

GREAT LAKES UNITED

Great Lakes United Activities

Overall Goal:

To Build a Basin-wide constituency that will work for the conservation, protection and restoration of the Great Lakes - St. Lawrence River ecosystem.

Major Program Emphasis:

Consistent with the overall goal of our work there are four major program focuses. The four program areas are:

- 1) Zero Discharge and Pollution Prevention;
- 2) Protection and Conservation of Fish and Wildlife Habitat and Water Quantity;
- 3) Clean-up and Restoration of the Great Lakes - St. Lawrence River Ecosystem;
- 4) Protection of Human Health;

1) Zero Discharge and Pollution Prevention

The goal of this program is to promote and ensure the implementation of programs, policies, and actions that will reduce toxic chemical use and exposure and achieve zero discharge in the Great Lakes Region.

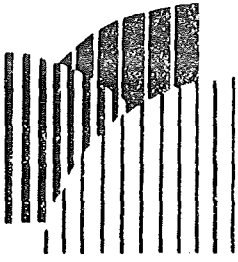
Activities as part of this program include:

- A) Producing the Bulletin of Pollution Prevention
- B) Producing Two Citizens Guide to Pollution Prevention
- C) Labor/Environment Taskforce - this taskforce of Great Lakes United is working on cooperative strategies between labour and environmentalists to reduce the worker and environmental exposure to toxic chemicals.
- D) Producing Great Lakes Pesticide Report
- E) National Pollution Release Inventory (Canada) - GLU working with other Canadian organizations is providing input and into the development of a Canadian Toxic Release Inventory.

An international organization dedicated to conserving and protecting the Great Lakes and St. Lawrence River
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ATLANTIC STATES LEGAL FOUNDATION

NEWSLETTER, WINTER 1991

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Atlantic States Continues Enforcement Efforts in Fort Wayne, Indiana

by M. Alan Hays, Esq.

Acting on requests from a number of its members in Indiana, Atlantic States Legal Foundation began investigating pollution problems at the Fort Wayne Water Pollution Control Plant last December. A review of the monthly discharge reports of Fort Wayne industries discharging to the Plant revealed an extensive history of Clean Water Act violations by almost one-quarter of those industries.

For decades, the Fort Wayne Water Pollution Control Plant was able to distribute valuable, nutrient-rich sewage sludge, a by-product of sewage treatment, to Fort Wayne farmers and gardeners for use as a fertilizer. This program was halted by the United States Environmental Protection Agency in 1987 when it was determined that the sludge contained high levels of heavy metals, including cadmium and zinc, and other toxic contaminants.

This sludge is now accumulating at a rate of 7,000 tons per year at a storage site on the Maumee River Flood Plain. Fort Wayne activists examined this problem and stated publicly that Fort Wayne's toxic pollution problems ran deep, declaring the need for tougher enforcement.

Following their review of "pretreatment" files [see sidebar pg. 2, "Industrial Pretreatment and the Clean Water Act"] at the Fort Wayne Water Pollution Control Plant, Atlantic States staff returned to Syracuse with discharge data supporting citizen enforcement actions against twenty of Fort Wayne's most egregious pretreatment violators. Subsequently, Atlantic States put twenty pretreaters on notice of its intent to sue for Clean Water Act violations.

Atlantic States' actions prompted a meeting behind closed doors among representatives of the industries who had been put on notice, the City of Fort Wayne, and the Indiana Department of Environmental Management (IDEM), to discuss strategies for derailing Atlantic States' enforcement efforts. The Clean Water Act provides that if a polluter is already facing "diligent" enforcement by government, then a citizen suit may be precluded. We believed that the objective of this meeting was to develop a strategy for precluding our enforcement efforts after the fact, with slap-on-the-wrist settlements between government and the polluters.

Were it not for a keen Atlantic States' member who blew the whistle on this dubious meeting, government and industry in Fort Wayne might have succeeded in colluding to defeat the intent of Congress in authorizing citizens to sue to enforce the Act, with the public no wiser and again left out in the dark.

These events whipped up a frenzy of debate in Fort Wayne. Newspaper articles likened Atlantic States attorneys to eastern vigilantes swaggering down

(Continued next pg....)

Greetings! We hope you find the Winter 1991 Newsletter informative. It's not an easy task to condense all the various operations of Atlantic States into a small publication, but we think we have put together another representative sampling of our organization's activities.

Don't forget to renew your membership with ASLF -- the contribution of each and every member is crucial for our continued survival as an effective organization, especially in these trying economic and political times. You will find the renewal form inserted in the middle of the newsletter. Thanks!

EPCRA ISSUES

EPCRA ENFORCEMENT ENCOURAGES POLLUTION PREVENTION

By Robert Nagel, Esq.

(...con't from prev pg.)

through the plant to be discharged into the plant's receiving water, usually a river. The US EPA estimates that tens of thousands of tons of industrial waste enter the nation's waterways in this way each and every day. In addition, some pollutants, like poly-chlorinated biphenyls (PCB's) and heavy metals (lead and cadmium, for example), accumulate in the sewage sludge. An prime example of the dangers of contaminated sludge occurred in Bloomington, Indiana, where soil additive distributed from the sewage treatment plant spread PCB's to gardens all over the city, making them unfit for use.

Since discharge permits are issued under the authority of the Federal Clean Water Act, they are subject to the citizen enforcement provisions of the Act. Therefore, when a permittee continually exceeds the pollution limitations in its permit, it subjects itself to liability for violating the Clean Water Act. Citizen enforcers of the Clean Water Act will be focusing increasing attention on pretreatment in the future, as more and more industrial operations are coming to rely on sewage treatment plants to handle their wastewater. ♣

The Simon J. Volpert Environmental Center

at 658 W. Onondaga Street
Syracuse, New York

*Is home to the environmental and
social not-for-profit groups:*

Atlantic States Legal Foundation

American Clean Water Project

Energy Clearing House

SANE/FREEZE of CNY

In Concert With Nature

Fund for the Environment, Inc.

Atlantic States Legal Foundation is the first plaintiff to successfully use the citizen suit provisions contained in the Emergency Planning and Community Right-to-Know Act (EPCRA). Ten cases have now been settled; seven of these ten settlements require the defendant to prepare and implement pollution prevention and toxic use reduction plans. Most of the settled cases involve Erie County, N.Y. companies; one is with a Jefferson County, N.Y. manufacturer; one is with a Broome County, N.Y. manufacturer; and the other concerns a tannery in Milwaukee, Wisconsin.

