Looking at the Planet Selected Papers, Talks and Testimony 1978-2007

Michael Gregory

Dedication

It's been my pleasure and privilege to know and work with many exceptional human beings in our mutual efforts for environmental protection, including many whose names and deeds are already firmly established in the legends, memoirs and histories of the movement. My teachers, colleagues, *compañeros*, comrades with-arms-linked, my friends, family, community.

To mention, let alone adequately remember all the people and organizations informing these compiled papers would be an arduous and finally impossible task and, in any case, likely little more than a formal gesture in the right direction (which is to say, toward the left).

Siempre la lucha. Venceremos.

• About *Looking at the Planet*

Looking at the Planet is a selection of the papers, talks, testimony, articles, comments, etc. that I authored or co-authored in the years 1978-2007 when I was active in environmental politics.

They include articles published in newspapers, newsletters and journals; scripts read on the eponymous "Looking at the Planet" program I hosted on KSUN community radio in Bisbee, Arizona; papers, reports and *communiques* issued by non-governmental organizations; talks delivered to environmental, political, religious and business organizations and Earth Day gatherings; comments to and testimony before governmental and intergovernmental bodies at local, state, national and international levels—most made financially possible largely due to a number of non-profit foundations and environmental organizations, government agencies, and private parties corporate and individual. Most of the policy-related papers of Arizona Toxics Information, the non-profit I started in 1990) are included, except for a few lengthier technical reports and interactive software on US-Mexico border issues).

I started putting these papers together for publication in book form a few years ago in the belief, or at least in the hope, that insofar as they led to successful outcomes on struggles they engaged, they may be of more than historical, cultural or biographical interest, may in fact be of practical use to people faced with similar environmental threats and issues.

Following the recent elections, with evisceration of environmental laws and regulations being openly proposed by powerful forces in Washington and state capitols, it occurred to me that they may be of even more immediate and widespread use than I had thought likely. With that sense of urgency in mind, I decided to make them accessible a soon as possible on the Web even though the brief introductions I had planned for each section of the hardcopy compilation were as yet unfinished or unwritten. Those are posted here as works-in-progress of sites under-construction.

The papers are sorted by topic (with considerable overlapping) in eleven sections or chapters and within each section, more or less chronologically by first date of presentation or publication. Most of them date from 1978-1999, none earlier than that and only five later. The introductions which head each section are intended not as essays in themselves, nor as synopses of the sections they introduce, but simply to suggest contexts in which the papers originally appeared; in general, no attempt is made to reference later developments in science, politics, etc.

All but four of the papers are reproduced as they were originally, except for minor corrections of typos, grammar, spelling, punctuation, format, etc. Those four are presented here only in part: the Bisbee Vegetation Management Committee paper and USFS IPM papers are complete except that the exhibits presented with the originals are here excluded; the reports on the Border Right to Know Project and the Tijuana River Watershed Toxics Data Project are represented here only by their introductions, summaries and recommendations of the originals.

Michael Gregory Just Deserts, Arizona April 2017

• Taking it Personally

Civil rights, human rights, environmental rights. . .freedom of, freedom to, freedom from. . . . Freedom of speech. Freedom of association. The fundamental right (as Justice Brandeis called it) to be left alone (cf. Isaiah Berlin on *negative liberty*: "the maximum degree of non-interference compatible with the minimum demands of a social life"). The rights and obligations of citizenship. The tensions (between public and private; local, national and international; individual and societal) intrinsic to government, especially maybe to a democratic republic, a body politic engaged in conversations with itself.

It's not surprising that the environmental movement in the US started and spread in conjunction with the civil rights, peace, women's and LGBTQ movements, nor that they all rose up in the reactionary repressive pressure cooker of the Cold War insecurity state. The photograph of earth from the moon printed on the cover of *The Whole Earth Catalog* following the 1969 moonshot may be the signature icon of the era—the new vision of Spaceship Earth as Buckminster Fuller called it, putting in vividly pictorial terms the need to "think globally" (as David Brower put it), that is, to think (w)holistically, ecologically about the real world, our real estate.

My own trajectory isn't untypical: teenage loneliness and rebellion coming of age in the early civil rights movement; twenties restlessness and soul-searching caught up in the anti-war movement; thirties and forties deliberately confronting the forces of environmental destruction, guided by an increasingly complex and therefore increasingly nuanced understanding of the main ecological principle (summed up by John Muir as everything "hitched up to everything else"); fifties focusing on what the previous years had shown to be a field where I might be of most use; sixties sliding into retirement, trying to see and understand the "long strange trip it's been."

