

DON'T BE FOOLED 2005



America's Ten Worst Greenwashers

The Green Life

APRIL 2004

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Don't Be Fooled is a project of The Green Life's Greenwash Campaign to explain, expose and eliminate greenwash in labeling, advertising and public relations.

The Green Life helps the growing number of environmentally aware, health conscious Americans make informed lifestyle decisions. Through education, outreach and advocacy, we support a demand-driven movement toward sustainable consumption, while guarding against supply-side greenwash.

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INTRODUCTION

“The ads are back,” announced Green Business Network founder Joel Makower in August 2004. He referred to the recent rise in frequency of corporate environmental image advertisements. Aimed at values-based consumers, socially responsible investors and public policy makers, the ads number as many as a half-dozen per issue in *National Geographic*, *The Economist*, *Atlantic Monthly* and other opinion-leading magazines. With lesser but likewise increasing visibility, the marketing blitz has advanced into newspaper and television markets nationwide. Not since the early 1990s—when the green consumerism emerged, and delegates to the United Nations Rio Earth Summit debated ratifying international environmental regulations—have companies so aggressively asserted their green credentials.

In this report we run a background check, investigating whether those credentials should be accepted. On the contrary, we find, they should in most cases be revoked, for rarely do they convey a company’s true identity.

An automaker that produces dozens of models of gas-guzzling SUVs opts to market its lone hybrid as proof of far-reaching environmental responsibility. An energy company uses solar to symbolize its commitment to a post-carbon future, even as all but a sliver of its operations are stuck in oil. And a chemical company touts its donation to a conservation group, made only to silence grassroots gripes about toxic pollution.

Dealing in lies of omission, image ads belong to a business strategy known as greenwash, defined by the Oxford English Dictionary as “disinformation disseminated by an organization so as to present an environmentally responsible public image.”

In addition to image ads, greenwash encompasses misleading product labels such as “all natural,” “biodegradable” and other vague descriptions used entirely at the discretion of the manufacturer, as well as improper appli-

cations of terms, for example, “organic” and “free range,” which are meaningful regarding certain products but unreliable with others.

Greenwash also covers a range of public relations tactics: front groups feigning public support for hidden anti-environmental agendas; scientists-for-hire who vouch for industry-funded research; sustainability reports offering partial disclosure and spotty transparency; hollow mission statements and codes of conduct; contributions to innocuous nonprofits; community advisory panels that have access without influence; and sponsorship of Earth Day events, where local industry plays host to the people it poisons.

The incentive for greenwash is obvious. Paraphrasing a Chevron executive who saw sales spike 10 percent during the company’s eco-friendly *People Do* marketing campaign, greenwash in all its forms serves a single purpose: “it pays.”

The *Environmental Business Journal* and *Nutrition Business Journal* report that the market for green goods and services in 2003 was \$440 billion, or 4.3 percent of the U.S. economy, and is expanding twice as fast as GDP. Even companies without a share of the “Healthy Products, Healthy Planet” sector can profit from values-based consumers by building a reputation as goodly purveyors of necessary evils, like gasoline and computers.

Socially responsible investments, now totaling \$2.16 trillion, grew 40 percent faster than all professionally managed investments between 1995 and 2003, according to the Social Investment Forum. The *2004 Cone Corporate Citizenship Study* found that 70 percent of Americans view a company’s commitment to social issues as an important factor in their investment decisions.

Since the early 1990s, U.S. companies, both individually and collectively, have launched more than 200 voluntary environmental programs. In the public policy sphere, companies tout the merits of such programs

to render cost-inducing regulations, from local ballot initiatives to federal legislation, superfluous.

Given the growth of the “Healthy Products,” “Healthy Planet” sector and of socially responsible investing, along with the popularity of voluntary environmental programs, one might surmise that the concurrent rise of greenwash correlates directly with positive trends. Perhaps, as Gaylord Nelson, former Senator and founder of Earth Day, once said, “If corporations are moving to be green, that’s just fine.... [T]hey’ll just help spread environmental propaganda.”

But in fact, greenwash has a stifling effect. In the lexicon of classical economics, it creates market distortions. Unless consumers have perfect information about products—not excluding their environmental costs—the market will not reflect their true preferences. Endowed with bigger marketing and public relations budgets, greenwashers shut the door on genuinely green business struggling to get a foothold in the marketplace. A few, notably organic food producers, have broken through, yet most, among them green-building contractors, renewable energy providers and organic apparel retailers, remain on the outside, obscured from potential customers.

By the same token, greenwash makes companies with strong financial performance but weak environmental performance more palatable to socially responsible mutual funds, some of which, as Paul Hawken pointed out in a recent report, take a facile approach to picking stocks. A poll by *Investor Relations Magazine* found that image ads have persuaded 42 percent of portfolio managers to consider investing in a company. Absent image ads, managers would be forced to dig deeper for companies that do well by doing good.

Bolstered by niche marketing inside the Beltway, voluntarism over the past decade has gained considerable political currency. However, after a trial period, it is apparent that self-regulation is no substitute for government mandates. Researchers studying voluntary environmental programs such as

the chemical industry’s *Responsible Care* and the logging industry’s *Sustainable Forestry Initiative* have concluded that without concrete standards, independent oversight or the threat of enforcement, companies are not compelled to clean up their practices.

Thus greenwash is not part and parcel of environmental propaganda, boosting awareness of environmental problems in spite of its source. Instead, greenwash is itself an environmental problem, one that will persist, and likely worsen, until it no longer pays.

To flip the economic calculus of greenwash, so that its costs outweigh its benefits, consumers can refuse to buy from companies that they discover are out to fool them—whether through in-depth research or merely by turning the page from the image ads to the news. The same goes for investors, who should understand that companies are not always as they appear on paper. And policy makers must weigh the results of voluntarism more heavily than they do the guarantees of companies to go green of their own accord.

Together, consumers, investors and policy makers can demonstrate the power of accurate environmental information.

NOTES ON METHODOLOGY

As its title implies, this report does not account for all greenwashers, only the worst. The companies profiled herein were selected due to the discrepancies between their environmental rhetoric and the reality of their environmental performance. By these criteria, some environmental laggards did not make the list because, for lack of interest or fear of backlash, they do not bother with greenwash. On the other side of the coin, some leaders were chosen because, though in reality their environmental performance far outpaced that of their competitors, their rhetoric was still more extreme.

To each greenwasher we recommend steps to reconcile rhetoric with reality. The recommendations do not in general represent bold environmental reform, but are typically modest measures designed to convey a company’s true identity.



EXECUTIVE SUMMARY

Greenwash fools progressive consumers into supporting the economy's unsustainable status quo; lures investors who link positive environmental performance with profitable financial performance; and misleads policy makers charged with designing and enforcing environmental regulations.

America's Ten Worst Greenwashers are:

1. FORD MOTOR COMPANY Greenwashing the Blue Oval

The Greening of the Blue Oval presents the Escape Hybrid and the River Rouge factory as symbols of Ford's sweeping environmental commitment.

However, set against Ford's entity-level operations, these two technologies illustrate that the company's colors are changing merely at the margins. In 2004, for the fifth consecutive year and 20th time in the past 30 years, Ford had the worst fleetwide fuel economy of all major automakers. Hybrids account for approximately one-half of one percent of Ford's annual sales, or roughly one-quarter the number of F-150s made each month beneath the vegetation-covered roof at River Rouge. Ford plans to steadily expand its lineup of hybrids, yet their impact on the company's fuel economy will be counteracted by new models of non-hybrid SUVs, such as the Volvo XC90 and Jaguar Z-Type, coming in 2007.

Likewise, Ford's leaked plans for a voluntary fuel-economy target decades down the road lacks credibility as the company currently allocates part of its \$8 million annual lobbying budget to opposing both state and federal mandates to reduce carbon dioxide emissions.

As long as hybrids are hardly a sliver of Ford fleet and its green factory produces pickup trucks with worst-in-class fuel economy, Ford should cease marketing the Escape Hybrid and River Rouge as environmental emblems.

2. BP

Third Party's the Charm

BP on the street sparks a conversation between BP and everyday Americans about issues related to energy and the environment.

But the dialogue is disingenuous. By employing the manipulative third-party technique, the campaign artificially aligns BP with the public's vision of an ideal energy company: one that is progressing "beyond petroleum" to realize the promise of renewables. Oil still comprises the majority of BP's reserves, while its solar subsidiary, the world's largest photovoltaic producer when BP acquired it in 1999, was eclipsed by three competitors within four years. Even as solar panels sold by BP in 2003 are expected to save 0.5 million tons of carbon dioxide emissions over their lifetime, the company's fossil-fuel products emitted 1,298 million tons of carbon dioxide in 2003 alone.

Looking ahead, BP pledges a "precautionary approach" to global warming based on stabilizing atmospheric carbon concentration between 500 to 550 part per million (ppm). Yet that range exceeds the 400 ppm threshold above which the International Climate Change Taskforce believes "the risks to human societies and ecosystems grow significantly."

Debate about the energy industry and the environment is confused enough without BP conflating corporate and public voices. BP should cease implementing the third-party technique in its marketing.

3. U.S. FOREST SERVICE Forests With Flacks

Forests With A Future aims to convince the public that the Forest Service's revision to the Sierra Nevada Framework is a necessary and cost-effective measure to avoid catastrophic wildfires.

The agency's argument was compromised when it was revealed in the press to be crafted

by a private public relations firm. Along with paid pundits and video news releases, *Forests With A Future* is part of America's mounting problem with government propaganda. In 2004, the federal government spent \$88 million on contracts with PR firms, up from \$39 million in 2000. For \$113,000, One-World Communications invented the name of *Forests With A Future* while helping the Forest Service to develop videos, a brochure and other materials. All of the materials disregard key facts about the new Framework, for example, that it will replace a Clinton-era version finalized after ten years of scientific study and public input, and that annual timber removal will increase from 111 million board feet to 330 million board feet.

In explaining complex Forest Service policy to the public, the agency's bureaucracy should not be bypassed, but abided as a function of democratic government. The Forest Service, like all government agencies, should be transparent about its taxpayer-funded contracts with PR firms, and should eschew them entirely in cases as sensitive as that of the Sierra Nevada Framework.

4. GENERAL MOTORS All Aboard the Missed Bus

A trio of green-themed advertisements depict GM's "next generation" of hybrid and hydrogen vehicles.

Vehicle for vehicle, GM today is the auto-industry's worst emitter of smog-forming pollutants, and ranks only ahead of Ford in producing heat-trapping emissions. Judging from their maturation to date, the vehicles of the future are either too disappointing or too distant to distinguish themselves from their predecessors: *Hybrid Power to the People* features gas-electric pickup truck models—of which GM will produce just 2,500 in 2005—offering a modest 10 percent mileage improvement on their conventional counterparts; similarly, the hybrid transit buses of *All Aboard the Magic Bus* boost fuel efficiency over non-hybrid models by just 10-20 percent, far short of the advertised 60 percent

upgrade that a GM executive acknowledged was overstated; and *Who's Driving the Hydrogen Economy?* suggests that children today will drive "cleaner cars," though hydrogen still may be yielded by fossil fuels decades from now. The trio is backed by GM's \$3 billion advertising budget, the largest in the U.S.

GM should ensure the accuracy of its environmental claims by stating only what it knows to be true. That criterion affects its focus on hydrogen, which should be reduced to avoid creating unrealistic expectations.

5. CHEVRONTEXACO A Limited Partner

Based around the slogan "Turning partnership into energy," ChevronTexaco's marketing campaign describes the company's environmentally responsible relationships with foreign governments, local transit agencies and fellow fossil-fuel producers.

Under a watered-down definition of partnership, the campaign includes only those cases in which ChevronTexaco gets its way due to government and industry backing: *Monitoring Emissions* tells of the company's donation of emissions-monitoring technology to the American Petroleum Institute, a forum not of "competition," but of collusion to avoid regulation of greenhouse-gas emissions; the bill for the \$3 million hydrogen fuel station shown in *Hydrogen Economy* was split in half between ChevronTexaco and taxpayers— with the company's share likely amounting to less than the cost of *Hydrogen Economy's* publishing run; and on both the import and export ends of ChevronTexaco's distribution of Australian gas to American markets, as outlined in *Meeting Natural Gas Demand*, the company's approval to operate in sensitive ecosystems resulted from basic regulatory process, not enlightened partnership.

Unless a case can be found in which it makes even a small sacrifice for a partner's sake, ChevronTexaco should abandon the current focus of its campaign.



6. NUCLEAR ENERGY INSTITUTE Truth Gone Fission

Nuclear. The Clean Air Energy frames nuclear as the answer to America's needs for both domestic security and sustainability.

In so doing, it repeats several of the same environmental claims for which the NEI's previous ad campaigns have been officially denounced as deceptive. Ignoring the censure of the Federal Trade Commission and the National Advertising Division of the Council for Better Business Bureaus, the NEI continues to call nuclear energy "clean" and "emissions-free." In fact, because fossils fuels are typically required to run the mining and processing operations that transform uranium into fuel rods, nuclear energy over its lifecycle contributes 39.1 grams of greenhouse gas emissions per kilowatt hour. Nuclear energy also produces waste heat, small amounts of smog-forming pollutants and, of course, radioactivity.

Tolerated only by a loophole in truth-in-advertising law that differentiates opinion leaders from consumers, the NEI's claims to cleanliness should be dropped.