The EPCRA legislation serves a very important function by enabling industrial workers and concerned citizens to find out about materials they work with, or reside near, that might have an impact on their health or safety. Citizen enforcement of EPCRA's provisions—such as those undertaken by Atlantic States—becomes necessary as companies regularly neglect to file the required information, leaving neighbors, workers, and local emergency services in the dark about hazardous substances stored or used by industries. It is easy to see why a city fire and police departments would need to know exactly which types and quantities of dangerous substances are present when they might well be called upon to fight a fire in a factory or storage facility.

Under a settlement reached with Atlantic States in December 1990, a Buffalo company, Murray Sandblast and Paint, has now implemented a pollution prevention and toxics use reduction plan. Murray Sandblast is a metal blasting and paint shop, whose primary business activity is finishing auto carrier trailers and trucks.

The two primary toxic substances used by Murray are methyl ethyl ketone and methyl isobutyl ketone. Other toxic substances they employ include xylene, glycol ethers, and toluene. These solvents are contained in the primers and paints used by Murray, and are all extremely toxic.

In 1989, Murray generated twenty-one tons of paint and primer sludge, over twenty tons of solvent emissions, over seven tons of paint and primer overspray, and some 450 pounds of steam cleaning residues. It is important to remember that these solvents, in addition to being stored and used on-site, are also released to the atmosphere as both stack and fugitive emissions. The waste primer, waste paint, and waste thinner must finally be disposed of as hazardous wastes, according to the Federal Resource Conservation and Recovery Act (RCRA). Hence a strategy for dramatically cutting such substances' use becomes crucial, to insure the safety of local residents and plant workers alike.

The primary pollution prevention strategies identified for Murray are spent blasting-grit reclamation, electrostatic painting, and water-based paint substitution. Murray has identified a company that will reuse the spent aluminum oxide blasting grit that had formerly been landfilled. In 1989, Murray landfilled twenty-seven tons of the material. Now, as a result of the pollution prevention plan, the material will be sold to a Michigan abrasive manufacturer and used in the manufacture of sandpaper and abrasive wheels. Not only will this avoid using scarce landfill space, but Murray also achieves cost savings by avoiding tipping fees and by generating revenues through the sale of this former waste product.

(Continued next pg...)

Central New York Issues

Atlantic States Settles Case with Bristol-Meyers and Onondaga County

by Donald Hughes, P.E.

On November 4, 1991, Atlantic States filed a Consent Decree with the U.S. District Court in Albany, N.Y., formalizing a settlement with Bristol-Meyers and Onondaga County that has been well over a year in the making. According to the terms of the settlement, Bristol must comply with the following measures:

- complete a sewer consolidation project which will combine seven separate outfalls into a single discharge point;
- hire an independent consultant to perform a wastewater pretreatment/pollution-prevention study;
- fund a study by Onondaga County that will develop pretreatment standards concerning volatile compounds (such as acetone, methylene, and chloride), in order to make improvements to the Metro sewage treatment plant;
- provide funds for Atlantic States to monitor compliance with the levels of its wastewater discharge permit; and
- cover the legal fees and costs of Atlantic States and its attorneys (True, Walsh, and Miller of Ithaca, NY) incurred while carrying out this citizens' enforcement suit.

The county, in addition to the study mentioned above, is also required to revise Bristol's discharge permit to reflect tighter limits on phenols and pH.

Background

Bristol Meyers operates a pharmaceutical facility located in East Syracuse, N.Y., which produces penicillin and other antibiotics in large quantities. This plant discharges about one million gallons per day of high strength wastewater to the "Metro" sewage treatment plant owned and operated by Onondaga County. Although Bristol's wastewater constitutes less than two percent of the total flow, it accounts for about twenty percent of the nitrogen, ten percent of the phosphorus, and twenty percent of the suspended solids entering the plant each day. Much of this pollutant loading could be avoided if Bristol Meyers pretreated their wastewater,

or modified their industrial processes so that so many pollutants did not enter the wastewater in the first place.

Shortly after Atlantic States served notice of their intent to sue Bristol, Onondaga County proceeded to revise their discharge permit (the legal license that sets limitations on various pollutants in wastewater) by removing limits on nitrogen and phosphorus the plant had violated. In effect the county attempted to bring Bristol's discharge into compliance with the law by simply issuing a more lenient permit.

In December 1989, Atlantic States filed a formal Complaint against Bristol Meyers that reaffirmed the accusations contained in the notice letter, and also cited the numerous chemical spills which have entered the municipal sewer system. Such spills endanger both the Bristol plant and the public-owned treatment facility downstream. Susan Brock, the attorney representing Atlantic States, said, "Over the next several months we tried, in vain, to convince the county to restore Bristol's original permit limits. They refused, and in August 1990 we named Onondaga County as a co-defendant in the case."

Settlement Terms

Three major issues formed the basis of these lengthy negotiations: in-plant improvements at Bristol-Meyers' facility, a pretreatment study to determine the best method of processing the water *before* it enters the sewage system, and a study to determine enforceable but environmentally reasonable limits on volatile compounds in the wastewater discharge.

Altogether, Bristol Meyers expects to have spent some \$3.2 million upgrading their tank farm, installing new neutralization facilities, and consolidating their sewer lines measures that should have been in place all along. Any funds left over

from the pretreatment study will go to Save the County, a local land preservation group, for the purchase and protection of sensitive wetlands in the Onondaga Lake watershed.

Atlantic States will receive funds explicitly for the purpose of monitoring and enforcing the terms of the settlement, insuring Bristol's compliance with the terms. This includes attending progress meetings and reviewing in detail the results of the mandated studies, which should be available from the consultants no longer than eighteen months from the filing of the consent decree.

We are optimistic that, after review by the U.S. Department of Justice, the judge will sign the decree by January 1992. ♣

Incinerator Update

Atlantic States, together with a coalition of five other local activist groups and a county legislator, filed for party status to challenge the proposed solid waste incinerator to be built in the Town of Onondaga near the Rock Cut Road exit of Interstate 481. The coalition believes the proposed incinerator does not reflect the state's overall waste management priorities of reducing, reusing, and recycling garbage before burying or burning it. Further, we question procedural matters, as well as issues not yet addressed adequately, such as the landfilling of concentrated waste ash, possible effects of the facility on endangered plant species, and effectiveness of air pollution controls.

At the time of this writing, we still await a decision on whether an adjudicatory hearing will be held by the New York State Department of Environmental Conservation to review these issues, and whether the coalition of groups that includes Atlantic States will be permitted to participate and voice its concerns. ♣

FYI

The Future of Ecotourism: Lessons from the U.S.

by Samuel H. Sage and Anne Beeman

The first national park in the world was Yellowstone, whose magnificent geysers, waterfalls, and relict ungulate herds commanded the attention of the public. However, even Yellowstone could not be set aside for its own sake, but needed to be created and promoted as a tourist destination before the concept of a national park gained widespread acceptance. The first directors of the United States National Park Service spent more energy promoting the parks and trying to attract visitors than they did trying to protect the parks from unneeded development.