From local actions (e.g., a rally to raise money for the sit-ins in the South; helping organize the first sit-in in my home town, Toledo, Ohio, to integrate a neighborhood roller rink); to actions targeting state and federal policies (demonstrations, marches, lobbying, drafting laws and regulations, etc.); to media-aware actions geared toward effecting meaningful change at local to global levels (e.g., conferences and campaigns, lobbying, at-the-table participation in changing international policies and practices). From teenage rallies to UN treaty-making, with multiple stops in between. And always trying to set it down in clear writing: description, explanation, argument; in fact, I seldom trusted my ad lib skills enough to give extemporaneous talks.

Altruisms and kindred idealisms likely animate any sustained public endeavor, but my years of activism were founded on an urgent sense of self-defense (self-interest, if you will). Saving the world wasn't where it was at. I never had much use for do-gooders and busybodies in general, or found them to be of much use *in situ*; usually found that they smacked too much of *holier-than-thou* with a tendency to turn the other cheek. For years I kept a button on display at home which nicely ridiculed the hero-myth that was more in vogue than ever, and government-approved, after 9-11: "If I don't save the universe who will?"

On the other hand, besides responding to instinct and the need to protect self and family in the face of clear and present danger, many people joined the environmental movement not only from the promptings of survival instinct and sense of adherence to the environmental *ethos*, but from empathy with the natural world, personal commitment to participation in protection of the global commons, the commonwealth, the endangered support system of Mother Earth.

Faced with a seemingly unstoppable cascade of environmental mayhem (Lake Erie fish kills, the disappearance of eagles and songbirds, the Cuyahoga River on fire, smog, Love Canal, the

clearcutting and ripoff of forests, the bulldozing of wetlands, the ecocide in Vietnam, Seveso, Bhopal, Chernobyl...), along with millions of other people I went into survival mode, withdrew, looking for a safe haven, for means to stave off the menace, to bring it to heel, confine it, understand its nature in order to know where to counter it, to do whatever it took to end it.

The second half of the Cold War/Lonely Crowd era when American individualism often appeared in the guise of alienation, delinquency a common behavior in all age groups throughout the nation. Emerson's Self-Reliance after the Bomb and its preparatory century. Feeling at odds with what I thought of as most cultural norms of the day, my sense of self embattled, withdrawal seemed the best choice. In my teens, one of my first pieces of writing to win a prize was an essay expressing the maddening effects of light and noise pollution. In my twenties, I left family, career and lifestyle, eventually leaving urban habitats behind as far as feasible, to live in the mountains and uplands of the west, northwest and southwest. In 1971, I settled onto forty acres of high semidesert grassland in southeast Arizona, ten miles from the US-Mexico border.

After a time more or less hiding out with a chip on my shoulder, I began to see individualism itself as a large part of the problem. While it did in a sense afford a sort of self-protection, it was also oppressive, threatening, the very mentality behind king-of-the-mountain industrialization and finance. I had a growing awareness that I needed to temper such hallowed traditions (manifested all too plainly in client-state diplomacy, business-as-usual and macho attitude) with equally-venerable pro-social traditions of nurturing and community. Citizenship as brotherhood.

Individualism as it had come to be by mid-20th C generates its contrary: the ego/subject/I is *ipso facto* in relation to an Other, a kind of mirror-self. The problem is dialectical. The sometimes screaming Me-Me's inevitably have to come to terms (or grips) with the Me-Its (and often do so by finding some condolence or escape from isolation, some reconfigured sense of identity in the dissociative Us-Them of social reality with all its obvious potential for unpleasantness).

One of the turning points in my retreat was the recognition (Whitmanic, I thought at the time) that the other I was confronting looked a lot like me, that I and the dominant culture (and associated political regime) were in fact offspring of the same leatherstocking yankee-doodle incubator. No escaping it. We the people singing a song of myself. "Figuring out the enemy" meant, to an unnerving degree, understanding myself. Identity politics with a vengeance.

Well aware that such ruminations smacked of psychobabble, instead of taking to the couch (not being inclined toward psychoanalytic theory), I set out to see how what I had in common with my mirror-society could be used not so much against It/Them as to find common goals and ways to achieve them. Similarly, I began to see that as a community of activists, as a movement, we couldn't reasonably, or ethically, seek to educate the public or "shift the paradigm" until we recognized our immersion, participation, even collusion, our *place* in it. As Wendell Berry wrote, "If we are members of a society, we participate, willy-nilly, in its evils." Not to recognize this is not only to lose, as he says, "the vision of community," but to enable those evils. Dropping out came to seem a copping out; engagement the order of the day.

And though I admit to having felt some pride in my work when I got letters (and, later, emails) from activists in places I had never been, like one from an herbicide activist in Chino, California, congratulating me for, among other things, showing "how much a single individual can accomplish," I was also increasingly aware of how much an individual acting alone can't do.