7. ALLIANCE OF AUTOMOBILE MANUFACTURERS An Emission by Any Other Name

Ultra-Clean Autos informs Beltway decision makers of the dramatic reduction in vehicle emissions achieved by automakers since the 1970s.

Through the integrated marketing and public relations campaign, the AAM both exaggerates the auto industry's solution to smog-forming emissions and conceals its worsening problem with heat-trapping emissions. *Ultra-Clean Autos* labels today's vehicles "virtually emission-free" though it will not be until 2009 that all new cars and trucks comply with the Environmental Protection Agency's Tier 2 regulations on smog-forming emissions.

Meanwhile, carbon dioxide emissions from U.S. autos are growing each year as automakers have failed to raise fleetwide fuel

economy from its level 20 years ago. In 2005, American cars and trucks will emit 1.3 billion tons of carbon dioxide. Since its founding in 1999, the AAM has spent close to \$35 million lobbying on behalf of its members against the Climate Stewardship Act, provisions to increase CAFE standards and other federal policies. At the state level, the AAM is currently suing to prevent California from mandating a 30 percent reduction by 2016 in greenhouse gas emissions from new vehicles sold in the state.

The AAM should stop declaring that vehicles made today are "virtually emission-free," since even by maintaining ambiguity between smog-forming and heat-trapping emissions, the claim is unfounded.

8. TRUGREEN CHEMLAWN Conifer of Confusion

Funded and directed by TruGreen ChemLawn, *Project EverGreen* teaches consumers about the environmental benefits of well-maintained landscapes.

At the same time, through lies of omission, the awareness campaign hides the environment costs of chemically-dependent lawn care. Along with other members of the self-styled Green Industry, TruGreen ChemLawn has fostered an American obsession with 'the perfect lawn.' Each year, more than 70 million pounds of pesticides are used on America's 30 million acres of lawn. Of the 32 pesticide products available through TruGreen ChemLawn's residential services, 17 contain possible carcinogens, 11 contain known or suspected reproductive toxins, and all 32 threaten non-targeted species and ecosystems. Despite the growing popularity of organic lawn care, TruGreen ChemLawn does not offer customers an organic option.

TruGreen ChemLawn should cease funding and remove its executive from the board of *Project EverGreen*. The company should also make safety data on its pesticide products available on its Web site.

9. XCEL ENERGY

The Corporate Citizen

Citizens for Sensible Energy Choices was established to convince Colorado voters that a 2004 ballot initiative requiring renewable energy development was unnecessary because public utilities such as Xcel, which contributed \$520,000 to the committee, were expanding renewables voluntarily.

Given that all but \$100 of *CSEC's* war chest came from companies, the committee qualifies as a quintessential front group, obscuring corporate interests to skew public opinion. *CSEC's* case against Amendment 37 conflicted with evidence that Xcel, one of the nation's leading wind-power providers, would not have the renewables capacity it has today without government mandates. Xcel's largest wind farms in both Colorado and Minnesota were built only at the behest of regulators, while its plans to build further farms were dependent upon federal tax credits.

In a regulated electricity market such as Colorado, where voting can be consumers' only recourse to more abundant and cheaper renewable energy, Xcel should not distort the democratic process by filtering its views through a front group.

10. NATIONAL SKI AREAS ASSOCIATION

The Snow is Greener on the Other Side

Sustainable Slopes is the NSAA's environmental stewardship program, designed to promote best practices in several aspects of mountain management.

A recent study showed that, like many voluntary programs lacking standards, independent monitoring and enforcement, *Sustainable Slopes* is easily exploited by companies seeking public relations benefits without compliance costs. Researchers compared the environmental performance of participating ski areas to that of non-participants and found that, on average, the former fared worse. The study stressed environmental issues influenced heavily by the ski industry, particularly land and water use, and downplayed others, such as global warming, upon which the ski industry's impact is proportionately smaller.

In contrast, *Sustainable Slopes* emphasizes global warming, the ski industry's greatest threat. Facing a rise in snowlines of up to 1500 meters this century, the NSAA's reasons for targeting global warming are understandable, yet do not excuse participants of *Sustainable Slopes* from improving their performance on other environmental issues. Moreover, participants undermine their actions to curb global warming by endorsing the discretionary design of *Climate RESOLVE*, the Business Roundtable's ineffectual voluntary greenhouse-gas management program.

The NSAA should make *Sustainable Slopes* meaningful by setting concrete standards; employing third-party monitoring; and sanctioning poor performers by putting them on probation or expelling them from the program altogether. The net results would be a stronger, more dependable *Sustainable Slopes* for the ski areas that remain, and a bolstered case for effective climate change regulations.



FORD MOTOR COMPANY

The Greenwashing of the Blue Oval

“Ford Motor Company is committed to the environment and to improving the fuel economy of our vehicles. We believe that market based initiatives, not mandated increases, are the best method of improving fuel economy.”

– Official position on fuel economy of Ford Motor Company under Chairman and CEO William Clay Ford, Jr.¹

“We wouldn’t have had the fuel economy unless there were a federal law, and there would not have been the emission control unless there had been a federal law.”

– Henry Ford II, former chairman and CEO, uncle of William Clay Ford Jr.²

PROFILE

Ford Motor Company (Ford) manufactures and distributes more than six million automobiles annually in 200 global markets. Based in Dearborn, Michigan, the company has 327,000 employees worldwide. In 2004, Ford posted a profit of \$3.5 billion.³

RHETORIC

In spring 2004, Ford launched a print and online marketing campaign designed to illustrate *The Greening of the Blue Oval*. The ads are oriented around the Escape Hybrid, the world’s first gas-electric SUV, and the remodeled River Rouge factory, a “model of 21st century sustainable manufacturing,” according to Chairman and CEO William Clay Ford Jr. (Mr. Ford).⁴

The campaign has reached a wide range of left-leaning publications, including the New Yorker and Mother Jones, as well as the Web site of the Environmental News Network and other internet venues. “What we’re spending on the environmental campaign is consistent with what we would typically spend to launch a vehicle,” said Ford marketing manager Chris Feuell. “So it’s pretty significant.”⁵

Of the Escape Hybrid, the campaign pronounces, “Finally, a vehicle that can take you to the very places you’re helping to preserve,” while River Rouge is designated “America’s greenest automotive factory.”^{6 7}

“Green vehicles. Cleaner factories. It’s the right road for our company,” reads one ad in National Geographic. “And we’re well underway.”⁸

Feuell states that the campaign is geared to boost sales of the Escape Hybrid and “to communicate an over-arching message about Ford’s overall environment strategy.”⁹

REALITY

The Greening of the Blue Oval presents the Escape Hybrid and the River Rouge factory as symbols of Ford’s sweeping environmental commitment. But in the context of Ford’s entity-level operations, these two technologies show that the company’s colors have changed merely at the margins.

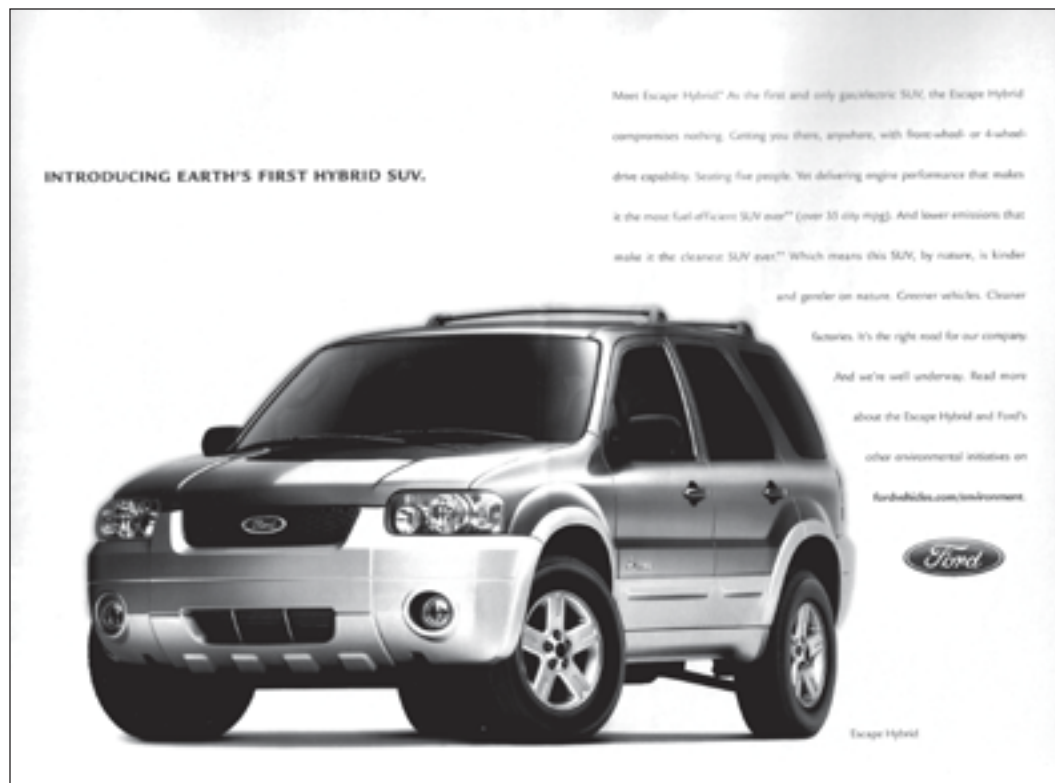
Just weeks before Ford rolled out the campaign, the Environmental Protection Agency found that in 2004, for the fifth consecutive year and 20th time in the past 30 years, Ford had the worst fleetwide fuel economy of all major automakers. Ford’s fleetwide fuel economy is worse today than it was in 1984.¹⁰

“We are in the business of giving customers what satisfies their demands,” says Chairman and CEO Bill Ford, chalking up the company’s status as the auto industry’s environment laggard to values-neutral market forces.¹¹

Ford is indeed responsive to demands for

Ford’s fleetwide fuel economy is worse today than it was in 1984.





Ford Escape Hybrid print ad

Neither Volvo nor Jaguar included SUVs in their fleets before Ford owned the brands.

large SUVs and full-sized pickups, which together account for 80 percent of Ford's revenues. Yet the company is leaving other, greener wishes unfulfilled.¹²

Over the 12 months following the Escape Hybrid's release last summer, Ford planned to manufacture 20,000 units—fewer than the number of F-150s featuring worst-in-class fuel economy that are made each month beneath the River Rouge's vegetation-covered roof. However, the Escape Hybrid has been marketed so well and consumers are so eager for fuel efficiency that orders are outstripping availability, forcing customers onto months-long waiting lists.^{13 14}

Ford's zero-emissions vehicles (ZEVs) are in even shorter supply. Despite promising to sell its several hundred remaining ZEVs in California to their current lessees, Ford last year decided to confiscate and demolish the electric cars and trucks. Eventually, the impounding initiative was abandoned in response to well-publicized protests led by environmental groups, but by that time Ford had already proved willing to take fuel-efficient options off the market.¹⁵

A recently announced timetable to offer five hybrid models—three of them SUVs—by 2008 is an unreliable sign that Ford is reforming its product line. Ford is simultaneously building its fleet of non-hybrid SUVs, such as the Volvo XC90 and Jaguar Z-Type, coming in 2007. Neither Volvo nor Jaguar included SUV in their fleets before Ford owned the brands.^{16 17}

To enable the addition of ever-more low-mileage models, Ford focuses its lobbying efforts on averting increases to federal Corporate Average Fuel Economy (CAFE) standards. When legislators proposed in 1999 to close CAFE's 'light truck loophole', close to three-quarters of Americans supported the change. Alas, thanks to concerted lobbying by Ford, fellow automakers and the oil industry, CAFE still endorses a double-standard between cars and light trucks, on the outdated premise that the latter are mainly used commercially.¹⁸

Today, 89 percent of the public agree that it is important for government action to ensure a 40 miles per gallon (mpg) fuel economy standard to curb global warming

GO FIGURE

- 20,000 Number of Escape Hybrids (36/31 mpg) Ford expects to produce in one year¹⁹
- 78,293 Number of F-Series trucks (14/18 mpg and below) Ford sells in one month²⁰

and reduce foreign oil dependency. But Ford, armed with a \$5 million annual lobbying budget, continues to fight mandates.^{21 22}

Having helped tie up new fuel economy standards in Congress, Ford is tackling progressive legislation at the state level. The Alliance of Automobile Manufacturers (AAM), of which Ford is a member, has filed a lawsuit to prevent California from enacting a landmark bill to achieve by 2016 a 30 percent reduction in greenhouse gas (GHG) emissions from new vehicles sold in the state.²³

Nevertheless, Ford insists that it is serious about making environmental progress, only it prefers to do so voluntarily. For example, in 2000, Ford pledged to boost the fuel economy of its SUVs by 25 percent by 2005. However, the company was compelled to give up the goal in 2003, as SUV fuel economy was actually falling.²⁴

The *New York Times* reported in October that Ford executives are considering a new target: a 30 percent increase in fleetwide fuel economy by 2030, resulting in a GHG-emissions cut of 45 percent. The target is based on “Ford’s strategy, somewhat similar to an approach used by BP, [incorporating] a goal of reducing its emissions to contribute to a stable global level of carbon concentration in the atmosphere of 550 parts per million by 2030.”²⁵

Though it is refreshing for Ford even to consider a stabilization level of atmospheric carbon concentration when many major emitters do not, the company’s strategy has two major drawbacks. First, it pales in com-

parison to California’s enforceable mandate demanding faster improvement from all automakers. More importantly, its scientific basis is woefully misguided.