The debate still continues. The recent purchase of the parent company that runs the concessions at Yosemite National Park in California has raised important questions surrounding the role of tourism in the protection of natural wonders: can you protect an area and develop it at the same time? With development, there seem to be only incentives for more people to visit; in essence, we love our parks to death.

Another example of this dilemma is Niagara Falls, perhaps the most-visited "ecotourism" site in the world, where the abundant waters of the upper Great Lakes drop 99 meters (326 feet) through the Niagara Escarpment and then into Lake Ontario. The area has become despoiled over time by unaesthetic trinket shops, fast food restaurants, and ugly towers, and ironically, one of the greatest concentrations of chemical industries and concurrent toxic emissions in the world.

Promoters of ecotourism maintain that one does not face an all-or-nothing choice between economic development and environmental preservation. They insist that ecotourism can be a "win-win" situation, since the area does not have to be

built-up in order to attract visitors. Visitors, ecotourist promoters argue, will pay for the opportunity to see the land in its primitive form. Of course, the development of ecotourism as a viable economic alternative is not as simple nor as environmentally sound as they suggest. All tourists, "eco-" or not, require a basic infrastructure somewhere airports, ground transportation, lodging, communications, and the bureaucracy to maintain these facilities. Investments in water and sanitation are often needed to ensure the health and well-being of the tourists. This investment in infrastructure development necessarily involves a sacrifice of land and resources and the possibility of environmental degradation in the process. Where there are numbers of people, some kind of development seems nearly impossible to prevent.

Is it possible to strike a balance between environmental protection and sustainable development? And who should be responsible for doing so? In many instances, local citizens are excluded from the decision-making loop by developers with an abundance of projects and capital to finance them and by national officials with hopes of attracting development. As the experiences of the United States National Park Service reveal, even active public concern for the protection and preservation of natural wonders may not be enough to prevent the environmental degradation created by uncontrolled ecotourism. What is needed for successful environmentally-sound tourism is widespread planning and foresight.

All environments are fragile to a certain extent and all have an inherent "carrying capacity," or threshold level of tourist activity [or any activity] beyond which there will occur physical deterioration of the resource or damage to natural habitats. Therefore, all ecotourist promotion and development must be grounded in an understanding of the carrying capacity of particular regions.

An ecotourism-planning mechanism should allow for the control of

the scale and amount of development appropriate to the particular site and should include guarantees that no pollution would result from this development. However, the best planning cannot take the place of an understanding of the finite nature of the carrying capacity of the areas in question. How much is too much requires a case-by-case analysis.

Fragile areas need special management. Examples of this kind of management include wetland and coastal dune areas in the United States where boardwalk systems have been designed to keep people from trampling the very resources that are being protected and visited. Another example is the seasonal closing of bird nesting areas which has been important in the preservation of viable populations of these creatures.

True ecotourism may well have the potential for being economically viable and environmentally sound. However, as can be seen, it requires much planning for cooperation among developers, tourists, and communities. The key in this planning is the empowerment of the local population and their involvement in any development projects, and the presence of numerous non-governmental organizations that can carry the burden of being watchdogs and protectors of the land. ♣

Volunteers and Interns:

A special thank-you to our community volunteers:

Carl Borek, Andrew Gold, and Anne Stephens.

We are equally grateful to our student interns from Syracuse University and the State University of New York School of Environmental Science and Forestry:

Anne Beeman, Brian Colella, Denver Gilliland, Jesse Herbert, and Danielle Hindenmuth.

You all contributed ably to Atlantic States Legal Foundation's fight to improve the environment!

Activities of Pollution Probe
1992

The activities for Pollution Probe for 1992 can be described as follows:

Campaign for an Environmental Bill of Rights for Ontario: For over two decades, environmentalists have been fighting for environmental rights to protect the environment. In November of 1991, the Ontario Minister of the Environment announced a task force to draft an Environmental Bill of Rights. As a member of this task force, Probe hopes to ensure the bill:

- * will give the public the right to participate in environmental decisions (such as permits, standards);
- * ensure the public has the right to sue polluters for non-compliance; and
- * give workers extended whistle blowers protection, among other protections.

The draft bill will be released for consultation in the spring of 1992.

Sunset Chemical Project: Pollution Probe is in a joint project with George Washington University called the "Sunset Chemical Protocol" project. The purpose of this project is to identify the worst pollutants and processes and then develop strategies to phase-out those chemicals and processes.

Pollution Probe researchers have been involved in the Virtual Elimination Task of the International Joint Commission. It is also a participant in the consultation process sponsored by the Canadian federal government called the Accelerated Reduction and Elimination of Toxic Substances (ARETS). Probe is now in the process of drafting a citizens' guide to the concept of sunset chemicals and strategies for community involvement.

One of the key focal points of this project is air pollutants owing to the perceived regulatory weaknesses in Canada in this area.

Biotechnology: Pollution Probe is undertaking a major research project on the environmental implications of biotechnology and the decision-making processes concerned with that industry.

North America Free Trade Agreement: Pollution Probe is working to oppose the NAFTA, and at any rate, to ensure it takes into account the environment, especially in its dispute settlement mechanism.

GREAT LAKES INDIAN FISH & WILDLIFE COMMISSION

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• MEMBER TRIBES •



MICHIGAN

Bay Mills Community
Keweenaw Bay Community
Lac Vieux Desert Band

WISCONSIN

Bad River Band
Lac Courte Oreilles Band
Lac du Flambeau Band
Red Cliff Band
St. Croix Chippewa
Sokaogon Chippewa

MINNESOTA

Bois Forte Band
Fond du Lac Band
Grand Portage Band
Mille Lacs Band

To: Great Lakes United
Phillip Weller

From: Karen Vermillion

Re: GLIFWC Activity Summary

Date: March 18, 1992

Dear Phillip:

There are four sections in the Biological Services Division of the Great Lakes Indian Fish and Wildlife Commission: Environment, Inland Fisheries, Great Lakes Fisheries and Wildlife. Very broadly, the Environment Section investigates environmental issues, provides technical assistance to tribes, acts as a liaison with environmental organizations, performs water quality studies. The Great Lakes Section monitors commercial fish harvest, act as a liaison with Great Lakes fishery agencies, conducts Sea Lamprey assessment, performs Lake Trout/Whitefish tagging studies, participates in inter-agency studies of the ruffe in western Lake Superior tributaries, and provides technical assistance to the tribes. Inland Fisheries Section manages the fish harvest, provides technical assistance to tribes, acts as a liaison with fishery agencies, inventories and classifies inland waters, and conducts fish population studies. Wildlife Section assists tribes in managing wildlife and wild rice harvest in ceded territories, act as a liaison with wildlife agencies, perform wildlife population studies, develop programs with other agencies for habitat improvement, and provide Circle of Flight technical assistance for Circle of Flight Initiative, and develop wild plant management with the Commission member tribes.