By April 1970, the date of the first Earth Day, it was widely acknowledged that the extent of environmental problems required political, not just personal and bakesale-level action on

national and international, not just local, state and regional fronts. Conceived and engineered largely by people of my age-group, children brought up in the shadow of the mushroom cloud with our ingrained understanding of the need for *restraint* (the need to rein in our drives and desires across the board, to check our greed, our runaway technology, our out-of-date scarcity economics king-of-the-mountain games); given impetus by Rachel Carson's *Silent Spring* and political expression in the *Wilderness Act* of 1964 and *National Environmental Policy Act* (NEPA, signed into law on 1 January 1970); that first Earth Day can be seen as a marker for the resurgence and realignment of the coalition-building that had characterized the civil rights, antiwar and youth movements of the 60s.

Many of the same groups that came together for social and political action then, found it relatively easy and advantageous to include environmental issues in their agendas, especially insofar as environment came to be seen as the basic context, and ecological degradation as a fundamental threat for all movements. The 70s through 80s saw an unprecedented rise and effective mobilization of networks and coalitions in many parts of civil society, few or none more prevalent or effective than those among conservationist, naturalist and environmentalist groups, manifesting anew the associational proclivity in American culture noted a century-and-a-half earlier by Tocqueville.

While from where I stood, it looked like most groups in these new alliances were of what traditionally was called left or left-liberal persuasion, the all-inclusive nature of the movement drew support from both sides of that cultural-political divide. Some of the strongest and most effective Congressional advocates for environmental protection were Republicans, some of the most dangerous were washed-in-the-blood Democrats. And as, in the 70s and 80s both the dominant parties in the US increasingly were seen to be subsets of an overarching Business or War Party, with both sides dedicated to endless (though periodically interrupted) technology-driven, environmentally-destructive economic growth, the movement tended to develop beyond the usual two-party structure.

In the 90s, growing recognition of the overlap of social justice and environmental justice for minority groups; the common interests of labor and community organizations in the safety of workplace and public environments; the widespread awareness of the ecological effects of war (from resource exploitation to chemical, explosive and radiological devastation of land, air, water and food)—all led to environmental groups frequently becoming allied with social justice, health, labor and other public sector advocacy groups to form broad-based networks, alliances that became ever stronger as the groups found themselves faced with a similarly rapid growth of globalization, so-called free trade, and a corresponding proliferation of corporations and high-finance lobbying consortia.

Though many, probably most of us in the US weren't aware of it, the environmental movement was in fact global. First brought to prominence in the 1972 UN "Conference on the Human Environment" (the "Stockholm Conference"), the movement progressed through a powerful series of processes and agreements that have kept it (largely unlike its US counterpart) active and effective on widely diverse fronts. Generally-considered the most significant of these products out of Stockholm, was the World Commission on Environment and Development (WCED). Brought together at UN request in 1983 and chaired by Gro Harlem Brundtland of the Netherlands, the Brundtland Commission included a number of distinguished environmental leaders from around the world, among them William Ruckelshaus (EPA's first administrator and then in that position again a decade later, replacing Reagan's first EPA choice, Anne Gorsuch, after her scandal-driven resignation).

In 1987, the Brundtland Commission issued its first report, *Our Common Future*, which made

clear that *environment* and *sustainable development*, the two principal largely disconnected terms dealt with by the Stockholm Conference, were in fact interdependent and inseparable. Giving large place to concerns with social equity, poverty and indigenous peoples, emphasizing political rather than technical solutions, the report made terms like *pollution prevention*, *precautionary principle*, *polluter pays*, *public participation* and *sustainability* part of the new international vocabulary codified in succeeding UN meetings, processes and treaties, most notably the 1992 Earth Summit and its resultant *Agenda 21* and summary *Rio Declaration*.

The Rio Earth Summit (UNCED, the United Nations Conference on Environment and Development) was a pivotal event in global environmental protection. With 172 nations participating and 2400 NGOs having consultative status (with 17,000 people attending the parallel Global Forum), the summit issued a number of precedent-setting agreements, including the Convention on Biological Diversity, the Framework Convention on Climate Change, the UN Convention to Combat Desertification, and the Commission on Sustainable Development (which latter was tasked with overseeing outcomes of the Summit).

*

Terms of engagement as arbitration, conflict resolution, cooperation, working together, democratic process. . . . My writing and talks began to emphasize first person plural rather than singular faced off against second. Politics as civil discourse. Communication, said Kenneth Burke, the basic act of love, the opposite of war. Right about then, NAFTA reared its ugly head. As an environmental NGO based on the US-Mexico border, with connections on both sides of the line, Arizona Toxics Information (ATI, the non-profit organization I started in 1990) was quickly propelled into the high-stakes politics of globalization, international trade and the tangled mess of the ecology-economics pushme-pullyou. For the next ten years I was in the thick of it, promoting the equal protection principles of environmental protection in the international arena, networking with major transnational groups as well as with other small NGOs from countries all over the world, culminating (thanks in large measure to Fran Irwin at World Wildlife Fund) in work on the OECD's "Guidebook for Nations" on how to implement PRTRs, and (more or less synchronously) with the International POPS Elimination Network (IPEN) in crafting the 2001 *Stockholm Convention on Persistent Organic Pollutants*.

