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ABSTRACT

Since Earth Day 1970, the number of environmental groups has approximately doubled and the movement articulates a much broader and comprehensive philosophy than earlier conservation or preservation movements. The Lake Michigan Federation, one of the new environmental groups developed from the Open Lands Project, was publicly proclaimed in September 1970. The official goal of the federation is to "save the lake." This study is an evaluation of the Lake Michigan Federation and was undertaken: (1) to provide the federation with means of examining its performance, (2) to monitor the use of grant monies, and (3) to provide useful information for other environmental groups. The study contains six chapters: History and Organization of the Lake Michigan Federation, Lake Michigan Federation Operation, Political Effectiveness, Public Information and Membership Evaluation, Lake Michigan Federation Leadership, and Conclusion. The conclusions of the study include: (1) the group functions effectively as a political interest group, (2) federation leadership is very centralized and dependent on the work of the organization's Executive Secretary, and (3) the federation can be used as a model for other groups. Appendices are also included. (TK)

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THE LAKE MICHIGAN FEDERATION:  
EVALUATION OF AN ENVIRONMENTAL INTEREST GROUP

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## PREFACE

"Whatever legacy we have,  
Hell,  
it isn't going to be getting a  
Cesspool for Winnetka!"

Richard Nixon to John Ehrlichman,  
April 14, 1973

Fortunately for Winnetka and other American communities, the sentiments reflected in the above quote are not universally held. The issues of "cesspools for Winnetka" and other efforts to protect the environment are contested daily by government agencies, legislatures, and courts, at the local, state, and federal levels, by industries and other users of the environment, and by that collection of organizations, large and small, cosmopolitan and parochial, which has come to be called the "environmental movement."

Since Earth Day 1970, a significant event has taken place in American interest-group politics -- the growth of the environmental movement. Since 1970 the number of "environmental" groups has approximately doubled (CEQ, 1973), and, as Morrison et al. (1972) and others have pointed out, the movement articulates a much broader and comprehensive philosophy than either of the older conservation or preservation movements. New environmental groups, as well as established organizations like the Sierra Club, have attracted considerable resources: the time and effort of citizen activists, memberships dues, other membership contributions, and significant funding, especially by foundations. One such new environmental group is the Lake Michigan Federation (LMF).<sup>1</sup>

The study was stimulated by one of the federation's major funding sources.

A portion of a three-year, \$100,000 operating grant from the Ford Foundation to the LMF was designated for an evaluation study to be conducted by "an objective outside agency."<sup>2</sup> The Public Lands Project<sup>3</sup> was contracted by the federation to perform this study in September 1973, and the study has been conducted during the past academic year.

Our evaluation of the federation has three explicit objectives. First, the study is intended to provide the federation with a means of examining its performance and organization. Providing insights on which to base changes or improvements is implicit in such a goal. Second, the study could be viewed as an informal method by which the Ford Foundation can monitor its grant to the federation (although this goal was never explicitly stated by the foundation). It should be noted, however, that (a) the last year of the grant was not contingent on the outcome of this study, and (b) the grant was understood to be a one-shot, "seed money" arrangement only. Third, it is hoped that this study will prove useful for other environmental organizations, that an understanding of the experience and performance of one environmental group will be relevant knowledge for similar groups who are seeking to examine their own performance.

This third objective of the evaluation study reflects the rationale of the case-study method in academic social science: the study of one entity among many may provide insights into the common properties of all of a class of entities. In fact, this has been a personal objective of the author in conducting this study. While there is a well-developed tradition in the study of politics which argues that interest groups play a significant role in the development of public policy, there have been relatively few detailed case studies of individual interest groups, particularly environmental interest groups.<sup>4</sup> Hopefully, this study can contribute to filling this gap in interest-group literature.

While an evaluation such as this should meet the objectives described above, it also presents certain unique problems. The primary or first goal of the study -- to provide the federation with a systematic evaluation of its performance -- does not fit neatly into either of the traditions of evaluation research. One tradition, policy evaluation research, is generally concerned with the outcomes or effects of governmental actions. That is, one evaluates whether a governmental decision did or did not have the intended effect and/or whether the decision produced some unintended result. Such an approach (rightly or wrongly) assumes that a governmental action has a direct and straightforward effect on some physical, social, political, or economic environment; that is, the referent system includes only a governmental entity and some relevant environment which is being acted upon. However, an interest group like the Lake Michigan Federation does not operate in such a simple system. The LMF's actions (1) are at least one step removed from the actual decision, and (2) compete with the actions of others (e.g., industrial dischargers) and are reinforced by the actions of others (e.g., other environmental groups with the same point of view on given issues).

The second tradition in public policy analysis focuses on the decision-making process in government. However, a process in which one entity (a government agency or legislative body) both receives pressures and makes a decision is much more amenable to both quantitative and qualitative analysis than a process in which one entity (an interest group) seeks to influence many decisions made by many governmental bodies.

(Another plausible evaluation would be to examine the management efficiency of the federation's activities. This has not been a focus of the study, and the author's interests and competences would not enable him to perform such an evaluation. In addition, such an evaluation would not be particularly productive for an organization as small as the federation, with six full-time employees, etc.)

A view of the federation as a discrete entity whose sole role is to influence public policy significantly underestimates the federation's activities. A major focus of the federation has been to "promote citizen participation in the public policy decisions needed to protect" Lake Michigan.<sup>5</sup> This statement is not a myth generated by the federation to increase the legitimacy of the organization in the eyes of decision makers or to protect its "non-political" tax status. This function is widely perceived by officers, staff, and members of the federation and by persons in government and industry to be the primary purpose of the federation, and it is, in fact, both a major behavioral activity of the federation and the means by which it seeks to achieve its pure advocacy goals. Therefore, this evaluation will examine both the effects of the LMF on the governmental system (Chapter III) and the LMF's success in working with its constituency of citizen groups and individuals (Chapter IV).

A familiar aspect of prefaces is the statement that many are responsible for the success of a research project and the author is responsible for its failures. This should logically suggest that authors are either falsely modest or overpaid. I know the former is not the case, and hope that the latter is not as well. My sincere thanks and appreciation go to the following.

In a sense, the cooperation of the Lake Michigan Federation was an evaluative experience in itself: where the federation preaches open government to administrative agencies, it practices openness itself. In particular, the staff of the LMF--Nancy Flowers, Arnie Leder, Mary Morris, Mary Ann Smith, Terry Tiernan, Becky Brackin and especially Lee Botts--were exceptionally open and honest with me, and very patient with my intrusions into their work. Mike Love, the Federation Executive Council's liaison for this study, was also very helpful, especially with the membership questionnaire, and supportive throughout.

The study could not have been made without the gracious cooperation of all those who allowed me to interview them and/or completed questionnaires I sent them.

Paul Friesema, my colleague in the Public Lands Project, has been a major contributor to this study and to my whole professional development by his insights into and enthusiasm for the study of environmental politics.

Thanks are also due to Terry Stranke, who assisted with coding and interview transcribing, and the staff of the Center for Urban Affairs, Louis Masotti, Director, and Gave Haverkos, Jane Johnson, and Alice Murray, secretaries, for general administrative assistance.

Finally, my editor, Diane Culhane, has attempted, despite enormous odds, to translate this report into a reasonable approximation of the English language.

#### FOOTNOTES TO THE PREFACE

1. However, as will be noted in more detail in Chapter I, preliminary steps to organize the federation were taken prior to 1970.
2. Funding such evaluation studies is a common Ford Foundation practice, particularly when funding new, "action-oriented" organizations or programs.
3. The Public Lands Project is a study group within the Center for Urban Affairs at Northwestern University which specializes in the politics

and administration of natural resources, and particularly of public lands managed by agencies of the federal government. Members of the project, including the author, are political scientists.

It should be pointed out that, although the project is located in the Chicago area, the project had not had any contact with the LMF prior to this study.

4. The major theoretical work on interest groups is Truman (1971). Zisk (1969) is a good general treatment of interest groups.

The major works on interest groups have been on "private" interest groups, for example Millbrath (1963) and Bauer, Pool & Dexter (1963).

Good general treatments of environmental interest groups are Morrison et al. (1972) and CEQ (1973). Berry (1974) presents a good discussion of public interest groups, of which environmental groups are a subset. The only work which involves a case study of an individual environmental group is Sabatier's (1974) dissertation on the Chicago Clean Air Coordinating Committee.

Zisk (1969, p. 6) notes that the interest-group literature is most deficient in determining the influence of interest groups on policy outputs (that is, in the area of one main focus of this report).

5. LMF Program Proposal for 1973, n.d., page 1. The same phraseology is used consistently; for example, "A Continuing Effort of Citizen Action to Preserve a Great Lake," the title of the 1972-73 LMF Annual Report, and "Lake Michigan Federation--Citizen Action to Preserve a Great Lake," the title of the current LMF promotional brochure.

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## LIST OF ABBREVIATIONS

AAAS	American Association for the Advancement of Science
AAUW	American Association of University Women
ACLU	American Civil Liberties Union
AEC	Atomic Energy Commission
BPI	Business and Professional People for the Public Interest
CACC	Clean Air Coordinating Committee
CAP	Citizens' Action Program (formerly, Campaign Against Pollution)
CBE	Citizens for a Better Environment
CEQ	Council on Environmental Quality
CF	Conservation Foundation
COLMP	Committee on Lake Michigan Pollution
C-SELM	Chicago-South End of Lake Michigan wastewater management study
CZMA	Coastal Zone Management Act of 1972
DNR	Department of Natural Resources (Michigan DNR; Wisconsin DNR)
ELR	<u>Environmental Law Reporter</u>
ERDA	Energy Resources Development Administration
GLBC	Great Lakes Basin Commission
IEPA	Illinois Environmental Protection Agency
IIEQ	Illinois Institute for Environmental Quality
IJC	International Joint Commission
IPO	Independent Precinct Organization
IRS	(U.S.) Internal Revenue Service
IVI	Independent Voters of Illinois
IWL	Izaak Walton League
KNC	Kalamazoo Nature Center
LAND	League Against Nuclear Dangers
LCV	League of Conservation Voters
LMF	Lake Michigan Federation
LWV	League of Women Voters
MSD	Metropolitan Sanitary District of Greater Chicago
NEPA	National Environmental Policy Act of 1969
NIPC	Northeastern Illinois Planning Commission
NOAA	National Oceanic and Atmospheric Administration
NOREC	Northern Environmental Council
NDES	National Pollutant Discharge Elimination System
NRDC	Natural Resources Defense Council
NWF	National Wildlife Federation
OLP	Open Lands Project
PCB	(Illinois) Pollution Control Board
RAPP	Refuse Act Permit Program
SDC	Save the Dunes Council
SPCB	(Indiana) Stream Pollution Control Board
U.S. EPA	U.S. Environmental Protection Agency
U.S. EPA-V	Region V, U.S. Environmental Protection Agency
WMEAC	West Michigan Environmental Action Council
WQTI	Water Quality Training Institute

\* \* \*

Corps	U.S. Army, Corps of Engineers
Mann Committee	Special Illinois House Committee on Lake Michigan
Water Bill	Federal Water Pollution Control Act Amendments of 1972
501(C)(3)	Section of the Internal Revenue Code applying to tax-exempt educational organizations, contributions to which are tax-deductible.

## I. HISTORY AND ORGANIZATION OF THE LAKE MICHIGAN FEDERATION

### EARLY ORGANIZATIONAL HISTORY

The Lake Michigan Federation originated in the Open Lands Project (OLP). Formed in 1963, the Open Lands Projects's primary goals were and are the preservation of natural areas, expansion of park areas, and provision of open space in private developments. The Open Lands Project is, in short, an organization in many ways similar to the national Nature Conservancy, except that its geographic focus is on the Chicago metropolitan area.

In 1969, OLP hired Lee Botts, then editor of the Hyde Park Herald to develop a general environmental education program which would also specifically focus on Lake Michigan-related environmental issues.<sup>1</sup> This commitment to Lake Michigan took place during a time of recently increased public awareness of the problems of lake pollution<sup>2</sup> and only mixed governmental success in controlling pollution through the mechanism of the "enforcement conference."

The first major event of the lake program at OLP was a four-state conference on Lake Michigan entitled "To Prevent an Unnatural Death." The conference, held on April 12, 1969, at the University of Chicago, presented discussions of thermal, sewage, industrial, and agricultural pollution, shoreline development, and landfill, as well as descriptions of the efforts of several environmental interest groups.<sup>3</sup> A secondary purpose of the conference, however, was to propose a "system of interpretation," or coordinating organization, on lake-related issues.<sup>4</sup> At and immediately after the conference, a steering committee was formed composed of fifteen representatives of environmental organizations in the four states bordering Lake Michigan. Eight of these original members of the first steering committee were later to become members of the LMF Executive Council -- including both the past and present presidents of the LMF -- and another five represented organizations which have been continuously represented on the Executive Council, albeit by different individuals. The steering committee met on May 1, 1969, in Chicago to organize a "Lake Michigan Group" within the OLP. The function of the Lake Michigan group was to serve as an "information clearinghouse," and the medium for that role was to be a newsletter.<sup>5</sup> Issues defined as important at this first meeting and in subsequent correspondence were thermal pollution and pesticide pollution.

As the Lake Michigan group began to develop into a major program activity, the OLP Executive Director, Gunnar Peterson, and Lee Botts were forced to confront the relationship of the group with the parent organization, OLP. The Lake Michigan group was, in a number of ways, quite different from OLP. Whereas OLP focused on the Chicago metropolitan area, the Lake Michigan group was regional in membership and substantive interest. Where OLP had goals which placed it in the traditional preservationist movement -- albeit with an unusual urban focus and somewhat less radical approach than other preservationist groups like the Wilderness Society -- the Lake Michigan group was much more comparable to the newer environmental movement.<sup>6</sup> The Lake Michigan group was, in addition, taking a more explicitly political role, where OLP had directed a substantial proportion of its efforts toward private decisions and private efforts to preserve open space. In this regard, the Lake Michigan group's focus on thermal pollution was a source of controversy at OLP. As a result of these differences, the OLP Board of Directors, while expressing

confidence in Botts and the Lake Michigan group and explicitly supporting the group's work on the thermal issue, resolved that the group should be established as a separate organization.

Peterson's and Botts' first steps in establishing a separate Lake Michigan organization involved tentative contacts with two Chicago foundations, the Wieboldt Foundation and the Chicago Community Trust. Wieboldt tentatively offered the Lake Michigan group \$10,000, contingent on OLP Board of Directors' approval. The Chicago Community Trust also expressed interest. Peterson and Botts then received OLP Board approval for a funding proposal. That proposal stated:

"An Organization is needed to serve as the link between government and citizen action directed at saving Lake Michigan. The 'Save Lake Michigan Federation' would provide a direct entry for citizen participation at every level [of government]. A major function would be to interpret and disseminate information about issues and conflicts which must be resolved if Lake Michigan is to escape the fate of its sister, Lake Erie."

The second step was to publically propose that the federation be created, that is, to organize the constituency of the proposed federation. This proposal was made at the Second Annual Four State Lake Michigan Conference, "Power Production and Protection of the Lake," held on May 2, 1970, at Illinois Beach State Park in Zion, Illinois. (The site was deliberately significant: Illinois Beach State Park is adjacent to the controversial Zion Station, a nuclear power plant operated by Commonwealth Edison Company of Chicago.) Following a day-long discussion of environmental issues surrounding nuclear power, Botts made the final presentation. She proposed formally organizing a federation to serve as an information source and to stimulate direct action by other environmental groups on Lake Michigan issues. The proposed federation would not in theory take policy positions. The organization of the federation was to be contingent upon support for the concept among environmentalists in the four-state region.<sup>7</sup> Peterson and Botts then proceeded to insure such support, in part by transforming the ad hoc steering committee into an "advisory council."

The Lake Michigan Federation was publically proclaimed at a press conference at the OLP office in Chicago on September 1970. At the press conference, the new president of the Federation, Vance VanLaanen, stated that the federation's first issue would be thermal discharges into the lake.

The public proposal at the Zion Conference had still described the federation as operating within OLP. However, it was understood that the federation would operate within OLP only temporarily, allowing the federation to become established while enjoying the tax-exempt status of OLP. The initial period of this arrangement was stipulated to be one year. However, in June 1971 a revised statement of understanding was agreed to, making LMF independence contingent on approval by the U.S. Internal Revenue Service (IRS) of the new federation's tax status. The arrangement included other "shared" services - office space, insurance, etc. - and the use of the OLP as the legal entity for federation contracts, such as the first LMF contract with Businessmen for the Public Interest (BPI) on Corps of Engineers' compliance with the Refuse Act.<sup>8</sup> On September 1, 1971, the federation received its tax exempt

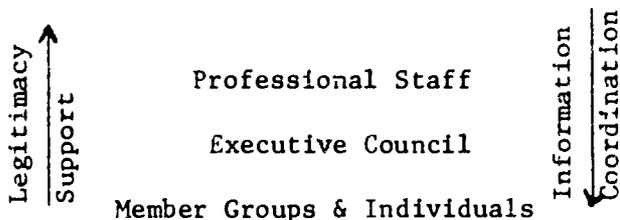
status from IRS and moved into its own offices next door to the Open Lands Project.

The history of the establishment of the federation is significant for several reasons. First, although the LMF was formally established after Earth Day 1970, it was not (like many of the environmental groups organized that year) a spontaneous response to the fervor of the moment; the organization had been on the drawing boards for more than a year before Spring 1970. Second, the establishment of LMF was a result of the organizational work of Lee Botts, rather than a spontaneous formation of a coalition; the federation did not occur, it was created. This fact has had consequences (discussed in Chapter V) which have continued to the present. Third, the establishment of the federation reflected contrasting views of the federation's role. On the one hand, the explicit purpose of the federation was to influence public policy decisions. However, for a variety of reasons the federation adopted organizational characteristics which, in theory, implied a more neutral and less political role: the federation would not assume formal positions, its primary function would be as an "information source,"<sup>9</sup> and it actively sought tax-exempt status as a "nonpolitical," "educational" organization. This seeming difference between objective and organization has not resulted in a situation in which objectives are traded off to maintain organizational characteristics. It has, however, required the federation to pursue its objectives in sometimes subtle ways.

#### ORGANIZATIONAL STRUCTURE

The formal structure of the Lake Michigan Federation has four primary aspects. The first three are the components of the federation: (1) the membership of the federation, (2) its Executive Council, and (3) its professional staff. The fourth aspect is a set of constraints on the organization of a formal or legal nature; the most prominent being the federation's tax status as an "educational" group. Within those formal or legal constraints, one could simplistically depict the federation as a pyramidal organization, as in Figure I-A, in which the membership supports and legitimates the Executive Council (i.e., by electing it) and the Executive Council supports and legitimates the staff (by appointing it), and in which the staff provides information to and coordinates the actions of the Executive Council and the membership. Such a view conforms to view expressed by Ralph Nader (related to the author by Lee Botts) that public interest politics needs "a few people to work full time, a moderate number to commit themselves part time, and many people to contribute a little." While the formal

FIGURE I-A



structure of the federation may conform to the simple pattern of Figure I-A, the actual behavior of the organization is considerably more complex. Those complexities will be discussed in succeeding chapters; the following sections contain a relatively straightforward presentation of the composition of the federation's membership, Executive Council, and staff.

Membership

The Lake Michigan Federation describes itself as a "coalition of citizens in the four states" which border the lake -- Illinois, Michigan, Indiana, and Wisconsin. In fact, in its initial conception and according to its constitution the federation attempted to be a coalition of citizen organizations.<sup>10</sup> The federation, however, also includes a large number of "individual" members not represented by some other member organization.<sup>11</sup> While individuals and groups which can be broadly defined as environmentalist or conservationist make up the bulk of the federation's membership, a small number of federation members are affiliated with government agencies or industrial firms. These members, along with a number of libraries, belong to the federation for the primary purpose of receiving the LMF Bulletin so they can be appraised of LMF activities. Table 1.1 describes the breakdown of LMF membership by state and membership category.

TABLE 1.1

LAKE MICHIGAN FEDERATION MEMBERSHIP<sup>a</sup>

<u>State of Residence</u>	<u>Member Category</u>					<u>Total</u>
	<u>Individual</u>	<u>Group</u>	<u>Gov't Agency</u>	<u>Corporation</u>	<u>Library</u>	
Illinois	151 (37%)	49 (12%)	11 (2%)	1 (*)	3 (*)	215 (53%)
Michigan	67 (16%)	15 (3%)	0 (*)	1 (*)	3 (*)	86 (21%)
Indiana	22 (5%)	21 (5%)	0 (*)	2 (*)	1 (*)	46 (11%)
Wisconsin	22 (5%)	19 (5%)	1 (*)	3# (*)	0 (*)	45 (11%)
Other states and District of Columbia	9 (2%)	1 (*)	2 (*)	3 (*)	0 (*)	15 (3%)
Totals	271 (66%)	105 (26%)	14 (3%)	10 (2%)	7 (2%)	407 (100%)

Source: LMF Membership Files, as of August 6, 1974.

a) All entries include both paid-up and "outstanding" (dues in arrears) members.

\*) Less than 1%.

#) Includes one press service.

As Table 1.1 shows, most LMF members are located in Illinois, predominately in the Chicago metropolitan area. Michigan members represent the second largest membership category, with one-fifth of all members. Most Michigan members are from the southeastern part of the state: one-third are from Kalamazoo, with other heavy concentrations in the Bridgemen-Stevensville-St. Joseph area (near the Donald Cook nuclear power plant), the Grand Haven-Spring Lake area, and the city of Grand Rapids. (Kalamazoo is the location of the Kalamazoo Nature Center (KNC), one of Michigan's stronger environmental groups; Arnold Leder of the LMF staff was previously on the staff of the KNC.) Indiana members, as one would expect, are concentrated in the Gary to Michigan City metropolitan area, that is, along Indiana's relatively short Lake Michigan shoreline. There is no particular geographic concentration of Wisconsin members.

This pattern of membership, however, somewhat overstates the importance of LMF's Illinois members. Because of the LMF's informal style of operation (discussed in Chapter II) and the formal organizational commitment to work with groups, certain "key" organizations have a dominant role in the federation. These are organizations with interests very similar to those of the LMF, and most have been represented continuously on the LMF's Executive Council. These groups are more evenly distributed among the four states than is the total LMF membership.

The Save the Dunes Council (SDC) in Indiana is important not so much because of the close identity of interests between itself and the LMF, but as a philosophical antecedent of the federation; before the establishment of the LMF, Senator Vance Hartke (D., Ind.) suggested that there was a need for a "Save Lake Michigan Council" modeled on the SDC.<sup>12</sup> Many of the LMF's key Indiana contacts represent relationships developed through the SDC. For example, Harold Olin, LMF President, is a SDC member; James Jontz, the professional staffer of the Indiana Conservation Council (the National Wildlife Federation affiliate), a member of the LMF Council and formerly a LMF staffer, is also on the SDC board of directors; and Helen Bieker is chairperson of SDC and American Association of University Women (AAUW) committees, in addition to being on the LMF Council. Lee Botts, LMF Executive Secretary, is a former member of the SDC board, and currently owns a summer home in the Dunes.

In addition to the Indiana Conservation Council, two sportsmens' groups are key LMF members in Indiana. One is the Izaak Walton League, with both the Indiana Division and several local chapters as members. Two members of the IWL are on the LMF Council, and the LMF has a well-developed staff-to-staff relationship with Thomas Dustin, Executive Director of the IWL-Indiana Division and a nationally recognized conservationist. The second key group is the Lake County Fish and Game Protective Association, the influence of which is due principally to one of its leaders, John Macnak.

