

---

---

# THE PUEBLO SUPERFUND PROGRAM—A NATIVE AMERICAN PERSPECTIVE ON CULTURAL IMPACTS AND ENVIRONMENTAL EQUITY UNDER THE COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA)

*C.M. Sanchez, T.L. Garcia, E.F. Chavez, K. Tso, C.L. Francisco, A. Allison, and D. Tso, All Indian Pueblo Council/Pueblo Office of Environmental Protection, 3939 San Pedro NE, Suite B, Albuquerque, NM, 87110, Phone: 505-884-0480, FAX: 505-883-7641*

**ABSTRACT** The All Indian Pueblo Council (AIPC) through the Pueblo Office of Environmental Protection (POEP) implements and provides a variety of environmental programs and services to the 19 Indian Pueblos of New Mexico. Specifically, the POEP Superfund Program investigates and evaluates potential hazardous waste sites within Pueblo lands. The POEP Superfund Program began in September 1991 when the 19 Pueblo Governors signed a Superfund Memorandum of Agreement with the U.S. Environmental Protection Agency (EPA) Region VI. The goal of the POEP Superfund Program is to determine those sites that are eligible for Superfund-financed remedial action by placing those sites on the National Priorities List (NPL), while including the Pueblo perspective. Because the 19 Pueblos are each unique, sovereign nations, several differences and gaps associated with the current Superfund law and EPA methodologies exist. Currently, the Superfund Hazard Ranking System (HRS) model does not account for Indian religious and ceremonial impacts from these sites. Due to their importance in Pueblo life, culturally significant plants, animals, ceremonial surface water use, and sacred areas should be considered as critical impacts when evaluating the various pathways of exposure of the HRS. Tribal environmental equality is an aspect that will be included into all environmental laws. AIPC and POEP are working to address this issue under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA).

**KEYWORDS:** cultural significance, sovereignty, regulatory reform

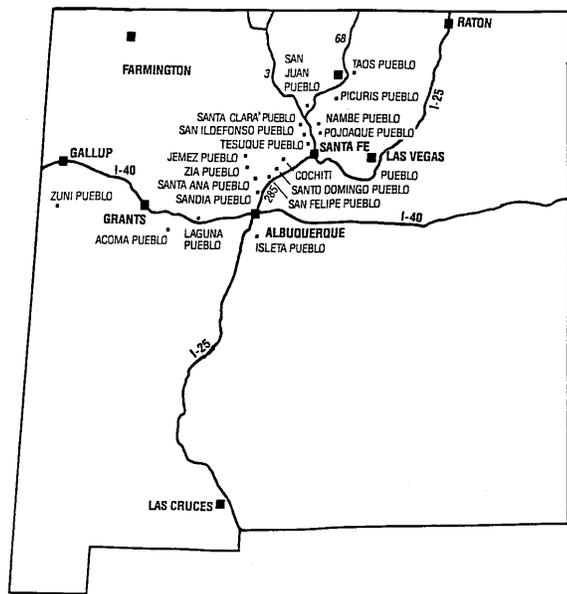
---

---

## HISTORY

The 19 Pueblo Tribes in New Mexico are comprised of the Pueblos of Acoma, Cochiti, Isleta, Jemez, Laguna, Nambe, Picuris, Pojoaque, Sandia, San Felipe, San Ildefonso, San Juan, Santa Ana, Santa Clara, Santo Domingo, Taos, Tesuque, Zia, and Zuni. The Governors of the member Pueblos form the governing body of the All Indian Pueblo Council (AIPC). Within a two million acre landbase, approximately 60,000 Pueblo members reside on the Pueblo reservations

with additional non-Indian populations. As a consortium of the 19 Pueblos, AIPC is empowered by and through each of the Pueblo Governors and Tribal Councils to assist the member Pueblos in a variety of legal, economic, political, social, and environmental goals and programs available to the individual member Tribes. Figure 1 shows the locations of the 19 Pueblos in New Mexico.



**FIGURE 1.** LOCATION OF 19 PUEBLOS IN NEW MEXICO.

The Pueblo Tribes today operate under a form of government that is both native and European, the European form of government having been introduced by the Spaniards in colonial times. Two forms of this Spanish Government structure exist. One form was introduced by Juan de Oñate in 1598. The other was created by royal decree in 1620. While each of the 19 Pueblos is autonomous, most of them are governed according to ancient tribal systems, and they also operate a coalition system of government under AIPC. This permits mutual counsel, and allows for the development of a degree of political power in Pueblo relations with the state and federal governments.