Fads, fallacies, urban legends, slogans, buzzwords and the like (jargon, slang, codewords, *patois*, *popular delusions and the madness of crowds* as Mackay called them), tend it's said to infinity, they come and go—in environmental politics as elsewhere. One year this a hot-button, next year that. But linking one with another can give some sense of relations, continuities, some shape to otherwise amorphous cultural perturbations. Connecting dots.

Public Participation, Right to Know, Environmental Justice, Environmental Protection, Environmental Health, Medical Prudence, Life cycle analysis, Pollution Prevention, Reduce Reuse Recycle, Polluter Pays, Precautionary Principle, Not In My Backyard, Preserve Protect Enjoy, People Not Poisons, Forever Wild, Love Your Mother—these phrases are of that time, and are of a kind: a string, birds of a feather, terms of art, terms in a grammar of action, in flux, the meaning of each subject to change, implicating the meanings of the others, jointly and severally. This one or that one in fashion at any given time, old ones becoming obsolete, new subjects taken up, new fields brought into focus. . .yet remaining meaningful.

As the discourse continues, linkages between this that and the other are nurtured. Not to put too platonic a spin on it or a biological map of an aristotelian sort, there is an intercourse (not to say incest), a communion, a communication, some likeness linking the headlines and labels and environmental poster children *du jour*. Words have effects. Propinquity may as readily breed

solidarity as contempt. Linguistic play leading by process of synthesis toward a naming or titling or lumping of the aggregate. A parallel process of interchange informs the individuals and organizations speaking in those terms, expressing those principles, with an eye toward seeing them realized.

When I retired, it was not with a sense of anything like "mission accomplished" (a phrase not yet the bad joke it became), but with full awareness that bad ideas never go away and that in the high-tech postmodern era they were sprouting enhanced powers of seduction and destruction (soon made all-too-evident in post-*Patriot Act* truncating of civil rights, and again in the absurd 2016 election of a billionaire real estate developer *cum* reality-show host, and installation of his reactionary, plutocratic and anti-environmental government)—but also with some hope that the good ideas and the activists to enunciate them would continue as well, and prevail.

Greybear gets up early and flops Salmon out of his stream. Salmon flops back. Licking his paw does no good: he still can't understand the birds.

They have wings because they fly. Why do they fly? They fly because Greybear doesn't understand. They fly because it's there. Greybear stands in cold

water, belly small with pain, looking up to where the birds mate. Salmon sprays his oceans of meals over the falls

A Paper Trail

Thanks to the many editors, publishers, funders and organizations who have encouraged and given circulation to these papers, which first appeared as indicated below.

Acceso Público a la Información sobre Medio Ambiente en la Frontera México-Estadounidense, presentado en la Segunda Conferencia Anual Binacional del West Texas Regional Poison Center sobre Aspectos de Toxicología y Salud Ambiental, "La Toxicología no tiene Fronteras," El Paso, Texas (6 de septiembre de 1996)

A Four-Point Primer on Pollution Prevention, *Bisbee Mountain Journal* (4 September) 1980), p.8.

Air Toxics, Maximum Achievable Control Technology and Residual Risk: an Opportunity for Clean Air Reform in Arizona Or, On a Clear Day You Can See Which Way the Wind Blows, presented to the Commission on the Arizona Environment, the Arizona Lung Association and the Environmental and Natural Resources Law Section of the State Bar of Arizona Conference, "The 1990 Federal Clean Air Act Amendments: Their Interpretation, Impacts and Implications for Arizona," Mesa, Arizona (27 September 1991)

A List of Lists for the US-Mexico Border Region: New Software for Integrating Public Right to Know with Local Land-Use and Emergency Planning, presented to the Unison Institute/US-Environmental Protection Agency Toxics Release Inventory and Right-to-Know Conference, "Building for the Future," Washington, D.C. (8-10 September 1997)

An Environmental Agenda for the 1990 Arizona Legislature: An Outline (1989), Outline of Sierra Club Grand Canyon Chapter comments to the Arizona Joint Legislative Committee on Hazardous Wastes (October-November 1989); presented to the Governor's Commission on Arizona Environment, Phoenix, Arizona (1 December 1989)

Arizona Farmworkers Resolution on Pesticide Safety, PPEP Arizona (Personal Portable Educational Preparation) "Public Forum on Pesticide Usage and Safety," Tucson, Arizona (14 January 1979)

Before the Arizona Joint Legislative Pesticide Oversight Committee, for the Sierra Club Grand Canyon Chapter, Phoenix, Arizona (30 October 1987)