In January 2005, the International Climate Change Taskforce (ICCT) found that greenhouse gases will need to be kept below a concentration of 400 ppm in order to limit the rise of global temperatures to under 2.5 degrees Celsius, a level at which “the risks to human societies and ecosystems grow significantly” and “the risks of abrupt, accelerated, or runaway climate change also increase.” The European Union also has determined that a warming of 2.5 degrees Celsius presents unacceptable risks.^{26 27}

Even if it were aligned with sound science, the nonbinding target, taken on faith that Ford will achieve substantial GHG-emissions reductions of its own accord, would give Ford more credit than a demonstrated defaulter on past pledges deserves.

RECOMMENDATION

As long as hybrids account for but a sliver of Ford’s sales and its green factory produces pickup trucks with worst-in-class fuel economy, Ford should cease marketing the Escape Hybrid and River Rouge as emblems of its overall environmental performance. This does not mean that the company should not advertise them at all, but when it does so it should not use them as evidence, for example, that the auto industry’s fuel economy laggard is “well underway” on the path of environmental progress.

Ford’s carbon-stabilization strategy is woefully misguided.



BP

Third Party's the Charm

Q: "What can an oil company do to gain your trust?"

– BP, from *BP on the street*²⁸

A: "Put [its] words in someone else's mouth."

– Merrill Rose, member, Public Relations Hall of Fame²⁹

PROFILE

BP, the world's third-largest energy company, posted a profit of \$10.5 billion in 2003. BP's core operations, involving more than 100,000 employees in more than 100 countries, are the exploration, production, refining and marketing of fossil fuels, and the manufacture and marketing of petrochemicals.³⁰

RHETORIC

BP on the street is the global energy company's brand advertising campaign in the U.S. Produced by marketing firm Ogilvy & Mather, the campaign has appeared on television stations including CNN and CNBC and in the pages of *Time*, *Newsweek*, *National Geographic* and other publications. It is the broadest and most expensive U.S. ad campaign in BP's history.³¹

"Ultimately, *BP on the street* aims to change the way people think about the company by engaging in a dialogue about the world's growing demand for energy and the challenges in meeting that demand," states BP on its Web site.³²

The ads consist of three sequential parts: a question about the energy industry and the environment posed by BP; a candid response from the proverbial man or woman on the street; and relevant information about BP's environmental initiatives.

For example, young and fashionable Jessica Myrowitz is asked, "Are oil companies thinking beyond oil?" She answers, "We're going

to run out of oil and we're not going to have that resource anymore then we need (sic) to start looking at other resources. Specifically, we can start looking at natural gas; and I think that would be a way to look and look towards the sun, and look towards solar energy and that's the business that oil companies should be in."³³

To the question, "Are oil companies thinking of the future?" Chris Pierce, of business-like manner with bass voice and button-down shirt, replies, "You can't go from, you know, a highly dependent fuel economy to the next day having no oil; and I mean, there has to be a transition in between and that has to involve oil companies."³⁴

Cynthia Browning is dealt a difficult choice: "What would you rather have, a car or a cleaner environment?" Chuckling, she confesses, "I would love to have a clean environment but that's like asking someone to give up chocolate. To give up their car, it's, it's just not going to happen. I love my car."³⁵

The third phase of the ads, expressed in BP's words, typically goes something like this: "Natural gas is the clean bridge to renewable alternative energy.... We're one of the largest providers of solar energy in the world.... It's a start."³⁶

REALITY

Regardless of BP's reputation as the oil industry's peak environmental performer, it is the nation's most manipulative marketer of fossil fuels. Through a disingenuous "dia-

Cynthia Browning is dealt a difficult choice: "What would you rather have, a car or a cleaner environment?"

logue” with average Americans, BP artificially aligns itself with the public’s view of an ideal energy company.

Beginning in the 1990s, BP became a green leader by a variety of measures, including reducing operational greenhouse gas (GHG) emissions to 10 percent below 1990 levels; producing low-emissions fuels; investing in renewable energy; abstaining from public policy lobbying; restricting activity in environmentally sensitive areas; and certifying its major operations under the ISO 14001 environmental management system.

In 2000, the company sought to formalize its conversion through a \$200 million rebranding. BP replaced its staid shield logo with a green-and-yellow sunburst design, while altering the meaning of its acronym from British Petroleum, formerly its official name, to a new slogan, Beyond Petroleum.³⁷

The rebranding and the reforms that inspired it appealed critics and charmed managers of socially responsible mutual funds. Yet, given that oil constitutes 55 percent of its 18.3 billion barrels of fossil-fuel reserves, BP overstepped its moral margin with the slogan. *FORTUNE* writer Cait Murphy quipped, “Well, please: If the world’s second-largest oil company is beyond petroleum, *FORTUNE* is beyond words.” Kenny Bruno of CorpWatch called it “perhaps the ultimate co-optation of environmentalists’ language and message. Even apart from the twisting of language, BP’s suggestion that producing more natural gas is somehow akin to global leadership is preposterous. Make that Beyond Preposterous.”^{38 39 40}

In response to the backlash, BP found a means of manufacturing public consensus about its preferred progressive image. *BP on the street* incorporates a classic tool of the pub-



BP on the street print ad

lic relations industry known as the third-party technique, which transforms supposedly independent individuals—usually trustworthy types such as scientists and average citizens—into spokespersons.

A description from the Web site of BP’s operations in Australia, where *BP on the street* has also aired, offers insight into how the campaign was crafted; the methodology is not unusual in marketing, but does not mesh with BP’s claim that *BP on the street* is an open forum: “From the original [323] interviews, these were reduced by our advertising agency to a shortlist of 40 clips. A panel from the BP marketing team reviewed all of these clips and rated each individually, on the basis of content and relevance to our campaign.” Next, a shortlist of 15 clips was shown to focus groups, which provided “valuable information that was used in determining which clips would be used in the television and print ads.”⁴¹

According to John Stauber and Sheldon Rampton of the Center for Media and Democracy, companies use the third-party

The rebranding, and the reforms that inspired it, appealed critics and charmed managers of socially responsible mutual funds.

A panel from the BP marketing team reviewed and rated each interview, belying BP’s claim of an open forum.



Within four years of purchasing the world's largest solar company, BP saw its new subsidiary eclipsed by three competitors.

On the bridge to renewables, BP is still decidedly nearer the oily shore.

technique for three reasons, each evident in *BP on the street*:

1. "It offers camouflage, helping to hide the vested interest that lurks behind the message."

If BP declared that the emergence of renewable energy will be controlled by oil companies, its stance would be sullied by self-interest. But when someone unaffiliated with the company, such as Chris Pierce, says so, he has credibility.

2. "It encourages conformity to a vested interest, while pretending to encourage independence."

Jessica Myrowitz's eager idea that oil companies should begin exploring solar is hardly outside the box; in fact, it aptly describes what BP and its competitors are already doing. A truly challenging proposal would call on companies to put renewables at the core of their portfolio even at the cost of pushing out profitable fossil fuels.

3. "It replaces factual discourse with emotion-laden symbolism."

Reduced mobility is not an inevitable tradeoff for a clean environment. The fallacious question posed to Cynthia Browning is liable to make consumers believe that the car, America's quintessential symbol of power and prestige, is under threat from uncompromising environmentalists, thereby winning BP a battle in the PR war against its detractors.⁴²

The claims the company expresses itself in *BP on the Street* are as skewed as the utterances of its unwitting mouthpieces.

Though BP may still be "one of the largest providers of solar energy in the world," recently it has tumbled in the rankings. In 1999, BP purchased Solarex, then the world's largest solar company. Within four years, BP Solar, as the subsidiary was renamed, was eclipsed by three competitors. Between 1999 and 2003, BP Solar increased its annual output from 32.5 megawatts (mw) to 70.2 mw, or 116 percent—not a trivial change, but not exceptional either considering that global output shot up by 270 percent during the same period. Of the top ten PV producers, despite having the deepest pockets of the group, BP Solar underwent the second-slowest rate of growth.⁴³

Even so, *BP on the street* will have the public know that the primary course by which the company is reducing its emissions is "the clean bridge to renewable alternative energy," also known as natural gas. BP is not only building the bridge, but is also the tollkeeper. In 2003, the company sold 26,269 million cubic feet of natural gas per day, mostly in North American markets, where it the continent's number one wholesaler.⁴⁴

Displacing oil with natural gas does substantially cut particulate and smog-forming emissions, such as sulfur dioxide and nitrogen oxides, yet calling natural gas "clean" is only half true, for the fossil fuel's hand in global warming is still dirty. Burning natural gas yields 117,000 pounds of carbon dioxide per billion British thermal units (BTUs), versus 164,000 pounds for petroleum. On the bridge to renewables, BP is still decidedly nearer the oily shore.⁴⁵

GO FIGURE

- 0.5 Million tons of carbon dioxide emissions that solar panels sold by BP in 2003 could save over their lifetime⁴⁶
- 1,298.0 Million tons of carbon dioxide emitted by BP's products in 2003⁴⁷

According to BP's *2003 Sustainability Report*, the company still will reach the cleaner coast in time to stabilize atmospheric carbon concentration within the range of 500-550 parts per million (ppm), compared to 379 ppm in March 2004 and 280 ppm at the onset of the Industrial Revolution. By following this "precautionary approach," BP holds that "serious damage to the environment could be avoided while society would be provided with the energy it needs." CEO Lord John Browne believes that "a shift to a significantly lower carbon economy would require the removal by 2050 of a significant volume of carbon emissions."^{48 49}

The target works to BP's advantage. Since many analysts predict the "end of oil"—that is, the drying up of profitable wells—to arrive mid-century, BP is allowed ample time to harvest the last drops. Furthermore, the company can prepare oil's replacements at its leisure, in effect, by bringing along natural gas while leaving solar waiting in the wings.

But recent scientific findings reveal that BP should be acting in haste. In January 2005, the International Climate Change Taskforce (ICCT) reported that greenhouse gases will

need to be kept below a concentration of 400 ppm in order to limit the rise of global temperatures to under 2.5 degrees Celsius, a level at which "the risks to human societies and ecosystems grow significantly" and "the risks of abrupt, accelerated, or runaway climate change also increase." The European Union as well has determined that a warming of 2.5 degrees Celsius above current temperatures presents unacceptable risks.^{50 51}

So deep into the danger zone, BP's stabilization target is "precautionary" only by foolhardy measures. To cross the energy bridge quickly enough to avoid exacerbated risk, BP will have to mature beyond the mentality captured in the catchphrase, "It's a start," and rapidly advance its development of renewables, perhaps regaining the spot it let slip as the world's largest solar company.

RECOMMENDATION

Debate about the energy industry and the environment is puzzling enough without BP conflating corporate and public voices. In the interest of open communication, BP should cease implementing the manipulative third party technique in its marketing.

So deep into the global warming danger zone, BP's "precautionary approach" is a foolhardy measure that ignores the risks of climate change.



UNITED STATES FOREST SERVICE

Forests with Flacks

“The Forest Service, in an effort to wisely use its share of precious tax dollars, is calling upon all those concerned about wildfires to support these actions.”

– *Forests With A Future* brochure⁵²

“[The Forest Service is] using taxpayer money to spin the public.”

– Representative Jay Inslee in a budget hearing of a House Resources subcommittee⁵³

PROFILE

The United States Forest Service is an agency of the Department of Agriculture, overseen by Secretary Mike Johanns. Celebrating its 100th anniversary in 2005, the Forest Service manages 193 million acres of national forests and grasslands.⁵⁴

RHETORIC

On January 22, 2004, the Forest Service unveiled *Forests With A Future*, a public awareness campaign “to protect old growth forests, wildlife, and communities.” A revised version of the Forest Service’s Sierra Nevada Framework was announced the same day.⁵⁵

By way of videos, four-color posters and a glossy brochure, *Forests With A Future* communicates the reasons for the new Framework.

The brochure reads, “Today’s forests, dense with green, may seem beautiful, but are in fact deadly.” The Sierra Nevada, spanning 400 miles along California’s eastern edge, is “choking with brush, tinder-dry debris, and dead trees which make the risk of catastrophic wildfires high.” The Framework “serves two purposes—reducing biomass in strategic locations and selling this timber to offset some of the costs of making the forests more fire safe.”⁵⁶

A chronological series of six photographs featured in the brochure illustrates the dangers of decades of “well-intended” but misguided fire suppression management.

The first photo, from 1909, shows a section of the forest in its original state, with large, widely-spaced trees and little vegetation on the forest floor. Underbrush grows gradually, maturing into the thick, threatening biomass portrayed in the 1989 photo. According to Forest Service spokesman Matt Mathes, “The idea here was to show increasing density over time.”⁵⁷

Allaying suspicions that the revised Framework amounts to a reward for the pro-Republican timber industry, *Forests With A Future* tells citizens, “Don’t confuse the tree thinning and underbrush removal projects of this campaign, with the logging operations of decades ago in the Sierra Nevada.”⁵⁸

REALITY

Along with paid pundits and video news releases, *Forests With A Future* is part of America’s mounting problem of government propaganda.