This is the broad description from which specific projects and involvements manifest. During the course of our meeting, which I look forward to, specifics can be discussed. Just for a brief look at these issues, we are involved in the Wisconsin mining sites from a tribal/environmental perspective, for example. Also, research is ongoing regarding traditionally used plants and their habitats. We coordinate fish sampling for mercury and some persistent toxics annually. But always, we approach our work from the tribal



Great Lakes Plans and Activities

The framework for Greenpeace activities in the Great Lakes basin remains ZERO DISCHARGE OF PERSISTENT TOXIC SUBSTANCES. We campaign for an end to the production, use and disposal of persistent toxics. This is essential if we are to reverse the devastation of Great Lakes fish and wildlife and if we are to prevent growing human health impacts. Greenpeace encourages grass roots activists to see toxic substance battles in their individual communities as connected in the framework of the Great Lakes basin ecosystem.

Our specific Great Lakes programs include:

1) PULP AND PAPER. We continue to work for a phase-out of all chlorine based bleaching by the paper industry. This year, we are putting greater emphasis on changing marketplace demand with a focus on large purchasers such as major magazines, governments and governmental agencies, corporations, social change organizations, etc. We are pressing (seeking either legislation or executive order) to get State governments to establish procurement policies that specify both chlorine-free and maximal recycled content in the paper they purchase. In the U.S., we continue to campaign against efforts by the EPA to "reassess" the toxicity of dioxin and other organochlorine compounds discharged by bleach pulp mills. In Canada, we seek to persuade the Ontario government to follow British Columbia and set a time-table for zero discharge of organochlorines.

2) INCINERATION. We continue to campaign against all forms incineration (hazardous waste, solid waste, medical waste, etc.) in or near the Great Lakes Basin. This year, we plan to increase public understanding of how incineration is a major contributor to persistent toxic pollution of the Great Lakes.

3) CHLORINATED SOLVENTS. A new push for Greenpeace this year is to show how the use of chlorinated solvents is also a major contributor to persistent toxic pollution of the Great Lakes. We are working on a project to get commitments from the Great Lakes automobile manufacturing industry (and their parts suppliers) to

--more---



Working for the Nature of Tomorrow's

NATIONAL WILDLIFE FEDERATION

Great Lakes Natural Resource Center
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1992 Major Activities of National Wildlife Federation Great Lakes Natural Resource Center

Our main activities will continue to focus on the two projects in our office, the Model Water Quality Standards Project and the Lake Superior Project.

Model Water Quality Standards Project:

-Most of our efforts will center around the Great Lakes Initiative to ensure a strong package is approved by EPA. Our short-term push is to have the draft guidance package published in the Federal Register for public comment. We are planning to hold training workshops in various locations in the Great Lakes basin as well as to coordinate other strategies to increase citizen influence in the process. We will also be developing fact sheets and position papers for citizens to use.

-We will also work to pressure the governments to convene a "daughter of GLI" process to address those issues that are not a part of the Great Lake Initiative, like contaminated sediments, non-point run-off, and atmospheric deposition.

Lake Superior Project:

-Last year at the IJC Biennial meeting, the governments committed to a "Binational Program to Restore and Protect Lake Superior." It includes a Zero Discharge Demonstration Program and a broader program to protect the Lake (mostly the development of the Lake Superior Lakewide Management Plan). We will continue to push for the program to be strengthened and to see that the program is implemented.

-It is very likely that we will file one or more lawsuits against permit violators in the basin.

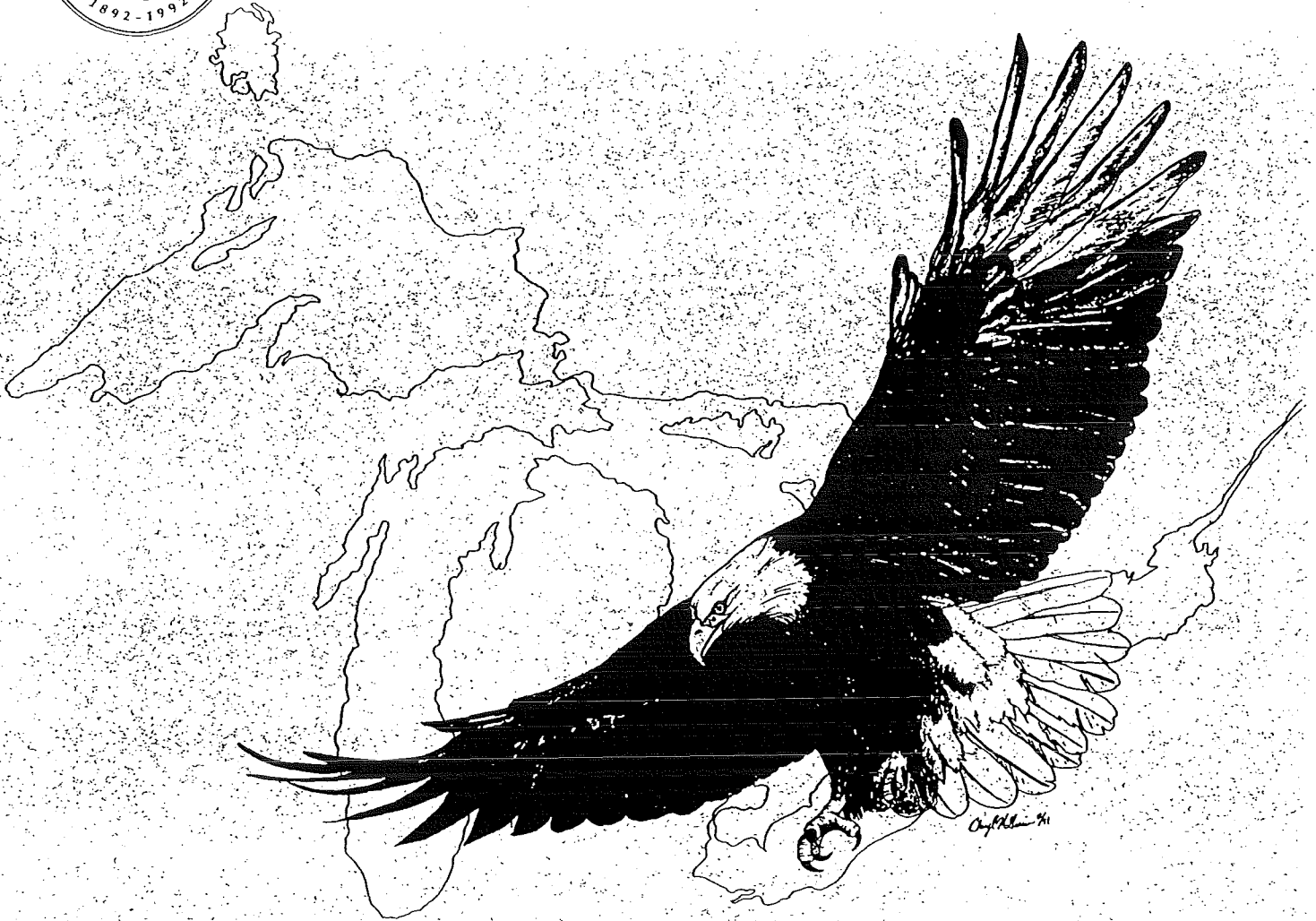
-We have drafted a Lake Superior Protection Act, which we want to see introduced either as stand-alone legislation or as part of the Clean Water Act reauthorization.