The core of the federation's Michigan membership is a number of riparian associations and individuals. Typical of such groups are the Lake Shore Property Owners Association, the Dunewood Association, the Golden Sands Lighthouse Association, and the Michigan Lakes and Streams Association (an umbrella organization of riparian groups which focuses on inland lakes). A significant number of "individual" LMF members own second homes on Lake Michigan.<sup>13</sup> The Grand Mere Association of Stevensville, Michigan is in some senses a riparian group; Grand Mere is an organization which, like the Save the Dunes Council, is

primarily concerned with the preservation of a unique area of duneland adjacent to Lake Michigan. However, members and particularly leaders of these riparian groups overlap considerably with four general environmental groups in southeast Michigan: the Kalamazoo Nature Center, West Michigan Environmental Action Council (WMEAC), United for Survival, and the Tri-Cities Action Council. For example, Donna Asselin, the LMF Secretary, is also an officer of the Lake Shore Property Owners Association, United for Survival, and the Grand Mere Association.

LMF's Illinois members do not represent nearly the number of "key" members one would expect, given the Illinois share of total LMF members. Most of the more important Illinois member groups are located in the "North Shore"<sup>14</sup> suburbs of Chicago: the Winnetka Environmental Council, National Council of Jewish Women, and the (lately inactive) Committee on Lake Michigan Pollution. The most important Illinois "member" is BPI, but its relationship is much more one of professional partner than of "member." (In fact, most government agency people tend to discuss the two organizations in the same breath -- "Lake Michigan Federation/BPI," or vice versa.) Chicago is a relatively highly politicized metropolitan area and, since the headquarters of the LMF is located in Chicago, the federation has contacts with a large number of Chicago environmental groups. However, on many important issues in which the LMF is active, the federation -- or the LMF-BPI partnership -- is the "Illinois" environmental group which specializes in the particular issue.

Where the core of LMF's Michigan constituency is the set of shoreline property owners associations, the more prominent set of key groups in Wisconsin includes several ad hoc, anti-nuclear power plant groups. Included in this set of groups are the League Against Nuclear Dangers (LAND), the Paris Preservation Committee, and Koskonong Alert. These groups were organized to oppose specific nuclear plant sites proposed in Rudolph Paris Township and on Lake Koshkonong, Wisconsin. None of these sites is on Lake Michigan; the LMF's relationship with these groups represents a policy decision not to take a "beggar-thy-neighbor" approach in protecting the lake from nuclear power plants. The federation also has relatively good working relationships with the Wisconsin Environmental Decade (a general environmental group, also involved in the nuclear issue) the Racine Committee on the Environment, and (with the exception of the past year) the Wisconsin Resources Conservation Council (through past LMF president VanLaanen.)

Three of the most important LMF member groups are regional. The first is the League of Women Voters (LWV). The LWV is organized into local chapters and state organizations. A large number of these local and state organizations are represented by "individual" members of the federation, or are carried on the LMF's general mailing list (that is, receive LMF information without being formal members). More important than the separate organizations is the four-state "Lake Michigan Inter-League Group," a committee-like group of LWV leagues in the four states which shares a number of significant interests with the LMF. The LWV and the four-state Inter-League Group have been continuously represented on the LMF Council, in each case by Chicago-area league members. The second regional grouping is the Sierra Club, which like the LWV is organized locally into chapters and groups. Five Sierra Club officers have served on the LMF Council, although two (including present LMF staff member Leder) formally

represented other organizations. Of particular importance has been the relationship of the LMF and Jonathan Ela, Midwest representative of the club. Lastly, NOREC, like the four-state group of the LWV, is explicitly specified in the old constitution as a member of the LMF Council. Currently Walter Pomeroy, NOREC Executive Director is its representative on the council. NOREC, however, tends to focus on Lake Superior issues, rather than on Lake Michigan.<sup>15</sup>

In addition to interest groups, in the normal sense of that term, the LMF's "key" membership also includes a significant number of academics from Midwest universities and other technical specialists. The LMF Council, for example, includes three university professors and a consulting engineer. These individuals, while not representing a public constituency, are significant in that they structurally internalize a consultant capacity within the federation. This capacity is evidenced in the work of Curtis Larsen on shoreline erosion processes<sup>16</sup> and the work of Thomas Murphy on water quality modeling in connection with the LMF's Water Quality Program (discussed in Chapter II). Many individual members and representatives of member groups also have technical backgrounds: two council members are architects; both members who have served as liaisons from the OLP to the federation have scientific backgrounds; one of the key contacts with the Indiana IWL is an engineer; and one of the LWV leaders who works closely with LMF (whose primary interest has been in municipal sanitary district issues) has a background in public health administration. Also, the liaison of the (Chicago) Clean Air Coordinating Committee (CACC) to the LMF is a management professor who acts as an informal consultant to the LMF on business and personnel management.

#### Executive Council

The LMF Executive Council performs two basic functions. First, the council is the legal equivalent of a corporate board of directors, that is, the governing body of the organization.<sup>17</sup> In this formal sense, it appoints the staff, "determines the policies of the Federation and direct(s) the Executive Secretary in carrying out these policies."<sup>18</sup> Its second function is to formalize the relationship between the member groups and the federation, specifically the staff. In the legal sense of the LMF constitution, members of the council represent member groups to the federation. In addition, and in fact predominantly, the members of the council serve as liaison or contact points between the professional staff and the member groups.

At least formally, the Executive Council is elected by the member groups of the LMF at the federation's annual meeting. In fact, however, that meetings-- although open to all members -- is typically attended only by Executive Council members, and the full slate of nominees of a council nominating committee are routinely elected. (The implications of the LMF's nominating and election procedures will be discussed in more detail in Chapter V.)

The council is currently composed of 28 individuals, 24 of whom represent important member groups. In comparison with total LMF membership, the council relatively underrepresents Illinois and Michigan -- particularly Michigan -- and overrepresents Indiana and Wisconsin. Mainline conservation organizations like the IWL, Sierra Club, LWV, and the "general" environmental groups are represented significantly on the council, with other important representation by the more single-issue groups, such as the riparian and anti-nuclear groups.

TABLE 1.2

EXECUTIVE COUNCIL MEMBERSHIP, BY STATE  
OF RESIDENCE AND PRIMARY GROUP AFFILIATION

	<u>Illinois</u>	<u>Indiana</u>	<u>Wisconsin</u>	<u>Michigan</u>	<u>Total</u>
Sportsmen's groups (NWF, IWL, etc.)	0	4	0	0	4
Women's groups (LWV, AAUW, Jr. Leag.)	2	1	1	0	4
"General" env. groups	1	0	2	1	4
Individual/tech. specialist	2	1	1	0	4
Sierra Club	1	0	1	1	3
Riparian groups	0	0	0	2	2
Anti-nuclear groups	0	0	2	0	2
Other (COLMP, OLP, Audubon, planning, and air groups)	3	1	0	1	5
Totals	9	7	7	5	28

Source: LMF Executive Council roster.

A noteworthy feature of the council, however, is a pattern of multiple-group memberships, similar to the phenomenon of interlocking directorates in the corporate world. The 24 council members for whom complete information is available hold, in addition to their positions in the LMF and their primary organizations, an average of 1.8 other official positions in organizations, and are active members of another 2.6 groups.<sup>19</sup> Thus the council forms the basis for a relatively large number of contacts between the LMF and other organizations, even though several of the contacts overlap (i.e., the SDC and the Indiana IWL) and some of the contacts are not salient for the federation (e.g., church groups, Kiwanis).

The members of the Executive Council are predominantly of high socio-economic status. All but one are occupations defined by the census as managerial or professional (primarily the latter). The exception is a skilled craftsman who represents a sportsmen's group; since the membership of this important class of conservation group is predominantly from the working class, this individual is a particularly appropriate representative to the council.<sup>20</sup> Of the 26 whose educational background is known, all but two are college graduates, and 14 have done postgraduate work. Nine of the 28 are women.

TABLE 1.3

LMF EXECUTIVE COUNCIL:  
OVERLAPPING ORGANIZATIONAL AFFILIATIONS

<u>Organization Type</u>	<u> Holds Formal Position</u>	<u>Active Member</u>	<u>Total Affiliations</u>
"General" environmental groups (e.g., WMEAC, United for Survival, etc.)	7	6	13
Professional or trade associations	0	13	13
Wilderness/Natural area preservation groups (e.g., SDC, Wilderness Soc., etc.)	7	5	12
Womens' groups (LWV, AAUW, etc.)	6	4	10
Izaak Walton League	5	3	8
Govt'l or quasi-govt'l committees or advisory boards	5	3	8
Sierra Club	3	3	6
Cultural or historic societies	3	3	6
Planning groups; Special non-govt'l environmental committees	3	2	5
Church or related organizations	2	3	5
Riparian groups	3	1	4
Hunting, fishing, recreational groups	1	3	4
Nat'l. Wildlife Fed. affiliates	3	1	4
Clean Air Coordinating Committees	2	1	3
Scouts; Camps	2	1	3
Electoral political organizations	0	3	3
Radio stations	3	0	3
Anti-nuclear groups	2	0	2
Planned Parenthood	0	2	2
Garden clubs; organic farm ass'ns	0	2	2
Colleges	2	0	2
Kiwanis	0	2	2
Other: (one each of) Audubon; ACLU; Child welfare ass'n; Citizens of Greater Chicago; Common Cause; Economic development committee; Human relations committee; Steelworkers' union	5	3	8
	64	64	128

Source: Executive Council Survey.  
N = 25 of 28 Council members.

TABLE 1.4

LMF EXECUTIVE COUNCIL: OCCUPATIONS AND  
EDUCATIONAL BACKGROUNDS OF COUNCIL MEMBERS

<u>Occupation (present or most recent employment)</u>		<u>Educational Background</u>	
University professor <sup>b</sup>	5	Physical sciences and math	7
Env. group profess. staff <sup>a</sup>	4	English	3
Architect	2	Engineering	2
Attorney	2	Architecture	2
Engineer <sup>b</sup>	2	Law	2
Insurance executive <sup>b</sup>	2	Health administration	2
Journalist/author	2	Social sciences (econ.; pol. sci.)	2
Publisher/editor	1	Business administration	2
Educational consultant <sup>b</sup>	1	Education	1
Hospital administrator	1	Nursing	1
Manuf. corp. executive	1	Fine arts	1
Retail buyer <sup>b</sup>	1	Unknown <sup>c</sup>	<u>3</u>
Craftsman (electrical)	1		
Unknown or none <sup>c</sup>	<u>3</u>	Total	28
Total	28		

Source: Executive Council Survey.

- a) Includes one person in salaried, governmental environmental position analogous to environmental group professional staff position.
- b) Includes retired persons formerly in that occupation.
- c) Includes nonrespondents to survey questionnaire.

Table 1.4 presents the occupations and educational specializations of the members of the council. The scientific and technical backgrounds of many of the council members (11 of 28 with scientific or engineering backgrounds) are particularly noteworthy because of the importance of technical criteria in many environmental policy issues. Also significant is the fact that better than half of the council members (16 of 28) work in occupations directly relevant to environmental issues. This includes four of the five university professors, all of the environmental group staffers, of course, the engineers, both publisher/editors, the architects (because of the relationship of the field in general and the two individuals in particular to the planning profession), and the attorneys.

The officers of the LMF during the course of the study were Harold Olin, an architect representing the Lake Michigan Regional Planning Council, a member of SDC and LMF President; John Langum, an economist, Sierra Club member, and LMF Vice-President; Norris Love, a management professor, board member of the (Chicago) Clean Air Coordinating Committee, and LMF Treasurer; and Donna Asselin, an officer in the Lake Shore (Michigan) Property Owners Association, Grand Mere Association, and United for Survival, and LMF Secretary.

## Professional Staff

The heart of the federation's activities is its professional staff. Six individuals are on the staff full time. Three are staff members whose responsibilities are in political program areas: Lee Botts, Nancy Flowers, and Arnold Leder. The fourth programatic staff person is Mary Morris, who is responsible for LMF membership development. Two members are support staff, the office manager, Terry Tiernan, and secretary, Mary Brackin.

Of the three political staff members, the person whom the federation is most closely identified with is Lee Botts, the LMF's "Executive Secretary."<sup>21</sup> Botts' educational and occupational background is in journalism. After graduation from Oklahoma State University, having majored in English and worked for the student paper, Botts moved to Chicago with her husband, who was doing graduate work at the University of Chicago. While raising her family, Botts was a freelance editor, writer, and reporter for a variety of publications and agencies. In the early 1960's she became the conservation columnist for the Hyde Park Herald, a local newspaper serving the area around the University of Chicago. From 1966 to 1969, just before joining the OLP staff, Botts served as the editor of the Herald. During this same period (from 1960) she was active in and a member of the Board of Directors of the SDC, particularly handling "public relations" for SDC. At various times, Botts was also on the boards of the Chicago Beautiful Committee and the Citizens of Greater Chicago, a civic group in which she just recently dropped her position.

Botts' association with and residence in the Hyde Park community in Chicago is significant. Hyde Park has been and still is the primary base of political liberalism and independence from the regular Democratic organization in the city of Chicago, producing political figures like the late Charles Merriam (an unsuccessful candidate for mayor of Chicago, and a classic example of the "good government" reform movement), (U.S.) Senator Paul Douglas, long-time anti-machine Alderman Leon Depres, former U.S. Congressman Abner Mikva, and (Illinois state) Rep. Robert Mann.<sup>22</sup> Hyde Park was also the site of one of Chicago's few conservation issues before the late 60's, an issue in which Botts played a part: opposition to the construction of a highway, South Lake Shore Drive, through Jackson Park on the lakefront.

As discussed earlier, Botts should probably be considered the organizer or founder of the LMF. She is also currently at the center of all the group's activities. She has the primary responsibility for many of the LMF's political activities, and directly and closely supervises and works with the staff person most responsible for the remaining activities (e.g., with Leder on the Water Quality Program, or with Flowers on the preparation of the Bulletin). She is normally the public spokesperson of the federation, except in situations in which two events occur simultaneously, in which case a staff member (or occasionally a member of the Executive Council) will substitute for her. (This is discussed by the staff, more or less explicitly, as "substitution.") In addition, Botts is the federation's business manager, the most crucial responsibility of which has been fund raising from foundation sources. This is, of course, a normal situation for the head of an organization, particularly an organization the size of the federation.

Like Botts, Flowers' background is in journalism. Before coming to Chicago to join the LMF staff, Flowers worked in the public relations department of Baylor University (from which she had just graduated with majors in journalism and environmental studies), as a reporter for the Dallas Morning News, and as coordinator of the state board of education environmental education center in Waco, Texas. Her exact title at LMF is "Information Director."

Flowers' responsibilities are the most diverse of the LMF staff, falling into four main areas:

- (1) Preparing and editing the LMF Bulletin, other publications such as the Annual Report, and certain "alerts" and press releases;
- (2) Answering public inquiries directed to the LMF, including the routine "tell-me-all-you-know-about-ecology" requests and more issue-specific requests, particularly from groups or individuals which do not have well-developed contacts with the federation;
- (3) Performing the detailed organizing work for special events, such as conferences or meetings sponsored by the LMF;
- (4) Substituting for or acting as a back-up for Botts; for example, answering inquiries (particularly from the press) when Botts is out of the office on a given day.

Since most of Flowers' explicitly political activities fall into the fourth category, she has tended to be involved in issues in a less direct and systematic way than either of the other political staff members. In addition, she describes the primary benefit of this involvement to be a maintenance of her knowledge of issues so that she can continue to perform roles #1, 2, and 4 well. Exceptions to this pattern occur occasionally, and apparently randomly. Flowers has had primary responsibility for particular issues in situations in which an issue was important and her schedule was relatively more free than Botts' or Leder's. An example of this had been the monitoring of the (Chicago) Metropolitan Sanitary District (MSD), and particularly the District's Fulton County Project (land disposal/application of sewage sludge). Flowers was also the LMF representative to the "Illinois legislative group," an informal meeting of environmental-group people in which professional staffers kept volunteer activists apprised of developments in the state legislature.

The third LMF political staffer is Arnold Leder, the federation's "Program Director." After military service (Army Intelligence in Korea), Leder completed college at Western Michigan University (Kalamazoo), majoring in philosophy. He then worked for the Kalamazoo Nature Center, particularly with the Human Environment House, the KNC's environmental education program. While on the staff of the KNC, Leder served as an alternate member of the LMF Executive Council, representing Dr. Lewis Batts of the KNC.<sup>23</sup>

Leder's primary (almost sole) responsibility with the LMF is the "Water Quality Program." This is a joint effort of LMF and BPI. The focus of the program has been to monitor the administration of the Federal Water Pollution Control Act Amendments of 1972 (the "Water Bill") primarily by the U.S. Environmental Protection Agency (U.S. EPA). (The early stages of the program, however, involved monitoring of the Corps' compliance under the Refuse Act Permit Program, until this program was superseded by the Water Bill.) The program involves the staff time of Leder, under Bott's supervision, at LMF and of two members of the BPI staff, Irvin Goodman and David Comey.<sup>24</sup> BPI's participation in the program is funded, through the federation, by a foundation grant which also supports part of the LMF's contribution to the program.

The fourth programmatic staff member of the LMF is Mary Morris. Morris joined the LMF staff in 1974 to coordinate the LMF "Membership Development" program (i.e., to increase LMF membership). This program is described more fully in Chapter IV. Morris was recruited for the position at LMF from the staff of the U.S. Savings and Loan League, where the LMF President, Harold Olin, is Director of Architectural Research. Her background in in public relations.

Terry Tiernan and Mary Brackin comprise the support staff at the LMF. Tiernan, the LMF office manager, has one of the more political backgrounds on the LMF staff. Before joining the LMF in 1973, Tiernan worked in independent (i.e., liberal, anti-machine) politics in Chicago, most recently as manager of the 44th Ward Office; the 44th Ward is one of two (of 50) wards in Chicago which are represented by aldermen associated with the Independent Precinct Organization (IPO). Prior to working in independent politics, Tiernan was an officer and organizer for the union which represents employees of the Cook County (Illinois) Department of Public Aid.<sup>25</sup> Brackin was not associated with any political or environmental organizations before joining the LMF staff.<sup>26</sup>

In addition to the full-time staff, several individuals have worked for the LMF part time during the course of this study. The most important, in a programmatic sense, was Mary Ann Smith, the coordinator for the Mann Committee, assisting Botts in the LMF's role as technical staff to that committee of the Illinois House of Representatives. Like Tiernan, Smith has been associated with independent politics in Illinois, notably as the environmental specialist of the Independent Voters of Illinois (IVI).<sup>27</sup> Smith is also a former full-time staff member of the LMF, and has been associated with other Chicago area environmental groups. The other part-time LMF staff members have performed essentially clerical and office duties. Included in this group are John Brimingham, Shirley Robinson, and Josephine Stringer, work-study students from Loop College in Chicago, and a number of volunteers associated with the Retired Senior Volunteer Program at the Hull House Association.

There are two interesting general characteristics of the LMF staff. First, none has a particularly technical background; the backgrounds of the programmatic staff are in journalism, public relations, and "environmental education," but not in the scientific fields most relevant to the issues in which the LMF is involved--chemistry, geology, biology, or the engineering disciplines.<sup>28</sup> This is not to say, however, that the staff either is technically incompetent or approaches issues from an ascientific perspective. Leder is as technically competent in evaluating pollution permits as his BPI counterpart, Irvin Goodman (an engineer), or the typical technical staff of a government agency. Botts is a sophisticated and thorough consumer of the most technical material. Primarily, however, the LMF has sought to compensate for this lack of technical background by developing consulting relationships with technical specialists, and in a number of cases has formalized this by including these persons on the LMF Executive Council. In Botts' and Flowers' cases, journalism may be the most relevant "technical" training for one of the federation's major functions -- translating technical material before transmitting that information to the LMF's member constituency. Lastly, of course, "political," rather than scientific, skills are the most relevant "technical" skills of an interest-group staff person.

The second interesting aspect of the staff members is that their backgrounds are not as explicitly political as one might expect. On the one hand, their

previous occupations were not explicitly political positions, but involved activities of a more "educational" nature; Leder's position with the KNC is a partial exception to this since it involved "citizen participation" as well as "environmental education." Also, when Botts joined the staff of OLP, a significant part of her job was to establish and "environmental education" program. On the other hand, however, the staff has an extensive history of volunteer political activity, such as Botts' association with the SDC. This volunteer activity included partisan political work, ranging from Botts' involvement in the 1952 Stevenson presidential campaign to Leder's recent work as a precinct captain in a state legislative campaign,<sup>29</sup> and, of course, the relationship of Tiernan and Smith with IPO and IVI. This contrast is useful in understanding the somewhat low-keyed, quasi-educational approach of the federation on public policy issues.

### Organizational Constraints

The LMF has imposed two primary constraints upon itself: a restriction on formal LMF policy positions, and the restrictions inherent in the LMF's tax status.

One of the early organizational hurdles the LMF had to overcome was the issue of the federation taking formal policy positions. Several important potential LMF member groups were (and still are) precluded by their own bylaws from affiliating with organizations which might take positions in the name of members without obtaining the approval of the members. The LWV is a good example of this restriction. The LWV has a relatively complex procedure for arriving at policy positions. That procedure involves building a "consensus," with the initiative taken by the local membership of the leagues. Needless to say, such a process is typically very lengthy. It also tends to restrict coalitions which include the LWV to positions on which the LWV had already developed a consensus position. Other organizations, like the Sierra Club, have similar restrictions, although usually not with the complexities of the LWV consensus rule.

Such restrictions presented the LMF with two options: (1) decline to take formal policy positions or (2) effectively exclude organizations like the LWV and the Sierra Club from formal LMF membership. Because of the importance of groups like the LWV and the Sierra Club, the LMF chose the former option. This decision was an important part of the early organizing of the LMF; it was, for example, the second feature mentioned by Botts in publicly proposing the LMF at the 1970 Zion Conference (OLP, 1970, p. 112). The position is formalized in the LMF Constitution, Art. II, Section 2:

"The Federation will encourage its members to set their own positions on individual issues and to participate in the determination of public policy on those issues without any question as to agreement with other members of the Federation separately or collectively."

In short, the LMF defined itself as a weak coalition organization, in that there are no formal mechanisms for integrating external policy efforts of the LMF and member organizations.

The effect of this constraint appears to be minimal, however. The federation, as will be discussed in the next chapter, does submit testimony at hearings,

write letters, meet with, and telephone decision makers. This constraint only means that those messages to decision makers are not labeled as "formal positions" reflecting official views of all LMF members. But this distinction is not perceived by decision makers, nor would it probably be important to them if they were conscious of it. The problem is, essentially, finessed.