In 2004, the federal government spent \$88 million on contracts with public relations agencies, up from \$39 million in 2000. According to a recent report from the House Committee on Government Reform, not all contracts are “illegal or inappropriate.” Yet most go undisclosed, unless, like the cases of columnist Armstrong Williams, compensated \$240,000 to promote the No Child Left Behind Act, and Karen Ryan, Medicare’s reporter-for-hire, they are exposed in the media.⁵⁹

Along with paid pundits and video news releases, *Forests With A Future* is part of America’s mounting problem with government propaganda.


On March 10, 2004, the Associated Press reported that the Forest Service had diverted \$113,000 from taxpayers to OneWorld Communications, a San Francisco PR firm, to pay for the production of *Forests With A Future*. Agency officials had earlier denied having any specific information about the expenses of *Forests With A Future*. But they acknowledged the OneWorld payout after Craig Thomas, director of the Sierra Nevada Forest Protection Campaign, was mailed a leaked memo in which the firm cautioned the Forest Service to keep their contract private, as “members of the public who are not professionals in public relations and marketing might misinterpret certain ideas or concepts.”⁶⁰

Before receiving the memo, Thomas had filed a Freedom of Information Act request concerning the Framework that did not yield any information about the relationship between OneWorld and the Forest Service. “The fact that they didn’t include it seems like a clear violation,” he said.

“The act only exempts certain sensitive or personal information, and this memo doesn’t fall within those guidelines.”⁶¹

Thomas filed the request to piece together why the Forest Service was abandoning the Clinton-era Framework, favored by environmentalists for protecting old-growth forests and encouraging watershed restoration. Under the new Framework, timber removal will increase overall from a maximum of 111 million board feet per year to an annual haul of up to 330 million board feet, an amount unequalled since the 1980s. Whereas trees

Forests With A Future Campaign



Increasing Density

This campaign expects to reduce acres lost to catastrophic wildfires more than 30% within the next fifty years. We also expect the habitat of wildlife, such as the spotted owl, and old growth forest areas to double in the same period.

Methods to reduce fire damage

Fire itself is a method to reduce the highly flammable dense brush and trees in forests – although in many areas now fire is too risky to use. Even a small fire can explode out of control, where vegetation is dense. Prescribed burns can only be used with extreme care.

Thinning some trees and clearing underbrush and “lash” (small branches left after tree thinning) is expensive but must be done in key areas. Around homes and communities, is the top priority. Clearing brush and thinning trees in strategic sites where wildfires are most likely due to the density of vegetation, terrain, and wind patterns, will slow down these fires.

There are about 90 million trees measuring 20 to 30 inches in diameter in the Sierra Nevada. About 183,000, or 0.2%, of these will be thinned each year as part of an approach tailored to the requirements of each local forest. Thinning these trees serves two purposes –

reducing biomass in strategic locations and selling this timber to offset some of the costs of making the forests more fire safe.

The campaign will adapt these and other methods to meet the specific needs of each forest watershed, with scientists and professional foresters monitoring the effect on old growth trees, wildlife, and wildfires.

Focusing the Sierra Nevada Forest Plans

Sierra Nevada forest plans, which provided the basis of this campaign, have evolved over the last decade with the input of hundreds of scientists, forest professionals, and the public, as knowledge and practical experience has deepened.


After the Sierra Nevada Forest Plan Amendment was released in 2001, Forest Service District Rangers, responsible for managing the forest to prevent catastrophic wildfires, found that the amendment needed to be improved because they were not able to accomplish the necessary

Forests With A Future brochure

above 20 inches in diameter were safe from logging under the previous plan, trees less than 30 inches wide can now be cut. As a result, forest canopy in old-growth stands will fall from 80 percent to 50 percent. Finally, for all of the agency’s claims about new Framework’s guardianship of at-risk communities, it reduces the percentage of funds used to thin timber near residential areas from 75 to 25 percent, pushing the bulk of timber removal into remote, virgin areas.⁶²

Asked to justify why the Forest Service went beyond its in-house experts to con-

Under the new Framework, timber removal will increase overall to an amount unequalled since the 1980s.

America’s Ten Worst Greenwashers  17

GO FIGURE

- 18 Spotted owl habitats that the Forest Service claims in *Forests With A Future* materials were destroyed by wildfires between 2000 and 2003⁶³
- 7 Minimum number of those habitats that an investigation in 2004 by the Associated Press found to be “green, flourishing and occupied by the rare birds of prey”⁶⁴

“Creating a perception is not the job of the agency. Allowing citizens to access information is.”

vey such comprehensive changes, Mathes explained to the AP, “We needed to get to plain language. We felt a fresh look would help us better convey the enormous dangers California faces.”⁶⁵

A month after the OneWorld contract came to light, Chad Hanson, director of the John Muir Project, discovered that *Forest With A Future*’s look was not just fresh, but false. The series of six photos, the primary medium for depicting California’s dangers, were actually taken in Montana. The agency had used them twice before: initially in a 1983 report that Hanson had seen before entitled “Fire and Vegetative Trends in the Northern Rockies,” and again in a 1998 publication showing forest growth in Ashland, Oregon. Furthermore, a close look at the 1909 photo revealed newly slashed tree stumps; rather than capturing natural conditions, it was taken soon after the forest was logged.⁶⁶

Representatives Jay Inslee and Nick Rahall requested an investigation by the Agriculture Department’s inspector general into whether the *Forests With A Future* constituted an illegal use of federal funds. “Creating a perception is not the job of the agency,” Inslee said. “Allowing citizens to access information is.”⁶⁷

Since neither “propaganda” nor “publicity” is strictly defined, the terms are subject to broad administrative interpretation; among the 20 federal agencies that have held PR contracts since 2000, the prevailing interpretation tends to be broad.⁶⁸

In May, the Agriculture Department deemed the campaign to be a lawful defense of the Forest Service’s official position on the Framework. In a later ruling requested by Representatives Richard Pombo and Greg Walden, the General Accountability Office (GAO) echoed the department’s decision, concluding, “While the Forest Service policy is controversial, the materials explaining the policy do not constitute prohibited publicity or propaganda.”⁶⁹

Though *Forests With A Future* has passed its legal test, the Framework itself may ultimately fail. In February 2005, California sued to thwart it. “With no basis in science and no new facts, the Bush administration is has jettisoned the product of more than 10 years of study, public participation and consensus building,” said Attorney General Bill Lockyer. The litigation is now pending.⁷⁰

RECOMMENDATION

The Forest Service bureaucracy of expert scientists and policy makers—at least some of whom object to the revised version—should not be bypassed, but abided as a function of democratic government. The Forest Service, like all government agencies, should be transparent about its taxpayer-funded contracts with PR firms, and should eschew them entirely in cases as complex and contentious as that of the Sierra Nevada Framework.

The Forest Service bureaucracy should not be bypassed, but abided as a function of democratic government.

GENERAL MOTORS

All Aboard the Missed Bus

“Common sense says that if you really want to help the environment, you don’t start by making the vehicles that use the least amount of fuel more efficient, you start by making vehicles that consume a lot of fuel more efficient.”

– Beth Lowery, GM vice president of energy & environment, on the hybrid versions of the Chevy Silverado and GMC Sierra⁷¹

“Buying this truck because you want to save fuel is like leaving the last bite of your bacon double cheeseburger because you’re watching your weight.”

– Jim Kliesch, American Council for an Energy-Efficient Economy⁷²

PROFILE

General Motors (GM) is the world’s largest automaker, accounting for close to 15 percent of the global vehicle market. In 2004, the company sold 8.6 million vehicles in 200 countries. Based in Detroit, Michigan, GM has 324,000 employees worldwide.⁷³

RHETORIC

The “next generation of GM” is touted in a trio of print ads appearing in *National Geographic*, *Barron’s*, *FORTUNE*, *Boston Globe*, *New York Times* and additional outlets. GM is running parallel ads on radio and television as well.⁷⁴

Who’s Driving the Hydrogen Economy? depicts toddlers rolling a toy car across a green and blue landscape. “The hydrogen economy is the endgame of a multi-faceted strategy GM set in motion years ago, with steps that are real, progressive, and well-underway,” reads the ad. “We’re making sure children today are in cleaner cars tomorrow. And in the driver’s seat of the hydrogen economy.”⁷⁵

In *All Aboard the Magic Bus*, one of Seattle’s 235 GM hybrid transit buses runs along a road at the edge of city, with the Space Needle dominating the downtown backdrop. The buses “increase fuel efficiency up to 60 percent,” saving Seattle “over 750,000 gallons of fuel annually.”⁷⁶

Lastly, *Hybrid Power to the People* shows a pickup charging across rugged terrain. Installed in the 2005 Chevy Silverado and GMC Sierra, hybrid engines are “where they’ll do the most good... whether you’re hauling a trailer or hauling the kids to school.” The two models “are leading the charge in offering hybrids as an option.”⁷⁷

GM decided to commit part of its \$3 billion advertising budget—the largest in the U.S.—to environmentally-friendly products because, according to marketing executive Kenneth Stewart, “we’ve got to make sure we get the word out on our leadership capabilities with this technology.”⁷⁸

The ads are aligned with the latter two phases of a “three-pronged strategic approach to advanced technologies” layed out on *GMability*, GM’s corporate responsibility Web site:

- “Near-term – we will continue to refine and improve today’s technology to provide better efficiency and performance.
- “Mid-term – from now into the next decade, we will focus considerable resources in bringing more hybrid technologies to market.
- “Long-term – we will continue our efforts to develop and bring to mar-

GM committed part of its \$3 billion advertising budget to environmentally friendly products to “get the word out on [their] leadership capabilities with this technology.”

ket vehicles powered by hydrogen fuel cells.”⁷⁹

Highlighting its success in the first phase, GM asserts that it “has always been, and will continue to be, one of the leaders in fuel economy and emissions technology.”⁸⁰

REALITY

In an unfortunate convergence, GM is not only the auto industry’s biggest player, but also, vehicle for vehicle, its worst polluter.

GM accounted for 27.9 percent of U.S. vehicle sales in the 2003 model year. Its cars and trucks contributed an even greater proportion of domestic greenhouse gas (GHG) emissions (29.4 percent) and a still larger share of smog forming emissions (37 percent). On the basis of these data, the Union of Concerned Scientists place GM last in its Automaker Rankings 2004: The Environmental Performance of Car Companies.⁸¹

The hybrid and hydrogen vehicles featured in GM’s green-themed ads are either too disappointing or too distant to have a meaningful impact on the company’s rock-bottom ranking.

Studies by the Seattle transit authority found that GM’s “magic” buses will save the city fewer than half of the advertised 750,000 gallons. Instead of achieving a 60 percent improvement in fuel economy compared to non-hybrids, they have boosted mileage just 10 to 20 percent.⁸²

Larry Nitz, GM’s director of hybrid powertrain engineering, maintained, “I think we’re doing what we expected to do in Seattle.” If expectations were the so low to begin with, the engineering department should have advised the marketing department to adjust its ads.⁸³

The Sierra and Silverado are weak performers as well. At 17 miles per gallon (mpg) in the city and 19 mpg on the highway, the hybrid engines that are supposed to “do the most good” in GM’s full-size pickups do barely better than their conventional counterparts (15/19 mpg). Moreover, the hybrids are not about to achieve fuel savings of scale on their modest mileage margin: in 2004 GM sold just 500 units of the hybrid



All Aboard the Magic Bus print ad

Silverado and Sierra—less than 2 percent of its 2004 Hummer sales—and plans to build 2500 in 2005.^{84 85}

In a candid quote from Automotive News, GM vice chairman Robert Lutz belied the declaration that GM is “leading the charge” on hybrids when he admitted that GM has “missed the boat” on the gas-electric market controlled by Japanese competitors.⁸⁶

But the company has caught, and through its ads, is propelling, the wave of excitement about hydrogen. To date, it claims, it has invested \$1 billion into R&D of fuel cells. GM is also the beneficiary of federal FreedomCAR grants, for example a grant for a hydrogen fuel station near Washington, DC, and a \$10 million grant to devise “an advanced method for storing hydrogen based on metal hydrides.”^{87 88 89}

Existing storage technology allows liquid hydrogen, “the Houdini of elements,” to escape at a rate of 3 to 4 percent per day. But storage is hardly hydrogen’s most pressing problem: efficiency is.⁹⁰

In the case of hydrogen, it takes energy to make energy; with today’s technologies, hydrogen takes more than it makes, neutralizing its potential to reduce net GHG emissions. Ninety percent of hydrogen produced in the U.S. is extracted from natural gas, at an aver-

The hybrid and hydrogen vehicles featured in GM’s green-themed ads are either too disappointing or too distant to have a meaningful impact on the company’s rock-bottom ranking.

age of 72 percent efficiency. The efficiency of electrolysis, whereby hydrogen is made from water, is 70 percent, and because electrolysis is usually generated from fossil-fuel power plants, which are 30 percent efficient, the true efficiency of electrolysis is 20 percent.⁹¹

Ideally, the hydrogen economy would be fueled by electrolysis via renewables. But as Thomas Homer-Dixon and S. Julio Friedmann noted in the *New York Times*, it would take two times as much electricity as the U.S. currently generates—from either a Massachusetts-sized array of solar panels or a wind farm as large as the state of New York—to provide enough power to run America’s fleet of cars and trucks from fuel cells.⁹²

Such a scenario is a worth pursuing, yet it appears to be a long way off; certainly, the federal government does not consider it a top priority: in 2005, the DOE’s subsidies for wind and solar will be a combined \$124 million, versus \$798 million for coal and \$402 million for nuclear energy R&D.⁹³

In the meantime, global warming would be better curbed by increasing fuel economy. According to the Natural Resources Defense Council, by 2030—when the toddlers with the toy car have kids of their own—an increase of Corporate Average Fuel Economy (CAFE) standards to 40 mpg by 2012 and 55 mpg by 2020 would save 37.1 barrels of oil, while operating 100,000 fuel-cell vehicles per year by 2010 and 2.5 million per year by 2020 would reduce oil consumption by 7.7 barrels—and those fuel cells still would likely require natural gas. Clearly, if global warming were a factor in GM’s “endgame,” the company would support raising CAFE standards.⁹⁴

But it does not, arguing instead that “market-based partnerships are the way to get” to a zero-emissions auto industry.