-We are working with the six Lake Superior senators to request that the governments issue a reference letter to the IJC to examine Lake Superior ecosystem protection issues.

-We will finish Phase One of our Lake Superior Biodiversity Project, which focuses on evaluating the scientific and legal framework for ecosystem protection in the basin, both on the U.S. and Canadian sides.



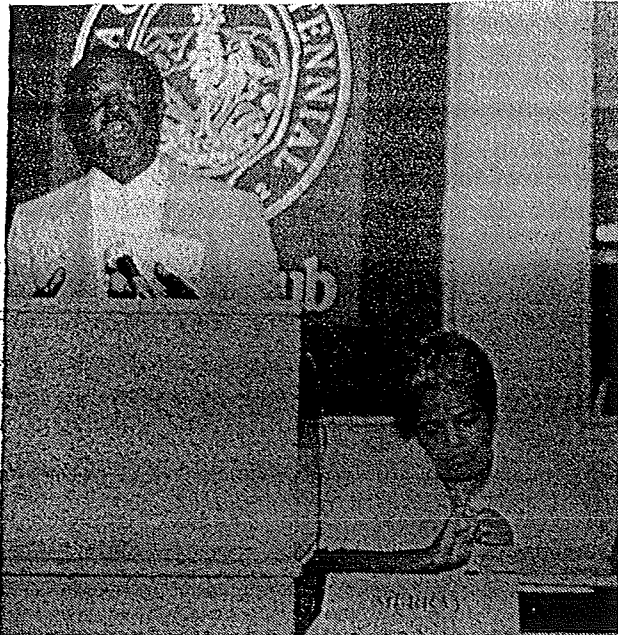
SIERRA CLUB GREAT LAKES



ANNUAL REPORT

1991

Sierra Club Great Lakes Program
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(608) 257-4994



Pat Bryant of the Gulfcoast Tenants Organization speaks at the GreatLakes Air Toxics Conference.

Club is also actively participating in the rulemaking process for the Clean Air Act and analyzing Clean Water Act and RCRA policies.

CLEAN WATER ACT/WETLANDS RESPONSE

In planning for the 1991 battle over clean water, the Sierra Club organized and hosted a Great Lakes Clean Water Assessment meeting at the Midwest office in November, 1990. The group's goal was to evaluate the Clean Water Act with regard to meeting the goals of the Water Quality Agreement, in particular Zero Discharge. Organizations attending were: Great Lakes United, Greenpeace International, Lake Michigan Federation, Citizens for a Better Environment, and the National Wildlife Federation.

The group concluded that federal pollution control programs must shift from dilution strategies to prevention strategies in order to reach zero discharge goals. They agreed to analyze key federal programs to identify opportunities for the Club's Clean Water Agenda released in March, 1990.

Great Lakes groups released a progress report on the agenda at the 1991 Washington Week, using the *Blueprint for Zero* document. Great Lake activists have utilized *Blueprint for Zero*, which the Club has widely distributed throughout the basin. In May, 1991, Brett Hulsey testified before the House Public Works, Water Resources Subcommittee to present

Blueprint for Zero and other issues dealing with clean water policies.

The Great Lakes Program staff continues to monitor federal provisions and policies that affect the Great Lakes and have focused efforts on Lake Superior. In the summer the Club helped host a series of meetings around Lake Superior, including a pollution prevention program at the Inland Sea Symposium, a Lake Superior Visions conference in Thunder Bay, Ontario, and a kick-off meeting for the Windigo Chapter, a new Sierra Club chapter in Michigan's Upper Peninsula.

STOPPING BAD ENERGY POLICY

Great Lakes Program staff coordinated efforts with more than ten other environmental groups to inform policy makers of the effects of the Johnston-Wallop energy bill, a bill that would have spelled environmental disaster for the Great Lakes ecosystem. Senators defeated the bill, S. 1220, in early November.

In addition to opening the Arctic National Wildlife Refuge to oil exploration and drilling, the bill would have seriously threatened the Great Lakes region. "This bill would have given us more oil spills, more nuclear power plants, more poisoned fish, fewer free rivers, more polluted cities and more expensive electricity," said Brett Hulsey, the Club's Great Lakes Program director.

POLICY ANALYSIS

It is the Club's ongoing commitment to analyze contemporary laws and regulations that affect environmental quality in the Great Lakes basin. Early work on air toxics produced Section 112(b), Title III of the 1990 Clean Air Act, which strongly regulates air toxics.

Every year the program staff analyze public policy on air and water quality, public lands management, and energy. Last year, during the Club's Great Lakes Washington Week, program staff and volunteers consolidated this analysis in *Blueprint for Zero*. *Blueprint for Zero* analyzed hazardous waste policy, the Clean Water Act, RCRA, toxic pollution policy, conventional pollution, and wetlands. The document also provided an overview how agencies implement

Members were very pleased when the board gave the Great Lakes campaign status and, thus, higher priority within the Club.

The committee participated in this year's Great Lakes Week, an intensive training and educational experience in Washington D.C. This event has consistently brought new people into active involvement with Great Lakes issues and the committee and increased the visibility of Great Lakes issues with both elected representatives and agency people.

In addition, committee members also serve on the Clean Water Act Network and the Wetlands Task Force, and the committee is working closely with the Labor Liaison Committee and the Clean Steel Network (a current project of the Great Lakes Program).