The second constraint is taken much more seriously by the LMF. The LMF is classed as a nonprofit, "educational" or "501(C)(3)"<sup>30</sup> organization. The "not-for-profit" classification exempts the LMF from certain taxes, for example, Illinois state sales taxes; this is not particularly significant in itself, but only as a precondition for the rest of 501(C)(3) status. The "educational" status is important because it facilitates certain classes of revenue for the LMF. On one level, contributions to the LMF -- including memberships -- from individuals may be treated by the contributors as tax deductions. This may be a slight inducement for certain individuals to support the LMF. The primary importance of the status for the LMF, however, is its importance to foundations. Essentially, foundations are themselves 501(C)(3) organizations. To protect their own tax-exempt status, they must assure themselves that grants are made to organizations for only tax-exempt purposes, and the easiest way to assure themselves of this is by awarding grants only to other 501(C)(3) organizations.<sup>31</sup> The importance of the foundations' own tax status, of course, lies in the tax deductability of contributions by individuals to the foundations. Therefore, to facilitate grants by foundations, the LMF is more or less required to have 501(C)(3) tax status. The importance of this foundation requirement is that foundation grants are the primary financial base of the LMF. For example, for fiscal year 1973, foundation grants represented about 84% of revenue received by the federation.<sup>32</sup>

The 501(C)(3) tax status places certain restrictions on an organization. Most are trivial for the LMF: that the LMF not realize a financial profit from its operations (which the LMF has no difficulty complying with), that there be no transactions between the LMF and its officers or board members which financially benefit the officer or board member, etc. The one real restriction is that the federation may not spend a "substantial" proportion of its activity on certain "political" matters.<sup>33</sup> The definition of "political" activities under the statute, however, is quite narrow. First of all, a 501(C)(3) organization may spend about 5% of its time on restricted "political" activities; the definition of "substantial" proportion is not exactly understood, has not been tested in the courts, and is cited as different amounts by different experts, including experts within the tax bar. Second, "political" activities are defined as "lobbying" legislative bodies, that is, an organization on its own initiative urging legislators to take a particular action on a particular bill. Therefore, contacts with all nonlegislative decision makers (e.g., agency administrators, judges in a suit against a polluter, etc.) are not "political." In addition, several classes of contacts with legislators are permissible under the statute, including testimony as an expert witness to a legislative committee at the request of a member of the committee, contacts which do not concern specific pieces of legislation, and, arguably, "informational" testimony at a public hearing without invitation. To "lobby" one has to, essentially, corner a legislator in the corridor of a capitol and tell him why he should vote "yes" or "no" on bill XYZ. The LMF takes particular (almost extraordinary) care that its contacts with legislators are of the legitimate, non-"lobbying" types permitted under the statute. Even though the LMF has extensive contacts with

legislators, and even though most of the LMF's activities are political within the political science definition of that term, the author is not aware of any action of the LMF staff during the course of this study which was "political" within the meaning of the statute. This says something about the perceptual biases either of legislators/lawyers or of political scientists or perhaps both. However, the fear that the anti-lobbying provision of 501(C)(3) status could be used punitively against an interest group by an anti-environmental administration, through the IRS, seems very real to the LMF and other tax-exempt environmental organizations. In view of the first article of impeachment against former President Nixon, such a fear does not seem totally groundless.

The restrictions inherent in 501(C)(3) status is something of an issue within the LMF and in the environmental movement generally. The status involves a trade-off between funding advantages and freedom to attempt to influence policy in all possible ways, including full-scale lobbying. Several interviewees mentioned this as a feature of the LMF which, in their view, structurally limited its effectiveness.<sup>34</sup> Their argument basically revolves around the importance of legislative bodies in the political process. That is, if one feels that administrative agencies or the courts are more important sites of decisions, then the prohibition against lobbying becomes less salient than if legislatures were dominant in the decision-making process. The argument of those who criticize the LMF's eschewing of an aggressive lobbying role is that administrative agencies and the courts operate within certain statutory constraints. Therefore, if, as the LMF tries to do, one seeks to make fundamental changes in public policy, one must often approach legislative bodies to obtain new laws.

A common solution to this problem is to create two separate organizations. The tax-exempt organization can pursue all activities permissible under 501(C)(3) status, while the non-exempt organization can specialize in lobbying. A number of national organizations (e.g., the NWF and the Sierra Club) have adopted this approach. The present scale of the LMF does not, however, lend itself to such an approach. First, the current LMF membership is not large enough to support such a division. To oversimplify a bit, in environmental organizations such a separate lobbying organization would have to be supported by membership dues and contributions. If an organization can legally devote 75 of its time to lobbying, and if memberships represent less than 5% of revenue -- as is the case with the LMF -- then there is no point to dividing the organization. Second, unless the LMF staff were increased, such a division would require the somewhat artificial separation of the roles of existing staff members into the exempt and non-exempt organizations.

#### FOOTNOTES TO CHAPTER I

1. This report is, of course, only concerned with the specific focus. However while Director of Environmental Education at OLP, Botts did organize an environmental education program, which is still on-going under the direction of Wayne Schirmer.
2. This increased interest was due in large part to the excellent investigative series by Casey Bukro and William Jones in the Chicago Tribune on eutrophication of Lake Erie, and similar threats to Lake Michigan. See Bukro (1967), Jones (1967), and Bukro and Jones (1967). This series of almost daily, front page articles came to be called the "Save Our Lake" series.

In summary, using criteria appropriate to the LMF's basic strategy, the LMF appears relatively successful. One issue -- the thermal question -- has progressed to the point where an optimal environmental policy seems imminent. Erosion/land use, power plant siting, and energy conservation have developed to the point of debate of environmental alternatives, although those alternatives are by no means the certain future policy. On basic water pollution, public policy is at an implementation stage. Public participation is a widely accepted goal on the part of government, although there is still some variation among agencies. In the field of nuclear safety, significant incremental modifications have been made on individual power plants, but the basic question of the wisdom of reliance on nuclear power has not been resolved. Essentially, environmentalist questions have been put on the public policy agenda, and decisions have developed over the years.

The difficulty, as always, is to attribute developments to the LMF. On the thermal issue there is general agreement that the LMF was influential on the outcome. However, it is a general difficulty of the "informational" style of operation that developments of public policy may be attributed not to the interest group's information, but to the decision makers' new-found wisdom. A colleague of the LMF's noted, in connection with the change in approach of the Corps on certain types of erosion issues:

"I think that there was a point of impact there, although I think that part of that, to give Graves some credit, was derived on his own. I do not think that you have to dig very far into the issues before you see the futility of most of the things that have been talked about, particularly in terms of big [lake] levels controlling structures and that sort of thing."<sup>22</sup>

There is one major problem with the LMF's strategy of broad policy change. As noted in Chapter II, the conventional wisdom among interest group leaders and particularly administrators, is that broad or fundamental shifts in public policy can usually not be accomplished without recourse to legislation -- for example, statutory authorization for agencies to embark on radically new programs. This explains the observation by several observers of the LMF -- environmentalists and administrative agency people -- that the LMF's tax-exempt 501(C)(3) status has weakened the organization.

#### Decision Makers' Perceptions of LMF Influence

There are two types of perceptions of LMF influence by decision makers. The first and more pervasive perception describes its influence in relationship to agency decisions on very discrete issues. The LMF's role in the decision-making process is to provide a particular perspective in particular decision-making situations (e.g., the "environmentalists' point of view," or the "non-structural viewpoint,"). The second perception views the LMF as a force which, in effect, supports the agency by balancing the agency's public constituency. Both of these views assume an agency-centered decision-making process in which an interest group is only as effective as decision makers allow it to be.

The first view of the LMF and environmentalists in general is congruent with the "incremental decision-making" model of agency behavior. Administrators do not confront broad policy choices, choosing rationally between all possible alternative actions. Rather they choose among alternatives which represent only

12. U.S. EPA-V (1972). This is an interesting article: a very complimentary biographical sketch in a governmental agency public relations magazine about the head of an interest group which is supposed to critically pressure the agency. See Chapter III on the relationship between LMF and U.S. EPA-V. The story was the cover story; the Cover picture showed Botts standing on a revettment (!) along Lake Michigan at Jackson Park near Chicago's Hyde Park and was captioned "Lee Botts: Lady of the Lake."
13. This observation is the result of a series of follow-up telephone calls to a sample of Michigan nonrespondents on the membership survey. During the course of conversation, it developed that about one of every four owned second homes on Lake Michigan.
14. The "North Shore" suburbs are those suburbs, predominantly bedroom communities, along the Lake Michigan shore in Illinois north of Chicago, which are considered the traditional upper-class residential areas in the Chicago metropolitan area.
15. For example, the Reserve Mining Case, United States v. Reserve Mining Company, 4 ELR 20573-20598, and Reserve Mining Company v. United States, 4 ELR 20598-20604. For an interesting curio on Reserve, which notes NOREC's role, see Boyle (1974). NOREC's involvement is not restricted to Lake Superior, but Lake Superior issues represent the most direct relationship with the LMF.

16. Larsen (1972, 1973).

17. The old LMF Constitution discussed the Executive Council as a creation of and subservient to a "board of directors," on which each member group is represented. The "board of directors" did not exist, other than as a symbolic electoral college: ballots for the Executive Council are mailed only to member groups. The Executive Council, therefore, performed all the essential functions of a board of directors.

The new LMF Constitution of October 18, 1974, renames the Executive Council the "Board of Directors," thus clearing up this confusion.

18. Old LMF Constitution, Article IV, Section 6.
19. Including LMF and primary organization council members hold positions in an average of 3.6 official positions (recall that several council members are "individual" members only--e.g., university professors--and do not represent any primary organization to the LMF) and are active in an average total of 6.1 organizations.

This information is based on a questionnaire to council members; the questionnaire is reproduced in Appendix E. Response rate was 23 of 28 (83%); other information was available from other LMF biographical material and author's personal knowledge. This accounts for the variation in multiple answers for different items.

20. Several persons who are not currently employed (retired or "housewife") were classified on the basis of most recent occupation; one person was classified on the basis of spouse's occupation; occupations of two members,

nonrespondents, are unknown. Specific breakdown by occupational category is:

Professional	19	73%
Managerial	6	23
Craftsman	1	4
Unknown	2	--
	<u>28</u>	<u>100%</u>

There is a fairly extensive literature which argues that the environmental movement is strictly an upper-middle-class phenomenon (Harry et. al, 1969; Gale, 1972; McEvoy, 1972; Dunlap & Gale, 1972; Dunlap et. al, 1973; and Schmaiberg, 1973). Aside from certain methodological problems -- such as sampling only Sierra Club members or college students -- such arguments ignore the extremely important role in the environmental movement of the sportsmen's groups like the NWF, which are composed predominantly of working-class individuals. Such groups are an important part of the LMF membership, particularly in Indiana, even though their representatives on the council are not themselves from working-class occupations.

Although "professional" and "managerial" are considered to be the two highest-status occupational classifications, several of the council members from professional occupations -- notably from the environmental group professional staff people -- do not have high incomes.

21. Botts' title, "Executive Secretary," seems to be used more for women than men, as the following demonstrates:

Title of Administrative Head, U.S. Conservation Organizations, by Sex of Administrative Officer

Title <sup>a</sup>	Sex <sup>b</sup>		
	Male	Female	Indeterminate <sup>c</sup>
"Executive Secretary"	36	16	2
"Executive Director"	85	6	7
Other <sup>d</sup>	43	0	11

(For the 2 x 2 table, Ex. Secy.-Ex. Dir. by Male-Female,  $X^2 = 14.94$ ,  $p = .001$ , d.f. = 1)

Source: Conservation Directory 1974.

- a) Title was classified for the individual who was apparently the head of the organization's professional staff, if any.
- b) Sex determined on basis of individual's first name.
- c) Includes (about 4 of 5) persons with initials only listed, and persons whose first name is used by both men and women. Since the practice of using initials seems more prevalent among men than women, most "indeterminants" are probably male.
- d) Includes 17 "Directors," 20 "Executive Vice-Presidents," and six others ("Executive Officer," "Director-General," "General Manager").

The relationship between "Executive Director" (male) and "Executive Secretary" (female) is statistically significant.

Botts' title originated while she was with OLP, where the term was used to avoid confusion between the head of the "Lake Michigan group" (Botts) and the Executive Director of OLP, Gunnar Peterson (Author Interview: LMF staff)

22. For further discussion of the importance of Rep. Mann, see Chapter II on the Special (Illinois) House Committee on Lake Michigan, the "Mann Committee."

It is only recently that another base for political liberalism and independent politics has become organized in Chicago, based on the strength of the Independent Precinct Organization (IPO) in several lakefront wards on the North Side of the City of Chicago. Related to this, see the discussions of the background of Terry Tiernan and Mary Ann Smith in this section.

23. A similar pattern involved James Jontz, a former LMF staff member, who became Executive Director of the Indiana Conservation Council and is currently a member of the LMF Council.
24. Goodman works full time on the Water Quality Program under Comey's supervision. Goodman is a lawyer and engineer with previous experience in industry. Comey, whose background, like Leder's, is in philosophy, has been most closely associated with BPI's involvement in nuclear power plant interventions before the AEC.

The program, for BPI, is the follow-up to a long-standing involvement in water pollution, including a survey of major water polluters. See BPI (1972).

25. The union is, and was particularly at the time Tiernan was associated with it, one of the more radical unions in Chicago, concerned not only with employee rights and benefits, but also with the rights of welfare recipients.
26. Brackin's previous job was secretary to an evangelist. Readers may draw their own inferences.
27. The IVI is a long-standing electoral and lobbying group which has recently allied with IPO. IPO has tended, however, to restrict itself to electoral campaign work in Chicago, whereas IVI is a statewide organization.

Smith's husband, a law professor, recently ran an independent campaign for nomination to be a county judge. His campaign was an interesting -- and just narrowly unsuccessful -- exception to the rule of political party dominance of judicial contests in Illinois.

28. This is not uncharacteristic of environmental group staff people. Less than half of the environmental group staff people with whom the author is personally familiar were educated in the sciences or engineering.
29. For Steven Klein, the head of the (Chicago) Environmental Lawyers Clinic.

30. *From Section 501(C)(3) of the Internal Revenue Code, Title 26 of the U.S. Code. The provisions were contained in the Tax Reform Act of 1969. See Sugarman (1970).*
31. *Author Interview: foundation director.*
32. *Source: Rome and Zeitlin, 1974. Other significant income sources were 9.5% from restricted grants from two government agencies (for specific LMF contractual services to the agencies), 3% from membership dues, and 1.5% from other contributions.*
33. *Author Interview: attorney.*
34. *Author Interviews: several.*

## II. LAKE MICHIGAN FEDERATION OPERATIONS

The official goal of the LMF is to "save the lake." The first step in evaluating the federation is to specify the organization's goals more precisely.<sup>1</sup> That is, what or whom is the LMF trying to save the lake from? Secondly, in what ways does the LMF attempt to save the lake?

### ISSUE INVOLVEMENT

The LMF defines itself as an "issue-oriented" group. That is, the desired outcome of all of the federation's activities involve decisions on political policy issues. (Consequently, the referent object of the group's activities and goals is not the physical system of the lake, but the political system of government.)<sup>2</sup> The activities of the federation are directed towards a myriad of governmental entities and political decisions. In the course of this study, it was possible to identify 112 more-or-less distinct "issues" in which the LMF was involved in some way from January 1973 through July 1974.<sup>3</sup> Some of these issues were relatively precise: decision makers were identifiable, a known set of alternatives existed, and the decision occurred at a known time. Other issues were very broad and amorphous: no specific decision maker had been defined as responsible (or many were); alternatives were not specified or were not limited; and the time at which a "decision" would be made, if ever, was unknown. Nonetheless, it is possible to discuss LMF issues as falling within three very general categories: (1) energy-related issues, particularly issues surrounding nuclear-powered generation of electricity; (2) water quality or water pollution issues; and (3) issues involving shoreline erosion. Each of these three issue areas, but particularly the third, is related to or leads to broad questions of land use planning, which represents a fourth major LMF involvement.

TABLE 2.1

#### LMF ISSUE INVOLVEMENT

Issue area	Definable Issues <sup>a</sup>		LMF Activity <sup>b</sup>		
	# of Issues	%	# Transactions	%	Adjusted %
Nuclear (including thermal pollution)	23	20.6%	20	7.3%	10.0%
Other energy (including energy conservation)	9	8.0	35	12.8	17.5
Water quality (primarily industrial & municipal wastewater pollution)	43	38.4	62	22.7	31.0
Shoreline erosion	12	10.7	7	2.6	3.5
Water resources development	5	4.5	10	3.7	5.0
Natural area preservation	7	6.3	10	3.7	5.0
Land use planning	9	8.0	37	13.6	18.5
Other issues	4	3.6	18	6.6	9.0
Intra-organizational	NA	-	52	19.0	(deleted)
Educational	NA	-	22	8.0	(deleted)
Totals	112	100%	274	100%	100%

a) Source: Issue analysis; see Appendix C. All definable issues from 1/73 through 7/74.

b) Source: Correspondence analysis; see appendix B. A sample (about 22% non-random) of all LMF correspondence from 1/74 through 7/15/74. Note particular bias, discussed in Appendix B, with respect to "land use" of the sampling procedure.

## Nuclear Power and Energy Conservation

As noted in the history of the LMF, one of the federation's earliest issues was the question of "thermal pollution." The genesis of this involvement was a reaction to a pattern which became evident in the late 1960's of siting nuclear power plants along the Lake Michigan shoreline.

The first of the major conflicts over this siting pattern was the intervention into the AEC's licensing of the Palisades nuclear plant of Consumer's Power Company (located in South Haven, Michigan) by the Sierra Club and three local Michigan groups, the Michigan Steelhead and Salmon Fishermen's Association, the Michigan Lakes and Streams Association, and Thermal Environment Must Be Protected (TEMP). Although it was not a named intervener, the LMF played an important coalition-building role in the Palisades intervention. The question of thermal pollution<sup>4</sup> became the primary focus of this intervention, since it was a legal entree into the intervention process. (Essentially, the AEC is statutorily mandated to regulate all forms of "energy" by the Atomic Energy Act of 1954 and 1959 amendments to the Act, 42 U.S. Code Section 2011, et seq.; waste heat is a form of "energy.") The intervention was settled in 1971 when the utility agreed to install cooling towers (a form of "closed-cycle cooling").

This case gave the LMF its first national recognition (CEQ, 1971, p. 91). The Palisades settlement did not, however, set a precedent for other proposed plants. As a result, the LMF and Sierra Club, joined by BPI and a variety of more localized groups,<sup>5</sup> continued to intervene in other nuclear licensing procedures, including the Point Beach and Kewaunee plants in Wisconsin, the Cook plant in Michigan, the Zion plant in Illinois, and the Bailly plant in Indiana. All of these plants were licensed, although the most recent license, for the Bailly plant, is being appealed.

The thermal issue shifted from the AEC to the U.S. EPA with the passage of the Water Bill in 1972. Section 316 of that Act mandated that the "best available technology" be applied to minimize thermal environmental effects, and required U.S. EPA to define that technology. (Section 316 applies to both nuclear and fossil-fueled plants.)

The LMF has been involved in two ways in EPA decision making on the thermal issue. First, it has served as an observer on the Lake Michigan Cooling Water Panel, an advisory board and study group composed of representatives of the four states' governments and academic specialists, with U.S. EPA acting as the panel's secretariat. The LMF is generally credited with being a primary motivating force behind the establishment of the panel.<sup>6</sup> Secondly, the LMF has influenced national U.S. EPA administrative rule making on thermal effluent guidelines under section 316 of the Water Bill. During 1973, LMF was one of a number of environmental groups which pressured U.S. EPA to publish its guidelines and to define closed-cycle cooling as "best available technology." An important phase in this environmental pressure was the release on October 18, 1973, by the LMF of leaked memoranda documenting Nixon Administration pressure on U.S. EPA to withhold and weaken the 316 guidelines. (These leaked memoranda are ironically referred to as the "Love Letters" by the LMF, after former Governor John Love, a former White House energy advisor, over whose signature the memoranda were sent to U.S. EPA.) Proposed guidelines requiring closed-cycle cooling were finally issued by U.S. EPA on March 4, 1974. After some delay due to utility pressure, U.S. EPA, in early October 1974, revised its proposed rules to cover

only large (500-megawatt) plants which went into operation after 1969, and all plants which began operations after 1973.

While the thermal question has been a constant and highly visible LMF issue, and while the LMF can claim with some justification to have made a significant contribution to a relatively clear-cut environmental victory, the federation does not (and claims it never did) consider thermal pollution to be a primary issue. It was viewed more as an entree into the AEC's licensing proceedings than as the basic issue. The primary targets were the plants themselves, not their cooling systems.<sup>7</sup> This is evidenced by the LMF's continued opposition to nuclear plants where the thermal question is moot or is not salient to the lake. More basic objections to the plants themselves are nuclear safety and power plant siting procedures.

Nuclear safety involves two major questions. The first concerns the reliability of the plant's systems for preventing accidents which would cause a major disaster. The second involves the storage of large amounts of radioactive waste, particularly plutonium. The problem of preventing release of radioactivity due to natural occurrences or human misuse (i.e., theft) is exacerbated by essentially indefinite storage requirements. Plutonium, for example, has a half-life of about 2500 years.<sup>8</sup> While safety has been an issue in interventions in which the LMF played a part, and while the LMF has acted as an information source on this issue, the federation has not played a major direct role in public policy decisions on safety nationally.

Power plant siting has, however, been a major concern of the LMF. Nuclear power plants tend to evoke considerable opposition from local residents of areas in which plants are proposed. This opposition is related, in part, to general issues. (If, for example, environmentalists' arguments on safety are true -- that a lethal system accident is possible -- the facilities could logically be viewed by current residents as undesirable neighbors.) However, the plants have also caused particular local controversy: both the Bailly and Cook plants were sited adjacent to natural areas with well-developed preservation groups (SDC and the Grand Mere Association); the Cook plant has been the subject of litigation over shoreline erosion; the Zion station is close to a large metropolitan area (Chicago), etc. Irrespective of general feelings on the subject of nuclear power plants, it seemed that no one wanted one moving in next door.

In time, environmentalists perceived that the pattern of siting power plants on Lake Michigan was being abandoned by the utilities--that, for a variety of reasons, utilities were proposing nuclear power plant sites inland. This did not represent a "solution," at least in the eyes of the LMF, because the LMF needed to avoid the appearance of "protecting the lake at the expense of somebody else's lake," and also because the site, like thermal pollution, was not the primary problem--nuclear power was. The LMF response to this situation has been to develop a "power plant siting proposal," which it has promoted, usually indirectly, with mixed success before a variety of decision-making bodies. The basic recommendation of the LMF siting policy is the statutory establishment of a certifying agency which would (1) have "public" and environmental representation, (2) insure public participation, (3) operate openly, especially with respect to information, (4) be empowered to critically examine the need for power weighed against all of the costs (environmental and social) of producing the power, and (5) insure other environmental safeguards ("best available" emission control technology, minimum transmission line effects, etc.) (LMF Bulletin, June 1973, 1-11).<sup>9</sup>

In addition to the specific issues surrounding nuclear power production, the nuclear issue is closely related to the broadest of environmental issues-- growth. This is rarely mentioned as an explicit basis for opposition to nuclear power plants by the LMF, and never (to the author's knowledge) publically. Electricity production is both a leading precondition for other kinds of economic growth and one of the clearest examples of self-sustaining, exponential growth in the American economy. Thus electrical power becomes a visible target for an anti-growth approach. This visibility is accentuated by the fact that the electric utility industry is one of the few industries directly regulated by the government, a condition the utilities themselves recognize.<sup>10</sup> Moreover, environmentalists found that their objections to plants on the basis of safety, siting, or thermal pollution were met by (and lost to) the inexorable argument of the utilities (not to mention the AEC) that they must "produce power to meet the demand." In addressing this fundamental problem of "the demand," the response of environmentalists like the LMF has been a classical ideological position, energy conservation. As Table 2.1 shows, promoting this position has been a major LMF activity as an organization. For example, the LMF has sponsored events like the "Energy Conservation Conference" (held in Chicago, October 11, 1973) with several other organizations. In addition, a good deal of Botts' activity which is technically "personal" (not official LMF activity) is in the area of energy conservation: she has been an active member of the advisory board to the Ford Foundation's Energy Policy Project,<sup>11</sup> and was an individual intervener in a utility's rate-increase proceeding on the issue of the space heating promotional rate. However, until the gasoline shortages of Fall-Winter 1973-74, the environmentalists were basically crying in the wilderness.

### Water Quality

While much of the LMF's initial public image was developed in energy-related issues, the set of issues which takes up the highest proportion of LMF time is water quality or water pollution. This is, of course, a logical focus, since pollutants are the most obvious "threat to the lake." The basic goal of the LMF on these issues is to have municipal or industrial discharges into the lake or its watershed eliminated or minimized.