GM’s opposition a CAFE increase, as well as to other legislation promoting fuel efficiency, is backed by an \$8 million annual lobbying budget. CEO Rick Wagoner belongs to the Business Roundtable, an anti-Kyoto coalition of 150 CEOs of major corporations. In the 2004 progress report for Climate RESOLVE, the roundtable’s voluntary GHG-management program, GM was featured for, among other initiatives, its “removal of bulbs illuminating the front panel of over 100 vending machines.”^{95 96}

Currently, as a member of the Alliance of Automobile Manufacturers, the auto industry’s main lobbying group, GM is helping to fund a lawsuit to stop California from mandating a 30 percent reduction by 2016 in GHG emissions from new vehicles sold in the state.⁹⁷

GM has, however, added one paradoxical plus to the Golden State’s goal of cutting emissions: a hydrogen-powered Hummer, custom-built from scratch at Governor Schwarzenegger’s personal request.⁹⁸

RECOMMENDATION

GM’s ads go beyond skewing the facts into outright falsehood. For example, far from being “one of the leaders” in controlling emissions, GM accounts for more of them than any other automaker, while its supposed 60 percent boost in the fuel economy of buses is known to be unrealistic. To correct its marketing claims, GM should start merely by expressing what it already knows to be true. That criterion also affects its focus on hydrogen, which should be dramatically reduced in favor of attending to the company’s current operations. GM cannot be “sure children today are in cleaner cars tomorrow” as long as the single-element energy’s eventual separation from fossil fuels is still uncertain.

Clearly, if global warming were a factor in GM’s “endgame,” the company would support raising CAFE standards. But it does not.

Far from being “one of the leaders” in controlling emissions, GM accounts for more of them than any other automaker.

GO FIGURE

- 6,192 Tons of carbon dioxide captured in 2003 by the more than one million trees GM has planted since 1990⁹⁹
- 6,192 Tons of carbon dioxide emitted in one year by 864 GM vehicles, or 0.01 percent of GM’s 2003 vehicle sales, driven 15,000 miles at average MY2003 fuel economy¹⁰⁰

CHEVRONTEXACO

A Limited Partner

“The business community can force [a new energy model] to be addressed in a bipartisan, realistic, balanced fashion.”

– ChevronTexaco Chairman and CEO Dave O’Reilly¹⁰¹

“Gov. Arnold Schwarzenegger’s ambitious plan to reorganize almost every aspect of state government was influenced significantly by oil and gas giant ChevronTexaco Corp., which managed to shape such key recommendations as the removal of restrictions on oil refineries.”

– Tom Chorneau, Associated Press¹⁰²

PROFILE

ChevronTexaco, the world’s fifth-largest integrated energy company, earned \$13.3 billion in 2004. With 47,000 employees worldwide, ChevronTexaco markets natural gas and petroleum products in 170 countries.¹⁰³

RHETORIC

In 2004, ChevronTexaco launched a brand marketing campaign composed of a series of ads carrying the company’s slogan, “Turning partnership into energy.” The campaign appears on *Nightline*, *Meet the Press* and *McLaughlin Group* and other politically-themed television programs, and in publications including *The Economist*, *Time*, *Foreign Affairs*, *Harvard Business Review* and *Roll Call*.

Three of the campaign’s six two-page print ads carry an environmental focus.

The left page of *Monitoring Emissions* shows an aerial view of vehicles on a zig-zagging network of grey freeways. On the right, superimposed on an image of a clear atmosphere, the ad asks, “After investing heavily in a better technology to measure greenhouse gases, what do we do?” The answer: “Give it away.” The technology in question is the SANGEA Energy and Emissions Estimating System, which ChevronTexaco developed and then donated “to our competitors. Because in the end, improving the environment

can best be accomplished by improving our cooperation.”¹⁰⁴

In *Meeting Natural Gas Demand*, featuring adjacent photos of surfboards and the Sydney Opera House each set against a blue sky, ChevronTexaco claims, “We go to the ends of the earth to find cleaner energy.... ChevronTexaco is working with governments and partner companies to secure the largest deposits of natural gas in Australia for shipment to the U.S.” The ad describes natural gas as “one of the most environmentally friendly fuels in the world.... Sounds like a lot of g’days to come.”¹⁰⁵

Hydrogen Economy adapts the age-old chicken-or-egg question as an analogy for the problem of which should be developed first: hydrogen fuel stations or hydrogen vehicles? “Chicken...” reads the ad, superimposed above the image of a hydrogen-powered bus, “meet the egg,” a prototype hydrogen fuel station that ChevronTexaco is constructing together with Alameda County Transit of California. “By using this practical approach to build stations, we’re well on our way to building a better tomorrow.”¹⁰⁶

REALITY

ChevronTexaco’s brand marketing campaign distorts the nature of the company’s environmental partnerships.

For example, the donation of SANGEA

ChevronTexaco’s brand marketing campaign distorts the nature of the company’s environmental partnerships.



Hydrogen Economy ad

was made not in spite of competition, but because of collusion. The proprietary rights to the technology were transferred to the American Petroleum Institute (API), an oil industry trade group chaired by Chevron-Texaco CEO Dave O'Reilly. As “a unified voice,” the API lobbies for public policies with industry-wide benefits, such as those which expand foreign and domestic energy markets, reduce corporate contributions to Superfund and resist regulation of greenhouse gas (GHG) emissions.

Part of the API's argument in favor of voluntary GHG management rests on demonstrating that oil companies can monitor emissions without government intervention. Thus, in the face of the Kyoto Protocol, Climate Stewardship Act and other prospective regulations, it is in the interest of all API members, including ChevronTexaco, to ensure that SANGEA is distributed quickly and widely among them.

In its quest to keep GHG management internal, the API has branched out to find allies. In 1998, Chevron (before it merged with Texaco) and other API members converged in Washington, DC to lay out the logistics of a \$6 million anti-Kyoto lobbying initiative. A leaked memo from the meeting

stated, “Informing teachers/students about uncertainties in climate science will begin to erect barriers against efforts to impose further Kyoto-like measures in the future.”¹⁰⁷

Their vision was realized in 2002, when the API teamed with Project Learning Tree, an environmental education program founded by the logging industry, to produce “Energy and Society,” a K-8 curriculum inviting children to “discover how much life there is in a barrel of oil”. Global warming is taught as scientifically controversial; if it ever does end up occurring, effects will be delayed for between 80 and 100 years.¹⁰⁸

ChevronTexaco was relieved to learn that it would not have to wait as long as that to bring natural gas from Australia's offshore Gorgon Gas Field to California's booming energy market. In January 2005, the Mexican government granted the company the necessary permits to construct a liquefied natural gas (LNG) import terminal near the Coronado Islands off the coast of the Baja Peninsula.¹⁰⁹

The floating facility, the size of three football fields, will be anchored to the sandy ocean floor. Reuters described the surrounding environment as “one of the world's best preserved ecosystems” and “a breeding ground

The donation of SANGEA emissions-monitoring technology to ChevronTexaco's competitors was in fact an act of collusion.

A leaked memo stated that informing teachers and students about uncertainties in climate science would erect barriers against Kyoto-like measures in the future.

GO FIGURE

- 150 Kilograms of hydrogen dispensed per day at ChevronTexaco's hydrogen fuel station in Oakland, California, scheduled to open in August 2005¹¹⁰
- 546,729,000 Kilograms of refined petroleum products sold per day by ChevronTexaco in 2004¹¹¹

The secretary of the Mexican Congress's energy committee said, "They are dumping this on us because our environmental laws are lax here."

for thousands of gray whales." Francisco Carillo, secretary of the Mexican Congress's energy committee, said, "They are dumping this on us because our environmental laws are lax here."¹¹²

Though laws are stricter in Australia, the start of the LNG supply chain, Chevron-Texaco managed to overcome regulatory obstacles there as well. In September 2003, despite concerted protests from the Australian conservation community, the Australian government granted in-principle approval to ChevronTexaco, Shell and ExxonMobil to build a natural gas liquefying plant on Barrow Island, a protected nature reserve located roughly 40 miles from the companies' Gorgon reserves.¹¹³

To its credit, ChevronTexaco has conducted small-scale oil operations on Barrow Island for years without major incident. But regardless of whether or not Australia's approval is warranted, it is the result not of enlightened "partnership," but of basic regulatory process.¹¹⁴

In the Alameda Transit Authority and the Department of Energy (DOE)—and, by extension, taxpayers—the company does have genuine partners helping to develop a hydrogen fuel station in Oakland, California. But while the station is supposed to serve as a prototype for California's coming hydrogen infrastructure, in the context of the company's fossil fuel-intensive future, it does not substantiate ChevronTexaco's claim of being "well on our way to building a better tomorrow."

ChevronTexaco chipped in half of the total cost of the station, or approximately \$1.5 million—government grants covered

the other half. In contrast, the company's 2005 capital and exploratory budget is \$10 billion. Virtually all of it will be earmarked for oil and natural gas projects such as the Bomboco Field, which began production in 2004 as part of a \$1.9 billion deepwater development near Angola; the \$4.5 billion Agbami development off the coast of Nigeria; and the Tahiti Field in the Gulf of Mexico, where ChevronTexaco successfully drilled to a depth of 25,000 beneath the seafloor, setting a record for deepwater drilling in the gulf.^{115 116}

ChevronTexaco projects that by 2010 deepwater drilling will account for 20 percent of its total production portfolio, up from 3 percent today. Meanwhile, its marketing portfolio is the only place where hydrogen's presence is growing comparably. Depending on how long and how widely ChevronTexaco runs the *Hydrogen Economy* ad, the company may end up spending more on marketing the Oakland hydrogen fuel station than it paid to make it.¹¹⁷

RECOMMENDATION

By its broad definition of partnership, ChevronTexaco might consider the Environmental Protection Agency a partner for allowing the company to settle allegations of clean air violations for \$275 million in October 2003. Likewise, the 24 species found nowhere in the world but Barrow Island for accommodating a new natural gas facility. Unless ChevronTexaco can shift its attention away from partnerships in which it gets its way thanks to government and industry support, the company should abandon the current focus of its marketing campaign.^{118 119}

ChevronTexaco's contribution of \$1.5 million for a hydrogen fuel station prototype is in sharp contrast to its 2005 capital and exploratory budget of \$10 billion.

NUCLEAR ENERGY INSTITUTE

Truth Gone Fission

“It is uncontrovertible (sic) that the use of nuclear power to generate electricity does not generate greenhouse gases.”

– Joe F. Colvin, NEI CEO¹²⁰

“[A] claim that is technically true may still be misleading.”

– National Advertising Division of the Council for Better Business Bureaus¹²¹

PROFILE

The Nuclear Energy Institute (NEI) is the nuclear energy industry’s chief trade association, representing more than 260 corporate members from 15 countries. Founded in 1994 through the merger of several smaller groups, the NEI lobbies to promote the stability and growth of nuclear energy.¹²²

RHETORIC

Produced by advertising agency Smith & Hartoff, the NEI’s *Nuclear. The Clean Air Energy* campaign began in May 2003 and has since run on radio and television and in publications including the *Wall Street Journal* and *Atlantic Monthly*. “As the U.S. Congress considers broad energy policy, this campaign will inform Washington decision-makers about the benefits of nuclear energy,” said Scott Peterson, NEI’s vice president for communications.¹²³

The print ads come in two flavors: one for the “financial community” and another for “all audiences.”¹²⁴

The specialized ad features a picture of a mixed-sex and mixed-race row of business-people walking down a city sidewalk. An adjacent image shows a young girl hanging upside down on a monkey bar; from across a flat, grassy field, the rising sun lights up her already shining face. The copy begins, “Whether you’re on Wall Street or Main Street, electricity is important to our daily lives.... Where will we get the electricity we need to sustain future growth? From the

reliable, affordable nuclear energy plants that we have today, and new reactor technologies being developed for the future.”¹²⁵

The ad for the general public depicts ethnically diverse children at play: leaping from a lake dock, collected around a computer and swinging from a rubber tire. “Kids today are part of the most energy intensive generation in history,” declares the ad. “They demand lots of electricity. And they deserve clean air.... [O]ur 103 nuclear power plants are emission free so they help keep the air clean.”¹²⁶

Each ad bears the heading, “Electricity & Clean Air, Today & Tomorrow,” and concludes, “We need... domestic sources of electricity for the 21st Century—and we also need clean air. With nuclear energy, we can have both.”¹²⁷

REALITY

Nuclear. The Clean Air Energy repeats several of the same environmental claims for which the NEI’s previous ad campaigns have been formally deemed deceptive.