According to oral history, AIPC existed before European contact to counteract the nomadic raiding tribes. Scholars, as well as tribal historians, disagree on the exact date of the arrival of the nomadic Apaches and Navajos from Athabaskan lands in the north

(Canada). Some place the date at A.D. 1400 and others cite A.D. 1525.

In 1598, when Juan de Oñate arrived in Pueblo country, he met with 38 Pueblo Leaders at Santo Domingo Pueblo. Thus, the date of 1598 appears on the logo of AIPC to indicate that this date is inscribed in writing by the Spaniards and is considered the recorded date of origin of the Council. Following institution of the Spanish form of government among the Pueblos, each Governor received a silver-crowned cane of office. Just as the blindfolded woman holding a balancing scale represents American justice, the canes given to the Pueblo Governors are symbols of justice and leadership. A Christian cross is engraved on the head of the cane, indicating that the cane had the blessing of the Catholic Church and its owner had the support of the Spanish Crown. When Mexico won independence from Spain, sovereignty was established by the new government, and new canes, silver-crowned, were presented to the Pueblos. They were again authorized to function in line with previous custom. Today, these Mexican canes are held by the Pueblo Lieutenant Governors.

The third cane presented to each Pueblo is the Abraham Lincoln cane. It was given to each Pueblo Governor in recognition of his authority under the United States Government. Inscribed on each cane is the name of the Pueblo, the year 1863, and the signature of the President, "A. Lincoln." These canes were symbols of the new sovereignty, extending continued authority for the Pueblo form of government. A fourth cane was presented to each Pueblo Governor by New Mexico State Governor Bruce King during his second term in 1980. This cane was presented in order to reaffirm the sovereignty of the Pueblo governments. And in September 1987, King Juan Carlos of

Spain, while visiting New Mexico, gave a second Spanish cane to the Governors. Now each Governor has four canes. Thus for more than three centuries there has been continued recognition of Native American government, the most enduring local government in America. Now each Pueblo possesses five canes all of which symbolize the sovereignty of the Pueblo governments. Four of the canes are held by the Governor and one is held by the Lt. Governor.

The canes are symbols to the Pueblo people that all power and authority exist in their own form of government and that their government is responsible to the people. At the same time, the canes are also symbols of the United States Government's responsibilities for and trusteeship of the Pueblos.

On October 16, 1965, AIPC adopted a constitution and bylaws. This action brought the ancient traditional group into the structure of modern governmental bodies under a Western format. The two systems, ancient and modern, began an attempt to develop cooperation among the two worlds with the objective of encouraging economic progress, education, and unification of the Pueblos on such issues as water rights, land rights, and preservation of Indian cultural values.

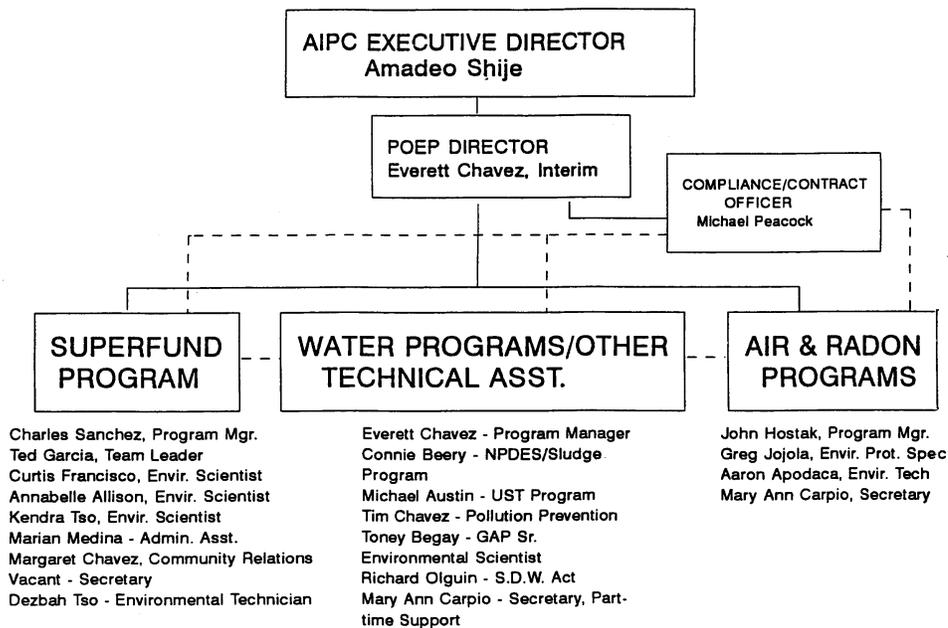
In 1985, representatives of the Navajo Nation and the Shoshone Tribe, frustrated at the EPA's failure to pursue aggressively meaningful changes in federal environmental laws as they applied to Indian reservations, began working on a new concept. The concept stated that Tribal governments should have the same standing and authority that state governments enjoy under federal environmental regulatory laws. The premises of this approach were simple: 1) Tribes had the inherent authority, but not the resources,