The bulk of the LMF's activities on water pollution issues are carried out under the joint LMF-BPI Water Quality Program. The purpose of this program is to monitor administrative implementation of the 1972 Water Bill by U.S. EPA. (When the program was established, prior to the passage of the Water Bill, its purpose was to monitor compliance with the Refuse Act of 1899 by the Corps; the Water Bill has superseded the Refuse Act program.) The Water Bill set two basic "national goals": elimination of the discharge of all pollutants by 1985, and an interim 1983 goal of water quality which protects fish, wildlife, and recreation. These goals were to be accomplished by limiting the pollutants discharged into waterways from "point sources" (i.e., from any specific outfall into a waterway) so that water quality standards set by the states in conformance with national standards would not be exceeded. Dischargers were to do this by installing "best practicable [economically efficient] control technology" by 1977, and "best available [regardless of economic factors] control technology" by 1983. These control technologies -- and dates by which they must be installed -- are specified in permits issued to the discharger under the National Pollutant Discharge Elimination System (NPDES). U.S. EPA has primary authority under the act, but administrative authority may be transferred to state pollution agencies if the states can develop programs which meet federal requirements. (In Region V,

four of the six states have received NPDES authority, and a fifth has applied for the authority.) In addition, the Water Bill contained, in Section 101(E), a very strong citizen participation mandate.<sup>12</sup>

The LMF-BPI program has been active in each phase of the Water Bill's implementation (standard setting, effluent limitation determination, permit issuance, transfer of NPDES authority to states, and citizen participation). In addition to the previously noted LMF activity on the thermal effluent guidelines issue, LMF-BPI has contracted for independent reviews of U.S. EPA effluent guidelines for two industries (food processing and dairy), and coordinated similar reviews by two other federation members, the Sierra Club (papermaking) and LWV (steel). The program has focused considerably on the review of draft permits to be issued by either U.S. EPA or the states (Wisconsin or Michigan DNR's). This review involves checking both the permit and full permit files for completeness and congruence with known data (primarily information generated by BPI, 1972), and negotiating stricter permit conditions if required. Major commitments have also been made to review and negotiate with U.S. EPA and the states on the transfer of NPDES authority to the states. The nature of LMF-BPI involvement in these aspects of the Water Bill program is highly technical, both in terms of the scientific and engineering complexities of individual permits and associated determinations (such as waste-load allocation models)<sup>13</sup> and in terms of the administrative and legal complexities of the U.S. EPA's and states' programs.

In addition to technical monitoring, the LMF-BPI program, particularly on the LMF side, has sought to maintain and strengthen the "citizen participation" provisions, especially Section 101 (E) programs. This insures continued legitimate access of LMF-BPI to NPDES decision making, since the LMF-BPI program is, of course, "citizen participation" itself. A major part of the LMF-BPI comments on the transfer of authority to the states has been directed at the states' public participation programs. This was most pronounced in the case of the Michigan transfer, which involved the release by the LMF of leaked memoranda documenting an anti-participation bias on the part of certain administrators within the Michigan DNR.<sup>14</sup> The LMF was also the subcontractor (from U.S. EPA, via the Conservation Foundation) for a two-day Water Quality Training Institute (WQTI) designed to train environmentalists to work effectively in the NPDES program. In addition, the LMF and BPI's Goodman served, at U.S. EPA's request, as consultants to Ohio and Minnesota environmentalists on NPDES authority transfers to the pollution agencies of those states.

Since the Water Bill more or less subsumes most water pollution issues, most LMF involvement in water quality is related to the act's implementation. The exceptions to this rule have primarily been issues related to sewage treatment in the Chicago metropolitan area: a Corps project on wastewater management, the Chicago-South End of Lake Michigan Study (C-SELM); the MSD's Fulton County land disposal project; and the MSD's "Deep Tunnel" project, which is designed to create a holding area for wastes that overload the MSD's system after rainstorms. Botts chaired an advisory board on C-SELM, and was involved in the controversy which led to the cancellation of that project. The LMF has been a peripheral observer on the Fulton project. The Deep Tunnel project is only in the proposal stage, but it appears to be closely related to several other LMF issues because of the apparent plan to use tunnel spoils to create offshore islands in Lake Michigan.

## Shoreline Erosion and Land Use Planning

As noted before, a significant number of the LMF's members are riparian groups and individuals. The bulk of these members are Michigan residents (or Illinois and Indiana residents with second homes in Michigan on the lake, e.g., the Rosemary Beach Association). For these LMF members, erosion is an extremely salient issue.

Erosion occurs when, under certain conditions, more material is carried away from a shoreline by the lake than is replaced by the lake. There are a number of "causes" of erosion; two of the principal causes on which there is general agreement are wave action and high lake levels. The "problem" of erosion is that material carried away from the shore is someone's property. The problem is compounded by the fact that since it is scenically located on the lake, that property tends to be more expensive than most other kinds of property. In certain areas, such as Beverly Shores, Indiana, property has been eroded to the point that homes fall into the lake. The natural human response to this situation is to attempt to "save" this property. The traditional approach to saving property from erosion has been to construct one of a number of devices (groins, revetments, breakwaters, seawalls, etc.) on or in the water to counteract the effects of wave action.<sup>15</sup> The major issue surrounding erosion has been the effects and effectiveness of these approaches. The position of the LMF and others has been that erosion control structures erected at one point contribute to erosion at other points because the structures interfere with the natural replenishment of the shore by the "littoral drift" (Larsen, 1972). This argument applies both to structures erected to control erosion and to structures built for other purposes, such as Northwestern University's landfill campus. Thus, from the environmentalists' perspective, traditional structural approaches to control erosion are a classic case of the solution to one problem becoming the next problem requiring a solution.

The observation that the structural approaches themselves are "problems" does not, however, address the issue of property loss due to erosion. The solution advocated by the LMF is land use planning and control. That is, if erodable areas are not allowed to become someone's valuable property erosion is no longer a "problem." Within the context of erosion, land use planning is sometimes referred to as a "nonstructural approach."

The most significant LMF involvement on the pure erosion issue has been the sponsorship of the Larsen (1972, 1973) studies on erosion processes, and the rather successful promotion of these studies, particularly to the Corps. The Corps has essentially accepted the basic LMF position on erosion control.<sup>16</sup> Marketing the alternative--land use controls--has, however, been a more complex process.

The most direct and recent LMF involvement in land use planning has been through the "Mann Committee." The Special Illinois House Committee on Lake Michigan was established during the 1973-74 legislative session by House Resolution 363 "to study the causes and effects of erosion as well as past, present and proposed future policies of usage of the Lake, shoreline and adjoining land." (It must be pointed out that, while land use planning is a logical extension of the erosion issue for the LMF and the Committee, land use planning is by no means limited to erosion questions; the Mann Committee has not been so limited.) House Resolution 363 was introduced by Rep. Robert Mann, an independent Democrat whose

district includes the Hyde Park area of Chicago. Mann's previous environmental involvement included sponsorship of the controversial "Lake Michigan Bill of Rights," which was defeated in a previous session of the Illinois legislature. The purpose of the committee, however, was not to resurrect that "Lake Michigan Bill of Rights," but to study shoreline use, particularly with respect to the federal Coastal Zone Management Act (CZMA).<sup>17</sup> After a period of inactivity Rep. Mann persuaded Botts and the LMF to act as the committee's technical staff, under a grant from the Wiebolt Foundation. As noted earlier, Mary Ann Smith rejoined the LMF staff to act as special coordinator for the committee. The committee held a series of public meetings during the first half of 1974, and was extended by the House. A report and possible recommendations are forthcoming.

Another body engaged in land use in relation to the CZMA is the Michigan Coastal Advisory Board, a quasi-governmental body on which three LMF members serve, two of whom are LMF Executive Council members; the new LMF chairman is also the Advisory Committee's chairman. The work of this advisory body is, however, just beginning.

#### Other Issue Areas

As Table 2.1 shows, energy, water quality, and erosion/land use constitute about 85% of LMF issues. The two main categories of the remainder are natural area preservation and water resources development.

"Water resources development" refers to projects designed to use bodies of water for some direct economic purpose. These projects typically involve construction or are related to commercial navigation; they are administered by the Corps of Engineers. All of these projects in which the LMF has been involved are related to commercial navigation: dredging of the Indiana Harbor, extension of the Great Lakes winter navigation season, Corps promotion of Lake Michigan navigation, and a Corps conflict with the U.S. Fish and Wildlife Service, in part related to the Illinois Waterway. A basic concern in many of these issues is the increased growth and industrialization stimulated by shipping and leading to increased pollution (shipping contributes directly to pollution, of course, through spills, dumping, and blowdowns). Each issue also has particular sub-issues, for example, leakage of dredging spoils in the Indiana Harbor operation, and the use of nuclear power plant thermal discharges to melt ice to extend the winter navigation season.

While the background of many in the LMF leadership is in the traditional preservationist movement (SDC, Sierra Club, OLP, Grand Mere, etc.), the preservation of natural, scenic, or recreational areas has not been a primary LMF concern. When LMF does participate in such issues, it is usually a relatively peripheral participant. For example, on the issue of expansion of the Indiana Dunes National Lakeshore, the sole LMF involvement was a statement to a congressional committee by LMF President Olin, who is also active in the SDC, which was organizing the pro-expansion coalition.

Of the issues not discussed under any of the above general categories, the most significant was the LMF participation in the effort to defend the Clean Air Act. The LMF, along with a large number of other environmental groups, mobilized to prevent the modification of the Clean Air Act to allow the burning of high sulphur coal. This modification was proposed as a response to the "energy crisis." While

this issue had almost no direct relationship with Lake Michigan -- unless one used the logic of Professor Murphy's work on airborne pollution of the lake -- the issue was seen as a critical test case in "defending environmental gains" (i.e., environmental protection statutes) from inroads due to the "energy crisis."

### Issue Complexity

In substantive terms, most issues with which the federation deals are quite complex. At the most basic level, environmental issues deal with physical processes which require specialized scientific or engineering competence. In addition, many issues involve basic scientific or engineering processes which are not well understood or which are subject to differing and conflicting understandings. Two examples of differing understandings involve erosion and nuclear safety.

There is a basic theoretical disagreement between the position of the Corps and the position of environmentalist scientists (i.e., Edith McKey, whose work is reflected by Larsen's (1972, 1973) work on erosion) on the role of Lake currents in accelerating erosion. This theoretical debate calls into question the wisdom of the Corps' structural approaches to erosion control.

The basic debate over nuclear safety revolves around the AEC's position on safety. The AEC (1974) has demonstrated that the risk of a catastrophic accident at a given nuclear plant in a given year is extremely small (at least in part due to AEC safety regulation.) The environmentalist position (Kneese, 1973) is that over the long run, with many nuclear plants, the probability of a major accident somewhere increases to unacceptable levels, given the chilling consequences. Thus, there is no agreement on the most basic criterion for evaluating safety. Such basic disagreement is, of course, a basic feature of political debate; Schattschneider (1960), for example, suggests that one definition of political power is the ability to define the criteria on which decisions will be made.

Within this substantive complexity the LMF also faces varying degrees of governmental or bureaucratic complexity. With the exception of the LMF-BPI Water Quality Program, the specific goals of the federation usually involve advocacy of very broad developments in public policy. In a sense, such policy development represents a change from status quo approaches. That change is not a simple change, but typically implies that additional factors be interjected into policy considerations. The shift from structural erosion control to comprehensive land use planning and the shift from nuclear safety or thermal issues to power plant siting (a subset of land use planning) or energy conservation are good examples of this broadening of considerations in policy making. The major implication of this approach is that issues rapidly outstrip the jurisdiction of those decision-making entities that initially dealt with the problem. The AEC is understandably hard pressed to deal with environmental problems if the alternative is energy conservation; the Corps, likewise, feels that it does not have the authority to impose land use controls as an alternative to revetments and groins. Thus the policy-development approach of the federation implies that the federation must interact with a complex set of governmental decision makers on any given issue, and the system becomes more complex as the issue moves closer to an optimum solution. In addition, of course, the complex governmental system changes from issue to issue.

The decision-making system with which the LMF staff had to contend while

serving as staff for the Mann Committee is a good example of this complexity. Bodies with specific formal authority in this system included, the U.S. Congress, which passed the CZMA; NOAA, the agency responsible for administration of the CZMA program; the Illinois Department of Conservation, and later the Illinois Bureau of Water Resources, designated by the state to administer CZMA programs in Illinois; and the Illinois Legislature, including in particular the Mann Committee and the Illinois Water Resources Commission, which would have to pass any state enabling legislation. In addition, the formal responsibilities of the following governmental entities are affected by the committee: the Corps of Engineers, MSD, the North Shore Sanitary District, thirteen lakefront municipalities (with Chicago represented by its Department and Planning, and the other municipalities organized into a Lake Michigan Advisory Committee), the Illinois Geological Survey, the Northeastern Illinois Planning Commission (NIPC), the Great Lakes Basin Commission (GLBC), and Chicago's and the other other twelve municipalities' park districts. This is, of course, just a listing of the bodies with a directly related, formal responsibility. The listing omits an equally long list of nongovernmental interests which were involved in the system. On the surface, this system resembles Grodzins' (1966) metaphor of the political process as a "layer cake" of interrelated swirls of authority. But the system also resembles Banfield's (1961) description of political influence as a process in which a large number of actors exercise essentially veto power over decisions. The LMF must not only operate within this swirl of authorities, but it must frequently persuade many decision makers to obtain the basic policy changes it advocates.

#### FEDERATION OPERATING STYLE

In the broadest sense, the activities of the LMF are the sum of the actions of all those associated with the organization--officers, staff, and members. The bulk of those actions, however, are taken by the federation staff or center around the actions of that staff. The actions of the LMF staff fall into three general categories: (1) staff information gathering, (2) actions directed towards the LMF's membership constituency, and (3) actions directed towards public policy makers. The desired end result of all these types of actions, however, is the influencing of policy makers.

#### Staff Information Gathering

A precondition of the role which the LMF staff attempts to play in policy decisions is that the staff itself be well-informed on the issues and decisions. Two types of information are important for the LMF staff. First, most issues, as noted above, have a very high scientific content. To participate adequately on issues like erosion, water quality, and particularly nuclear power issues, the staff must itself develop a thorough familiarity with the physical phenomenon at the root of the conflict. Second, the federation must acquire and evaluate a good deal of political information. This information includes knowledge of when, where, and by whom critical decisions will be made, who other participants in the decision are, and what the nature of their positions on questions relevant to the decision may be. One LMF contact put it this way:

"The kind of stuff she [Botts] needs is lead time on a decision, or what direction the agency is moving in. Possibly the agency is moving in a direction she could impact on, and a better decision could come out. Occasionally I need information on what another agency might be doing that she might be aware of, or what a private interest is about to do, and she might have a close contact on that ... It is a matter of

anticipation by both sides ... You Know, 'What is happening, and how might we change it at this point?'"

Both of these types of information-gathering activities require substantial amounts of LMF staff time.<sup>18</sup> Much of the substantive information (i.e., on scientific background of issues) is found in written sources: technical reports, books, journals, etc. The LMF staff tends to rely on government-originated material rather than more academic sources, probably because of the LMF's interest in applied rather than theoretical research. However, an important part of the LMF's information-gathering activities has been the sponsorship of original research, usually by academics, on questions related to environmental policy issues. This research is usually not done by the LMF staff itself, but by specialists associated with the LMF; the role of the staff has been to stimulate, finance, and then market this research. The best pure example of this is the work of Larsen (1972, 1973) on shoreline erosion. In many ways the role of the LMF staff in this activity is much like their role as a political coalition builder (see below). For example, the LMF has been attempting to stimulate a comprehensive study of lake processes related to land use and erosion questions. This has involved trying to broker among several academic groups and a variety of government agency funding sources (the City of Chicago, Corps, NOAA, State of Illinois, etc.).

Political information gathering takes up more LMF staff time. It is, of course, the most appropriate type of information for the federation staff to acquire. Some of this information gathering occurs in obvious ways: calling an agency official and asking about the current status of a certain decision, receiving a call from a member about an important local decision related to federation concerns, reading the Federal Register and copies of public notices (e.g., of NPDES permits, Corps' construction permits, etc.), and so forth. Much of this takes place within the context of other activities of the staff. The behavior of the staff at public meetings is a good example of this process. At the typical public meeting, the staff member will exchange information with other participants at the meeting before, during, and after the meeting. Often these contacts will have little or no direct bearing on the subject of the particular meeting. At one representative public hearing, for example, Bot\* made contacts with thirteen people; only two were directly related to the subject of the hearing, six were indirectly related (the hearing was on nuclear power plant siting authority and the "indirectly related" subject was energy conservation, and particularly the then recently released draft report of the Ford Energy Policy Project), and the remainder were on subject not related to the subject of the hearing. Other staff activities--particularly telephone contacts, which are by far the most frequent medium of contact, with both government officials and environmentalists--follow this pattern of discussion of a number of issues during the same interaction. This process, particularly as practiced at public meetings, is referred to as "making contacts." It is viewed as an extremely important part of the work of the staff. When reporting on meetings and outside events, about half of the developments mentioned by the staff involve this process of "making contacts."<sup>19</sup> Making contacts is viewed as an "investment" by the staff in which the payoff is the development of a relationship which may prove valuable in the future.<sup>20</sup> That payoff may involve information ("inside" information from agency officials is particularly valuable) or general receptivity of the contact to the LMF in future decision-making situations. The importance of making contacts is that the contacts place a great deal of reliance on personal familiarity, trustworthiness, sophistication, and resulting perceptions of positions on issues.

### The LMF As an Information Source For Members

A lack of information and coordination on Lake Michigan issues was the original need which was identified as the reason for creating the LMF. At least formally, meeting this information and coordination need is the primary activity of the federation's staff. This function was described in the following manner by an associate of the LMF in an interview with the author:

"Not everyone along the shoreline has anyone available, for example, to read the Federal Register, or to keep up with litigation that is relevant to their situation. They need to know the current state of the situation, whether it is in terms of regulation, law, or bills pending in the Congress. What is the latest status of research on a project, are the results in, is there a trend, and things like that. In other words, they have one place they can call, and if Lee (Botts) does not have the answer, she knows who to contact. Or someone will say, 'We have a problem here with a feedlot and we think it is doing a lot of damage to local streams; do you know of anyone who has done any good research on feedlot pollution?' And Lee can say, 'I will send you a ream of stuff, and here is the name of so-and-so at the university. We have dealt with him before, he is a good witness, and he is a fair guy who will give you the straight poop free.'

She brings people together, puts people together with needs and resources. She fulfills that function."

Two important facets of the LMF's information role are the sponsorship of workshops and conferences on particular substantive issues (e.g., on the federal Water Bill program, shoreline erosion, energy conservation, etc.) and LMF relationships with the press and electronic media. However, the most regularized method of conveying this information is through a monthly newsletter, the LMF Bulletin.<sup>21</sup> The typical Bulletin covers recent developments on a variety of topics (an average of about sixteen per issue). Material in the Bulletin ranges from brief one to two sentence news notes to longer articles which discuss substantive issues, background information, and important positions (primarily governmental) on the issues. If crucial decision makers are identifiable, the articles will usually specify their names and addresses sometimes explicitly suggesting that members communicate with the decision makers. Certain issues of the Bulletin have been devoted to single topics, for example, the January 1973 issue on nuclear power production, the March-April 1973 issue on erosion, and the May-June 1973 issue on the LMF power plant siting policy proposal.

The Bulletin is supplemented by occasional special "Alerts." These are usually one-page notices of need for environmental pressure on specific upcoming decisions. An Alert typically discusses an issue briefly, identifies the relevant decision maker, requests that members contact the decision maker (usually via a letter), and often suggests the content of comments. Unlike the Bulletin, Alerts are sometimes sent only to a restricted set of LMF members. The release of the "Purdy Memo" (mentioned above, page 26) for example was done as an Alert to Michigan LMF members, since the decision concerned the Michigan DNR. Also somewhat similar to the Bulletin and Alerts are special memos sent by Botts to the LMF Executive Council. Like the Bulletin, these memos usually cover a number of topics. They are similar to the Bulletin because the council functions as key local contacts of the federation. The distribution, obviously, is not as

wide (28 versus about 1,500 Bulletin mailees).

In general, the production requirements of mass distribution make Bulletins and Alerts useful only for communicating either general information or messages on specific decisions for which there is a reasonable amount of lead time. The Bulletin (average length fourteen pages, single spaced), requires about four days to write, type, duplicate, process, and mail; adding mailing time, the lead time on the Bulletin is therefore about a week and a half. Since many decisions require much faster response (and since most do not conveniently fall at the time of the Bulletin's monthly publication), the LMF extensively supplements these routine, mass-distribution media with informal contacts, usually over the phone.

TABLE 2.2

MEMBER CONTACTS WITH LMF

A) <u>Type of Contact</u>	0-1/yr.	2-5/yr.	6-11/yr.	1-3/mo.	1+/wk.	N.A. <sup>a</sup>	Total
Personal/telephone contacts	26.3%	22.9%	10.7%	9.3%	4.9%	25.9%	100%
Written Correspondence	34.6	24.4	5.9	5.4	4.9	24.9	100
Met at hearings, conferences, etc.	31.1	28.3	10.7	5.4	.5	20.0	100

B) "Do you read the LMF <u>Bulletin</u> or Alerts?"	"Yes"	"Sometimes"	"No"	No Answer Not Applicable <sup>a</sup>
	91.2%	2.9%	1.5%	4.4%

Source: Member Questionnaire  
N = 205

a) No Answer or Not Applicable; not applicable includes 5 LMF staff persons.

As Table 2.2 shows, almost all of the LMF members report that they read the Bulletin, but fewer than half report some form of individual contact with the LMF more than once a year. Because of this (very expectable) pyramidal pattern of contacts, the bulk of LMF contacts are with a very small proportion (about 15%) of the membership. In general, these high-frequency contacts are with important environmental leaders, particularly leaders of environmental groups. That is, the LMF's informal contacts tend to reinforce a system of interleader communication, rather than a system of broad distribution of information.

Most of these interleader contacts, however, are not primarily of an educational nature, but involve coalition formation or coordination on specific issues. The LMF does not act as a passive information source, but actively attempts to organize environmentalists on Lake Michigan issues. That is, the LMF staff attempts to be the pivot of coalitions supporting environmental interests on issues when crucial decisions require organized effort. In the simplest cases, this might involve stimulating a letter-writing campaign as a pressure tactic. Coalitions are, however, usually more complex. For example, in the case of the Mann Committee, the LMF (as staff to the committee) formed an "advisory committee" of citizens to attempt to counteract the possible image of the committee as solely a vehicle for the LMF or the committee's chairmen, Rep. Mann. In the case of several nuclear power plant controversies, the LMF helped to organize local

opponents who had legitimate "standing,"<sup>22</sup> and other organizations, like the Sierra Club and BPI, which had the requisite legal and financial resources to carry out an intervention into licensing procedures. Yet another type of specialized coalition is represented by the WQTI, which placed pressure on agencies via potential review of administrative decisions under the NPDES permit program.

The LMF performs this role of coalition organizer in slightly less than half of the issues in which it participates (45%).<sup>23</sup> There is a certain amount of specialization within the environmental movement. Thus, even though certain issues might logically fall within the LMF's responsibilities, the primary responsibility is generally understood to belong to other organizations. Examples of this are the lead role of the SDC on issues pertaining to the Indiana Dunes National Lakeshore, or the responsibility of the LWV for Chicago MSD issues. In these issues, the LMF plays a secondary role. The federation is available for support (e.g., testimony at hearings, etc.) when mobilized by the lead organization, but will not monitor developments as closely as issues in which it is understood to have primary responsibility.

#### Direct LMF Pressure on Government

LMF actions directed towards other environmentalists are basically indirect efforts to influence policy makers. Informing the membership is relevant to policy making in that it stimulates and facilitates (by providing knowledge) federation members' attempts to influence governmental policy. This is not to say that the federation uses its constituents (in a manipulative sense) to obtain LMF goals. The LMF has, in fact, a high commitment to citizen participation in and of itself. But the effect of this commitment is to (attempt to) increase the level of environmental pressure on government.

