
Larry's Chinese Theater
Pizza on a Stick
Barber College
Little Ludwig's Music School
Pay & Park & Pay
Jewelry to Go
Heinrich's Monocle Shop
Second Street
Cathedral of the Downtown
Springfield Grocery
National Bank of Springfield
The Escalator to Nowhere
Springfield Primate Institute
House of Tires
Springfield Civic Auditorium
Springfield Revolving Restaurant
Springfield Palace Hotel
Springfield Junior High School
Springfield Psychiatric Ctr.
Girls, Girls, Girls
Cheap Guns
Dr. Marvin Monroe's Family Therapy Center
Hair Loss Clinic
Toupée Town
First Bank of Springfield
McMahon & Tate Ad Agency
Springfield State Bldg
Third Street
J.R.R. Toykins
Bakery
3rd St. Subway Station
Springfield Trade Center (Millionaire's Club)
Springfield Knowlegeum
Ye Olde Anchor Shoppe
Medical Library
Springfield General Hospital
Center for Geriatric Medicine
Dr. Julius Hibberd Family Practice
Springfield Bell
Bow St.
Dr. Nick Riviera
A-1 Baby Crutcher
Costington's
Springfield Men's Shelter
Fourth Street
Burns Slyne
Kids First Industries
New Bedlam Home for the Emotionally Interesting
Springfield Memorial Bridge
Veterans Hospital
Plasma Center
Screaming Monkey Medical Research Center
Sperm Bank
Animal Hospital
Merry Widow Insurance Co.
The Perm Bank
Big T Theater
All Night Gym
Potholder Barn
Grandma's World
Historical Society
The Jazz Hole
You Thai Now
Jake's Unisex Hair Palace
Springfield Museum
Rock & Roll Museum
Springfield Palace of Fine Arts
The Burns Wing
Louvre American Syle
Auction House
She She Lounge
Stinking Fish Realty
Floppy's
Bigger Brothers
Sixth Street
Stu's Disco
Low Expectations Dating Service
Springfield Buddhist Temple
Tibet Town
Bob's Big Buddha
Luigi's Italian Restaurant
Eatie Gourmet's
Springfield Center for the Performing Arts
World's Largest Speedbump
Springfield Wax Museum
Museum of Crime
Two Guys from Kabul
Thai Palace
Springfield YMCA
Chinatown
Toys' L'Us
Magic Palace
Paté LaBelle
Tiffany & Co.
Hotel Pillowmint
French Confection
Chez Guevara
Springfield Convention Center
Russian District
Worst Western Hotel
Izzy's Diner
Lower Eastside
Temple Beth Springfield
Girlesque
The Gutter Room
Sales from the Crypt Mortuary
Springfield Dinner Theater
The Guilded Truffle
South Street
Up, Up, and Buffet
UGLI
Maison Derriere
Tannen's Fatty Meats
Springfield X
Bakery
Florence of Arabia
Little Newark
Springfield Communist Party
Helter Shelter
Phil's Gas
Yuk-ingham Palace
The Frying Dutchman
Pimento Grove
La Snotteria
Springfield Aquarium
Springfield Antiques
Java the Hut
Skate Rental
4H Club
Legal Clinic
Bumtown
Lap Dancing
Yiddle's Jokes
99¢ Store
66¢ Store
33¢ Store
Crackton
The Happy Gypsy Boarding House
Liquor Store
Oceanview Drive
SouthStreet Squidport
Hal Roach Apartments
Junkyville
The Rat's Nest Neighborhood
257th Street
Belle's Burlesk
The Bloated Liver
Hotel Majestic
The Waterfront
revised 03.15.02
TO CAPITAL CITY
Ye Olde Off Ramp Inn
Saphhire Lounge
U-Break-It Van Rental
Señor Ding-Dong's Doorbell Festival
Monstro Mart
Abandoned Aqueduct (below grade)
Bus Depot
Pool Sharks
AutoLand
Circus of Values
Big T Burgers & Fries
Bob's All-night Furniture Store
The Lumber King
Stor-Ur-Stuff
Shotkickers
Crazy Vladav's Place of Automobiles
Ad Agency
Mom & Pop Hardware (a subsidiary of Global Dynamics)
Leavelle's Bodyguard Academy
The Happy Earwig Motel
Kozy Kourt Motel
Route 18 Flea Market & Drive-In Theater
TO OGDENVILLE
Route 18
Aphrodite Inn Fantasy Rooms and Conference Center
Bob's RV Roundup
Interstate Route 401 The Michael Jackson Expressway (formerly the Dalai Lama Expressway)
Tam O' Shanter
Zip Boys
Elec-taurus
The O.K. Car-al (Canyonero Dealership)
SPRR
Aladdin's Magic Carpets
Krusty's Clown College
Who's to Know Motel
Try 'N' Save
East Springfield
Sporticus
Red Devil Realty
CostMo
SLeEp-eAZY Motel
Gulp'n'Blow
SHØP
Springfield Railroad Station
Sit n' Stare Bus Lines
Bloodbath and Beyond Gunshop
Jittery Joe's Coffee Shop
Barney's Bowl-A-Rama
Highland Avenue
Springfield Mall
LardLad Donuts
Nick's Bowling Shop
Doughy's Pizza
The Spruce Caboose
Springfield Skating Rink
Krusty Burger
Car Wash
Broken-Home Chimney Repair
Planet Springfield
Dairy Queen
Fortune Megastore
Springfield Fairgrounds
Smog Check
The Yogurt Nook
High Pressure Tire Sales
Big 5 Sporting Goods
The Texas Cheesecake Depository
Greasy Joe's Bottomless Barbecue Pit
Discount Meat Hut
Springfield Googleplex
Wall E. Weasel's
Dentz Auto Repair
Sir Putt-A-Lot's Merrie Olde Fun Center
P.J. O'Harrigan's
The Slaughter House
Municipal House of Pancakes
Der Krazy Kraut
Legitimate Businessman's Social Club
Blottos
Motherloving Sugar Corp.
Plumbing Supplies
Stoner's Pot Palace
The Hungry Hun
Zesty's Pizzas and Subs
Straight & Narrow Storage
Springfield Drive-In Theater
Springfield Square Garden
Mud City
Little Black Box
Stem Lecture Plumbing
1-Hour Dry Cleaners
Just Chloroform
P. Piggly Hogswine's Super-Smorg
Professor V.J. Cornucopia's Fantastic Foodmagorium & Great American Steakery
Springfield Airport
Morningwood Penitentiary (condemned)
Springfield US Air Force Base
Lil' Vicki Valentine's School of Dance
Wee World
The Vast Waistband
Singing Sirloin
Sha-Boom Ka-Boom
VHS Village (formerly The Beta Barn)
Eastside Ruff-Form School
Springfield Coloseum
Springfield War Memorial Stadium Home of the Springfield Isotopes
Flight School
Springfield Police Academy
Springfield Women's Prison
Springfield State Prison
Springfield Shopper
KBBL Radio
Itchy & Scratchy International
Professor Von Bowser's Sanitorium for Dogs
Pitiless Pup Attack Dog School
Museum of Sandpaper
Pillow Factory
Baby Get Well Cards, Inc.
Springfield Dog Pound
The Hate Box
Channel 6 Krusty-Lu Studios
Petrochemical Corporation Proud makers of Caustic Polypropylene and Malibu Stacey
Play-Doh Factory
Aqua Car Factory
Industrial Way
Duff Brewery
Galoshes Factory
Uriah's Heep
Ajax Steel Mill
Caramel Factory
Slide Factory
Chocolate Factory
Box Factory
Fake Vomit, Inc.
Bart's Factory
Oatmeal Works
Spirograph Factory
Smoke Factory
Day Care Center
Southern Cracker
Acne Grease Company
Rendering Plant
Davy Jones Hamper
Call Me Delish-mael Taffy Shop
Barnacle Billy Anger Mgmt. Ctr
Auto Wrecking Yard
Springfield Tire Yard Fire
Springfield Dump
Sea Cap'ns Bait 'n Barg'n B'n
Happy Sailor Tattoo Parlor
Little Lisa Recycling Plant
Springfield Naval Reserve Base
Springfield Harbor
Lighthouse
The Rusty Barnacle
Old Boardwalk
Mr. Burn's Casino (demolished)