to regulate effectively; 2) states had the resources but not the authority; and 3) the EPA had the authority and the resources, but lacked the will to enforce federal environmental laws on the reservations. The EPA issued its Indian policy the previous year, and emerging case law supported tribal regulatory authority over environmental quality matters. Tribal representatives pressed their case in Congress and, within two years, had succeeded. The Safe Drinking Water Act, the Clean Water Act, and CERCLA all were amended to authorize the EPA to treat Tribes as states for the purposes of grant and contract assistance, regulatory program development, and permitting and enforcement [1].

The newest office of AIPC, the Pueblo Office of Environmental Protection (POEP) was created in September 1991 through a Superfund Memorandum of Agreement signed by the 19 Pueblo Governors with the U.S. EPA Region VI. In March 1992, AIPC passed a resolution urging POEP to create other environmental programs in areas other than hazardous waste site assessment. Figure 2 shows the current POEP organizational chart and the various environmental programs. The individual Pueblos have also created or are in the process of creating their own environmental programs. AIPC and POEP will assist and encourage this effort of self-determination. It is important to note that the development and implementation of structured environmental programs within each of the Pueblos is relatively new, particularly when comparing them to programs that have been in existence for over two decades like the New Mexico Environment Department and EPA.

## **INTRODUCTION**

On July 10, 1991, at a meeting duly called in accordance with applicable Tribal and AIPC



**FIGURE 2.** POEP ORGANIZATIONAL CHART.

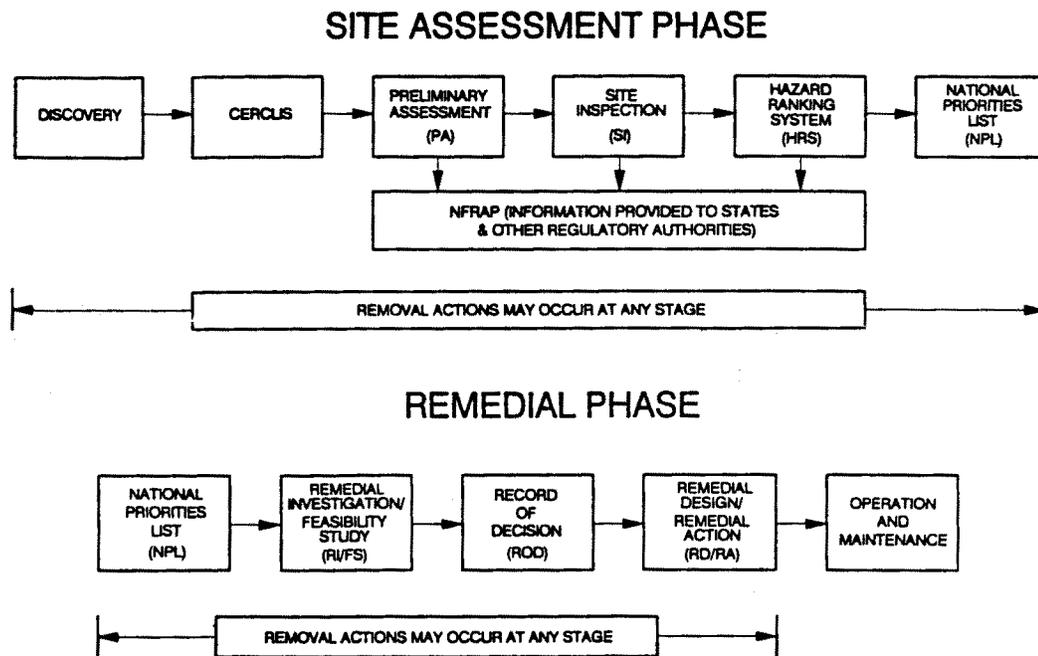
procedural requirements, AIPC approved and ratified resolution No. 1991-06, establishing POEP to facilitate the member Pueblos' collective environmental protection interests. By virtue of the ratification of Resolution No. 1991-06, and delegation of authority to POEP, POEP has been identified as the "lead" Tribal agency to represent the collective will of the member Pueblos for the purposes of the Superfund Memorandum of Agreement, pursuant to CERCLA [2].