The LMF staff also interacts directly with government policy makers on its own initiative, advocating points of view on policy decisions. Thus, in addition to its function of coordinating and informing other environmentalists, the LMF staff plays a traditional interest-group role. This direct contact with government entities takes up a large part of the LMF staff time.

A substantial proportion of the direct contact with government decision makers, however, is not traditional "pressure group" activity. As will be noted in the next chapter, the LMF advocacy style is "informational," particularly in contacts with legislative bodies. LMF activities, however, deviate even further from a "normal" model of interest-group advocacy. The most important deviation from that normal pressure group model is the LMF/BPI Water Quality Program. That program involves a "follow up" on a previous decision (i.e., the Water Bill legislation) rather than advocacy of new policy positions. In practice, this distinction is not clear-cut; the "follow up" on the legislation implies advocacy on decisions made by administrators -- U.S. EPA-V and the states' pollution agencies -- in implementing the original decision. In any case, the Water Quality Program can still be seen as an advocacy or adversarial relationship with decision makers, at least on the surface.

On a number of issues or programs, the LMF has entered into a relationship in which its staff formally cooperates with a unit of government. These formally non-adversarial relationships fall into three main categories:

**TABLE 2.3**

**LMF CORRESPONDENCE, BY TYPE OF CORRESPONDENT  
AND NATURE OF MESSAGE**

Nature of Message	Type of Correspondent						Total
	Envir. Group or "citizens"	Administr. Agency	Legisl.	Press	Academic	Other	
Advocacy	10 (3.6%)	23 (8.4%)	12 (4.4%)	2 (.7%)	1 (.4%)	1 (.4%)	49 (17.9%)
Informational	25 (9.1%)	24 (8.8%)	8 (2.9%)	7 (2.6%)	9 (3.3%)	5 (1.9%)	78 (28.5%)
Coalitional	12 (4.4%)	6 (2.2%)	3 (1.1%)	0	2 (.7%)	0	23 (8.4%)
Intra-organizational	31 (11.4%)	1 (.4%)	0	0	3 (1.1%)	0	42 (15.3%)
Answer to inquiry	6 (2.2%)	9 (3.2%)	14 (5.2%)	1 (.4%)	3 (1.1%)	0	33 (12.9%)
Routine	22 (8.1%)	12 (4.4%)	1 (.4%)	6 (2.2%)	3 (1.1%)	5 (1.9%)	49 (17.9%)
Totals	106 (38.7%)	75 (27.4%)	38 (13.9%)	16 (5.8%)	21 (7.7%)	18 (6.6%)	274 (100%)

Source: Correspondence Analysis, Appendix B.

- (1) The LMF has acted as a contractor for services provided to government. The clearest example of this type of relationship is the Mann Committee, for which the LMF provided professional staff services. Other examples of the relationship are the report on the food-processing industry effluent guidelines which was subcontracted through the LMF by the U.S. EPA, the WQTI conference funded by U.S. EPA through the Conservation Foundation, the Energy Conservation Conference which was funded principally by the American Association for the Advancement of Science and the Illinois Institute for Environmental Quality (IIEQ), and the second Larsen (1973) erosion study, also funded by IIEQ. In cases such as these, the LMF is funded by an agency to carry out an activity which is of mutual interest to both the agency and the LMF, and is at least nominally within the statutory responsibility of the agency (the U.S. EPA actions under the 101(E) citizen participation section of the Water Bill, and IIEQ under its general responsibility for environmental research and education under the Illinois Environmental Protection Act).
- (2) Persons formally associated with the LMF have held positions, including leadership positions, in a number of governmental advisory committees. This has not been as common for the LMF staff as for Executive Council members (see Table 2.3). However, Botts has served as the chairperson of an advisory committee to the Corps on the C-SELM project, and is on the advisory committee to the Ford Energy Policy Project (the latter, of course, is not an official governmental organization). There are significant drawbacks to participation on an advisory committee, as Cronin

and Thomas (1971) point out, but the advisory committee has been extremely powerful at certain times in certain agencies (Foss, 1960; Calif., 1960).

- (3) In a number of situations, the LMF staff has served as an informal consultant or investigator for decision makers. In these cases, the "normal" initiation of issues by citizens contacting the LMF, which in turn contacts the appropriate decision-making entity, is reversed; the government agency contacts the LMF for help in dealing with a citizen or group. In one case, the LMF was asked by U.S. EPA-V to determine the nature of local opposition to a proposed sewage treatment plant in Whiting, Indiana. In another case, the LMF was asked by Senator Adlai Stevenson (D., Ill.) to investigate a complaint by constituents about the handling of an erosion problem by the Corps of Engineers. In these cases, it is advantageous for the government entity to work through the federation because of the LMF's independence and familiarity with the issues involved. For the LMF, the activity is essentially compensation for previous agency cooperation with the federation.

The LMF uses a variety of approaches in purely adversarial situations. A certain amount of the LMF actions take the mundane form of written correspondence, participation at meetings, hearings, etc. The majority of contacts with decision makers, however, occur in informal situations. As noted above, much of the staff's "information gathering" activities takes place in informal situations, for example, as a secondary activity at a public meeting. This same type of contact is also used for informal advocacy. In fact, these informal contacts usually combine information gathering and advocacy to such an extent that it is difficult to distinguish between the two aspects of the interaction -- many "questions" are a subtle form of advocacy. As Berry (1974) notes, most public interest group staff people do not consider a public meeting to be a particularly effective forum for advocacy. The actions of the LMF staff confirm this observation: the side action at a public meeting is usually more significant than the direct testimony. Nonetheless, groups like the LMF must attend public meetings, and must participate seriously. The public meeting is in many ways a symbol of citizen participation in policy making; for example, one of the first levels of threat used by an environmental group when confronted with an adverse agency decision is to call for a public meeting on the issue. To maintain this symbol, the staff of environmental groups must put in an appearance at meetings and present competent, professional testimony, even though almost all participants realize that informal contacts are the most efficacious way of conducting business.

There are several tactical variations on straightforward advocacy, in either formal or informal settings. The LMF will often shift the content or tone of its approach in difficult decision-making situations. One variant of this tactic is analogous to a "high-low" tackle in football. For example, a colleague of the LMF staff will make a statement at a meeting excoriating a decision maker for incompetence, bias, or worse, threatening litigation, etc. The LMF staff person will then follow this performance with a "reasonable" and "moderate" presentation which actually represents the "real" environmentalist position. The first statement represents a false extreme, and the moderate position is a position which the decision maker could then treat as a "compromise." Before it changed interests, the Campaign Against Pollution (CAP, now "Citizens' Action Program") institutionalized this tactic within the environmental movement.

When certain decisions sought by the LMF appear to be foreclosed, the LMF will often shift to a secondary issue. This shift allows the LMF to "keep the issue alive" and also, of course, imposes costs upon opponents of the environmental position. In a very broad sense, the thermal issue is an example of this tactic; it was not possible to stop nuclear plants on the basis of safety, siting, or energy conservation arguments. But it was possible to maintain a controversy by shifting to the thermal question and, while fighting the battle over thermal pollution, also raising the primary issues.

It is not uncommon for the LMF to be a crucial participant in a conflict between two government entities. As Sigal (1971) has pointed out, the "leak"<sup>24</sup> is a technique commonly practiced by bureaucrats who wish to influence other governmental officials when more direct methods have failed. The LMF has been the intermediary in two noteworthy cases of leaks -- the leaks of the "Purdy Memos" and of the "Love Letters." In both cases, the release of the leaked material served to significantly jog the decisions in favor of the LMF (and the "leaking agency"). A tactic similar to the leak involves the use of indirect pressure by one participant in a decision-making process on another participant in the process. Essentially, the first participant uses a friendly third party as the medium for pressure. An environmental group staffer described the ploy in this way:

"I have been called by people over at [an agency] who say, 'Will you call the head of such-and-such an agency, and tell him you are concerned about this?' So I made the call, and everything hit the fan. Then I would get a call back later that afternoon from [the agency] saying, 'Thanks, they just budged.' I am speaking of person experiences, but I know that Lee [Botts] has had the same thing happen to her."<sup>25</sup>

The difference between this tactic and the leak is that the target decision maker's deeds are not made the subject of general public knowledge. It should be noted that, although the target of the tactic is almost always a governmental decision maker, the tactic can involve either a governmental official using a third-party interest group or an interest group using a third-party government official.

All of these tactics are relatively common among interest group (and government agency) staff people. They were not created by the LMF, but the LMF staff uses them as well as any other participants in the decision-making game.

#### Other Types of LMF Activity: Litigation, Press Relations, and "Environmental Education"

The LMF technically does not engage in litigation. In fact, the LMF as an organization has never been a named party in any form of litigation, including quasi-judicial proceedings, such as AEC interventions, proceedings before quasi-judicial bodies such as the Illinois Pollution Control Board, or even administrative agency adjudicatory hearings. As noted above, however, a number of LMF activities have involved litigation, primarily the LMF's coalition formation role in AEC licensing interventions. This lack of explicit involvement in litigation is purely a policy decision (and a logical one given the number of other environmental groups who can and do "sue the bastards," in Yannacone's (1970) words); the LMF is not precluded by its 501(C)(3) status from participating in litigation. While the organization has never been a party to a suit, Lee Botts and another

Executive Council member, Louise Young (the representative of OLP), have been official intervenors as individuals in proceedings before the Illinois Commerce Commission on a utility rate increase decision.

An activity which takes up a good deal of LMF time is press relations. This activity is a mixture of a number of functions. On the one hand, it is a method of informing federation members on issues. In this regard it has the side benefit of reaching a broader audience than the other LMF information media (the Bulletin and "Alerts"). The press is also useful on occasion as a medium for placing pressure on decision makers. In part because of Botts' and Flowers' journalism backgrounds, the LMF staff is regarded by fellow environmentalists and the media as fairly adept on this particular activity. (This activity will be discussed more completely in Chapter IV.)

The last of the significant LMF activities involves a general "environmental education" function. The difference between this activity and the LMF's role of informing its member constituency is that there is little probable pay-off from the former in terms of increased environmental pressure on decision makers. A large portion of this responsibility is handled by Flowers, particularly answering very general information requests ("Could you please send information on water pollution?"). Both Botts and Flowers also make a number of appearances at special educational events such as ecology field trips, local environmental programs, college seminars, etc. Certain special conferences which the LMF sponsors, such as the Energy Conservation Conference, could also be classified under this function.

#### FOOTNOTES TO CHAPTER II

1. For a good discussion of organizational goals, see Mohr (1974). On "official" or "manifest" goals, see Perrow (1961) and Simon (1964). For the distinction between "official" and empirically determined goals, see Simon (1964) and Cyert and March (1963). Mohr (1974) discusses organizational goals in terms of "transitive" and "reflexive" goals (goals directed outside or within the organization); this discussion of LMF issues falls within the former category.
2. This is a seemingly minor observation, but one with important implications for evaluation. If one accepts Simon's (1964) and Mohr's (1974) definition of organizational goal as probably different from an organization's stated goal ("Save the lake"), then one would evaluate different resultant phenomena. For example, levels of pollutants would not be an appropriate evaluative indicator, but governmental response to LMF pressure would be, irrespective of any changes in the physical system of the lake.
3. See Appendix C for details of the "Issue Analysis" conducted for this study.
4. Nuclear power plants use very large amounts of water for the purpose of cooling steam used in the production of electricity back to a liquid state. The usual practice of utilities is to draw this coolant from a body of water, use the water to cool the system, and then discharge the (heated) coolant back into the body of water; this process is known as "once-through cooling." The "thermal issue" is, therefore, (a) what is the effect of this heated discharge, particularly on aquatic organisms? and (b) should alternative cooling systems (e.g., "closed-cycle cooling") be used instead of "once-through cooling?"

5. Included in various interventions were: Wisconsin Ecological Society, Wisconsin Resource Conservation Council, Protect Our Wisconsin Environmental Resources (POWER), the Porter County (Indiana) IWL chapter, several individual residents of Dune Acres, Indiana (SDC members), WMEAC, two Michigan riparian groups, the Rosemary Beach Property Owners Association, the Dunewood Association, the Chicago MSD, and the State of Kansas. (Kansas intervened because of an AEC proposal to store radioactive wastes in Kansas caverns.)
6. Author interviews: Regulatory agencies' officials.
7. Interesting evidence of this fact is the January 30, 1973, LMF Bulletin entitled, "1973: Year of Decision for Atom and the Lake." The 20-page issue, devoted entirely to nuclear issues, gave the thermal question only a third of a page.
8. For the best statement of environmentalists' concerns about safety, see Kneese (1973). On AEC and industry attitudes on safety, see Brady and Althoff (1973). The AEC position is best stated in the recently released "Rasmussen Report," AEC (1974), named after Norman Rasmussen, the director of a 60-person MIT consulting group which prepared the report for the AEC. The study argues that "the consequences of potential reactor accidents are no larger, and in many cases are much smaller, than those of non-nuclear accidents" and that "the likelihood of reactor accidents is much smaller than many non-nuclear accidents having similar consequences" (AEC, 1974, p.1).
9. Because of the constraint against LMF "policy positions." See above, Chpt I.
10. Author interviews: Utility executives.
11. After a massive, long-term study, the Energy Policy Project advocated energy conservation as the most attractive long-run alternative for U.S. energy utilization policy. See Freeman et al. (1974).
12. For more on this very complex act, see: the act itself, P.L. 92-500, 33 U.S. Code 1151, ELR 41101-41129; "National Pollutant Discharge Elimination System," 40 CFR 125, U.S. EPA (1973a); U.S. EPA (1972); U.S. EPA (1973b); and IWL (1973). Also see Thomas' (1974) and Ball's (1974) analyses of the implementation of the act by U.S. EPA.
13. Waste-load allocations are computer models which relate water quality standards for a given body of water to effluent limitations on particular discharge sources.
14. The memoranda were known as the "Purdy Memos," after the Assistant Director of the Michigan DNR for Environmental Protection, Ralph Purdy. The memoranda were actually written by one of Purdy's subordinates, but went out under Purdy's signature.
15. For a very brief description of erosion processes and structural protection devices, see Corps of Engineers (1973). For a more complete discussion, see Larsen (1972, 1973), Brush and Inman (1973), and LWV (1974).
16. Author interviews: Corps administrators. While the Corps may have accepted the basic findings of the Larsen work, it is by no means in complete agreement,

particularly on the basic theoretical question of the role of lake currents.

17. The Coastal Zone Management Act of 1972 (P.L. 92-583, 33 U.S. Code 1124) was designed to "preserve, protect, and develop (sic)" areas on the Atlantic and Pacific coasts and Great Lakes shorelines by "encouraging and assisting the states to exercise effectively their responsibilities in the coastal zone" (Section 303).
18. The largest category of correspondence, by "Nature of message," was "Informational," at 28.5%; see Correspondence Analysis, Appendix B. The primary nature of this category is information gathering. In addition, portions of the "Routine" and "Neutral answer" categories are also related to this activity; for example, a request for a government technical report would fall in to the "Routine" category.
19. Author's conversations with LMF staff, particularly Botts, and observation of LMF staff meetings.
20. Author interview: Environmental group professional staff person.
21. See Appendix F for an example of the Bulletin.
22. "Standing" to sue is a threshold consideration in environmental litigation. The case law on the subject is represented by the Mineral King case, Sierra Club v. Morton, 2 ELR 20192-20201; see particularly Mr. Justice Douglas' dissent, Ibid. One of the best discussions of environmental law is Anderson (1973).
23. Source: Issue analysis; see Appendix C.
24. A "leak" is the release of usually sensitive governmental material to the public, usually via the press, by a governmental official, either without the approval of superiors or in violation of the customary manner of treating such material.
25. Author interview.

### III. POLITICAL EFFECTIVENESS

One of the most common descriptions of the political process is the Easton (1965) "systems" model. This model describes a relatively simple, linear political process in which interest groups make demands of government ("inputs" or "interest articulations") and governmental entities reach decisions ("outputs") which have certain effects ("outcomes") on social, physical, or political environments. (See Figure 3.1.) This system suggests three basic, plausible ways of evaluating the Lake Michigan Federation. One could evaluate the LMF at either of the three stages of the process: with respect to its effectiveness at the interest articulation, output, or outcome phases of the process.

As mentioned in Chapter II, while the official goal of the LMF is to "save the lake" ("outcomes"), the actual behavior of the organization is directed towards the governmental decision-making process. That is, the behavioral goal of the LMF is to influence decisions ("outputs"). In addition, and more importantly, public policy decisions which conform to the LMF's point of view are logical pre-conditions of an evaluation of LMF success in terms of physical environmental effects. For example, if the physical good which the LMF seeks is to prevent eutrophication, then one could not evaluate that condition until some governmental decision (i.e., the Water Bill) had been reached and a program had been implemented (e.g., dischargers had eliminated pollution under the terms of NPDES permits). In fact, in almost all cases neither of these conditions--decision and implementation--have been met. It is too early to make an environmental "outcome" evaluation.<sup>1</sup>

This chapter will discuss the LMF's performance at the first two stages of the process, the interest articulation and decision stages. The first stage involves two types of evaluative criteria: (1) assessment of the pure competence of the LMF's activities and (2) assessment of the access of the LMF to decision makers. An assessment of LMF performance at the second, or decision-making ("output") stage is the evaluation which most readers would probably define as the most salient determinant of LMF effectiveness. It is, however, the more difficult stage to evaluate, and this chapter will apply three different criteria of effectiveness:

- (1) a simple tabulation of decisions, and an attempt to relate these to LMF efforts;

**FIGURE 3.1**

#### THE EASTON LINEAR POLITICAL PROCESS AND CORRESPONDING EVALUATIVE CRITERIA

Entities/ Components	Interest Groups	→ Government	→ Outputs	→ Outcomes
Stage of the Political Process	Interest Articulation and Interest Aggregation		Decision Making	Implemen- tation    Effects on some Environ- ment
Evaluative Criteria	Competence Access		Success Rate Policy De- velopment Decision Maker Perceptions of Influence	Environmental Improvement or Protection

- (2) an examination of developmental trends in broad public policy issues; and
- (3) a discussion of decision makers' criteria of interest group effectiveness.

(These criteria treat effectiveness at the decision-making and implementation stages as equivalent, according to the logic that implementation involves decisions putting other decisions into effect.)

Finally, the chapter will discuss an evaluative perspective which combines performance at both the interest articulation and decision-making ("output") stages--a systems effectiveness criterion.

### COMPETENCE AND ACCESS

Two basic considerations in evaluating the LMF are (1) how well it performs its day-to-day activities (competence) and (2) whether it has succeeded in having its message heard by people who make public policy (access). These are primarily threshold considerations; that is, they are preconditions for influencing decision makers.<sup>2</sup>

The most common evaluations of the LMF by decision makers are evaluations of the competence of the LMF, particularly its professional staff. The basic positive evaluation of LMF staff is that they perform in a "professional" manner, and their "professional" skill is the ability to deal in a well-informed fashion with decision makers:

"The federation has been trying--and I think fairly conscientiously--to establish itself as an organization that takes the time to do its administrative and technical homework and endeavors to present a credible position in any event, whether they are in agreement or disagreement with the regulatory agency or the discharger."

"The few contacts that I have had with Arnie Leder, for example, I think the impression has been good. Really, it is one of the few places where you are able to really talk turkey about a given problem because he knows the background. And that is an awfully complicated subject, particularly with the new Federal Water Pollution Amendments. I mean, I do not even know many of the questions and answers that are involved there; for a citizens' group it is horrendous. So the contacts I have had left me with a good impression."

"I think there is nobody in this office who looks down on her work at all, or upon her competence. With certain citizens you have some people who say 'Well, you know ....' But with Lee Botts it is a matter of a person who is well informed, stays close to the issues, knows what is going on, and can deal on professional terms with these people."<sup>3</sup>

As noted in Chapter II, acquiring knowledge is a significant activity of the LMF staff. In addition, as noted in the first chapter, the LMF has attempted to develop and formalize relationships with the scientific community to offset any lack of staff background on scientific or engineering subjects.

While an important part of "professionalism" is basic knowledge--either of technical/scientific material or of legal and governmental complexities--the

perception of professionalism is sometimes colored by the operating style of the LMF. The difference between the LMF style and more radical tactics is particularly vivid to the Chicago interviewees who recall the days of CAP's environmental activities:

"They [the LMF] have not chosen to be the kind of activist group that Campaign Against Pollution was. It [LMF] grew from the Open Lands Project, which is essentially a very sensible and tractible group of people, who have a position, of course, but who want to talk about the issues and are willing to listen to the other side of the story. They are not push-overs, I don't mean to suggest that. But they work in the real world, and they understand the real world problems ... We respect these people [LMF's Botts, BPI's Comey and Myron Cherry, and the Clean Air Coordinating Committee's Richard Kates], their viewpoints, their judgement, their talents, their approach, whereas we don't respect a fellow like [CAP official], whose divisiveness and tactics we suspect are not honest."

"A group out here is running a case against the City of Chicago for sewers backing up and so forth. They've been in here spraying hydrogen sulfide around ... saying we are giving them the run-around. Very poor tactics. You know, it just turns you off."

"I think today's environmentalist is an adversary--should be. But there are ways and degrees and methods of being an adversary. You can come in and urinate on the floor, and then stomp out; that's one way of being an adversary. You can also find out about a particular case, and find out if there are serious flaws in what's going to happen. And that means you have got to sit down and do some work."<sup>4</sup>

Positive evaluations of competence or professionalism always underlie totally positive perceptions of the LMF by decision makers. On the other hand, decision makers who have reservations about the LMF make this most clear in discussing competence, usually technical or scientific competence. In a sense, challenging the technical competence of the LMF reflects a basic disagreement with the LMF. This pattern is most clear in those cases or issues which involve disagreements over scientific fact or theory. One Corps officer put it this way:

"I would say that the federation does its homework. I would also say that we have had some very real differences of opinion in the professional-technical area. The staff has taken violent exception to a few of the publications that have been underwritten and published by the federation.

(Q) "Are you referring to Curt Larsen's studies in particular?"

(A) "Yes. Well, I think a general respect exists between Lee Botts and Edith McKee on lake phenomena. Edith McKee and the Corps of Engineers do not see eye-to-eye on the physical mechanisms of shoreline erosion, and, since we do not see eye-to-eye on mechanisms, we do not see eye-to-eye on what kind of data you need to do a good job of decision making. So I think that, without question, the federation has accepted the McKee theory as contained in several reports. We have not."

Another pattern of evaluation depreciates LMF staff competence because of a lack of specialization in the technical fields relevant to environmental policy making:

"There is a professionalism in their newsletter and in their effort. There is a willingness on their part to do their homework. There is a willingness to keep probing and pushing and so forth, but I still do not consider them professionals as I would consider myself a professional. Maybe they are professionals in their field, but they stop being professionals when they come into my field as far as I am concerned."<sup>5</sup>

Decision makers who note this, however, will usually apply the same observation to all environmental groups:

"You might say that about most environmental organizations. They are just handicapped because it is difficult for them to sort out some of these very complicated, technical questions. And it is sometimes difficult for them to get a good and unbiased type of [technical expert] ... It would surprise me if that were not the case and understandably so. It is not to say that all of the people they get do not measure up. But on the whole, it is just a fact of life."<sup>6</sup>

And the official who said the LMF staff "stop being professionals when they come into my field" later noted that the LMF was, he thought the most "apt,... when compared with other groups."