TO SHELBYVILLE
Springfield Zoo and Botanical Gardens
Springfield Observatory
Springfield A&M University
SPRINGFIELD
Springfield Residential Hills
Buck McCoy's House
Duff Stadium
Springfield Amphitheater
Springfield Heights Institute of Technolo
• Honest John's Computers
Copy Jalopy
Springfield Robotics Lab
pringfield Heights
• Hemp City
• TheJava Server
Springfield Arms Apts (CB guy)
Springfield High School
Emily Winthrop's Canine College
The Tea Factory
Pet Shop (all our pets are flushable)
Miss Tillingham's School for Snooty Girls & Mama's Boys
Oak Grove
Street
Center
King
Street
Abandoned Aquaduct (below grade)
Fat
Troy McClure's House
Springfield Republican Party HQ
Fiesta Terrace
Stonecutters Lodge
Spinster City Apartments (P&S apt 1601)
Kentucky Fried Panda
Elm Street
Sycamore Street
Red Blazer Realty
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Springfield Community College Extension Center
Fireworks, Candy, and Puppydogs
Springfield Retirement Castle
Ayn Rand School for Tots
Mt. Auburn Street
Spaulding
Ave.
Street
Casa Nova
Arby's
K-JAZZ
Springfield Elementary School
Synagogue
First Church of Springfield
Springfield Community Center
Springfield Christian School
• Suicide Notes
• Pizza
• Discount Fashion
• Thrift Store
Plympton
Street
Pressboard Estates
Mallock
spiration Point
Trout Hatchery
Springsonian Museum
Happy Sumo
Herman's Military Antiques
Snippy • Longstockings
Bob's Big Poi
• Discount Frames
• Android's Dungeon
• Lullabuy$
• Barber Shop
• Top It Off
D Street
The Simp
742 Everg
Terrace
Evergreen Terrace
I.B. of J.D., P.C.& N.T. Local 643
Springfield Youth Center
Hall of Records
Court House
• Kidstown,USA
• Wee Monsieur
• Pet Shop
Old Library
Veterans of Popular Wars
Springfield • Armory
Naval • Recruitment Ctr
Veterans Park
• Christian Science Reading Room
• Adult Center
Springfield Hardware
Tar Pits

# PROACTIVE PREVENTION

- Preserving and producing documents
- Maintaining relations with prior owners of the facility and former employees
- Community relations
- Agency relations
- Legal engagement
  - Bellwether cases
  - Lobbying efforts
  - Remediation lawyering