Superfund is one of the nation's most ambitious and complex environmental programs. In 1980, CERCLA was passed in order to protect human health and the environment from the dangers posed by abandoned or uncontrolled hazardous waste sites. The EPA is the Federal entity in place to manage the Superfund Program, but Tribes retain broad sovereignty to regulate activities, including environmental laws, within their jurisdiction. In October 1986, the Superfund Amendments and

Reauthorization Act (SARA) was enacted. SARA reflected EPA's need to make several important changes to the Superfund law. However, the current Superfund law needs to be amended to include the many unique circumstances and the ways-of-life on all Native American reservations in the United States including the Pueblo reservations. The 19 Indian Pueblos of New Mexico are among the most traditional in their cultural practices and beliefs. Pueblo waters, lands, and other resources are a very important part of Pueblo culture. As such, they must be preserved.

The EPA Superfund Program is structured into two major phases, the Site Assessment Phase and the Remedial Phase. The flow chart for each of these phases is shown in Figure 3.

The POEP Superfund program is currently in the Site Assessment Phase of the Superfund process. To date, approximately 50 Preliminary Assessment (PA) reports have



**FIGURE 3.** FLOW CHART FOR THE TWO MAJOR PHASES OF THE EPA SUPERFUND PROGRAM.

been completed while approximately 15 sites have progressed to the next level of the assessment process and have been or are being sampled at the Site Inspection (SI) stage. In Fiscal Year 1993, the POEP Superfund Program assisted Isleta Pueblo with the first Indian-Lead Removal Action under CERCLA in the United States. The Wall Colmonoy Facility, a metal plating facility, located on Isleta Pueblo lands, contained chromium and nickel soil contamination areas adjacent to the facility. The Pueblo of Isleta negotiated with the responsible party cleanup standards for total chromium as 100 parts per million (ppm), total nickel as 200 ppm, and 10 ppm for hexavalent chromium. These levels were well below the recommended cleanup levels offered by the responsible party and those of other sites throughout the country that experienced similar type of contamination. This is a perfect example of the Pueblo's sovereign right to protect its land through

determination of stringent cleanup requirements.

As the POEP Superfund Program progresses through the Superfund process, we have recognized several injustices in the Superfund process and methodologies. General discussion of these injustices is included in the next section. Only the Tribal governments in this country can equitably determine the method for administering environmental regulations and programs on Indian lands. The EPA Indian Policy states that EPA will recognize Tribal Governments as the primary parties for setting standards, making environmental policy decisions, and managing programs affecting Indian reservations, their environments, and the health and welfare of the reservation populace [3]. The thrust of the EPA Indian Policy is to encourage Tribal self-determination and work on a "government-to-government" relationship. Therefore, it is the Pueblo's responsibility to assure that

Tribal concerns and interests are considered whenever EPA's actions and/or decisions affect Tribal environments. As a component of the AIPC consortium, POEP will incorporate the Pueblo needs and wants when applying the Superfund program. AIPC and POEP also recognize a need to overcome personal, religious, political, regulatory, and jurisdictional obstacles to establish "good neighbor" policies to address environmental issues together.

## **ENVIRONMENTAL JUSTICE ISSUES SPECIFIC TO THE SUPERFUND LAW**

CERCLA differs from the Clean Water Act, the Clean Air Act, and the Safe Drinking Water Act in the way it defines the tribal role. CERCLA currently calls for "substantially the same treatment as a state" for certain purposes. There are several provisions that specifically address tribes. An in-depth legal analysis and interpretation of these provisions is not included as part of this paper. It is, however, a general overview of the law and technical analysis of the Superfund process as it relates to Indian issues.

Foremost, the tribes should be treated as tribes, meaning in general, that they are to be treated as equivalent to states, at the same time taking into consideration their unique status as sovereign nations, their unique cultures, their current environmental protection capacity, and their special relationship to the federal government [4]. The CERCLA response on Indian lands needs more attention as far as the Federal government's responsibility. All components of the federal government have a trust responsibility and, therefore, may have some degree of responsibility to provide adequate resources, technical and financial, for

assessments and removals/remediations on Indian Lands.