In April 1998, the NEI ran an ad in the *Atlantic Monthly* depicting a small owl praising nuclear power for, among other qualities, being “environmentally clean” and able to produce electricity “without polluting the air and water”. Following an investigation requested by the Natural Resources Defense Council, the National Advertising Division of the Council for Better Business Bureaus (NAD), created in 1912 to promote truth

The ad shows a young girl hanging upside down on a monkey bar; from across a flat, grassy field, the rising sun lights up her already shining face.

in advertising, concluded that the advertisement's "unqualified clean air claims are overly broad . . . and have a strong potential to mislead consumers who are trying to distinguish between a wide variety of energy providers by comparing their environmental impacts."¹²⁸

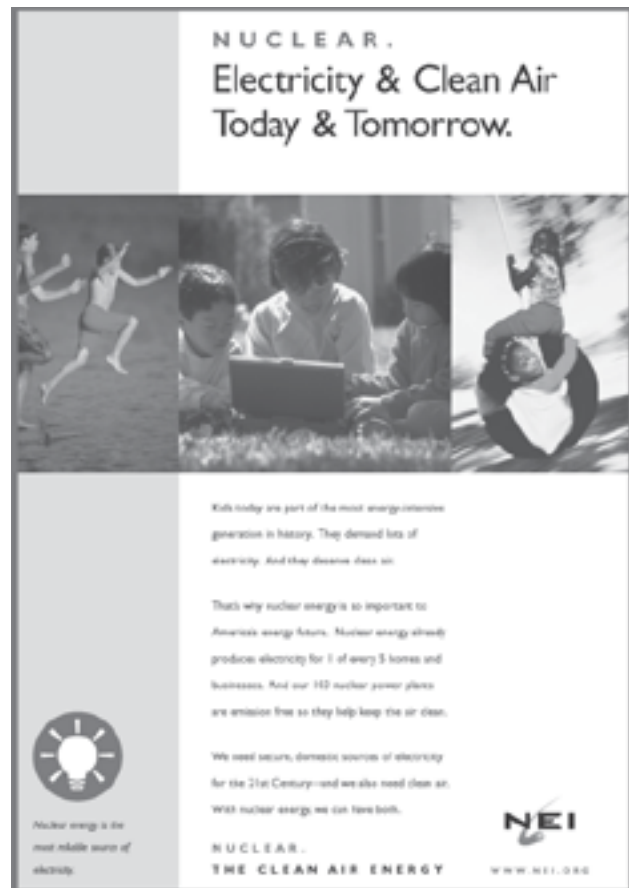
The NAD took particular exception to the NEI's assertion that nuclear is "a zero-emissions source of electricity."¹²⁹

It takes energy, often from fossil fuels, to run the mining and processing operations that transform uranium ore into fuel rods. For example, most of the electricity produced at two of the nation's largest coal-fired power plants, located respectively in Indiana and Ohio, is spent to enrich uranium. Additional energy is needed to build nuclear power plants and to dispose of nuclear waste. Accounting for its entire life cycle, excluding plant decommissioning and waste storage, nuclear power contributes 39.1 grams of carbon-equivalent emissions per kilowatt hour, putting it roughly on par with other non-fossil fuels including biomass, geothermal, solar and wind.^{130 131}

Small amounts of smog-forming pollutants sulfur dioxide and nitrous oxides, as well as acids used to leach uranium for ore, are also attributable to nuclear power, as are approximately two units of waste heat per unit of generated electricity. The heat is typically released into water, which then evaporates as steam or else flows into and raises the temperature of nearby aquatic ecosystems.¹³²

Nuclear power's primary problem, of course, is radioactivity, which nuclear power plants can emit by way of nuclear waste, accidents and the accumulated radioactivity of plant reactors themselves over time. Radiation's health effects include cancer, genetic mutation and 'radiation sickness', characterized by symptoms such as nausea, weakness, hair loss, skin burns and diminished organ function. According to the Environmental

It takes energy, often from fossil fuels, to run the mining and processing operations that transform uranium ore into fuel rods.



Nuclear. The Clean Air Energy ad

Protection Agency, no "safe" levels of radiation have been established.¹³³

In practice, uranium isotopes are no longer considered to be dangerous after passing ten half-lives. A single half-life of U-235, the isotope used in energy production, is 713,000,000 years. The half-life of nuclear power's byproducts, called nuclear waste, is shorter, ranging from hundreds to hundreds of thousands of years. By 2015, nuclear power facilities in the U.S. are expected to contain 75,000 metric tons of nuclear waste.¹³⁴

Though the NEI does not agree with the use of the life-cycle analysis to evaluate the environmental impact of nuclear power, it pledged nonetheless to "take NAD's concerns regarding potential misconceptions that our advertising might create into consideration in future advertising."¹³⁵

In May 1999, however, the NAD found that the NEI's next wave of ads still did not comply with its non-compulsory recommendations. It therefore referred the case to the

Federal Trade Commission, which has the authority to ban ads that can deceive consumers. The agency ultimately issued a split decision, ruling that the ads were indeed deceptive, but, judging from the types of magazines in which they were printed, they were aimed mainly at opinion leaders, not consumers in deregulated electricity markets, and were thus outside the FTC's jurisdiction.¹³⁶

Having said their piece, the NAD and FCC stayed quiet in 2001 when the NEI ran a broad campaign pronouncing *Clean air is so 21st century*. "Our generation is demanding lots of electricity... and clean air," says the star of the ad, a scooter-riding, cellphone-using teen adorned with blue-nail polish and a stick-on tatooo. "With nuclear energy, we can have both." In the absence of regulatory intervention, watchdogs attacked the ad, with CorpWatch awarding the NEI its 2001 Summer Greenwash Award and Philip Mattera of Good Jobs First observing that the generation on whose behalf the ad speaks is "too young to remember Three Mile Island."^{137 138}

The NEI's latest marketing effort sticks to the points made in its old campaigns: nuclear means "clean air" and should be the preferred choice of power for "[k]ids today." The ads note shrewdly that "nuclear power plants"—versus "nuclear power"—produce zero emissions, however, such a fine distinction would be lost on most readers, whether they are consumers, whose rights to accurate information are protected by law, or helplessly-targeted opinion leaders.¹³⁹

As it has in the past, the NEI insists its ads are intended exclusively for the latter. Accord-

ing to *TomPaine.com*'s Patrick Doherty, the nuclear energy industry is currently "shifting the lines of the nation's energy debate," framing nuclear power as a clean and cost-effective substitute for fossil fuels.^{140 141}

But just as nuclear's environmental argument is deceptive, so too is its economic one. Merely to replace today's crumbling atomic infrastructure would require \$8 billion in government subsidies—already, in 2005, subsidies for nuclear energy R&D are projected to be \$402 million. Once the costs of building additional nuclear power plants, keeping them secure from terrorist attacks, storing nuclear waste and cleaning up unpredictable accidents are accounted for, wind, solar and other true renewables are at the very least competitive—not to mention cleaner.^{142 143}

RECOMMENDATION

The line between consumers and opinion leaders is blurry and difficult to navigate. Every opinion leader consumes, while subscribers to the *Wall Street Journal*, *Atlantic Monthly* and similar publications hail from every deregulated electricity market in the nation. Moreover, opinion leaders do not deserve to be worse informed simply because they are supposed to be better educated. For these reasons, the NEI should drop the claims to cleanliness that are inappropriate for consumers even when its target audience is composed of opinion leaders.

The generation on whose behalf the ad speaks is "too young to remember Three Mile Island."

GO FIGURE

7,130,000,000 Years before U-235, the uranium isotope used in energy production, is no longer considered dangerous¹⁴⁴

5,000,000,000 Years before the sun burns out¹⁴⁵

ALLIANCE OF AUTOMOBILE MANUFACTURERS

An Emission by Any Other Name

“The North American International Auto Show has the cleanest vehicles ever.”
– Alliance of Automobile Manufacturers President and CEO Fred Webber¹⁴⁶

“Here’s a powerful charger bred to take on all those pony cars out there.”
– DaimlerChrysler CEO Dieter Zetsche, introducing the 2006 Dodge Charger (17/25 miles per gallon) at the North American International Auto Show¹⁴⁷

PROFILE

Based in Washington, DC, the Alliance of Automobile Manufacturers (AAM) is an industry lobbying group representing BMW Group, DaimlerChrysler, Ford Motor Company, General Motors, Mazda, Mitsubishi Motors, Porsche, Toyota and Volkswagen.

RHETORIC

The AAM unveiled the *Ultra-Clean Autos* campaign in January 2005 with press statements made at the Los Angeles Auto Show and North American International Auto Show, ads in political publications including *Roll Call*, *Congress Daily* and *Congressional Quarterly*, a radio spot on WTOP in Washington, DC, and an interactive tutorial on its Web site.¹⁴⁸

“These aren’t just concept cars that might be available in the future,” said AAM President and CEO Fred Webber in Los Angeles. “We’re talking about ultra-clean vehicles that are for sale on dealer lots everywhere right now.”¹⁴⁹

The print ad depicts a bright-eyed toddler in a car-seat holding a melting Popsicle. His sticky hands have stained the car’s interior. “Your car may never be spotless,” states the ad, “but it’s 99 percent cleaner than you think. Autos manufactured today are virtually emissions-free. And that’s a dramatic improvement over models from just thirty years ago. So if you want to know what it really means

to drive a clean car, look beyond the backseat. See what’s under the hood of every new car and light truck we make.”¹⁵⁰

The ad directs readers to the AAM Web site to find out more about ultra-clean autos.

According to the online tutorial, vehicles today have become “99 percent cleaner than the vehicles of the 1970s” as a result of a four-part strategy: “cleaning up the fuel going into the vehicle, burning the fuel more precisely in the engine, removing undesirable emissions with a catalyst in the engine, and finally monitoring all of these systems.”¹⁵¹

The tutorial concludes, “In many ways, automakers are driving innovation.”¹⁵²

REALITY

Through its *Ultra-Clean Autos* campaign, the AAM exaggerates the auto industry’s solution to smog-forming emissions, while concealing its worsening problem with heat-trapping emissions.

Nowhere in its print ad, and only in small-font subsections of its online tutorial, does the AAM explicitly identify which emissions are referred to in its claim that modern autos are “virtually emission-free.”

Yet, pressed to clarify, AAM spokeswoman Gloria Bergquist stated that the emissions in question are restricted to those classified by the Environmental Protection Agency as pollutants, such as nitrous oxides and hydrocarbons. She allowed, moreover, that the “99

The AAM exaggerates the auto industry’s solution to smog-forming emissions, while concealing its worsening problem with heat-trapping emissions.

BMW GROUP DAIMLERCHRYSLER FORD MOTOR COMPANY GENERAL MOTORS MAZDA MITSUBISHI MOTORS PORSCHE TOYOTA VOLKSWAGEN



YOUR CAR MAY NEVER BE SPOTLESS
BUT IT'S **99% CLEANER**
THAN YOU THINK.

Autos manufactured today are virtually emission-free. And that's a dramatic improvement over models from just thirty years ago. So if you want to know what it really means to drive a clean car, look beyond the back seat. See what's under the hood of every new car and light truck we make.

Find out more about ultra-clean vehicles at autoalliance.org.

AUTO ALLIANCE
DRIVING INNOVATION™



Ultra-Clean Autos *ad*

percent” reduction, measured using a baseline year before clean-air regulations forced automakers to install catalytic converters, will not be accurate concerning all new cars and trucks until 2009, when a new set of emissions standards will be enforced.¹⁵³

Automakers are adapting to the Environmental Protection Agency’s Tier 2 regulations

much to their chagrin. In 1999, when Tier 2 was being proposed, GM submitted three volumes of public comments, calling the standards “arbitrary and capricious,” while Ford was “one of the leading companies working to weaken” them.¹⁵⁴

Once in effect, Tier 2 will not solve smog entirely: in 2020, when more than three-

GM called the EPA’s proposed Tier 2 standards “arbitrary and capricious,” while Ford was “one of the leading companies working to weaken” them.