The Great Lakes Program staff, Binational Great Lakes Committee members, and other Sierra Club representatives worked together to represent Sierra Club interests within the Great Lakes Basin at the Great Lakes United (GLU) Annual Meeting in May.

Committee members presented at the Great Lakes Air Toxics Conference and RCRA workshop in May and the International Joint Commission Biennial Meeting at the end of September.

The committee also held meetings at the Great Lakes United Annual Meeting, the air toxics conference, held two conference calls over the summer, met at the IJC Biennial, and has another conference call planned before the end of November.

CLEAN STEEL GETS ROLLING

Great Lakes Washington Specialist George Coling is working with Blake Early of the Club's Washington, D.C., office and with individuals at the Natural Resources Defense Council to organize a Clean Steel Network. This network will work toward achieving a clean, sustainable future for America's steel industry. With grant funding for next year the Great Lakes Program staff plan to do a sustainable steel project in a major metropolitan center — Gary, Indiana, Detroit, Michigan, or Cleveland, Ohio, are three possible cities. The Club's basic strategy is to

try and convince steelmakers to make needed clean-ups on economic and social grounds.

POLLUTION PREVENTION

Last spring the EPA announced the long-awaited, bilateral pollution prevention plan for the Great Lakes. In a press conference in Chicago, EPA officials described what they called "an ambitious effort" to reduce toxics in the Great Lakes Basin. Highlights of the plan included: an auto industry initiative, which will promote voluntary pollution prevention in the auto industry; a Lake Superior initiative, which will promote a cooperative effort to prevent pollution in the largest and most vulnerable Great Lake; an urban non-point pollution effort, which will launch pilot programs in pollution prevention for urban non-point sources; and an international pollution prevention symposium, which EPA will cosponsor with Canada.

While the Sierra Club supported the pollution prevention effort, program staff were still critical of the plan's specifics. "The Bush Administration and the governors have made the first step, but restoring the Great Lakes will take more than a plan," said Sierra Club's Great Lakes Program Director Brett Hulsey. "What they do tomorrow is more important than what they say today." Hulsey said even with this plan, the U.S. and Canada have yet to significantly reduce toxics in the Great Lakes.



Environmental Policy Specialist Will Cwikiel briefs citizens on Great Lakes wetland issues at a zero discharge conference in Traverse City, Michigan.

Andrew Sevagian



George Coling

Sierra Club Great Lakes Program Director Brett Hulsey testifies at the International Joint Commissions biennial meeting in Traverse City, Michigan.

Diversity Task Force. The Task Force is leading a major effort to diversify the ethnic composition of the Club's members, leaders, staff and program participants. Mr. Coling has extensive experience in environmental issues for low-income communities, and in environmental leadership development among people of color. From this experience, enhanced by over a year of work on the Great Lakes Federal Policy Program, he has contributed to the Task Force's support for the Club. Likewise, his participation in the Task Force has helped the Great Lakes Federal Policy Project implement and plan more ethnically diverse programming.

PUBLICITY/OUTREACH

Great Lakes Program staff continues to distribute fact sheets and other project materials on request, and at appropriate opportunities for outreach. This effort includes circulating copies of "The Not-So-Great-Lakes," a television documentary produced by Michigan Public Television for its *Michigan at Risk* series. This video is popular among Sierra Club groups and committees interested in Great Lakes issues. Program staff have also prepared a *Blueprint for Zero* fact sheet for public distribution and have done several printings to meet demand. In cooperation with the Sierra Club's Public Affairs Department, a student intern worked with program staff and designed a Great Lakes information brochure.

Former Great Lakes Program Director Jane Elder continues her efforts with the club; this fall she completed two Great Lakes public service announcements for distribution throughout the basin. Elder also completed "Saving the Lakes We Love," a 20-minute slide show on the beauty and troubles of the Lakes.

PROGRAM NEEDS — THE FUTURE

This is a current list of anticipated program needs and objectives in the coming year.

PROGRAM NEEDS

- Stabilized funds for full-time staff to work on Great Lakes issues.
- A full-time Great Lakes lobbyist in Washington, D.C.
- A Clean Water Act lobbyist.
- A full-time Canadian organizer for Great Lakes issues, who would work toward a stronger program in Ottawa, Quebec and Toronto.
- Volunteer travel funds for Great Lakes and Northwoods committees.

PROGRAM OBJECTIVES

- Lobby for a radical shift in the Clean Water Act, from pollution controls to prevention and zero discharge.
- Push for product and process changes in RCRA to eliminate toxic waste stream.
- Work on comprehensive Great Lakes forest planning to break pulp mill and biodiversity tension.
- Bring chapter lobbyists and chapter lobbying into a Great Lakes focus, and build a cohesive state lobbying program.
- Urge the EPA, states, and Canada to aggressively implement the water quality

Washington Specialist: George Coling (Washington Office)

Mr. Coling's position was expanded to full-time in September of last year. In addition to continuing to monitor federal activity and coordinate our Washington Week activities, Mr. Coling also served as the key coordinator of our Toxic Air Pollution Conference, taking advantage of his significant experience in conference organizing and community outreach.

Great Lakes Washington Report Editor: Andrew Savagian (Madison Office)

Mr. Savagian, also a Masters graduate from the University of Wisconsin, joined the Great Lakes Program staff in the fall of 1990 after an impressive internship over the summer months. We attribute *Great Lakes Washington Report's* improved schedules and writing to his skills and to the advantage of having one individual responsible for publication of the Report. Mr. Savagian also works 60% time.

Project Writer: Polly Freeman (Madison Office and Freelance)

Ms. Freeman joined the staff to compile *An Action Guide to the 1990 Clean Air Act for Citizens in the Great Lakes and Other Ecosystems*. An experienced writer and editor, Ms. Freeman has previously written for the Sierra Club, the ACLU and other non-profit, citizen-oriented organizations. This is also a part-time position, and ended after completion of the project in September, 1991.

Conference Coordinator: Rick Tingling-Clemmons (Washington Office)

Mr. Tingling-Clemens worked with George Coling in the Washington D.C. office and assisted with organizing and managing the air toxics conference. This is a temporary, part-time position that concluded upon completion of the conference evaluation.

Administrative Assistant: Gwen McCutcheon (Madison Office)

Ms. McCutcheon provides assistance to the various Great Lakes staff in the Midwest Office, and provides

particular support for in issue research, writing and editing and coordinating the air toxics conference.

Administrative Assistant: Davora Goodwyn (Washington Office)

Ms. Goodwyn provides part-time support for George Coling, and assists in specific projects such as Great Lakes Washington Week coordination.