In the Superfund process, the primary objective of the site assessment phase is to obtain the data necessary to identify the highest priority sites posing threats to human health and the environment [5]. By EPA standards and methodologies, there is a ranking system requiring hazardous substances to be at certain concentrations while impacting various targets before a site will qualify for the National Priorities List (NPL). The NPL, as defined by EPA, is the list of releases and potential releases of hazardous substances, pollutants, and contaminants that appear to pose the greatest threat to public health, welfare, and the environment [5]. The determination of a priority and sites that pose the greatest threat to a Pueblo community differs from that of EPA. A site impacting a Pueblo community's health, welfare, environment, and, more importantly, their very culture should be ranked according to individual Tribal risks and given a higher priority.

The Hazard Ranking System (HRS) is a mathematical scoring system used by EPA to assess relative risk posed by sites to determine whether a site is eligible for placement on the NPL. An HRS score for a site is determined by evaluating four pathways: ground water migration, surface water migration, soil exposure, and air migration. The scoring system for each pathway is based on a number of individual factors grouped into three factor categories: likelihood of release, waste characteristics, and targets. Combining the four pathways of exposure with the three factor categories develops a site score which ranges from 0 to 100. Any site scoring 28.50 or greater is eligible for placement on the NPL [6]. In many cases, the NPL may be the only alternative to addressing an environmental

threat on Pueblo land. The deficiency of the HRS is the fact that Tribal risks and interests are not included in the mathematical model. For example, cultural impacts, be they water, plants, or culturally-historic sites, have direct links to Pueblo traditions and ceremonies. This is a substantial area of environmental protection in Pueblo country because it is the protection of Pueblo culture.

The current Superfund process is very lengthy and confusing to the Pueblo communities. EPA has recently developed the Superfund Accelerated Cleanup Model (SACM) which is a new approach to speeding up the process. During the development of this process, it is important that Tribes and Tribal needs are taken into consideration. Currently, the POEP Superfund Program is implementing an accelerated site assessment phase where the PA and SI requirements are combined into one effort. This eliminates the time it takes for a two-step approach and waiting for an EPA decision on a particular report. This also assists POEP with accomplishing the majority of the site assessment phase under one Pueblo Governor and administration for continuity purposes. The majority of the Pueblos change leadership on a yearly basis thus requiring continual community outreach, training, and education. It is also important to note that all reports developed by POEP must be approved by the respective Pueblo Governor prior to submittal to EPA. The POEP Superfund Program is also formatting all reports so that they are reader-friendly, incorporate cultural impacts, and allow for the respective Pueblo's comments and perspective.

Because of the complexity of the Superfund law, it would be beneficial for those Pueblo communities at the Site Assessment phase to be eligible for Technical Assistance Grants

(TAG) early in the process. This is due to the need for Tribal participation and communication strategies so that Tribes can adequately participate in the program. Additionally, better outreach efforts for education and training on the Superfund Program are needed. The POEP Superfund Program is currently incorporating more Community Relations efforts as we recognize the need for early Pueblo involvement.

When the Superfund law was established, each State, not including Indian tribes, was allowed to designate one site as a priority to the NPL regardless of its HRS score. Because there are approximately 500 Tribes in the United States, it would not be economically feasible for each Tribe to list a site on the NPL. However, there are several sites within just the 19 New Mexico Pueblos which deserve an equal opportunity to address environmental threats at particular sites the POEP Superfund program is currently evaluating. Those sites that do not qualify for the NPL are designated as No Further Remedial Action Planned (NFRAP) and deferred to other regulatory authorities. In the case of Pueblo environmental programs, there are no alternative programs such as the Resource Conservation and Recovery Act (RCRA) to address the site. RCRA does not expressly authorize treatment of Tribes as States. Again, this reinforces the fact that the Superfund Program may be the only alternative for a particular Pueblo to address a site.

The area of Emergency Response under SARA Title III is another area of improvement needed for the 19 Pueblos. Several interstates, highways, railways, and airways cross through Pueblo lands. Shipments of both hazardous and radioactive materials occur on a daily basis. There is a need to improve tribal response capacity

through increased resources, education, ongoing training, and coordination with local planning communities [4]. The POEP Superfund Program is planning to expand in this area while allowing the Pueblos to provide input and request assistance for Emergency Response planning. Those Federal, State, private, and local entities that are equipped and properly trained should be able to respond to an emergency response incident without having to worry about jurisdiction. This will lead to developing cooperative agreements with those entities while providing training and planning with the proper Pueblo personnel.