These observations represent basic technical evaluations by decision makers. They are not reactions to LMF positions which purposely overstate a case for essentially tactical reasons. Purposeful overstatements of positions are generally recognized as such by decision makers, as the following observation by an AEC official demonstrates:

"I feel she (Botts) overstates, for good reasons, some of the effects and some of the parameters on the lake, because our society is such that if you do not stretch things, people are not going to budge. There is just too much inertia. I do sometimes feel a little ticked off at some of the things she has said, but I realize ... One time I was on a radio talk show with a guy, who had written the Careless Atom, Lee Botts, and George Travers from Commonwealth Edison. We had a nice chat beforehand, and then the moderator said, 'Each of you give about a one-minute introductory thing.' Lee Botts said something about her concern about nuclear power. Then she said she 'understood there were a lot of two-headed babies, and how were they doing, Phil?' And then she turned to me! You've got to watch her when she's in public."

Administrators in slightly fewer than half of the agencies for which interviews were conducted had reservations about the LMF's scientific or technical competence.<sup>7</sup> Notwithstanding these reservations, all but one of the officials interviewed felt that the LMF had the best reputation among the environmental groups, or a reputation equal to any other environmental group. In a number of cases, when asked to compare the LMF with other environmental groups, officials had to grope for names of other group with which they could classify the LMF. In the case of both of the officials quoted above who had reservations about LMF

technical competence, as well as all who had positive perceptions of LMF competence, their regard for the LMF was based on the LMF's performance of its representative role. Two very senior officials described the value of this role of the LMF in the following ways:

"The federation has attempted to represent a fairly broadscale geographic representation for a number of citizens' groups in the area tributary to Lake Michigan ... And (they) get a range of input that recognizes the difference of citizen interests around a lake as diverse as ... Lake Michigan, from the upper portion of the lower peninsula on the one hand, to the heavy industrial development on the south end of the lake."

"First off, I think it is a source of views that you might not understand anywhere near as well were it not for the federation. Because the federation is very active, we get the point of view of those people conveyed quite clearly to us. With the federation, you identify what the federation stands for, and you get that point of view, and that is very helpful ... The second thing, which is also an advantage, and which is sort of a corollary of the first, is that some of their viewpoints would not come through unless you had something like a federation. I mean, isolated citizens might express these, but they come through better."<sup>8</sup>

Even the LMF's opponents recognize this interest aggregation role as a value, primarily because it is efficient. The following represents the first response of a corporate executive when asked about the LMF:

"It has acted as a focal point for a wide variety of environmentalists, preservationists, and conservationists around Lake Michigan, which were fragmented, and therefore ineffective. By having a federation of this nature, where they pay the staff, they were able to bring together the interests, to represent them in a larger forum. The reason the volunteer groups are so ineffective is they can only do it on evenings and weekends, because they all have regular jobs. When you have a paid staff person who is working 40, 50, or 60 hours a week on this sort of thing, they can bring a lot more time, effort, and talent than can people fragmented all over the lake.

"We have been involved in a great many hearings, and without that type of organization, you could have 50 or 60 representatives, and their statements would normally be emotional, general statements, and limited to their section of the beach or their little private interest - fishing for steelheads, for example. So if you are asking how we view it, it has served a useful purpose in that it has concentrated in one area the people with whom you have to deal on some of these issues."

The second threshold evaluation of the federation is an assessment of the LMF's success in gaining access to decision makers. As noted above, almost all governmental officials view the LMF as one of the most recognized environmental groups in the four-state region; on water-related issues it is generally the most recognized group.<sup>9</sup> Access is, however, another matter. One very simple way of examining access is to tabulate the frequency of contact between the LMF and various governmental bodies.

TABLE 3.1

## CORRESPONDENCE WITH GOVERNMENT ENTITIES

<u>Agency</u>	<u># Transactions</u>	<u>%</u>
U.S. Senate	23	20.0
U.S. EPA	17	14.8
Illinois Administrative Agencies (IEPA, IIEQ, IPCB, I.D. Conserv., Governor's Office, etc.)	16	13.9
Illinois Legislature	7	6.1
U.S. House of Representatives	7	6.1
Corps of Engineers	6	5.2
Michigan DNR	6	5.2
U.S. D. Interior	4	3.5
Chicago Agencies (MSD, D. Develoꝑ. & Planning)	4	3.5
Other Ill. municipalities	4	3.5
AEC	3	2.6
Great Lakes Basin Commission	2	1.7
Int'l. Joint Comm's.	2	1.7
Wisconsin DNR	2	1.7
Ind. SPCB	2	1.7
NOAA	2	1.7
Other	8	7.0
	<u>115</u>	<u>100.0</u>

Source: Correspondence Analysis, See Appendix B. These transactions represent 42% of the correspondence sample.

As Table 3.1 shows, during the period January through July 1974, the LMF's most frequent correspondence was with the U.S. Senate, U.S. EPA, and several Illinois state agencies. Important agencies with responsibilities on major LMF issues like the Corps and the Michigan DNR fall near the middle, and two (the AEC and the Great Lakes Basin Commission) represent relatively little correspondence. The sampling period probably leads to somewhat of an overrepresentation of LMF contacts with Illinois units of government, such as the Illinois state administrative agencies, the Illinois legislature, and the Illinois municipalities; a large proportion of these contacts were routine correspondence -- meeting notices, thank-you notes, etc. -- sent in connection with the LMF's staff role with the Mann Committee. (Correspondence about the Mann Committee represented 13% of all correspondence during this period.)

During the course of the study, contacts with the Senate were primarily with the staffs of two particular Senators, Nelson of Wisconsin and Stevenson of Illinois, two of the most pro-environmental members of the Senate. Contacts with U.S. legislators tend, however, to vary with the issues. For example, most contacts with the Senate were with one particular Senate staffer who was primarily responsible for energy matters and who used the LMF as an information source because of Botts' association with energy issues (e.g., as a member of the Ford Energy Policy Project advisory board).<sup>10</sup>

As has been noted previously, the participants in environmental issues view informal or "insider" contacts as the most efficacious type of interest

group (or political bureaucratic) activity. Written correspondence is, therefore, definitely not the most important type of contact with officials. Most of the really valuable contacts are made over the phone or, less frequently but just as important, as by-products of public meetings. Correspondence is, however, readily available for systematic coding, while phone contacts are not. Observation of staff activities and the statements of LMF staff indicates that the pattern of informal contacts roughly parallels the pattern of written correspondence.

The LMF has its closest informal contacts with Region V of U.S. EPA (U.S. EPA-V). LMF staffer Leder is in almost daily contact with EPA staff officers in connection with the federation's water quality program; he not only knows, but is well known by, all of the senior EPA-V officials and almost all lower-echelon officials in the most relevant divisions of EPA-V (e.g., the Enforcement Division). An incident demonstrating this familiarity was related by Leder at the Chicago WQTI. While talking with Leder, one EPA staff person stopped off to pick up his paycheck. After receiving his own check, the EPA staffer asked the pay clerk, "Where is Mr. Leder's check?" The pay clerk was extremely chagrined when she could not find Leder's check--Leder must surely be an employee, since she saw him around so frequently. Even more striking is the availability of top decision makers to the LMF through Lee Botts. The following incident is an example of that availability:

"After the Mann Committee meeting this morning, Botts heard that (U.S. EPA Administrator) Russell Train was in town. Botts and (BPI's) David Comey then walked to the EPA-V office, meeting (Chicago Tribune reporter) Casey Bukro in a conference room. Then (EPA-V Public Affairs officer) Frank Corrado came into the conference rooms, and said, "Hi, what are you (Botts and Commey) doing here?" Whereupon Botts subtly invited herself and Comey in to meet with Train! Corrado then took Botts and Comey and Bukro to the executive offices on the 10th floor, and showed Bukro into (Assistant Regional Administrator) Valdas Adamkus' office for his scheduled interview with Train. A minute later, Adamkus asked Botts and Comey to meet with Train first, and courteously ushered them into (Regional Administrator) Francis Mayo's office, where Train met them at the door."<sup>11</sup>

In short, Botts is able to sail into an office without an appointment and obtain an audience with a sub-Cabinet-level decision maker without so much as a bat of an eyelash from the agency's gatekeepers. It would seem that there are few higher levels of access for an interest group. One incident is not, of course, sufficient to generalize about a relationship. However, this incident should be viewed as only a clear example of the LMF's access to U.S. EPA-V.

The LMF has almost as high a degree of access to a number of other governmental bodies. The Corps has made a substantial effort in recent years to improve its record on public participation,<sup>12</sup> and the LMF has usually had a good level of informal contact with Corps units headquartered in Chicago. The LMF's access to top Corps officials is, however, somewhat discontinuous, since the Corps tends to transfer administrators to other assignments every few years. This means that the LMF must be continuously reconstructing its informal access to various Corps units. (See Kaufman, 1960, on the administrative technique of transferring administrators to avoid capture by interest groups.) The LMF also has a good relationship with

the Illinois Institute for Environmental Quality (IIEQ), the research/educational arm of the Illinois environmental program. IIEQ has funded several LMF conferences, published one of the Larsen (1973) studies, and cites LMF's Botts and Flowers prominently in its power plant siting report (Asbury and Hoglund, 1974).

The LMF's access is not nearly so well developed for a number of other important agencies. The most conspicuous is the AEC, the lead agency on the important nuclear issue. The LMF does have a good informal relationship with several local AEC officials, but these officials have no real decision-making power. The decision-making locus of the AEC is its Washington office, and the LMF has no contacts in that office and thus no direct informal access to this crucial agency. This lack of access is in part due to the quasi-judicial nature of AEC decision making. Environmental concerns have tended to be expressed to the AEC via intervention proceedings, which are costly, require formal counsel, and are more constricting than the LMF's preferred operating style. These same constraints have limited the LMF's direct relations with the Illinois Pollution Control Board (PCB) which also operates in a quasi-judicial fashion.<sup>13</sup>

These cases of minimal access can be attributed to structural properties of the agencies; the same reason does not, however, apply to relatively infrequent contacts with several of the important state agencies. While officials in state pollution control agencies may recognize and respect the LMF, they do not maintain frequent informal contacts. This is the case with the Michigan and Wisconsin DNR's. The federation's access to the Illinois EPA is perhaps even less well developed, although that agency is generally viewed by environmentalists as in turmoil under the administration of Governor Daniel Walker. During most of the course of this study, LMF had no significant contacts in positions of authority within the Indiana pollution control agencies, in part because there was minimal activity taking place in those agencies. Of late, LMF contacts with the Indiana Stream Pollution Control Board have increased because of decisions on Indiana Harbor waste load allocation modeling, and because of the proposed transfer of NPDES authority from U.S. EPA to the State of Indiana. The reason for this relatively poorly developed access to state agencies is that the LMF staff does not have the same opportunity for informal contacts with agencies headquartered in Madison, Lansing, Springfield, and Indianapolis as it does with agencies headquartered in Chicago (e.g., U.S. EPA-V, the Corps Chicago District, and the Corps' North Central Division). The same observation holds for the Washington-based AEC.

With the exception of the U.S. Senate contacts mentioned above and the Mann Committee, the LMF's access to legislative bodies also seemed limited during the course of the study. In these cases, the geographic distance reinforced some of the constraints of the LMF's 501(C)(3) tax status to make informal access difficult. The two exceptions have very peculiar properties: the Senate staffer used the LMF perhaps more than vice-versa, and the Mann Committee relationship was one in which the LMF was formally contracted to provide staff services to the committee. (In addition, Botts and the committee's chairperson, Rep. Mann, have had a long-standing personal acquaintance.)

Access and competence are very closely linked. In general, officials in agencies to which the LMF has high access evaluate LMF competence better. Agency officials would usually reverse the order of this relationship, suggesting that the LMF has high access because it is competent. In fact, both are probably related to a third factor (to be discussed below, under the "systems effectiveness" evaluative criterion) which might be called agency self-interest.

Agency officials offer a variety of reasons for their perceptions of LMF competence and, hence, access. Several have been alluded to already: the fact that the LMF operates with a paid professional staff was singled out by a number of non-environmentalist interviewees (e.g., page 45, third quotation), and was noted with even greater frequency by environmentalists interviewed. The full-time nature of the LMF staff basically allows the LMF to "do its homework." The LMF is also given access because of its representative role. That is, the staff's activities are viewed as legitimate because the staff is perceived to represent a definable and relevant segment of the public. The LMF is also viewed as "moderate" and "reasonable;" it does not (often) publically castigate officials, and is thus a relatively pleasant adversary to deal with. Also, a number of decision makers, as well as the LMF's fellow environmentalists, mentioned that the federation's focus on a restricted set of issues surrounding one physical entity--Lake Michigan--was an organizational strength. The organization's concerns are easily identifiable; it is able to focus in on a set of issues which are more easily addressable than if it attempted to address all possible environmental issues. On the other hand, the group is seen as sufficiently "broad" that its interests are not defined as parochial.

However, the most frequently mentioned reason involves the personal qualities of the staff, particularly Lee Botts. Terms applied to Botts, such as "forceful," "dynamic," "energetic," "a good field general," someone with "good political sense," etc., carry over to the organization. It was typical for interviewees, when asked an opening question about the LMF, to describe the LMF by explicitly listing Botts' personal characteristics, or to even describe the LMF as "the length and shadow of Mrs. Botts."<sup>14</sup>

Botts is a very vibrant, personable, articulate, and active (almost frenetic) person. She can communicate information in large quantity at such a rapid rate that the author invariably fell behind in note taking in geometric proportion to the amount of time he talked with her. (Several LMF colleagues also mentioned this phenomenon of information overload.) She can relate the complexities of issues in almost infinite detail. On the other hand, when dealing with decision makers she is highly disciplined, relating the LMF position in a concise, precise fashion, with feeling. In short, she is sharp. This is not to say that the other political staff members, Flowers and Leder, are reserved and/or unskilled--they most assuredly are not. However, Botts' personal style certainly dominates the federation's organizational style and observers' identification of the federation with Botts is understandable.

While one could--as one interviewee did--argue that high access and competence without high policy influence is a sterile prize, there are three ways in which they are important considerations in themselves. First, in certain approaches to interest articulation, there is an implicit assumption that access and competence are the equivalent of power. As Berry (1974) points out, this approach assumes that decision makers are open-minded, rational, and operate with imperfect information. Interest groups therefore influence decision makers by contacting them and giving them competent information. Berry calls this the "informational" role-type, and it is this role-type which the LMF explicitly embraces.

Second, a number of observers of the LMF have suggested that interest groups develop effectiveness, rather than possess it. Interest groups are thought by these observers to go through two stages: the initial stage is one in which the

organization develops competence and access; at some point these characteristics reach a threshold level, at which time the organization begins to have increasing policy impact. One environmental staff person referred to the first stage as "investment time," a period of relative ineffectiveness during which contacts are made with decision makers and from which benefits will accrue at a later date. Botts refers to this process as "gaining acceptance with the agencies." This process involves, in part, a mutual learning experience. Decision makers learn that the LMF is responsible, and the LMF refines its approach in light of past experience. An official recalled the following example of this learning process:

"Early in the permit process, we proceeded with a couple of permit applications dealing with some paper mills in the upper Wisconsin area. Partly on the basis of some information from local people, they (LMF) did an analysis of the nature of the discharge, and then gave us a report on their findings. They did this substantially with volunteer help, some of it probably graduate-student level. We took the time to double check what they did, and were able to convince them that it was kind of a sloppy job, and that if they were going to try to play that role, they had to do it with a level of professionalism that wasn't evident in the evaluation they made ... We have not gotten into that kind of relationship with them again. They tried to play a role there that they learned from."

In this sense, competence and access are qualities which are important not only in an "informational" interest group style, but as preconditions for other types of effectiveness.

Third, competence and, to a lesser degree, access are the only types of effectiveness which are more or less within the control of the LMF. The federation staff can work to insure that it is competent in its activities and can, within the limits of available resources, agency structure, and simple geography, work hard to develop access.

#### POLICY INFLUENCE

This section will discuss the impact of the LMF on the policy process using three evaluative criteria. The first is a rather straightforward tabulation of the current status of issues in which the LMF has been involved, and a rather crude analysis of the relationship between the outcomes and aspects of LMF participation. The second is an assessment of whether or not issues in which the LMF has been involved have progressed towards an environmentally desirable resolution. The third is an evaluation of the LMF's effectiveness in the decision-making process as defined by the agencies.

#### Issue Outputs Analysis

Appendix C discusses the details of the analysis of issues conducted for this evaluation. Several aspects of data collection should be mentioned before proceeding further. The analysis presented in this section is an attempt to present a simplistic, quantitative picture of the influence of the LMF on issues in which it has been involved. The data used were generated in the following fashion. Issues and decisions in which the LMF was involved were identified from the LMF Bulletin, "Alerts," and interviews with and participant observation of the LMF staff. The present status of the issues was then coded on a nine-point

scale (see below, Table 3.2). The lead agency on the decision was noted, and the commitment (activity) of the LMF, the scope of the environmental coalition, and the role the LMF played in the issue were coded into separate three-point scales. All of this coding was done by the author.<sup>15</sup> The rough coding categories employed by a single coder should lead the reader to be wary of possible high measurement error. Because of possibly high measurement error, this section should be viewed as heuristic only. In addition to basic data error, there are three other caveats about this section. First, the statistical procedures employed assume a model of LMF involvement in issues which is probably too simple in comparison with the real-world activities of the LMF. This is most clear in the omission of any consideration of the effects of non-environmentalist interests in the decision-making process. Second, the analysis does not deal with problems arising from the time frame of decisions. The effect of issues which arose late in the sampling period, and are coded as "nondecisions," are likely to produce misleading, artifactual results. For example, one issue had to be recoded two days after initial coding because of developments on that issue.

The status of LMF issues as of July 1974 is given in Table 3.2. "Significant decisions" were defined as actions which were unambiguously favorable or unfavorable to LMF interests; the recently published U.S. EPA thermal standards requiring closed cycle cooling is a good example of this sort of decision. "Mixed decisions" are those actions, but which on balance tended in one direction or another; the outcome of the Cook plant intervention, in which the plant was licensed but cooling towers were installed, is an example of an anti-LMF mixed decision. Also included in this category are very weak agency actions, such as the U.S. EPA-V decision to add a citizen participation staff person to the region's public affairs office; this action was taken as a direct response to LMF suggestions, but has minimal direct implications for public policy. "Symbolic" decisions recognize the position of the LMF or of LMF opponents, but do not represent actual public policy or governmental action; an example of this sort of decision is the recent appointment of environmental lawyer Myron Cherry to the Illinois Committee on Atomic Energy, or the appointment of LMF chairman Gerald Lindquist to the Michigan Shoreline Advisory Board. Issues in which no recognizable decision had yet been reached were coded in three ways: if the LMF was supporting the primary alternative under consideration, this was treated as a "negative nondecision"; if the LMF opposed the primary alternative, this was coded as a "positive nondecision." That is, in these cases a "stall" represented a form of "loss" or "win," respectively; an example of a negative nondecision is the Safe Drinking Water Act, which is currently buried in a congressional committee. If the issue had no discernible primary alternative, or if it was too soon for a decision to have conceivably been reached, this was coded as a "neutral nondecision."

TABLE 3.2 CURRENT STATUS OF ISSUES IN WHICH THE LMF IS INVOLVED

Status	Significant Decision Pro-LMF	Mixed Decision Pro-LMF	Symbolic Action Pro-LMF	Positive Non-decision	Neutral Non-Decision	Negative Non-Decision	Symbolic Action Anti-LMF	Mixed Decision Anti-LMF	Significant Decision Anti-LMF
	1	2	3	4	5	6	7	8	9
N	5	25	23	7	15	18	1	15	3
%	4.5%	22.3%	20.5%	6.3%	13.4%	16.1%	.9%	13.4%	2.7%

Mean = 4.36 Median = 3.93 Std. Dev. = 2.25 N = 112 (100%)  
 Source: Issue Analysis, Appendix C.

The most common type of decisional output is the mixed decision which on balance is favorable to the LMF's interests, followed closely by symbolic actions which support the LMF. It should be noted that most decisions are "mixed," that is compromises, followed by nondecisions. Very few issues are resolved in clear-cut wins or losses.

This distribution of decisions does not by itself tell us much about LMF effectiveness. First, there is no particular reason to attribute the outcomes of the decisions to the LMF. Second, the distribution says nothing about the expected outcomes of the decisions had the LMF not participated in some way. Third, the distribution does not have a defined baseline. Absolute effectiveness and ineffectiveness might be defined as all 112 cases in either category 1 or category 9. One might expect that the LMF would "win" about half of the time and "lose" about half of the time; in that case, an expectable average decision would be 5. The actual average decision (mean) is not significantly different (statistically) from that expected average.

Decisions are only very weakly related, in a statistical sense, to other coded aspects of the issue and LMF activity. If one treats the decision as a dependent variable in a multiple-regression model, and LMF activity, the scope of the environmental coalition, the role of the LMF, and the LMF's access to the lead agency as independent (predictor) variables, one obtains the results shown in Figure 3.2.<sup>16</sup>

FIGURE 3.2

LMF INFLUENCE ON DECISIONS<sup>17</sup>

$$\text{Decision} = .15 (\text{LMF Activity}) + .10 (\text{Access}) + .04 (\text{LMF Role}) - .03 (\text{Coalition}) + e$$

(.11)
(.09)
(.11)
(.10)

$$N = 112, F_{4,107} = 1.13, p = .34, R = .20, R^2 = .04$$

Neither the equation as a whole nor any individual predictor variable is statistically significant (at the 5% level).

If one weights the decision on the basis of the scope of the issue (that is, treats decisions on very broad policy issues as more important than those on very peripheral issues), the relationship is somewhat stronger, as can be seen in Figure 3.3(a).

FIGURE 3.3(a)

LMF INFLUENCE ON DECISIONS WEIGHTED BY SCOPE OF ISSUES

$$(\text{Decision} \times \text{Issue Scope}) = .28 (\text{LMF Activity}) + .07 (\text{Access}) - .07 (\text{Coalition}) + .03 (\text{LMF Role}) + e$$

(.11)
(.09)
(.10)
(.10)

$$N = 112, F_{4,107} = 2.49, p = .05, R = .29, R^2 = .08$$

FIGURE 3.3(b)

$$(\text{Decision} \times \text{Issue Scope}) = .27 (\text{LMF Activity}) + e$$

(.09)

$$N = 112, F_{1,110} = 8.77, p = .004, R = .27, R^2 = .07$$

---

The regression equation in Figure 3.3(a) as a whole is statistically significant (5% level) and the regression coefficient associated with LMF activity is also significant (1% level). However, the other variables (other than LMF activity) are trivial additions to the model. The only really meaningful relationship is the model shown in Figure 3.3(b), in which LMF activity predicts to the weighted decision. (Note in particular that the addition of the other three variables decreases, rather than increases the F statistic.)

The weighted decision variable does make more conceptual sense than the unweighted variable; "wins" on more important issues are, in fact, more important than "wins" on peripheral issues. However, it must be noted that LMF activity is highly correlated with the scope of the issue ( $\tau = .38$ ); the LMF tends to have more of a commitment to broad policy issues than to less broad issues. But this also means that the relationships in Figure 3.3 are spurious, an artifact of the correlation between LMF activity and scope of issue rather than a correlation between LMF activity and decision. In any case, a relationship which explains only 8% of the variance in decisions is not particularly powerful.

In short, using these rather crude measures of decisions and LMF participation in issues, there appears to be next to no significant relationship between LMF participation and decisional outcomes.

These results present a seeming paradox. If, as decision makers claim, the LMF is very competent, and if, as observed, the LMF has good access to a variety of agencies (the small number of agencies to which LMF has the highest ranked or next-to-highest ranked access account for 41% of all issues), why is the federation not measurably effective in influencing decision outputs? The most obvious answer to this question has been alluded to: the data are error filled. (However, it should be pointed out that if there were some systematic bias in coding issues -- one of two major plausible sources of data error -- one should probably expect that a LMF consultant would tend to subconsciously code such that the LMF would appear more effective. The results do not conform to such an expected bias. Pure crudeness of measurement remains as a possible explanation.) The second possible answer involves the inappropriateness of several of the simplistic assumptions in such a model of LMF influence. The following sections will examine several alternative views of LMF influence on decision making.