Before the Joint Legislative Study Committee on Hazardous Materials, for the Sierra Club Grand Canyon Chapter, Phoenix, Arizona (17 October 1989)

Between Kafka's *Trial* and Orwell's *1984*, Presented to the Earth Day gathering, Bisbee, Arizona (24 April 2004)

Border Right to Know Project: The 1993 Northeastern Sonora Pilot Inventories, Summaries, for Enlace Ecológico and Arizona Toxics Information, Agua Prieta, Sonora and Bisbee, Arizona (August 1994)

Civil Rights and Environmental Protection, presented to the Prescott College "Public Forum" (8 November 1989)

Cochise County-Northeast Sonora Planning Project (1995)

Community Access to Environmental Information in the U.S.-Border Region, presented to the Seventh Annual Transborder Library Forum, "Alternative or Non-Traditional Sources of Environmental Information in the Border Region," Ciudad Juárez, Chihuahua (22 February 1997)

Compromising Disease and Pollution Prevention: The Food Quality Protection Act of 1996, presented to the Arizona Agricultural Aviation Association, Arizona Crop Protection Association "Second Annual Desert Agriculture Conference," Yuma, Arizona (14 January 1997)

Criteria for Selecting Chemical Species for Pollutant Release and Transfer Registers, for Arizona Toxics Information, Border Ecology Project, Comité Civico de Divulgación Ecológica, A.C., Enlace Ecológico, A.C., Proyecto Fronterizo de Educación Ambiental, A.C., and Sierra Club, presented to Organization for Economic Cooperation and Development "Second Workshop on National Pollutant Release and Transfer Registers," Ottawa, Ontario, Canada (14-16 June 1994)

Dealing with Hazardous Wastes, KSUN Bisbee, Arizona (20 August 1980)

Dioxin in the Milk. Bisbee Daily Review/Sierra Vista Herald (17 September 1989)

Earth, Inc.: A Failure of Vision. Presented to Earth Day Rally, Arizona State University, Tempe Arizona (2 April; 1997); *Voices: Sierra Club Journal of the Environmental Justice Network* (Autumn), pp.6, 27

Elections, Environment and the Sagebrush Ripoff. (1980) Mule Mountain Observer 3(3):11.

Environment, Sustainable Development, Public Participation and the NAFTA: A Retrospective, Prepublication Draft (1992), *Journal of Environmental Law and Litigation* 7:99-173 (1993)

Environmental and Social Impacts of Mining: Notes for a Workshop, for Sierra Club Grand Canyon Chapter, Phoenix, Arizona (10 April 1998)

EPA Agrees to Regulate Airborne Radiation. (1980) Mule Mountain Observer 3(2):25.

Food Safety and Pesticides: Congress and EPA Move to Dump the Delaney Clause

Forest Planning in Arizona, Citizens National Forest Coalition Southwest Newsletter(15 November 1980)

Groups Denounce Weak Air Quality Bill, Call on Legislature to Protect Human Health and the Environment (1 June 1992)

Hazardous Materials in Arizona: Some Contexts for Change, presented for the Sierra Club, Grand Canyon Chapter, to the Verde Valley Citizens against Hazardous Waste, Cottonwood, Arizona (24 August 1989)

Hazardous Materials in the Maquila Industry, for the Border Ecology Project, presented to the United States-Mexico Border Health Association Annual Meeting XLVII, Tucson, Arizona (4 June 1989)

Hazardous Materials Orientation Training Module, prepared for Cochise County, Arizona, Planning Department (26 February 1997)

Hazardous Waste Transport, KSUN-FM (13 May 1980)

Health Effects of Hazardous Waste: An Environmentalist Perspective. Presented to the Agency for Toxics Substances and Disease Registry "International Congress on the Health Effects of Hazardous Waste," for the Sierra Club. (Atlanta, Georgia, 6 May 1993)

Herbicides on Rangelands: A Report on the Rangelands Symposium, Parts 1 and 2. *Mule Mountain Observer* 2(15):12-13.; 2(156: 23-24].(February 1979)

Herbicides, Overgrazing and the Coronado, Canyon E cho 19(3)(April 1983)

How Not to Foul Our Own Nest in a Throw-Away Society: Some Suggestions for Legislative and Regulatory Reform, Presented to the Arizona Public Health Association Sixty-second Annual Meeting, "The Health of the Environment = The Health of the People," Mesa, Arizona (12 September 1990)

In Praise of Predators. Mule Mountain Observer 2(19), (1979), pp.11,16

Integrated Pest Management (IPM) and Forest Service Policy, 1979-1985; in, Dave Brown, Samuel M. Hitt, William H. Moir, eds., *The Path From Here: Integrated Forest Protection for the Future* (Santa Fe, New Mexico: USDA-Forest Service Region 3, January 1986), pp. 3.1-23, Exhibits A-1 - L-10