With regard to the Remedial Phase of the Superfund process, the Pueblo Superfund Program has yet to enter into this area. However, it is imperative to address issues in this phase that impact Indian country. Stringent cleanup standards are vital to land-based tribal populations. These stringent cleanup standards are necessary given the Pueblo cultural reliance on the land. Tribes should have the authority to set and enforce Tribal Applicable or Relevant and Appropriate Requirements (ARARs). ARARs are defined as any standard, requirement, criterion, or limitation under any Federal or State environmental law that establishes cleanup goals, selecting the remedy, and determining how to implement the remedy while assuring protection of human health and the environment [7]. The POEP Superfund program is planning to assist the Pueblos in developing ARARs in the future. In the event that an NPL site is located on Pueblo land, the remedy selection should reflect the cultural differences of land-based Pueblo populations.

Although tribal participation in CERCLA response activities is well defined by statute and regulation, the extent which a tribe may be liable under CERCLA is not [8]. In

general, the statute needs to clarify tribal liability. Based on the Federal Government's trust responsibility, the Bureau of Indian Affairs, the Indian Health Service, or other Federal entities should be involved and held responsible for contamination created by facilities or actions they approved or developed.

Risk assessment studies should reflect differences based on cultural practices, cumulative effects, and background exposure. This is a sensitive area as the Pueblos have the sovereign right to protect their traditional practices, religion, and culture. The Pueblo Indians use their resources in a culturally significant manner vastly different than how others may use resources. Therefore, they may be exposed to contamination in ways other than is currently evaluated. Perhaps research in this area, with permission of a particular Pueblo, could further identify these areas.

Natural resource damage assessments should also include cultural resources under the definition of natural resources or create a new definition for cultural resources and the authority to bring claims for the loss of those resources. Tribes should also have the authority to conduct their own natural and cultural resource damage assessments [4].

Because the Pueblo Superfund program is still in the assessment phase of the process, we are discussing several issues with other Tribal consortiums and/or Tribes that currently have Superfund programs. This will allow us to share information, ideas, and experiences so that all Tribes have an equal opportunity to adequately implement the Superfund program.

## **PUEBLO SUPERFUND ACTIONS TO IMPROVE TRIBAL ENVIRONMENTAL INTERESTS**

The POEP Superfund Program has performed 47 PA reports, and 22 have been classified as NFRAP. The remaining 25 sites have continued in the Superfund process requiring sampling for an SI report in order to determine if there are any releases of hazardous substances. Several sites have been sampled and SI reports are in the process of completion. Through these past four years of site assessment work, the POEP Superfund Program and the Pueblos have learned of many improvements and changes that need to occur. These improvements and changes are needed to properly evaluate and address the Pueblo Indian community interests.

Foremost, the POEP Superfund Program works for the 19 Federally-recognized Pueblo Tribes of New Mexico. The POEP Superfund Program recognizes that each individual Pueblo maintains its inherent authority to implement and enforce environmental regulatory laws within their respective reservations. As a consortium, AIPC is not an official government but has been delegated the authority to implement the Superfund Program through POEP by the 19 Pueblo Governors. The Pueblo Superfund program consortium has been beneficial. Through this approach, all 19 member-tribes have access to technical expertise and services and are assured an active role in environmental decision-making as their governmental leaders desire. Furthermore, the POEP Superfund Program can provide a positive impact with limited resources, promote environmental justice for all 19 Pueblos, and help develop and strengthen individual Pueblo environmental programs. While EPA Region VI encourages the consortium approach for the Superfund

Program, it is clear that individual tribes may interact directly with EPA outside of the consortium. Of the nine current staff of the POEP Superfund Program, five are Pueblo members, three are from the Navajo Nation, and one is Hispanic, thus making us culturally diverse and sensitive to the Indian interests and beliefs. The POEP Superfund Program performs all work in-house without the need to contract out any technical or environmental services. Within the entire POEP organization with a current staff of 20, 80% are either Pueblo members or of other Native American descent.