#### Development of Broad Public Policy Changes

The LMF's goal in most issues has been to bring about fundamental changes in public policy relevant to the lake. In a sense, the LMF is less interested in specific decisions than in the opportunities those decisions present to raise fundamental questions and thus gradually change the criteria on which decisions will be made in the future. This is not to say that the LMF is not interested in the merits of specific decisions. A decision on siting a particular nuclear

power plant will involve all (or most) of the general questions and problems associated with nuclear power. In addition, certain sites will be considered more problematic by the LMF because of peculiar local characteristics of the site: the Bailly site in Indiana was important not only because of general nuclear questions, but because it was sited adjacent to the Indiana Dunes National Lakeshore, which has been the focus of long-standing preservationist interest (particularly by persons associated with the LMF); the Zion site was of particular interest because its proximity to Chicago intensified many of the concerns about safety.

Furthermore, certain decisions and issues are better vehicles for broad concerns than others. In the first place, particular decisions or governmental entities may be weaker than others, and thus more vulnerable to criticism. Secondly, certain public decisions arouse more public interest than others, and are therefore also better vehicles for broad policy questions. The question of water pollution administration by the Illinois EPA is a good example of both of these characteristics. Because the Illinois EPA has been in such turmoil (relative to the pollution agencies of the other states in the Midwest), that agency is an exceptionally vulnerable target. In July 1974, the Illinois EPA was embroiled in a budgetary dispute which centered around a conflict between Illinois' Governor Daniel Walker and the Illinois Attorney General William Scott--the highest-ranking state officials of the Democratic and Republican parties in Illinois, and both considered to be politically ambitious. The front-page headline nature of this conflict presented an opportunity for the LMF and other Illinois environmentalists to criticize the agency for its lack of performance in pollution control administration, and to have that criticism received as newsworthy by the media and the public.<sup>18</sup>

Lastly, certain decisions are of particular importance because they are specifically relevant to segments of the LMF's membership constituency. However, the approach of the LMF has been to use specific decisions as forums in which broad policy questions are addressed.

At least in the opinion of the LMF staff, this emphasis on the development of broad policy changes means that one has to view specific decisions in two ways. Whether the federation wins or loses is one way of viewing a decision. Another, and sometimes more important way is whether hitherto unconsidered issues are formally considered in a public policy making forum. Energy conservation is a good example of the latter. Botts likes to recall an incident several years ago in which a number of environmentalists were invited to a meeting by federal energy officials. Botts' predominant recollection of this meeting was the dumbfounded reaction of the officials to an environmentalist's question on how electricity demand was calculated--the need to evaluate the "need to meet the demand" for electricity was simply an unconsidered topic. Thus, pressure by conservationists like the LMF to weigh the "need" for electricity resulted in the inclusion of a broad question on the decision-making agenda.

Power plant siting is another example of the importance of getting issues on the agenda. In 1973 the LMF proposed a power plant siting policy, in theory as a guide for LMF members. To date, this proposal has been marketed by the LMF in several policy-making forums sometimes directly and sometimes via LMF members. In two cases a variant of the LMF's policy was introduced in state legislatures in the form of a state power plant siting bill. In one state (Wisconsin) the bill

was defeated in one house after passage in another house; in the other case (Michigan) the bill is still in committee. Even though the Wisconsin result could be considered to be a "defeat" for the LMF (and in fact it was so coded for the issue analysis reported in the previous section), the LMF staff regards the action as an initial step in changing public policy on plant siting.<sup>19</sup>

In addition to establishing issues as policy-making agenda items, certain decisions, even though they appear to be losses at the time, can have important secondary consequences. Essentially, an interest group's influence or threat of conflict can be sufficient to keep potential issues from ever surfacing. Certain developments on the thermal issue illustrate this phenomenon. Largely as a result of conflicts such as environmentalist interventions into nuclear plant licensing, the electric utilities made decisions apparently designed to shortcircuit further conflict. One decision was to site plants off of Lake Michigan. Another was to design closed cycle cooling systems, such as cooling ponds or cooling towers, as a part of initial project planning. This same phenomenon of "anticipated reactions" also applied to governmental decision.

The goal of the LMF to bring about the development of broad policy changes suggests two evaluative criteria: (1) has the LMF succeeded in raising issues to the level of formal public policy consideration, and (2) have these issues progressed towards some optimum, pro-environmental solution as a result of LMF efforts? These criteria are similar, in part, to Schattschneider's (1960) argument that one aspect of political power is the ability to control the agenda of decisions, particularly with respect to alternative decisions which are realistically considered by decision makers. It should also be noted that the underlying assumptions of this approach are implicitly a part of NEPA, the most significant piece of environmental legislation currently on the statute books.<sup>20</sup>

The clearest case of LMF influence in a broad policy area is the thermal issue. One of the original locations on which the thermal issue was raised was Lake Michigan, through the enforcement conference and intervention processes, by the LMF (or more precisely, by the LMF's predecessor organization while it was formally under OLP). Over the course of the LMF's history, the thermal question has progressed to the point where it appears to have been substantially resolved in the LMF's favor. When asked about the LMF's influence, agency officials almost always refer to the thermal issue as the case in which the LMF's efforts can be clearly related to policy outcome. One official recalled the following incident:

"When John Quarles (U.S. EPA Deputy Administrator) was out here at a news conference, Lee Botts was here and grabbed him after the conference and said, 'You have sold out on the thermal standards,' and confronted him on this issue, because they are very suspicious of what might happen--there are lots of vested interests, lots of expenditures, and so forth. So she reminded him that they were going to continue watchdogging this thing. Well, not many people accost Quarles that way. It is hard to assess the impact of that, but I am sure that Quarles remembered that."

The issue of water pollution in general has been more or less resolved in a public policy sense by the Water Bill and the proposed NPDES administrative system. The LMF's current role in this issue has been to maintain pressure for compliance with the act.

On the general issue of erosion/land use, there is now general agreement that pure structural approaches to erosion control have major limitations. In a sense, the debate has moved to the stage of discussion of land use planning and control. A basic decision, of sorts, has been made on land use which is most appropriate to the LMF's interests, the CZMA. That act, however, is a classic example of weak legislation since the policies it set would not be implemented unless actions were taken by the individual states. The most relevant work of the LMF in this field has been to attempt to get state implementation of the act. In addition to an indirect role in the Michigan program, LMF efforts have focused on the Illinois Mann Committee. As of this writing, the outcome of the Mann Committee's (and hence LMF's) work is uncertain. 21

The success of the LMF on non-thermal nuclear issues is difficult to determine. Most environmentalists (and everyone else, for that matter) credit the Middle East oil-producing nations with providing the incentive for making energy conservation a real part of the public policy agenda. At least verbally, FEO officials presently agree that energy conservation is the only real alternative "for the long run." The "short run" position is, however, increased supply, which is regarded by environmentalists as at least a symbolic anti-conservation position. The "long run" position, however, represents a major development in policy debates.

Developments in the nuclear safety area are unclear. On this issue the LMF has played a somewhat secondary role to BPI in the Midwest, handling informational and educational responsibilities and coordinating local groups, while BPI has handled more of the direct contacts with decision makers, especially in the past through interventions into plant licensing by the AEC. Pressure from environmentalists like BPI and LMF seems to have had some significant impact in areas like quality control and plant system design, even though no plant has ever been refused a license on safety (or any other) grounds. In addition, this issue has attained a heightened degree of public awareness. However, on the really basic issue of safety, the policy position of the AEC, as expressed in AEC (1974), seems to have hardened. The LMF and BPI have apparently reached the conclusion that the AEC's stonewall can not be budged, and have shifted their attack to the Congress. Recent legislation splitting the AEC into a new Energy Research and Development Administration (ERDA) and a Nuclear Regulatory Commission (NRC, Conservation Report, October 11, 1974, p. 474) appears to reflect some environmentalists' concerns about the AEC.

The issue of increased public participation is certainly one in which the LMF and environmentalists have obtained clear progress in recent years. As Culhane (1974) points out, the increase in public participation programs of federal agencies has been the one clearcut gain under NEPA. In a number of cases the LMF has played an important role in this development. The LMF's organizing of the WQTI is a major example of this role. However, the clearest example has been the reported change in the approach of the Michigan DNR as a result of the LMF's release of the so-called Purdy Memos. One agency official put it this way, in response to a question on how the LMF had influenced the agency:

"Our Assistant Executive Secretary wrote a letter, and he called these people (environmentalists) bordering on communists, and so forth, and why should we have to spoonfeed these people. And they got a hold of this over at the Lake Michigan Federation, and fired it right back in their newsletter. That was the straw that broke the camel's back. It has now resulted in a general policy within the DNR to be much more sensitive to the wishes of the people. So that's one way they have influenced us."

In summary, using criteria appropriate to the LMF's basic strategy, the LMF appears relatively successful. One issue -- the thermal question -- has progressed to the point where an optimal environmental policy seems imminent. Erosion/land use, power plant siting, and energy conservation have developed to the point of debate of environmental alternatives, although those alternatives are by no means the certain future policy. On basic water pollution, public policy is at an implementation stage. Public participation is a widely accepted goal on the part of government, although there is still some variation among agencies. In the field of nuclear safety, significant incremental modifications have been made on individual power plants, but the basic question of the wisdom of reliance on nuclear power has not been resolved. Essentially, environmentalist questions have been put on the public policy agenda, and decisions have developed over the years.

The difficulty, as always, is to attribute developments to the LMF. On the thermal issue there is general agreement that the LMF was influential on the outcome. However, it is a general difficulty of the "informational" style of operation that developments of public policy may be attributed not to the interest group's information, but to the decision makers' new-found wisdom. A colleague of the LMF's noted, in connection with the change in approach of the Corps on certain types of erosion issues:

"I think that there was a point of impact there, although I think that part of that, to give Graves some credit, was derived on his own. I do not think that you have to dig very far into the issues before you see the futility of most of the things that have been talked about, particularly in terms of big [lake] levels controlling structures and that sort of thing."22

There is one major problem with the LMF's strategy of broad policy change. As noted in Chapter II, the conventional wisdom among interest group leaders and particularly administrators, is that broad or fundamental shifts in public policy can usually not be accomplished without recourse to legislation -- for example, statutory authorization for agencies to embark on radically new programs. This explains the observation by several observers of the LMF -- environmentalists and administrative agency people -- that the LMF's tax-exempt 501(C)(3) status has weakened the organization.

#### Decision Makers' Perceptions of LMF Influence

There are two types of perceptions of LMF influence by decision makers. The first and more pervasive perception describes its influence in relationship to agency decisions on very discrete issues. The LMF's role in the decision-making process is to provide a particular perspective in particular decision-making situations (e.g., the "environmentalists' point of view," or the "non-structural viewpoint,"). The second perception views the LMF as a force which, in effect, supports the agency by balancing the agency's public constituency. Both of these views assume an agency-centered decision-making process in which an interest group is only as effective as decision makers allow it to be.

The first view of the LMF and environmentalists in general is congruent with the "incremental decision-making" model of agency behavior. Administrators do not confront broad policy choices, choosing rationally between all possible alternative actions. Rather they choose among alternatives which represent only

very restricted changes in public policy (Lindblom, 1959; Wildavsky, 1964). In environmental administration, this pattern of incremental change is usually a matter of modification of the details of a project, rather than an assessment of the overall merits of the project (Martin, 1969). An AEC official's answer to a question on LMF influence reflects this perspective well:

"I have a feeling that environmental groups do not feel that they have any influence, because to them a tangible aftermath of influence would be that a permit or license is denied. But along the way to granting these things, there have been a lot of changes in design and operating procedures, which are put in as technical specifications to the action, which are in the direction of answering or satisfying the requests or comments that environmental groups have made. It is a matter of degree. We are, hopefully, looking at the broader picture and balancing the need for this thing off against the way to arrive at getting this power. We are dealing with more of a grey area, whereas the environmentalists would like to have it more black and white. But I think that the environmentalists certainly have an impact."<sup>23</sup>

This official's response highlights the basic distinction between the approach of groups like the LMF and the behavior of decision makers. Where environmentalists seek broad policy changes, decision makers attempt to restrict the decision to as narrow a scope as possible.

This agency view of the role of interest groups is related to the agency's view of itself as impartially serving a generalized public interest. Administrators are rarely able to attribute to one sector of the population "influence" over a broad policy decision, only very particularistic "input" which "helps to make a better decision." A regulatory agency official put it this way:

"Policy is considered in light of what environmental groups will think about it, as well as what municipalities will think about it, as well as what industry will think about it. And the people. If we felt we were correct, there is no way our policy would be influenced by the LMF. However, we would be very cautious to build in mollifying clauses, say with regard to the thermal question, to make sure that the company's studies were going to hit on the areas that we felt were going to be a problem to us, that Lee (Botts) would call attention to. So yes, actually not policy per se, but the way the policy is written. So you would have to say that is influencing. There is an amelioration to some degree, a mollifying of a route that we would take."<sup>24</sup>

Note that this official points out an important facet of agency response. The positions and concerns of the LMF are known by administrators. Therefore, responses to many potential LMF criticisms are built into proposals before public release. This is the "rule of anticipated reactions" which Frederick (1937) characterized as one of the three laws of political decision making. This pattern of influence represents a carry-over of influence from one decision to the next because officials modify decisions on the basis of previous experience with LMF criticism.

A certain amount of the "anticipated reaction" is very explicit. The LMF is treated as an organization which can be profitably consulted to predict environmentalist or other citizen response. A colleague of the LMF put it this way:

"When a government agency comes to you and says, 'We want to run this up the flagpole,' you can be very helpful to them if you warn them in advance of an absolutely untenable position. If you can head them off at the pass, you may save everybody a great deal of sound and fury. For example, the Corps had this wastewater disposal project, and we had a meeting very early on with Col. Stewart. They said, 'What sort of problems do you foresee; what do you think the public reaction on this will be?' Lee (Botts) really laid it on; she said, 'I'll tell you what the people in Indiana are going to say,' and 'I'll tell you what the Illinois response is going to be.' And she predicted it! She was absolutely dead on; they ran into exactly those problems."<sup>25</sup>

The importance of interest group competence is very clear in this model of interest group influence. If interest groups are seen as entities which ensure that agencies have evaluated all relevant considerations properly, then technical sophistication is a logical prerequisite to effectiveness. This pattern of response to environmentalists, including the LMF, as participants in an incremental decision-making process represents the dominant (explicit) agency perspective. It covers, essentially, all of the relevant agencies with which the LMF deals except one.

The second view of the LMF's role pictures environmentalists as a supportive counterbalance to other interests. It is the general view expressed by U.S. EPA officials:

"I made it known that I was going to work with those groups [e.g., the LMF] to the extent of meeting with them, encouraging their participation in hearings and conferences and suits if necessary, and telling what their woes were in view of what this office was or was not doing. I regarded this as support, because I knew we were far behind in pollution control. And I did one other thing. I told state agency heads that I was going to work with these groups and listen to them, and I was not going to join any game of saying, 'They are kooks, and crazy and moving too fast.' This gave me a very healthy relationship with some old time pollution control chiefs in the state agencies who knew that I meant business."

There are subtle differences between this perspective on the LMF and the incrementalist perspective. Both picture the LMF role as "balancing." In the incrementalist view, the LMF provides a balancing point of view. However, in the second view the LMF balances the agency's constituency. In the former model, the interests of the agencies are not necessarily congruent with the interests of the LMF. In the latter model, the importance of the balanced constituency is that it supports an agency with interests similar to the LMF's (i.e., by maintaining pressure for strict regulation.) The LMF serves the function of making the agency's strict regulation legitimate. Sabatier (1974) described essentially this same relationship between U.S. EPA-V and the Chicago Clean Air Coordinating Committee in the past. Through devices like the "Breathers' Lobby" -- a phenomenon almost exactly analogous to the WQTI, and like the WQTI a program basically created by U.S. EPA -- the agency attempted to maintain a public constituency which would support strict air quality enforcement. Sabatier argues that the agency did this to avoid what Bernstein (1955) calls the "natural cycle of decay" of the vigor of regulatory agencies. Bernstein argues that the decay occurs because the interests which support legislation,

like the Clean Air Act or the Water Bill, tend to abandon regulatory agencies after passage of the laws; this leaves the agency with only one "constituency" -- the regulated industry -- and the agency is forced to compromise itself to maintain itself.<sup>27</sup>

The following observation demonstrates the importance of environmentalist support for U.S. EPA:

"EPA is an odd animal. The agency came into being -- and I think people recognize this -- because of the conservation groups' and citizen action groups' direct efforts to make this agency come into being. People in this agency know they have got a debt to these groups. If you go back a way -- to the start of this regional office in Chicago, Mayo was appointed because of strong newspaper and citizen efforts. There has always been a strong citizen concern for this area (environment) in Chicago. So there is a very close understanding.

"One of the first things that happened was that Citizens' Action Program marched on the office and demanded certain action out of EPA. That was a very early and strong lesson about concern for what the citizen wants. But I think that the agency has to be reminded. It is only through constant and continuing pressure of these groups that they maintain their strength or win successes. If they were to lapse and let the agency pursue its course without taking an active interest, you could be sure that they would be forgotten."<sup>28</sup>

This theme was repeated often enough, that one could even suspect that the author was being used to carry the message to the LMF.

The importance of a base of support for the agency is that the interests of environmentalists like the LMF become dominant values for the agency:

"I think Mayo always asks two questions when a major decision is coming up. First, what do the citizens' groups think about this? Second, how is the press reacting to it? And he is also concerned with a third point, what do the politicians feel about it? He is sensitive to this; he has been sensitized to this over the years.<sup>29</sup>

The viewpoint of the citizens' groups is not merely considered by the agency, but actively solicited. In the normal situation the LMF has to actively seek out an agency decision maker to get its message across. However, in the case of U.S. EPA the position of the LMF on a proposal is often actively sought:

"It is generally a case of trying to touch base with them on the breadth of our evaluation, as well as to try to get some feel for the kind of objections we are likely to run into . . . Say we have a water quality standards problem in a given state, where we knew the federation had an interest in how that water quality issue was going to be resolved, and we had some alternative courses of action which we could take. We have, on occasion, taken the opportunity to sit down with Lee Botts and David Comey, and maybe one or two others, to review that kind of a problem and ask what their reactions are to alternative courses of action: to get back from them what we hope will be a very frank commentary. They might object to one course of action, or they might object to another, and give us reasons why they object to one rather than another in an effort to give us some insight into how reasonable our approach is. If we are

convinced that our approach is right, and inconsistent with their views, [they might give us] some insights into how we can make the most constructive presentation of our position."<sup>30</sup>

This supportive relationship is reinforced by the agency in a variety of ways. The agency essentially defines LMF/BPI as the citizen expert on water pollution in the region. Thus the LMF/BPI are called on by the agency for responsibilities such as organizing the regional WQTI, training citizens in the non-Lake Michigan states on NPDES transfers of authority, and even serving as the experts in U.S. EPA-V produced materials. LMF staffer Leder is the dominant citizen expert (with NRDC's Barbara Reid Alexander) in a U.S. EPA-V-produced cassette tape on the NPDES permit program (U.S. EPA-V, "Clean Water--Now It's Up to You," September 1973).

In one sense, these characterizations come close to describing an agency which is captured or mutually coopted by one of its interest group clients, much as environmentalists have pictured the AEC or the Forest Service as captured by the electric utilities or forest products industries, respectively, in the past. The characterization seems to imply, in the vernacular, that LMF/BPI and EPA are "in bed together," a characterization which is heatedly denied by all participants in the relationship (i.e., EPA, LMF, and BPI). In fact, the style of interaction between LMF/BPI and the agency is not "buddy-buddy," as one official put it. Meetings, either formal or informal, are almost always marked by some environmentalist criticism of the agency for alleged failures or deficiencies, or other non-convivial things like off-hand mentions of litigation, etc.<sup>31</sup> Such criticism, however, is at least a tactical requirement of the relationship. The relationship must be adversarial because neither the agency nor the interest group can afford to appear to be coopted; if either appeared coopted, important values such as objectivity and independence would be threatened. While LMF/BPI and U.S. EPA-V act in many ways as allies, mutually reinforcing each other's interests and positions, the LMF/BPI seems to honestly define the relationship as adversarial, and the agency appears to take even the most ritualistic criticism seriously.

These two types of perceptions of the LMF by decision makers represent an evaluation of the federation's influence. Arnstein (1969) has defined a typology of citizen participation based essentially on the power of the citizen in the process.<sup>32</sup> The typology consists of three general categories ("nonparticipation," "degrees of tokenism," and "degrees of citizen power"), with eight subcategories. Using this typology the incremental decision-making model falls within one of two subcategories within the "degrees of tokenism" category -- "placation" and "consultation." In these types of participation, agencies consider the citizen's position, but feel free to ignore it "if they feel their policy is correct." The supportive model falls within the "degrees of citizen power" category, specifically "partnership," a position of power from which the LMF can negotiate with the agency.<sup>33</sup>

#### SYSTEMS EFFECTIVENESS CRITERION

Etzioni (1964) suggests that the most valid evaluation of an organization is (1) to determine the pattern of interrelationships which would make a given system most likely to lead to some desired future state or outcome, and (2) to determine whether an organization's relationships are congruent with these optimal relationships.

FIGURE 3.4

LMF PERFORMANCE WITH RESPECT TO SELECTED AGENCIES

<u>Evaluative Criteria</u>	<u>Administrative Agency</u>			
	<u>U.S. EPA</u>	<u>State Pollution Control Agencies<sup>a</sup></u>	<u>Corps</u>	<u>AEC</u>
Perceptions of Competence	Positive	Qualified	Qualified	Unknown <sup>b</sup> (Positive)
Informal Access to Decision Makers	Very High	Moderate to Low	Moderate	None Direct (Only via BPI)
Decision Outcomes Mean = 4.36 all N = 112	Favorable Mean = 3.05 EPA N = 20	Favorable Mean = 3.45 states N = 11	Average Mean = 4.36 Corps N = 11	Unfavorable Mean = 6.40 AEC N = 10
Development of Broad Policy Changes	Very successful	Not applicable <sup>d</sup>	Moderate Success	Mixed Success
Perceptions of Type Of Influence	Partnership/ Supportive	Consultation/ Incrementalist	Consultation/ Incrementalist	Unknown <sup>b</sup> (Consultation/ Incrementalist)

- a) Illinois EPA and PCB, Michigan DNR, Wisconsin DNR, and Indiana SPCB.
- b) No formal AEC decision makers were available for interview, only lower-level local officials. Local officials' perceptions in parentheses.
- c) Mean is based on High = 1 and Low = 9. See "Issue Analysis," pp. 50-53, especially Table 3.2, and Appendix C.
- d) State agencies have not been lead agencies for any of the broad policy issues in which the LMF has sought to bring about basic changes during the course of the study.

Figure 3.4 summarizes LMF performance according to the criteria discussed earlier in this chapter for the three most relevant federal agencies and the four state environmental agencies with which the LMF deals. In attempting to evaluate the LMF according to each criterion, we have concluded that the federation seems to perform well in some cases, but the organization's performance is not conclusively effective in other cases. In addition, interviewees and observation have suggested that, even in those cases where the LMF's effectiveness is suspect, the LMF is the most or one of the most effective environmental organizations. (The exception to this is the "decision outcome" criterion, which was not designed to be comparative; that is, it unfortunately gives not information as to whether other environmental organizations might have a higher success rate.) The similarity of LMF effectiveness by agency suggests, however, that the effectiveness of the interest group may be a function less of the LMF's characteristics than of the agencies'.<sup>34</sup> When dealing with U.S. EPA, particularly U.S. EPA-V, the LMF seems to be relatively effective; when dealing with the AEC, on the other hand, the LMF seems to be relatively ineffective.