MIDWEST OFFICE STAFF

In addition to the staff who work exclusively on Great Lakes Program activities, Great Lakes issues are also among the responsibilities of the Midwest Office Field Staff.

Midwest Regional Staff Director: Carl Zichella (Madison Office)

In addition to his activities as regional director, Mr. Zichella spends a great deal of his time working on such waste policy issues as cleaning up federal facilities like Fernald and the Club's War on Waste campaign, and on our public lands and Northwoods Forestry Campaigns to protect upland resources in the Great Lakes basin.

Midwest Administrative Assistant: Judy Hofreichter (Madison Office)

Judy Provides invaluable support for the Great Lakes Program.



Sierra Club Great Lakes Program staff and volunteers.

Karen Murphy

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
P.O. BOX 30028
LANSING, MI 48909

ROLAND HARMES, Director

RECEIVED JUN 15 1992
CMM

NATURAL RESOURCES COMMISSION

LARRY DEVUYST
PAUL EISELE
MARLENE J. FLUHARTY
GORDON E. GUYER
DAVID HOLLI
O. STEWART MYERS
RAYMOND POUPORE

June 5, 1992

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1. Help coordinate the annual Michigan Citizens' Conference on Great Lakes Areas of Concern;
2. Oversee criteria development for, and solicitation and selection of, demonstration projects to enhance public participation and public education in Michigan's AOCs;
3. Review and comment on the AOC Program Strategy for Michigan and subsequent updates, including the schedule for development of Stage 1 and 2 RAPs;
4. Review and comment on the Public Participation Strategy for Michigan AOCs;

**NOMINATION FORM
STATEWIDE PUBLIC ADVISORY COUNCIL**

Name of Nominee _____

Address _____

City _____ State _____ Zip _____

Phone _____ (Home) _____ (Office)

Area of Concern (AOC) to represent: _____

(Note: Only nominations for Clinton River, Kalamazoo River, Manistique River, River Raisin, St. Clair River, Torch Lake and White Lake are being accepted.)

Is nominee a member of:
(Check those that apply)

_____ Remedial Action Plan (RAP) Team

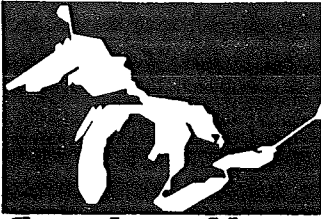
_____ Public Advisory Council (PAC) or
Binational Public Advisory Council (BPAC)

Is nominee currently involved with other affiliations that would provide a pertinent perspective to Council activities? (e.g., environmental/civic groups, business and industry, academia, professional/trade associations.) If yes, please list:

The success or failure of such a Council depends largely upon the nomination of individuals who can meet the challenges demanded of such a group. Nominees should be able to work cooperatively with a diversity of people, have a good understanding of the AOC Program, and be able to make the time commitment necessary to attend all Council meetings and accomplish subcommittee projects and tasks as necessary.

NOTE: In order to be considered, all nominations **MUST** be submitted to the Michigan Department of Natural Resources, Surface Water Quality Division, P.O. Box 30028, Lansing, MI 48909 (Attn: Ann Wilson) **no later than July 30, 1992.**

THANK YOU!



GREAT LAKES UNITED

RECEIVED JUN 15 1992 SM

June 5, 1992

To: Participants and Invitees to Great Lakes Environmental Leaders Meeting, March 29-30, 1992

Enclosed you will find a summary of the discussions which took place at the Great Lakes Environmental Leaders Meeting in Detroit March 29-30, 1992. In the package you will find a summary of the meeting, an appendix with a list of all those who attended the meeting, and summaries of the activities of organizations who attended the meeting.

In addition to those people who attended the meeting we are also sending this document to all those invited but unable to attend so they could benefit from the discussions which took place. If you have any questions about the meeting or the summary notes please don't hesitate to give me a call.

Once again, thanks for the active participation of all of you who were able to attend.

Sincerely

Philip Weller

An international organization dedicated to conserving and protecting the Great Lakes and St. Lawrence River
State University College at Buffalo, Cassety Hall • 1300 Elmwood Avenue, Buffalo, New York 14222

(716) 886-0142

Canadian Address: P.O. Box 548 Station A • Windsor, Ontario N9A 6M6

Summary
of
Environmental Leaders Meeting
Detroit Metro Airport
March 29 - 30, 1992

On March 29 - 30, 1992 Great Lakes Environmental leaders held a retreat in Detroit, Michigan to discuss priority issues for cooperative strategy development and action within the coming year. This document provides a summary and record of the discussions that took place during the Great Lakes Environmental Leaders Meeting.

Introduction

Four major goals were identified at the outset of the meeting. These were: 1) to understand what each other are doing; 2) to strategize together on how to do what we are each doing better; 3) to identify areas of cooperation and coordination; and 4) to identify new issues or activities we could be working on or ways of doing what we are doing more effectively.

In addition it was intended that we would reflect upon our activities and actions over the past year and understand more fully the climate within which we are currently operating. Summaries of the activities of each group were distributed and are attached as Appendix B.

An initial brainstorming identified the following issues for detailed discussion.

- 1) Great Lakes Water Quality Agreement
- 2) IJC
- 3) Zero Discharge/Sunsetting/Water Quality Initiative/MISA
- 4) Lake Superior
- 5) Habitat Protection
- 6) Clean Water Act
- 7) RAPS/LAMPS

Discussion of each of these topics took place.

1) Great Lakes Water Quality Agreement

The consensus of the groups was that the GLWQA remains a visionary document and while there are some things which we would like to see added to the Agreement the most important task is ensuring that it is implemented. Great Lakes United has taken the position that the Agreement should not be renegotiated following the governmental review after the next biennial report. This view was supported by others present.

2) International Joint Commission

There is considerable concern amongst participants about the

diminished government support for the IJC. Copies of a Great Lakes United report on the Commission and the undermining of its capabilities were distributed. Discussion took place on the implications of the closing of the Windsor IJC library. It was felt that the most important thing for groups to focus on was the overall diminishment of the Commission's capability to do its work.

It was noted that the Commission intended to release its sixth Biennial report on April 15. A coordinated response to the report was recommended and was put on the joint strategy agenda.

3) Zero Discharge/Sunsetting/WQI/MISA

There was considerable agreement that since the last time groups had met there was significant progress on zero discharge and pollution prevention. The language of zero discharge and pollution prevention is used in circles where it would have been unheard of in years past. As an example, Jack Weinberg cited the recent decision of Time Inc. to agree to use chlorine free paper when it becomes available. Paul Muldoon cited the development in Canada of a Toxics Release Inventory. These and other successes were seen as directly attributable to the efforts of organizations to promote zero discharge and pollution prevention strategies.