Introductory Remarks to the Workshop: Integrated Hazardous Materials Tracking for Land Use Planning and Pollution Prevention, Sierra Vista, Arizona (7 May 1996)

Is the State Ready to Give up Health-based Air Quality Standards? (1991)

Law West of the Pecos, Mule Mountain Observer (13 December 1979), p.22

Life, Liberty and the Pursuit of Clean Air, for the Sierra Club Grand Canyon Chapter, presented at the OSHA/Environmental Network "Right-to Know Conference," University of Arizona, Tucson (12 October 1985)

Lista de Referencia de Tóxicos en la Frontera México-EU. Edición Homepage (19 de marzo 1997)

Medfly Eradication and Public Health: a Fruitless Effort? Co-authored with Nancy Rucci; published, with minor revisions, in *New Solutions* 4(4):9-20 (1994)

The Medfly, the Government, and Individual Rights (1985)

Necesidades para la Información Ambiental en la Frontera México-Estados Unidos. comentarios hechos durante la Reunión Pública Binational Frontera XXI, Nogales Arizona (12 de julio de 1996)

News from the Phenoxy Front, *Huachuca Audubon Trogon News* (Winter, 1978)

NGO Statement on Procedures for Public Notice and Confidentiality, submitted to the to the Border Environment Cooperation Commission, El Paso, Texas (15 November 1995)

No Road to Progress, Bisbee Daily Review/Sierra Vista Herald (10 November 1985)

Of Development, Disruption and Dispossession, *Bisbee Review/Sierra Vista Herald* (15 April 1984), p.5A

On Aquifer Protection Permitting of Phelps-Dodge Copper Queen Branch, for the Sierra Club Grand Canyon Chapter, submitted to Arizona Department of Environmental Quality (29 December 1987)

On Aquifer Protection Permitting of the Phelps-Dodge Copper Queen Branch Tailings Storage Area, Co-authored with Dick Kamp, submitted to Arizona Department of Environmental Quality (8 January 1992)

On Arizona Department of Environmental Quality Draft Surface Water Quality Standards, for the Sierra Club Grand Canyon Chapter, submitted to the Arizona Department of Environmental Quality (October 1990)

On BECC Confidentiality Procedures and Regulation, presented to the Border Environment Cooperation Commission (25 September 1995)

On Establishing a San Pedro Riparian National Conservation Area, for the Sierra Club Grand Canyon Chapter, before the Subcommittee on Public Lands, Committee on Interior and Insular Affairs, House of Representatives, Hearings on H.R. 4811, Washington, D.C. (15 July 1986)

On Interim BECC Procedures and Regulations Regarding Public Notice and Comment Procedures, presented to the Border Environment Cooperation Commission (18 October 1995)

On Permitting of the Phelps Dodge Copper Queen Branch, submitted to the Arizona Department of Environmental Quality (8 April 1990)

On Proposed Arizona Air Permit Rules (4 July 199), submitted to the Arizona Department of Environmental Quality (4 July 1993)

On the APHIS Rangeland Grasshopper Cooperative Management Program Draft Environmental Impact Statement as Supplemented 1986, for the Southwest Regional Conservation Committee of the Sierra Club (22 February 1986)

On the BECC 20 December 1995 Revised Procedures for Disclosure and Confidentiality, submitted to the Border Environment Cooperation Commission (11 January 1996)

On the Draft Animal Damage Control Plan for the BLM Safford District, for the Sierra Club Grand Canyon Chapter, submitted to the BLM Safford District (10 January 1989)

On the Draft Animal Damage Control Plan for the Coronado National Forest, For the Sierra Club Grand Canyon Chapter, submitted to the Coronado National Forest (12 February 1990)

On the Draft Guidelines for Project Submission and Criteria for Project Certification, submitted to the Border Environment Cooperation Commission (14 July 1995)

On the Draft Permits for the Proposed Arizona Hazardous Waste Management Facility submitted to the Arizona Department of Environmental Quality for the Sierra Club Grand Canyon Chapter (31 October 1990)

On the EPA's Proposed Denial of an NSO to the PD Reduction Works, Douglas, Arizona, for Sierra Club Grand Canyon Chapter, and Southwest Regional Conservation Committee, presented to the US Environmental Protection Agency, Douglas, Arizona (17 May 1986)

On the Governor's Hazardous Waste Technical Advisory Committee, Report before the Arizona State Legislature Joint Legislative Committee on Hazardous Wastes, Phoenix, Arizona (5 October 1990)

On the Master Development Plan for the Proposed "Summit" Project near the City of Sierra Vista, for the Sierra Club Grand Canyon Chapter, Chiricahua Group, before the Cochise County Board of Supervisors Public Hearing (23 April 1984)