GO FIGURE

- 1898 Year in which the use of catalytic devices to clean the fumes of petroleum engines was first reported¹⁵⁵
- 1966 Year in which Ford, GM and Chrysler first attached catalytic devices to their fleets, in order to comply with California law¹⁵⁶

Since its founding in 1999, the AAM has spent close to \$35 million lobbying against the Climate Stewardship Act, provisions to increase CAFE standards and other federal policies.

quarters of on-road cars and trucks will be in compliance, passenger vehicles will still be the source of more than 85,000 tons of toxic emissions, carrying the same cancer risk as 350,000 tons of benzene, according to the Union of Concerned Scientists (UCS).¹⁵⁷

But, as the UCS points out, “At the center of [the AAM’s] deception is their failure to acknowledge the heat-trapping carbon dioxide emissions from their automobiles.”¹⁵⁸

In 2005, cars and trucks under 8,500 pounds will emit 1.3 billion tons of carbon dioxide—and that figure does not account for vans, large SUVs and other passenger vehicles. Carbon dioxide emissions from U.S. autos are growing year to year. While part of the trend is attributable to a steady increase in vehicle-miles traveled, automakers have compounded the problem by lowering fleetwide fuel economy from its level of 20 years ago.¹⁵⁹

A spokesperson for Toyota, which possesses the strongest environmental reputation of all AAM members, maintained that heat-trapping emissions have no place in the *Ultra-Clean Autos* ad because lumping them in with smog-forming emissions would be like “mixing apples and oranges,” since, by the Environmental Protection Agency’s estimation, carbon dioxide “is technically an emission, but not a pollutant.” Though its premises are valid, the argument is unsound, for the ad refers not to pollutants, but to emissions.¹⁶⁰

While dismissive of carbon dioxide in its ads, the AAM is preoccupied with it concerning legislation. The AAM has aggressively

opposed efforts to raise federal Corporate Average Fuel Economy (CAFE) standards or to adopt regulations of greenhouse gas emissions. Since its founding in 1999, the AAM has spent close to \$35 million lobbying on behalf of its members against the Climate Stewardship Act, provisions to increase CAFE standards and other federal policies.¹⁶¹

At the state level, the AAM is currently suing to prevent California from mandating a 30 percent reduction by 2016 in greenhouse gas emissions from new vehicles sold in the state. Its case asserts that the bill is a *de facto* change from CAFE standards. According to Webber, “[f]ederal law is designed to ensure a consistent fuel economy program across the country.” At the same time, of course, the AAM aims to keep that shared standard low.¹⁶²

RECOMMENDATION

The AAM’s marketing misleads consumers and public policy makers about the degree to which smog-forming auto emissions have already been reduced, as well as about the distinction between smog-forming emissions and heat-trapping emissions—for none is made. Many of today’s cars and trucks still account for significantly more than 1 percent of the amount of smog-forming emissions produced by vehicles in the 1970s, while carbon dioxide emissions are increasing due to the failure of automakers to improve fleetwide fuel economy. The AAM should therefore withdraw its claim that today’s cars are “virtually emission-free.”

TRUGREEN CHEMLAWN

Conifer of Confusion

“We utilize the products and procedures that minimize risk to you and your pets.”

– TruGreen ChemLawn¹⁶³

“I hired TruGreen ChemLawn with their assurance that they would provide an effective and safe program for my lawn. But the next day my dog became violently ill and was treated for pesticide poisoning.”

– Joanna Glennon, customer¹⁶⁴

PROFILE

TruGreen ChemLawn is the largest lawn care company in the United States, serving 3.4 million households in 46 states. TruGreen Chemlawn in 2003 generated more than \$1.3 billion of income, representing 37 percent of the revenues of ServiceMaster, its parent company.¹⁶⁵

RHETORIC

Project EverGreen was formed in 2003 by pesticide producers, distributors and applicators, along with other members of the ‘Green Industry’. The mission of the organization is “to raise the awareness of the environmental, economic and lifestyle benefits of landscapes and promote the significance of those who preserve and enhance green spaces at home, work and play.”¹⁶⁶

Trugreen ChemLawn was an early funder of *Project EverGreen*. Norman Goldenberg, the company’s vice president of government affairs, sits on the organization’s board of directors.¹⁶⁷

In November 2004, *Project EverGreen* rallied support within the ‘Green Industry’ with ads in roughly two dozen trade magazines declaring, “THE GLOVES ARE OFF. Because of activists, extremists and misinformed politicians, consumers are questioning whether the products and resources used to care for their lawns, landscapes and other green spaces are a waste—or a harm to the environment.”

The ads appealed to members of the Green Industry to support *Project EverGreen*’s chief enterprise, a \$1 million consumer marketing campaign scheduled to launch in the spring of 2005.^{168 169}

The consumer piece is already active on *Project EverGreen*’s Web site, where the organization is taking orders for a “Thank-You Insert” that companies can pass out to their clients. “IT’S MORE THAN A LANDSCAPE—IT’S A LIFESCAPE.... Your efforts help the environment—and make life better for you, your family and your neighbors,” the insert states. The insert also lists “a few benefits of green spaces,” such as, “One small lawn produces enough oxygen each day for a family of four,” and, “Thick, healthy lawns prevent erosion and filter groundwater, reducing water pollution.” The insert may be a sign of messages to come in the consumer marketing campaign.¹⁷⁰

On the public relations front, *Project EverGreen* sponsors have donated their resources and expertise to events including the Renewal & Remembrance Project at the Arlington Cemetery and the International Children’s Games held in Cleveland. “*Project EverGreen* and local companies brought the importance of manicured green lawns and gardens to the world stage by contributing a healthy landscape,” said board co-chair Pat Fogarty.¹⁷¹

TruGreen ChemLawn has operated its own youth-related marketing and PR campaigns. From May 2003 to December 2004,

In November 2004, *Project EverGreen* rallied support within the ‘Green Industry’ with ads declaring, “THE GLOVES ARE OFF.”

TruGreen ChemLawn sponsored US Youth Soccer (USYS), which in return provided the company with a mailing list of its members. TruGreen ChemLawn sent mass mailings addressed to “The family of” young players who belong to the USYS. For every new customer gained through the promotion, TruGreen ChemLawn donated money for soccer-field maintenance.¹⁷²

Pesticides are now applied ten times as heavily per acre to residential lawns as they are to farmland.

REALITY

TruGreen ChemLawn plays a leading role in the profusion of dangerous lawn pesticides.

“With the aid of sophisticated marketing strategies backed by millions of dollars in advertising, the lawn care and pesticide industry has successfully created the desire for ‘the perfect lawn,’” write Matthew Wilson and Jay Rasku of the Toxics Action Center. Case in point, the TruGreen ChemLawn Web site states, “A healthy landscape says a lot about you and your home.”^{173 174}

Wilson and Rasku continue, “More importantly, the industry has succeeded in convincing many Americans that to have a green and healthy lawn, one needs to use an arsenal of pesticides and synthetic fertilizers.”¹⁷⁵

The residential lawn and garden sector is the fastest-growing sector of the pesticide market. Pesticides are now applied ten times as heavily per acre to lawns as they are to farmland. Each year, more than 70 million pounds of pesticides are used on America’s 30 million acres of lawn.¹⁷⁶

TruGreen ChemLawn offers 32 pesticide products through its residential lawn care program. Of those: 17 contain ingredients that are defined by the Environmental Protection Agency (EPA) and the World Health Organization’s International Agency for Research and Cancer as possible carcinogens; 13 contain ingredients that are banned or restricted in other countries; 11 contain known or suspected reproductive toxins; 9 contain known or suspected endocrine disruptors; and all 32 threaten non-targeted species and ecosystems.¹⁷⁷



Project EverGreen ad

In spite of their demonstrated dangers, these pesticides are registered for commercial and residential use by the EPA. Part of the agency’s readiness to rubber-stamp is attributable to its subjective bias favoring the pesticide industry, as borne out by its efforts to escape the oversight of the National Marine Fisheries Service and Fish & Wildlife Service in determining the adverse affects of pesticides on endangered species. But the EPA also has major gaps in its methodology.¹⁷⁸

The EPA does not require testing of the effects of pesticides applied in combination—as TruGreen ChemLawn’s commonly are—even though pesticide combinations can be more toxic than the sum of their parts. Nor does the EPA mandate studies of the unique ways in which pesticides affect children. Fewer than 10 percent of pesticides and their inert ingredients are tested for effects on developing nervous systems.¹⁷⁹

For consumers seeking confirmation of pesticide safety, the TruGreen ChemLawn Web site provides a link to a pesticide health information database operated by the EPA.

Fewer than 10 percent of pesticides and their inert ingredients are tested for effects on developing nervous systems.

Yet, since the company Web site does not also offer, as a starting point, the list of the pesticides used by TruGreen ChemLawn, the link is an immediate dead end.¹⁸⁰

Contacted directly, in person or by phone, company representatives have hedged on and hidden facts about the health effects of TruGreen ChemLawn's products, for example, by calling them "safe," a description that may violate federal marketing laws.¹⁸¹

Even with the attempts of TruGreen ChemLawn and other chemically-dependent companies to suppress it, word of the health and environmental effects of pesticides is getting out. A grassroots movement in Canada has spawned pesticides bans in nearly 70 cities and towns, while 20 states in the U.S. have passed legislation requiring the use of signs or other notification to be posted on lawns to which pesticides have been applied. "Pesticides are a bit like secondhand smoke," says Michel Gaudet of Coalition for Alternatives to Pesticides. "If you can smell your neighbor using them on their property, then you're being exposed too."^{182 183}

Whether as good neighbors or for their own sake, a growing number of Americans are turning to chemical-free organic methods of lawn care. The *2004 Environmental Lawn and Garden Survey*, released by the National Gardening Association and *Organic Gardening Magazine*, found that 5 million of the 90 million U.S. households with yards treat them exclusively with organic methods, while another 31 million use both organic and chemical methods.¹⁸⁴

TruGreen ChemLawn has the opportunity to profit from the market-based trend towards chemical-free lawn care by providing customers with an organic alternative to its standard services. Its service professionals could be

trained by organic lawn-care certifiers located nationwide.

Instead, through its support of *Project EverGreen*, the company is going the regressive route: instructing consumers that its lawn care services will "filter groundwater, reducing water pollution," when in fact nearly 10 percent of common water pollution and 3 percent of toxic water pollution are caused by residential use of pesticides and fertilizers; claiming that one small lawn will meet the oxygen needs of a family of four, as if oxygen starvation represents more of a public health threat than airborne pesticide particles do; and bemoaning "misinformed politicians" while the EPA continues to register pesticide products without adequate safety data.¹⁸⁵

As Beyond Pesticides, a group promoting alternatives to pesticide use, spells out in a response to *Project EverGreen's* announcement that "THE GLOVES ARE OFF," TruGreen ChemLawn should "GET A GRIP" on its communication with consumers.¹⁸⁶

RECOMMENDATION

In response to Canada's locally-organized pesticide bans, Allen James, president of Responsible Industry for a Sound Environment, a pesticide-industry lobbying group, said, "Local communities generally do not have the expertise on issues about pesticides to make responsible decisions." He is right (even if their expertise would likely lead to more, not fewer, pesticide bans). In order to make accurate information about pesticides accessible to customers and communities, TruGreen ChemLawn should cease funding *Project EverGreen* and should make safety data on its pesticide products available on its Web site.¹⁸⁷

"Pesticides are a bit like second-hand smoke—if you can smell your neighbor using them on their property, then you're being exposed too."

GO FIGURE

60 - 90 Percent of earthworm populations killed where pesticides are applied regularly¹⁸⁸

5, 7, 11, 3, 1.5 Times more nitrogen, phosphorous, potassium, exchangeable magnesium and calcium, respectively, in soil containing earthworm castings than in soil without them¹⁸⁹

XCEL ENERGY

The Corporate Citizen

“We’re a big supporter of wind. But at the time when customers have the greatest needs, it’s typically not available.”

– Xcel Energy Chairman and CEO Wayne Brunetti¹⁹⁰

“If you look at a map of where the wind potential is in this state, it’s a match made in heaven. The largest chunk of good energy potential is blowing across the eastern plains where people are hungry for economic development.”

– Robin Hubbard of Environment Colorado¹⁹¹

PROFILE

Xcel Energy is America’s fourth-largest electricity and natural gas utility, with more than 11,000 employees and \$7.9 billion in annual revenue. Xcel’s power plants possess 15,433 megawatts of generating capacity, serving 3.3 million electricity customers. Its 32,333 miles of pipelines funnel fuel to 1.8 million natural gas customers. Xcel operates in 11 Western and Midwestern states.¹⁹²

RHETORIC

Citizens for Sensible Energy Choices (CSEC) was created on July 28, 2004, when Xcel employee Michelle Stermer registered it as a political issue committee with the Colorado Secretary of State.¹⁹³

Xcel was the largest of *CSEC*’s several corporate contributors from the energy industry. Its cash donations, made between July and September, totaled \$520,000, or roughly one-third of the committee’s war chest.¹⁹⁴

CSEC’s mission was “to oppose... an amendment to the Colorado revised statutes concerning renewable energy standards for large providers of retail electrical service.” Known to Colorado voters as Amendment 37, it required that Colorado utilities with over 40,000 customers must derive 3 percent of their electricity sales from renewable sources by 2007, rising to 10 percent by 2015.¹⁹⁵

Statewide support for Amendment 37 stood at 76 percent when *CSEC* launched an advertising campaign calling it the “Right idea. Wrong solution.”¹⁹⁶

Radio ads informed listeners, “Colorado already ranks 8th in the nation [in the use of renewable energy], with more renewable on the way. But... Amendment 37 would mandate, not just promote, renewable energy use and the higher costs associated with it.”¹⁹⁷

The committee’s Web site explained that “Xcel Energy is the nation’s second-largest retail provider of wind energy, with 250 megawatts of wind capacity on its Colorado system... Federal tax incentives are significantly increasing the use of renewables in Colorado,” begging the question, “If incentives are working, why switch to mandates?”¹⁹⁸

Outside of its affiliation with *CERC*, Xcel communicated directly with Coloradans. In September, Xcel customers were sent an article, inserted into their utility bills, expressing the company’s opposition to Amendment 37. Online activists who encouraged the company to support Amendment 37 received an e-mail from Xcel’s Board of Directors warning that the mandate “would cost our Colorado customers between \$580 million and \$1.5 billion over the next 20 years.”¹⁹⁹

(On Election Day, Amendment 37 passed with 54 percent of the vote, making Colorado the first state to adopt a renewable energy standard by way of a ballot initiative.)²⁰⁰

There were no citizens in *Citizens for Sensible Energy Choices*. All of *CSEC*’s reported contributions—save for \$100 in seed money—came from companies.