There was substantial discussion about the need for additional work to take the rhetoric of pollution prevention that was now being used and to make sure it was effectively implemented. Discussion focused on the need for both legislative strategies and specific projects. The auto industry initiative was identified as one specific project that is trying to achieve implementation.

Agreement was reached that we needed to become more sophisticated in responding to the economic arguments against pollution prevention or pollution control. Jeff Stant noted his organizations struggles over permit rules in Indiana and Brett Hulsey identified the same problems with the Clean Air discussions.

4) Lake Superior

Gayle Coyer updated people on developments in Lake Superior. She noted that progress had been very minimal in implementing the Binational Lake Superior Plan in the U.S.. Similarly in Canada there was no special designations which protected the lake from further pollution inputs.

5) Habitat Protection

The issue of habitat protection was identified as being of increasing significance. The Sierra Club will be holding a Great Lakes Ecosystem Biological Diversity Protection Conference in

July. Rich Moore noted that we were facing increasing attacks from advocates of habitat destruction and that we were now on the defensive on many issues. Dick Kubiak supported this view and cited the development of the Pennsylvania Landowners organization as a case in point. There was considerable agreement that the climate for environmental activity was considerably different today than it had been even two years ago. Environmental groups are now spending more and more effort in responding to attacks from the other side. Development of a catalogue of groups in the wise use movement in our area was proposed. It was agreed that during the strategy session we would address this issue more fully.

6) Clean Water Act

Brett Hulsey updated the group on the status of the Clean Water Act. It appears unlikely that this bill will make its way through Congress during this session. There was agreement of the need to continue to ensure that there was grassroots education on Clean Water Act issues even though it unlikely the bill will move this year.

Participants further discussed the need to ensure that we have economic arguments in favour of Clean Water and that we develop more strongly information that can be used to counter the attacks on pollution control by interests who are arguing it costs too much.

7) RAPS/LAMPS

Glenda Daniel expressed the view of many groups that there are increasing reservations about the RAP program. Paul Muldoon stated the need to have an evaluation of the RAP program and the success that has been achieved. Steve Sedam noted that there seemed to be a paralysis in government in implementing the RAPS. Concern was expressed about the accountability to the RAPS. Similar reservations were expressed about the LAMPS. There was agreement among the participants that there needed to be a way to undertake an evaluation of RAPS and to develop ways to move RAPS forward.

Strategies for Cooperative Actions

During discussion of cooperative actions a number of ideas arose for joint actions. In addition to specific activities, a number of important themes were emphasized during the discussion. These themes included: 1) a recognition that our successes had brought about backlashes and counter-attacks from industry and developers. The Wise Use Movement and formation of various business organizations trying to limit pollution control are indicative of organized opposition working against our goals. 2) We need to be more effectively organizing economic arguments in favour of our goals. 3) We have had success in getting the

idea and rhetoric of pollution prevention and zero discharge utilized but we need to continue to promote practical implementation. 4) The strong statements of the IJC and the forums they have created have been useful to our efforts and we need to ensure that they continue to be effective spokespersons for the Great Lakes ecosystem and to provide opportunities for us to make citizen concerns known. Based on these themes the participants discussed a number of actions and activities and ideas for cooperative actions.

IJC Biennial Report

Groups felt it was important to put forward a strong unified voice in support of what was expected to be in the IJC report. It was agreed that we would use our contacts to get advance copies of the report. The overall message we would probably all put forward was the need to protect human health from toxic chemicals through phaseout and sunsets. We understood the report was going to recommend this. The report apparently also was going to emphasize Lake Superior actions which we would strongly support. Overall, it was agreed that our message would be positive on the Commission recommendations.

Economics

It was agreed that we need to expand our economic arguments in favour of environmental protection, although no detailed mechanisms was identified to do so. The Great Lakes United Labor/Environment Taskforce, which includes both labor and environmental activists, was identified as one forum through which we can promote policies that protect the environment and ensure employment opportunities for people in the basin. All of us need to cultivate and share contacts who can help us analyse the economics of various policies and programs. Together we need to be promoting ideas that are environmentally sound and economically beneficial.

Health

Both Greenpeace and Great Lakes United have programs on health that will be developed over the next few months. This issue is one that the Great Lakes Indian Fish and Wildlife Commission and the Eagle Project are both focusing on. For all our efforts it was identified that we need to be building coalitions with women's groups and health organizations.

Zero Discharge/Pollution Prevention

Greenpeace will continue to focus on pulp and paper and eliminating chlorinated solvents. Sierra Club is working on the Coke oven issue and Lake Michigan Federation on Sewage treatment plants. Great Lakes United has the Bulletin of Pollution Prevention where success stories on PP will continually be highlighted. Bill Davis and CBE are also continuing to work on

TRI data and Atlantic States is maintaining its citizen suits work. Groups will continue to work extensively in this area on the niches that each has currently developed.

RAPs and LAMPs

The group identified a compelling need to have a thorough evaluation of RAPs and to bring together citizens involved in this effort for discussions on whether we should continue to support RAPs and how we can get them to create true progress in AOCs. Great Lakes United, Pollution Probe, Lake Michigan Federation will explore with the Laidlaw Foundation and EPA and Environment Canada the possibility of funding this effort.

Computer Networking

Considerable discussion took place on computer networking amongst the groups present and through state organizations in the region. It was agreed that Great Lakes United would develop a proposal to undertake a computer communications network amongst Great Lakes groups and explore possible funding options. The intent of the network would be to ensure that basic information on issues is circulated to everyone who needs to know throughout the region.

Opposition Groups

During discussions it was identified that we were all facing increasing attacks from groups opposing our views. It was agreed that we would all try to share information on 'wise use' groups and industrial/municipal 'pollution groups'. Great Lakes United will try to publish information on these groups in its newsletter. Audubon and Sierra as well as other groups with profiles of these organizations will disseminate them also.

Appendix A

Foundations

Margaret O'Dell
Joyce Foundation
135 South LaSalle Street
Chicago, IL 60603
312-782-2464

Laidlaw Foundation
950 Yonge Street
Suite 700
Toronto, Ontario M4W 2J4
416-964-3614

Julia Parsons
Joyce Foundation
135 South LaSalle Street
Chicago, IL 60603
312-782-2464

Appendix B

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
P.O. BOX 30028
LANSING, MI 48909

ROLAND HARMES, Director

RECEIVED JUN 15 1992

NATURAL RESOURCES COMMISSION

LARRY DEVUYST
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O. STEWART MYERS
RAYMOND POUPORE

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STATEWIDE PUBLIC ADVISORY COUNCIL**

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