On the Nogales, Sonora Water Supply and Distribution, Treatment and Recharge Project (1996), submitted to the Border Environment Cooperation Commission (9 January 1996)

On the Plasma Arc Incinerator Proposed for Whetstone, Arizona, before the Cochise County, Arizona, Board of Supervisors, Bisbee, Arizona (12 April 2005)

On the Proposed H&K Municipal Waste Incinerator, presented to the Arizona Department of Environmental Quality, Pearce, Arizona (20 May 1997)

On the Proposed NPDES Permit for Ina Rd. Wastewater Treatment Plant, for Arizona Toxics Information and Sierra Club Grand Canyon Chapter, presented to the U.S. Environmental Protection Agency IX and the Arizona Department of Environmental Quality (30 June 1991)

On the Proposed Rule on Risk Management Programs for Chemical Accidental Release Prevention, submitted to the US-Environmental Protection Agency, Air Docket (LE-131)Attention: Docket No. A-91-73 (18 January 1994)

On the Proposed U.S.-Mexico Free Trade Agreement, before the the Subcommittee on Labor of the Committee on Labor and Human Resources, Committee on Environment and Public Works, U.S. Senate, Joint Hearing on the Proposed U.S.-Mexico Free Trade Agreement, Washington, DC (23 April 1991)

On the USDA-APHIS Medfly Cooperative Eradication Program Draft Environmental Impact Statement, co-authored with Nancy Rucci for Arizona Toxics Information and Sierra Club National Hazardous Materials Committee (18 June 1993)

People. . . Not Poisons, Citizens National Forest Coalition Paper released at the "Symposium on the Use of Herbicides in Forestry," Crystal City (February 1978)

Pesticide Regulation and Use: The Public Perspective, for the Sierra Club Grand Canyon Chapter, Draft Comments to the University of California, Riverside Desert Agriculture Institute Conference "Pesticide Regulation and Use: Conflict Resolution" Holtville, California (29 April 1994)

Pesticide Reform in Arizona: Moving Beyond Risk Assessment and Clean-up to Exposure Prevention, presented to the Community Pesticide Watch Group Forum "Agriculture in Transition: Farming and the Suburban Community," Phoenix, Arizona (12 March 1991)

Pesticides in Mexico, Citizens National Forest Coalition Southwest Newsletter (4 August 1978)

Pesticide-Use Reduction: The Core Element in IPM, Remarks to Arizona Clean and Beautiful, "Illegal Dumping Forum III," Phoenix, Arizona (5 November 1993)

Planning for Prevention: Once We Know, Then What? Presented to the Arizona Association of Community Health Centers and University of Arizona Rural Health Office, 1991 Legislative Forum "Arizona Health Care Issues," Phoenix, Arizona (10 January 1991)

Plugging the Leak: Emergency Response to Global Crisis. *Environmental Carcinogenesis Reviews (J. Envir. Sci. Health)* vol. C8 (1992) (2): 229-243.

Pollution and Human Rights, *Canyon Echo* 19(9) (1983)

Pollution Prevention in Occupational and Environmental Contexts, presented to the Thirty-seventh Annual Western Occupational Health Conference and First U.S./Mexico Occupational Health Conference, "Forging New Partnerships," Scottsdale, Arizona (2 October 1993)

Prevention, Not Risk Assessment Presented to The National Coalition Against Misuse of Pesticides "Twelfth National Pesticide Forum," Arlington, Virginia (12 March 1994)

Proyecto de Datos sobre Tóxicos para la Cuenca del Río Tijuana: Reporte Final, Seleciones, Entregado en Cumplimiento Parcial del Compromiso de Apoyo con la EPA # 824438- 01-0 (30 de Octubre de 1996)

Proyecto Fronterizo de Derecho a Saber, Resumenes, para Arizona Toxics Information y Enlace Ecológico, A.C. (Agosto 1994)

Proyecto de Planeación para la Región Noreste de Sonora/Condado de Cochise (1995)

Public Access to Environmental Information in Mexico and the United States: Issues and Policy Options: Draft for Discussion, presented to the North American Commission on Environmental Cooperation, Montreal, Quebec, Canada (17 December 1994)

Public Land Management and the Public. Mule Mountain Observer (13 December 1979), p. 20.