The POEP Superfund Program incorporates cultural impacts as part of its investigations in the site assessment phase. All technical reports include an evaluation of areas of cultural significance to the respective Pueblo that may be impacted from a particular site. The program also includes comments and obtains approval from the respective Pueblo for submittal of reports to EPA. The program is also instituting an accelerated site assessment at two sites this fiscal year in the effort to speed up the Superfund process.

As sites on Pueblo lands progress in the Superfund process, the program is intent on incorporating impacts to culturally significant areas in the ranking process to assure that Pueblo human health, environment, and culture are protected. For those sites that have dropped out of the Superfund process, the program will assist the individual Pueblos in identifying other regulatory programs, funding, and/or agencies that can assist in addressing an environmental threat.

The program plans to expand its efforts in the future to better address Emergency Response Planning for the 19 Pueblos, ARAR development, and community relations efforts. Through this expansion, the

program constantly seeks from all 19 Pueblos recommendations as to how the AIPC/POEP Superfund Program can better implement this program for their benefit. The POEP Superfund Program also actively communicates with other Tribes and/or Tribal consortia to share ideas on how the Superfund program can improve to better address Tribal interests. Both technical and regulatory reform will need to occur to make Tribal issues gain the necessary attention.

## **CONCLUSION**

The Pueblo Office of Environmental Protection continues to be the initiator in environmental matters as they relate to Pueblo Country. In doing so, POEP is continually pursuing changes and improvements to environmental laws and statutes that are constantly being identified. The POEP Superfund program has provided several key areas where Pueblo Tribes, with the assistance of POEP, can begin instituting change and improvement. These areas are primarily related to the resources that are culturally significant to the preservation of the Pueblo way of life. Surface water, springs, wetlands, shrines, petroglyphs, and so on, are all areas to be considered critically important when preservation of an environment and its people are pursued. This pursuit to have EPA recognize Tribal concerns is neither new nor isolated. These concerns have recently incorporated into environmental legislation, specifically in the establishment of Water Quality Standards with several of New Mexico's Pueblos. Cultural uses are a significant consideration when identifying designated uses for any given surface water body located on or near Pueblo reservations.

The reality of this effort is the fact that we as Tribal support agencies must continue to play a proactive role in bringing these issues

to the forefront. More importantly, the Tribes must acknowledge the need for these changes and improvements in legislation that may affect the very preservation of their culture. As a federally-funded consortium, POEP is restricted from engaging in any form of lobbying to modify federal laws. Therefore the role of POEP is to provide the necessary tools and information for Tribes to undertake the immense task of changing the views of a desensitized United States Congress. This may be viewed as a long, drawn-out battle but Tribes in general have long been in similar battles when faced with an uncertain outcome.

The issues surrounding Tribal environmental protection are increasingly centered around inequities that exist within the federal environmental regulatory framework. The task of bringing to light these concerns may at times be overwhelming. What are the alternatives? Should Tribes be more accepting of the development of laws and regulations at face value? Should Tribes take a passive approach to addressing their environmental concerns? Tribes must take steps toward re-affirming the government-to-government relationship, the trust responsibilities of the federal government, the Tribes' sovereign right to protect natural resources they deem significant, and to maintain their way of life as Pueblo People of this country.

## **REFERENCES**

1. S. Gover and P.C. Williams, Survey of Tribal Actions to Protect Water Quality and the Implementation of the Clean Water Act, National Indian Policy Center, The George Washington University, Washington, DC, 1995.
2. Superfund Memorandum of Agreement between the All Indian Pueblo Council

in Behalf of the 19 Indian Pueblos of New Mexico and the U.S. Environmental Protection Agency Region VI, AIPC Resolution No. 91-06, July 10, 1991.

3. EPA Policy for the Administration of Environmental Programs on Indian Reservations, November 8, 1984.
4. C.B. Isaac, Community Report on the Albuquerque Environmental Justice and Superfund Summit, San José Community Awareness Council, Inc., August 1995.
5. U.S. Environmental Protection Agency, Guidance for Performing Preliminary Assessments Under CERCLA, EPA/540/G-91/013, September 1991.
6. U.S. Environmental Protection Agency, Hazard Ranking System Guidance Manual, EPA/540-R-92-026, November 1992.
7. U.S. Environmental Protection Agency, ARARs explained in Twelve Pages, Memorandum, Tom Sheekells, Acting Director-Office of Program Management, July 29, 1992.
8. D.F. Coursen, Tribes as States: Indian Tribal Authority to Regulate and Enforce Federal Environmental Laws and Regulations, Environmental Law Reporter, September 1993.