REALITY

Xcel betrayed the facts about renewable energy development in Colorado in a desperate effort to undermine grassroots democracy.

There were no citizens in *Citizens for Sensible Energy Choices*. Records from the Secretary of State show that all of CSEC's reported contributions—save for \$100 in seed money from Xcel's Stermer, who was reimbursed two weeks later—came from companies. It therefore qualified as a quintessential front, or 'astroturf' (as opposed to grassroots), group.²⁰¹

Sharon Beder, author of *Global Spin: The Corporate Assault on Environmentalism*, writes: "These front

groups lobby governments to legislate in the corporate interest, to oppose environmental regulations, and to introduce policies that enhance corporate profitability. Front groups also campaign to change public opinion, so that the markets for corporate goods are not threatened and the efforts of environmental groups are defused.... The names of corporate front groups are carefully chosen to mask the real interests behind them but they can usually be identified by their funding sources, membership and who controls them."²⁰²

In CSEC's case, the committee sought to quell public support for Amendment 37 by demonstrating the Colorado energy industry's commitment to developing renewables voluntarily, as proven by Xcel's place among the top wind producers in the U.S.



CEO Wayne Brunetti smiling before Lamar wind turbines that Xcel was forced to build.

Xcel would not be a top wind producer today if not for government mandates.

Yet Xcel would not be where it is today without government mandates. The company's 162-megawatt (MW) Lamar wind farm, the centerpiece of its Colorado renewables program, was built only at the behest of the Colorado Public Utilities Commission (CPUC). In 2001, Xcel submitted a proposal to CPUC listing new electricity sources it wants to develop in coming years. CPUC rejected the proposal, which was initially limited to natural gas and coal, and demanded that Xcel add Lamar to the mix.²⁰³

Similarly, Xcel's wind operations in Minnesota, where Xcel has its largest renewable energy capacity, originated through regulation. In 1994, state legislators struck a deal with Xcel whereby, in exchange for a contract to storing nuclear waste on Prairie Island, the

GO FIGURE

- 25 number of companies that contributed to Citizens for Sensible Energy Choices²⁰⁴
- 1 number of citizens who contributed to Citizens for Sensible Energy Choices²⁰⁵

Xcel unwittingly undercut its own economic argument by testifying that the wind farm will save Coloradans \$4.6 million per year.

company was forced to construct 425 MW of wind capacity.²⁰⁶

Appearing to buck the trend, Xcel announced in August 2004 that it will voluntarily add 500 MW of wind to its portfolio by 2007. However, the plan came with one crucial caveat: company officials made clear that if the federal wind energy credit is discontinued, then Xcel's wind initiative will be also. Amendment 37, rather than "switching" from the so-far successful credit as *CSEC* claimed it would do, guarantees that turbines will be raised regardless of fickle federal policy.²⁰⁷

With the credit in effect, wind energy would be of course cheaper; at 2.8 to 3.5 cents per kilowatt hour, it would be less expensive, in fact, than natural gas (5 to 6 cents) and coal (4 to 5 cents). But even without it, there is no justification for Xcel's \$1.5 billion estimate of Amendment 37's cost to customers. Asked to explain the figure, Xcel spokesman Steve Roalstad conceded, "When you get down to it, nobody really knows [the cost] because there are so many different factors at play here."^{208 209}

Even so, based on their methodology, some guesses are better than others. Using a modified version of the U.S. Energy Information Administration's National Energy Modeling System, the Union of Concerned Scientists found that, far from being an economic drain, Amendment 37 will by 2025 yield Colorado

\$236 million in savings on consumer electricity and natural gas bills, \$709 million in new capital investment and \$15 million in income for rural landowners who lease their property for wind farms, all while adding 2,000 jobs.²¹⁰

Xcel unwittingly undercut its own economic argument in June 2003 by testifying to the Federal Energy Regulatory Commission that the Lamar wind farm will save Coloradans \$4.6 million per year. Furthermore, on the Web page of its Windsource program, a federally required program in which customers have the opportunity to pay a premium for renewable energy, Xcel states, "Windsource is good for Colorado's economy. Installing and maintaining wind turbines creates jobs, ongoing lease payments are made to land owners who can still use the land for other uses, such as farming. And wind turbines create sales tax income for counties."^{211 212}

RECOMMENDATIONS

In a regulated electricity market such as Colorado, where voting can be consumers' only recourse to more abundant and cheaper renewable energy, Xcel should not distort the democratic process by posing as a citizen. If the company wishes to make its views on renewable energy known to the public, it should not filter them through a front group such as *CSEC*.

NATIONAL SKI AREAS ASSOCIATION

The Snow is Greener on the Other Side

“We are succeeding in taking collective steps toward proactive environmental stewardship.”
– NSAA President Michael Berry²¹³

“When [*Sustainable Slopes*] came out, we said, ‘Let’s at least give this the benefit of the doubt.’ Five years down the line, not much has happened.”
– Aspen Skiing Company Environmental Affairs Director Auden Schendler²¹⁴

PROFILE

The National Ski Areas Association (NSAA) represents 326 U.S. alpine resorts accounting for more than 90 percent of the nation’s 54 million skier visits each year. Since 1962, the NSAA has guided ski areas in public and government affairs.²¹⁵

RHETORIC

Sustainable Slopes is the ski industry’s environmental stewardship program, designed to promote best practices in several aspects of mountain management. Created in 2000 by the NSAA with input from government, environmental and community groups, *Sustainable Slopes* was endorsed initially by 160 ski areas; today, the count has climbed to 177, representing over 72 percent of skier visits.²¹⁶

The program is voluntary, meaning participants are not required to meet specific standards, nor are they punished for failing to improve their environmental performance. “Regulations only help you avoid the worst, and a voluntary program like this only brings out the best in compliance,” said NSAA public affairs director Geraldine Link.²¹⁷

Ski areas participating in *Sustainable Slopes* are asked to complete a yearly environmental self-assessment survey analyzing the impact of their environmental initiatives.²¹⁸

Additionally, several participants host the program’s annual Outreach Day. Since 2003, Outreach Day has carried the theme

of “Keep Winter Cool,” which is also the name of a joint campaign of the NSAA and the Natural Resources Defense Council to tackle the ski industry’s greatest threat: global warming.²¹⁹

Typical activities at Outreach Day include alternative-transportation exhibits, organic food giveaways, and sales of ‘Green Tags’, or renewable energy credits, that allow skiers to offset the vehicle emissions generated by their ski trip.²²⁰

Finally, *Sustainable Slopes* participants are free to, and often do, display the program’s green-and-white logo on their Web sites and publicity materials.²²¹

REALITY

The NSAA’s *Sustainable Slopes* program promotes the very brand of voluntary corporate environmentalism that may ultimately force ski areas to ground their gondolas.

Last fall, researchers Jorge Rivera of George Washington University and Peter de Leon of University of Colorado evaluated *Sustainable Slopes* by comparing the environmental performance of participants to that of non-participants. They found that, on average, the non-participants actually fared better.²²²

The result is not a general indictment of all participants; indeed, some, such as the Aspen Skiing Company, are recognized environmental leaders. Yet the program does nothing to deter ski areas with poor environmental performance from joining the

Participants in *Sustainable Slopes* are not required to meet specific standards, nor are they punished for failing to improve their environmental performance.

The ski industry cannot afford to have its reputation tarnished since skiers consider the environment a higher priority than the general public does.

program for its public-relations benefits and lack of compliance costs.

In the U.S., more than 200 voluntary environmental programs have been created since the early 1990s. Typically, they are meant to improve public perception, to avoid government regulation, or to do both.²²³

The chemical industry's *Responsible Care* initiative, for example, was launched at the tail-end of a fall in the chemical industry's favorability rating from 30 percent to 14 percent during the 1980s, while the NSAA conceived of *Sustainable Slopes* soon after environmental arsonists—acting “on behalf of the lynx” native to the area—destroyed five buildings and four lifts at Vail, causing \$12 million in damages and casting a spotlight on the ski industry's environment record. The ski industry cannot afford to have its reputation tarnished: polls show that skiers consider the environment a higher policy priority than the general public does.^{224 225}

Rivera and de Leon wrote that to reform *Sustainable Slopes*, the NSAA should set concrete standards to which participants are accountable, replace self-assessment surveys with third-party performance monitoring, and sanction poor performers with probation and expulsion.²²⁶

Their suggestions are supported by studies documenting the ineffectiveness of programs similar to *Sustainable Slopes*.

When professors from MIT and New York tracked *Responsible Care* over the ten years following its launch in 1989, they concluded not only that, as of 1999, participants performed worse overall than companies which stayed out of the program, but also that, though both sets of subjects raised their scores somewhat during the decade-long period, the outsiders improved faster.²²⁷

Researchers examining the American Forestry & Paper Association's *Sustainable Forestry Initiative* discovered that the average environmental performance of participants improved only after the program implemented standards, monitoring and sanctions following several years without them. (However, compared to the *Forest Stewardship Council*, another forestry program, the *Sustainable*



Cover of the Sustainable Slopes charter

Forestry Initiative could stand to encourage further improvement.)²²⁸

But there is no clearer case of a vapid voluntary environmental program than *Climate RESOLVE*, organized in 2002 by the Business Roundtable, an anti-Kyoto coalition representing 150 major corporations, including Ford Motor Company, BP and General Motors. The sole mission of *Climate RESOLVE* is to achieve 100 percent participation by the Roundtable's members in voluntary greenhouse gas (GHG) management programs. Rather than setting their sights on either individual goals or a collective goal, participants are asked merely to “carefully consider” President Bush's plan to reduce U.S. greenhouse gas (GHG) emissions intensity, or the ratio of emissions to GDP, by 18 percent by 2012. The plan is modest—during the 1990s, under business-as-usual condition, emissions intensity in the U.S. dropped 16 percent even as absolute emissions increased—but should America somehow fail to follow it, participants in *Climate RESOLVE* will suffer no consequences.^{229 230}

By virtue of the size of the companies involved, *Climate RESOLVE* is America's closest approximation to a national climate change policy. The NSAA, for one, would

Rather than setting their sights on specific goals, Climate RESOLVE participants are asked merely to “carefully consider” the president's plan.

like to see it replaced.

The United Nations recently warned that global warming will raise snowlines and reduce annual snowfall worldwide, while a U.S. Geological Survey hydrologist estimates that snowlines in California may recede by between 1000 and 1500 meters this century.^{231 232}

Faced with a crisis of warming winters, in April 2004, the NSAA wrote a letter endorsed by 71 ski areas in support of the Climate Stewardship Act, a proposed federal regulation that would restrict GHG emissions through a cap-and-trade mechanism. “As die-hard skiers and snowboarders, we think that winter is already too short. We view climate change as a long-term problem, and want to implement... measures now to help solve it,” the letter states. Addressed to Senators John McCain and Joe Lieberman, who together introduced the bill, the letter asks, “Please let us know if there is anything else we can do (sic) help ensure the passage of S.139.”²³³

Though expressed in earnest, the letter is sullied by self-interest: it must be inferred that the NSAA prefers meaningful standards, monitoring and sanctions when it comes to curbing global warming, but not to solve environmental problems that have a more direct bearing on the ski industry’s operations.

The study by Rivera and DeLeon used data from participant self-assessment surveys and from the Ski Area Environmental Scorecard, compiled annually by a network of nonprofit groups. The scorecard emphasizes environmental issues influenced heavily by the ski industry, particularly land and water use, and downplays others, such as global warming, upon which the ski industry’s impact is proportionately smaller. Thus, even as the Aspen Skiing Company continues to outpace other ski areas in curbing operational greenhouse gas (GHG) emissions, its perennial ‘A’ grade might be in jeopardy due to a planned \$400

million development project.²³⁴

The authors of the scorecard point out that while the number of annual skier visits nationwide has nearly held steady for the past 25 years, ski area land-use has exploded to accommodate condominiums, hotels, restaurants and other facilities. For example, in Colorado’s White River National Forest, where the Forest Service leases land to several ski areas, annual skier visits have grown 28 percent since 1985, yet ski area land-use has climbed 107 percent over the same period. According to Jeff Berman of Colorado Wild, “Expanding into undisturbed forest brings more impact than almost anything else a ski area can do.”^{235 236}

For perfectly understandable reasons, the NSAA reserves most of its environmental attention to for global warming. But the organization’s preoccupation does not justify the failure of *Sustainable Slopes* participants on the whole to improve their performance on other environmental issues.

Unless *Sustainable Slopes* shows positive results internally, it amounts to nothing more than a propaganda campaign, a call for help from the outside world. And while that call deserves to be answered, it is not in harmony with the mission of *Sustainable Slopes*.

RECOMMENDATION

The NSAA should make *Sustainable Slopes* meaningful by setting concrete standards; employing third-party monitoring; and sanctioning poor performers by putting them on probation or expelling them from the program. The net result would be a stronger, more dependable *Sustainable Slopes* for ski areas that remain. Furthermore, by rejecting the discretionary design of *Climate RESOLVE*, the NSAA would bolster the case for climate change regulations such as McCain-Lieberman; after all, the NSAA wants to help in any way it can to ensure passage of the bill.

The NSAA prefers meaningful measures when it comes to curbing global warming, but not to solve environmental problems in the ski industry’s operations.

GO FIGURE

- 175 Ski areas asked to submit self-assessments surveys as part of *Sustainable Slopes* in 2004²³⁷
- 62 Ski areas that did so²³⁸

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