Questions Concerning the Proposed Contract Between Cochise County and Animal Damage Control, for the Sierra Club Grand Canyon Chapter (1989)

Recommendations for including Sustainable Development into BECC Project Certification Criteria, presented to the Border Environment Cooperation Commission Public Meeting, Ciudad Juárez, Chihuahua (21 April 1995)

Recommendations for Incorporating Integrated Pest Management and Right-to-Know Provisions in the Structural Pest Control Commission Rules, presented to Association of Structural Pest Control Regulatory Officials 30th Annual Meeting, Scottsdale, Arizona (30 September 1991)

Recommendations Regarding NAFTA Draft Text on the Environment, letter faxed to Bill Pistor, United States Environmental Protection Agency (31 August 1993)

Recycling Solid Waste, KSUN, Bisbee, Arizona (4 October 1980)

Right to Know in Ideal and Practical Contexts, presented to Proyecto Fronterizo de Educación

Ambientale, Texas Center for Policy Studies and University of Arizonsa Udall Center, "Encuentro sobre Medio Ambiente Fronterizo/ Second Annual Meeting on the Border Environment," Tijuana, Baja California (22 April 1999)

The San Pedro: A River Doomed to Go Dry?, Sierra Vista Herald and Bisbee Daily Review/Sierra Vista Herald (30 December 1984), pp. 6A-7A.

Some Semantics on Growth and Development. (1979) Mule Mountain Observer 2(14):16

Statement on Rangeland Policies, for Citizens National Forest Coalition, released at the USDA/USDI-BLM/ CEQ Symposium on the Rangeland Policies for the Future, Tucson, Arizona (28-31 January 1979).

Structuring Environmental Protection into a U.S.-Mexico Free Trade Agreement, for Arizona Toxics Information and Border Ecology Project(27 March 1991)

Sue the Bastards, Mule Mountain Observer 2 (12) (28 December 1978), pp 13, 17, 21

Sustainable Development vs. Economic Growth: Environmental Protection as an Investment in the Future, before the International Trade Commission Hearing on Probable Economic Effect on U.S. Industries and Consumers of A Free Trade Agreement between the United States and Mexico, Scottsdale, Arizona (8 April 1991)

The Arizona Hazardous Waste Management Facility: Public Concerns, for the Sierra Club Grand Canyon Chapter, before the Commission on Arizona Environment Conference on "Hazardous Waste Management: The Basics, The Issues, and the Controversy," Rio Rico, Arizona (8 August 1990)

The Need for a Pollution Prevention Approach: NGO Statement on Toxics, co-authored with the NGO Working Group, submitted to the UN Commission on Sustainable Development, New York (16-20 May 1994)

The Spirit of Nepa 20 Years Later: Needs and Opportunities, for the Sierra Club Grand Canyon Chapter, presented to the National Environmental Health Association "Mid-year Conference," Phoenix, Arizona (17 January 1989)

Tijuana River Watershed Toxics Data Project Final Report, Selections, submitted in Partial Fulfillment of EPA Assistance # 824438-01-0, Bisbee, Arizona (30 October 1996)

Toxic Farming, *Arizona Daily Star* (26 September 1989)

Toxic Substances and Deregulation, Citizens National Forest Coalition Southwest/Southwest Alliance for Alternatives to Pesticides Newsletter (1 October 1981)

Toxic Wastes and Taxpayer Expense. *Mule Mountain Observer* (28 November 1980)

Transparency, Local Control and Binational Cooperation: Adding Conditions of Sustainability to The Proposed North American Free Trade Agreement, presented to the Foro de Impacto Ambiental y Tratado de Libre Comercio, Universidad de Guadalajara, Encuentro Nacional el Tratado de Libre Comercio y Las Universidades Mexicanas, *La Feria Internacional del Libro*, Guadalajara, Jalisco, México (29 November 1991)

Uranium Testing Still Up in the Air after Phoenix Pow-Wow, *Mule Mountain Observer* (14 November 1979)

Usefulness of Instituting a National Pollutant Release and Transfer Register, presented to the Organization for Economic Cooperation and Development "Workshop on National Pollutant Release and Transfer Registers, Brussels (24-26 January 1994)

What's In the Milk?, *Mule Mountain Observer* 2(13):12-13; rpnt. in *Canyon Echo* 15(1):5 as "Not So Man rvelous Milk".(1979)

What's in the Smoke? A Breather's Guides to Douglas Smelter Pollution, for the Cochise County Smelter Study Group, Bisbee, Arizona (February 1982)

Who Administers Federally-owned Land? *Mule Mountain Observer* 3(1)(10 January 1980): 18-19.

"Wise-use" Movement Triumphs with Arizona "Takings" Legislation, presented to ATI activist mail list (5 June 1992)

Zero Discharge, Anti-Degradation and Source Reduction: Replacing the Failed Assimilative Capacity Model with Effective Surface Water Quality Standards for the 21st Century and Beyond, resented to the US-EPA Office of Water "Third National Meeting, "Water Quality Standards for the 21st Century," Las Vegas, Nevada (31 August 3 September 1992)

Zero Discharge, Non-Degradation and Anti-Backsliding: The Essentials of Water Quality Regulation, presented to Arizona Section American Water Resources Association, "Symposium on National and Regional Initiatives: Impacts on Arizona's Water Quality;" Tucson, Arizona (28 October 1994)