A discussion of interest group effectiveness of any sort assumes that decision makers can routinely be influenced. Few people would claim that, in highly conflictual and important cases, decision makers can not be influenced by intense pressure. Furthermore, if a group is providing information an evaluation of this tactic implicitly assumes that decision makers uniformly confront issues with an open mind. In fact, all evaluations of the LMF, and most of the conventional and academic literature on decision making--and especially administrative agency decision making--suggest that decision makers are either not routinely capable of being influenced or not uniformly and completely open-minded. Even the decision maker with the most open-minded self-image brings subtle biases into the policy process, if only through his past experience and disciplinary norms. Most important, however, the agencies themselves have identifiable interests. The most important are organizational maintenance (insuring the continued existence of the organization) and the dominant missions of the agencies.<sup>35</sup>

In the case of the U.S. EPA, the mission of the agency is roughly congruent with the goals of the LMF--from the name of the agency, to protect the environment. In addition, in Region V the LMF is the most readily available group to fulfill a crucial structural property for the agency. The pressure of the LMF "out there" represents a supportive ally the agency needs to carry out its mission without making concessions to potential opponents - in the case of water pollution, the wastewater dischargers.

In the cases of agencies like the AEC and the Corps, the agencies' missions are not nearly so congruent with the goals of the LMF. The AEC has a statutory mission to promote the peaceful use of nuclear power, which is at variance with the LMF's concerns with nuclear safety, power plant siting, and thermal pollution. The mission of the Corps has traditionally been to construct projects, either to protect private property or to foster commerce. Both goals of the agency invariably lead to conflicts with values important to the LMF and other environmentalists. In addition, the LMF is hardly perceived as a potential supporter of the agencies in their efforts to maintain their positions in terms of budget appropriations, authority, etc. It is possible that, if all criticisms by environmentalists of the Corps prevailed, the civil works program of the Corps would cease to exist, for example. This suspicion is reinforced by explicit LMF actions such as the federation's support of U.S. Senate Bill 1265, which sought to transfer certain Corps erosion control authority to NOAA. Likewise, the only support which the LMF has given the AEC involved an in-house conflict over the budget of the AEC's regulatory division. The LMF, like many other environmental groups, had noted that the AEC should be split up, separating the commission's regulatory and promotional functions. This was in fact done in recent legislation establishing a new ERDA and a Nuclear Regulatory Commission. Differences between the agencies' responses to environmental groups like the LMF can probably be accounted for by different levels of support for the agencies by non-environmental interests. Private interests are not nearly so active in dealing with the Corps as the utility industry is with the AEC. In all fairness, too, it must be pointed out that the Corps--probably as a result of being one of the chief "villans" of environmentalists--has undertaken one of the more extensive public participation programs among federal agencies since the passage of NEPA.

The relationship of the LMF with the state agencies is somewhat less understandable (aside from simple geographic considerations). In theory, the mission of these agencies is, like U.S. EPA's and the LMF's, environmental protection. They have not, however, had the same close relationship with LMF as has U.S. EPA.

In part this phenomenon seems to be related to a certain amount of state animosity towards U.S. EPA. U.S. EPA is seen as not only as an example of federal "meddling" with local problems, but as a newcomer and interloper seeking to control, via the NPDES permit program and federal grants-in-aid, state administration, and in the process it seems to get the bulk of public acclaim for cleaning up the environment. Some of this animosity seems to spill over onto the LMF, as the perceived ally of U.S. EPA.<sup>36</sup> There is some feeling that the state agencies were "captured" by the dischargers, that the agencies, before the rise of environmentalism, had to accommodate themselves to industry and thus became sympathetic to this constituency before the changed circumstances of 1969-72.<sup>37</sup> This interpretation seems suspicious in view of the great changes which have taken place in the state agencies concomitant with the rise of environmentalism. (Like U.S. EPA, most of these agencies were either combinations of previous fragmentary bureaus or rapid expansions of existing agencies.)

As noted earlier, the LMF is uniformly regarded as among the most respected and influential environmental interest groups. The distinction, of course, is that environmental groups are more influential in certain agencies than in others. That is, the LMF appears to be about as influential with U.S. EPA as Commonwealth Edison Company is with the AEC. Conversely, Commonwealth Edison is apparently as influential with U.S. EPA as the LMF is with the AEC.

Berry (1974, pp. 37-40) has identified four general strategies or operating styles of public interest groups. Each strategy, according to Berry, reflects a basic perception on the part of the interest group about the nature of the decision-making process, and each strategy has associated with it a number of commonly used types of tactics. The types of strategies, their assumptions about government, and their associated tactics are:

<u>Strategy</u>	<u>Assumptions</u>	<u>Tactics</u>
Legal	1) The law is fair. (Can also serve as a backup strategy if other tactics fail.)	Litigation and administrative intervention
Confrontation	1) "Sufficient exposure of bad policy will stimulate government officers to change such policies."	Political protest Whistle blowing (e.g., "leaks") Shareholders' actions Releasing research reports and
Informational	1) "A good number of people in government are open minded and approve of the [interest] group's work." 2) The role of the interest group is to overcome a situation of "imperfect information."	Releasing research reports and Personal presentations Hearing testimony
Constituency pressure	1) "Policy makers ... are people who can be pushed one way or another on issues for which they have no strong predispositions." (Also "enforces democratic norms by making officials more responsive to constituents.")	Letter writing Influential member pressure Voting record publication Campaign contributions

The "informational" style is most appropriate in cases where there is a congruence of agency and interest group goals. Each of the other styles presupposes that decision makers are not sympathetic with the basic goals of the group, and must be coerced by threat of loss of some constituency support (most appropriate for legislators), public embarrassment, or legal action.

To return to Etzioni's (1964) evaluative criteria, an organization is thought to be effective if its "patterns of interrelations are congruent with other patterns of relationships in the system." Thus far we have suggested that (1) an environmental interest group's success is likely to be predominantly influenced by the organizational interests of the lead agency in a given decision-making process, and (2) interest group strategies are based on different underlying assumptions about the nature of governmental decision makers. Therefore, a systems evaluation of the LMF would be, are the federation's operating strategies and tactics appropriate for the various governmental systems in which it operates?

In fact, at one time or another the LMF has used almost all of the tactics Berry associates with each of the four basic strategies.<sup>38</sup> However, the bulk of the federation's tactics fall within the "informational" style. The most common LMF activity, personal contact with decision makers, falls within this style.<sup>39</sup> The second most common LMF activity, distribution of research results, information, the Bulletin, etc., also falls within this style. (The distinction between the use of the tactic in the "informational" strategy and the "confrontation" strategy is based on the intent in releasing material, to change the general public climate on an issue in the former strategy or to pejoratively attack an offending official or agency in the latter case.) These strategies are appropriate for dealing with the U.S. EPA and, to a slightly lesser extent, with the state pollution agencies (at least in theory). They are not, however, as appropriate in dealing with agencies like the Corps and AEC, which do not meet the basic requirement of organizational interests which are congruent with LMF goals

There are problems associated with applying this system's effectiveness criterion too strictly. The evaluation suggests that an optimal approach might be to vary a group's strategy to conform to the nature of a particular agency's mission and values. Thus the LMF would use an "informational" strategy in dealing with U.S. EPA, while using "pressure," and/or "confrontation," and/or "litigation" tactics when dealing with agencies like the Corps or the AEC. However, a substantial reason for choosing one strategy over another is the personal predilection of group activists. As noted in Chapter I, the backgrounds of the LMF staff and Executive Council are generally more moderate than are probably required for the more highly conflictual strategies. In addition, there is a certain requirement for consistency on the part of an interest group -- it would seem incongruous for the LMF to play the insider "informational" role with U.S. EPA while suing everybody else.

The most important point, however, is that there is no requirement for the LMF itself to optimize its approaches for the system to be optimally effective. Within the Etzioni framework, the requirement is that the system as a whole possess relationships which are conducive to obtaining the desired goal. The LMF is only one among many environmental groups. In general, the differences among environmental groups are primarily substantive, water groups versus air groups versus preservation groups, etc. However, other environmental groups give the environmental movement as a whole the full range of tactics so that appropriate tactics can be employed with respect to a given agency or decision maker. BPI, the Sierra Club,

A second requirement of the media is that the spokesperson be competent:

"If something comes up, I've got to be able to call somebody I trust, somebody I feel is well informed, and ask, 'What do you feel about this?' And then she [Botts] gives me her reaction. She won't be the only one, but she'll be one of the people that I would normally call.

"A reporter starts out with some kind of event, and then he has to find out what other people think, how they react to the thing. And preferably you want informed reaction, rather than this knee-jerk stuff. That's another reason I would get involved with Lee."<sup>4</sup>

In addition, of course, Botts' ability to express her informed, representative positions in a concise, quotable fashion is a very valuable asset.

The federation has been quite successful in obtaining exposure in the press. From October 1973 through September 1974, two Chicago newspapers (the Tribune and the Daily News) carried a total of 578 articles which could be broadly defined as related to environmental issues.<sup>5</sup> Of these 578 articles 218 (38%) were on issues or policy areas in which the federation was active.

TABLE 4.1

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TWO CHICAGO NEWSPAPERS, OCTOBER 1973-SEPTEMBER 1974

<u>LMF Issues</u>		<u>Non-LMF Issues</u>	
<u>Environmental Group Cited</u>	<u># of Articles</u>	<u>Environmental Group Cited</u>	<u># of Articles</u>
LMF <sup>a</sup>	23	Citizens for a Better Env.	5
BPI <sup>a</sup>	19	Nat'l Org'n to Insure a	3
Invid. env. scientists	9	Sound Environment (NOISE)	
IWL/SDC (on Bailly issue)	4	Citizens Against Noise	3
Protect Our World's Environ. Resources (POWER)	4	Clean/Air Coordinating Comm.	3
Other (organizations with less than 4 citations)	15	Sierra Club; Grt. Lks. Chap.	3
Total articles in which env. grp. is cited	72	(No Tabulation performed on total number of env. grp. citations)	
Total number of articles	218	Total number of articles	362

Source: Author's clippings file.

a) LMF and BPI both cited in three articles.

Two-thirds of the articles either reported news without quoting or citing a source or cited only government officials. Environmentalists were cited in 72 of the 218 articles. As Table 4.1 shows, the LMF was cited in 23 of those articles. The LMF and BPI combined accounted for the majority of environmental citations in the newspapers sampled. Most BPI citations were in articles on the nuclear issue, while LMF citations were evenly distributed among nuclear,

## CONCLUSION

This chapter has presented an evaluation of the LMF according to a number (perhaps a welter) of criteria. The conclusion on many of these criteria is that the LMF is at least partially effective. Each reader will probably find one particular criterion to be most satisfying. The following is a summary of the findings presented.

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### SUMMARY OF FINDINGS ON LMF POLITICAL EFFECTIVENESS

<u>Criterion</u>	<u>Findings</u>
Competence	LMF generally perceived to be highly competent in knowledge of administrative and political matters; some qualifications on scientific/engineering competence, seemingly dependent on whether observer agrees with LMF or not.
Access	LMF generally has good informal access to most relevant decision-making bodies. Highest access with U.S. EPA. Access seems to vary with geographic proximity to Chicago, and basic congruence of agency mission with LMF goals.
Reputation	LMF generally recognized as either most highly regarded environmental group or one of a class of most highly regarded environmental groups.
Outcome of Decisions	LMF does slightly (but not statistically significantly) better than 50-50 success rate on issues in which it is involved.
Development of Broad Policy Change	Mixed success. In certain areas public policy <u>has</u> developed as LMF has wished; in other areas policy has developed considerably, but LMF goal is still a long way off; in still other areas no progress is evident. The contribution of the LMF to several of these developments is generally recognized.
Agency Perceptions of LMF Influence	Mixed. Most agencies view LMF as having a consultative influence, characterized by Arnstein as a form not of "power," but of "tokenism." Important, powerful influence with U.S. EPA.
Systems Effectiveness	LMF does play an important role in systems of environmental movement and various agency systems: crucial role with U.S. EPA; important backup role in other systems.

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In a sense, all of these are salient evaluations but none of them singly is completely correct. The author leans towards the last criterion -- systems effectiveness -- as the singly most correct evaluation.

If the last evaluation is in fact the most useful one, an important evaluation of the LMF is the degree to which it plays a significant integrating role with other environmentalists. This is, of course, an explicit goal of the LMF. Such a function

is related to two of Berry's (1974) pure advocacy tactics in the indirect or "constituent pressure" strategy -- "letter campaigns" and the use of the "influential member." The LMF's performance in this coordination or communication function is the subject of the following chapter.

### FOOTNOTES TO CHAPTER III

1. If one chose to evaluate on the basis of this criterion, one would be forced to judge the LMF harshly. Water pollution does continue (and the levels of various pollutants as measured at the Chicago water intake cribs has risen in the past year, after previous yearly decreases); erosion damage does still continue, etc. The only environmental disaster which has not occurred is a major nuclear accident. However, not only is it methodologically inappropriate to attribute these effects to the LMF, it is unfair to do so (or in the nuclear accident case, ridiculous).
2. The assertion that interests must be articulated actively sidesteps a very difficult conceptual issue -- the distinction between "potential" and "actual" interests. It could be argued that decision makers might consider interests, even if those interests are not articulated forcefully. Decision makers almost always argue that they respond to and act in the interests of constituents with whom they have never had any contact. In environmental issues, at least, these claims usually reinforce the position of one of the explicit protagonists in a conflict: if a Forest Service ranger cites the "public need for timber," that interest is represented by actual interest groups (i.e., lumber companies), if not by some "national homeowners association." Such claims by decision makers should probably be viewed as symbolic support for one side or another which has attempted to characterize its position as being in "the public interest."

Basically, however, this distinction is not relevant when discussing an actual, organized interest group, like the LMF. As long as a group is organized and active, it should, in theory, be more influential if it performs well than if it performs badly.

3. Author interview: Agency officials. Underscoring in this and all subsequent quotations represents verbal inflections in the original interviews.
4. Author interviews: Agency officials and corporate executives. The somewhat defensive attitude in the last quotation is recognized by environmental activists. One environmental group staff person put it this way:

"When you come to them with their dirty linen in your suitcase, open it up, show it, and then close the suitcase up and say 'I want something done about this' -- instead of calling a press conference -- they regard that as very professional. Don't ask me why, but somehow that is what they regard as professional."

(Q) "Professional is defined as ...

(A) "... as saving their ass."

5. Author interview: Agency official.
6. Author interview: Agency official.

7. Eight of twelve officials interviewed made positive evaluations of the LMF's technical competence, and four made qualified assessments. However, five of the positive comments were made by officials in the same agency, and two of the four qualified comments were made by officials in a different agency. Therefore, by agency, four of seven were positive, and three were qualified.
8. Author interview: Agency officials.
9. This use of "recognition" follows the style of influence represented by the "reputational school" of community power structure studies; see, for example, Hunter (1953).
10. That is, in contrast with correspondence about Senate legislative decisions. Author Interview: Senate staff member. The two Senators are the highest ranked legislators on environment, with ratings of 100 (Nelson) and 96 (Stevenson), according to the League of Conservation Voters ("How Congress Voted -- 1972").
11. Author participant observation notes: 4/25/74.
12. See, for example, Mazmanian & Nienaber (1974) for a preliminary evaluation of Corps public participation efforts.
13. However, there is some evidence from participant observation and search of the LMF's files that the LMF does have a good relationship with the PCB chairman. The relationship does not, however, spill over to PCB decision making. During the course of the study, the PCB was not an important locus of decisions in which the LMF has been interested, in part because there are very few Illinois dischargers into Lake Michigan.

Botts notes that the LMF has never actively attempted to develop extensive contacts with the AEC because BPI's Comey, with whom the LMF works very closely on nuclear issues, has good, established inside contacts with the commission.

14. Author interview: Corporate executives. While there may be some negative connotations to such a characterization, the interviewee's characterization appeared to be intended as positive.
15. The decision to code using only the author's code was based on two considerations: it was felt that (1) a non-naive coder, that is, someone who understood the nature of the LMF's positions on issues and who was reasonably familiar with LMF activities, was needed; and (2) the non-naive coder should be someone who was not so intimately involved in the issues that objectivity would be suspect (i.e., reactivity). In addition, time and similar considerations precluded an elaborate multiple coding routine.
16. The decision, LMF commitment, coalition scope, and LMF role are defined in Appendix C. "Access" was defined on the basis of frequency of contacts, as determined by the "correspondence analysis"; see Table 3.1. For example, EPA, the U.S. Senate, and the Mann Committee were coded highest; Corps, Michigan DNR, U.S. House, and Illinois legislature as next highest; AEC, U.S. D. Interior, IJC, IPCB, IEPA, Illinois D. Conservation, MSD, and NOAA next; and the remainder as lowest. This ranking is, in a few

cases, at variance with levels of informal access to the agencies.

17. Technical note: This regression was done using SPSS matrix algebra techniques for stepwise linear regression. The regression was based on an input matrix of Kendall Tau rank order correlation coefficients appropriate for ordinal data. The use of nonparametric statistics is in this case slightly conservative -- use of Pearson correlation matrix would result in slightly higher, but still nonsignificant, multiple R, F, and T statistics. See Nie et al. (1970) on SPSS, and Blalock (1960) on multiple regression techniques. The regression weights in the equations are beta coefficients, based on a normalized data assumption; that is, they are equivalent to path weights.
18. Such incidents are also occasions for another reward -- the pure excitement of political conflict. The LMF staff, like probably all other people, find an exciting day to be more "fun" than a dull day.
19. Epistemologists will note that such a criterion borders on non-falsifiability: a favorable decision is a "win," and an unfavorable decision is a "win" because the LMF's position was at least placed on the decision-making agenda. This caveat is particularly important if one ignores "non decisions."
20. P.L. 91-190, 42 U.S. Code 4321, Sections 102(2)(b) and 102(2)(c)(iii).
21. The work of the Mann Committee and the LMF has been sufficiently effective, however, to produce at least one unintended negative result. One of the major conflicts surrounding the committee's deliberations was whether adoption of the CZMA program by the state would preempt the control of municipalities, particularly Chicago, over lakefront zoning. The prospect of this was apparently sufficiently real to cause the Chicago municipal administration to order four machine congressmen to change their votes on the National Land Use Bill. These swing votes were the margin of the bill's defeat in the U.S. House. See Jack Anderson, "Daley Swung Votes to Kill Land Use Bill," Chicago Daily News, 6/21/74, p. 18. Botts' comment was, "I'm just sick."
22. Author interview: Environmental group staff person. The official referred to is the former Corps North Central Division commander, Major General Ernest Graves.
23. Author interview.
24. Author interview.
25. Author interview.
26. Author interview.
27. On the theory of agency capture by regulated industries, in addition to Barstein (1955) and Sabatier (1974), see Huntington (1952), Leiserson (1942), McConnell (1966), and Calef (1960). The classic on agency capture is Salancik (1949).
28. Author interview: EPA official.
29. Author interview: EPA official.

30. Author interview. The same "hypothetical" example was used by several interviewees to illustrate this point (without knowing that others were confirming the same view of the event). In fact, it refers to an actual event of some significance.
31. After one such meeting, a lower-level U.S. EPA-V official told the author, in effect, "See, what Irv Goodman and Arnie Leder said to us shows we are not 'buddy-buddy.'" He then, without a word of prompting, launched into a ten minute monolog on why the LMF/BPI was the greatest thing since sliced bread. This sort of unsolicited praise of LMF/BPI occurred several times during the course of observation of LMF activities (and once when the author met an EPA-V employee after church on a Sunday!) after the author identified himself as conducting an evaluation of the LMF.
32. The typology is based on different types of formal (institutionalized) types of power in the higher levels of participation. The influence of the LMF tends to be through informal channels, however.
33. "Partnership" is the lowest type in the category; the others are "delegated authority" and "citizen control."
34. It should be noted in this regard that policy-making processes are almost always government centered. Government entities not only make decisions, but are at the center of messages involved in the decision-making process. For example, see Table 2.3; correspondence between the LMF and corporations is only a small fraction of LMF correspondence (1/53).
35. On organizational maintenance see Simon, et al. (1972) and Cyert and March (1963). On the importance of statutory mission, see, for example, Jaffe (1954, 1955). See Leeper (1965) on the concept of subsystems of governments.
36. For example, one state agency interviewee discussed the LMF in relatively neutral terms, but, when the subject shifted to U.S. EPA, changed moods quickly, excoriating EPA for alleged staff ineptness and "political" maneuvering and susceptibility. Another state agency person asked the author at the end of the interview -- out of the clear blue sky -- "How much money does the federation get from EPA?" (!!!) (In fact, while LMF does receive funding from U.S. EPA, it is in the form of contracts to perform specific services, such as organize the regional WQFI, and does not contribute to the general operating budget of the federation.)
37. Author interviews: Environmental group staff persons, governmental official.
38. The tactics the LMF has not used are "shareholders' actions," "voting record publication," and "campaign contributions." Campaign contributions are forbidden absolutely under 501(c)(3) status. Since legislative lobbying is such a relatively small part of LMF actions, and since the LMF's contacts are essentially divided among ten legislative chambers (two houses in each of the four state legislatures and the U.S. Congress), voting record publication would be meaningless on any systematic basis. Shareholders' actions are only rarely appropriate for confrontations with corporations (and even then are a highly suspect strategy).

39. *Berry (1974) reports that this tactic is the second most used tactic among public interest groups, and is considered the most effective tactic of all tactics.*
40. *In this regard, the environmental policy subsystem conforms well with Grodzins' (1966) description of the political process as a complex system in which there are a large number of points at which the decision-making process can be impacted. \_\_\_\_\_*

#### IV. PUBLIC INFORMATION AND MEMBERSHIP EVALUATION

As noted in Chapter I, the LMF is an "educational" or 501(C)(3) organization. While the behavioral goals of the organization are primarily concerned with influencing governmental policy decisions, a substantial amount of LMF effort (i.e., staff time) is directed not at government decision makers, but at segments of the general population. Some of these efforts could be classified as providing "public information," while others are more traditional membership services. This chapter will discuss the federation's performance in both types of activities.

##### LMF PUBLIC INFORMATION FUNCTION

The LMF's public information activities include maintaining good media relations. Fellow environmentalists tend to attribute the LMF's success in this area to the journalism backgrounds of Botts and Flowers. In fact, there are certain requisite skills in dealing with the media which the LMF staff possesses, and which were undoubtedly acquired before staff members joined the federation. A colleague of the federation summarized these skills as follows:

"Have all your facts; have them all checked out; cover all your bases. Don't ever lie to the press. Don't ever call them out for a bad story. Always provide them with plenty of material. If I were a reporter, I would hate a press conference where nobody had a prepared statement, or they don't have the documents. Let's say you are revealing secret documents, and you don't have copies of the documents! That will drive a reporter right out of his mind!

"You have to take into consideration that they have a limited amount of time to write the thing. They may not be up to speed on the issue, because they have been working on other things. You have to give them the material, guide them through it, tell them what you think is important. And one thing to always do is give them the telephone numbers of what you consider the best spokesmen on the other side so they can call up and get the other side of the story."<sup>1</sup>

From the point of view of the media, however, there are other requirements for effective spokespersons. One is that the spokesperson be a representative of a larger group, or at least be perceived to be a representative:

"They (LMF) have a broad constituency throughout the whole area. When I am looking for people to quote, I don't want one person's viewpoint; I want a viewpoint that reflects a lot of people in the Chicago metropolitan area. And that is what you tend to get from the LMF, because of their constituency, because of all the groups involved in the LMF. It gives me a good idea of cross sections."<sup>2</sup>

An important additional feature of a spokesperson with a "broad constituency" is that the person's positions are perceived to be politically "pragmatic."<sup>3</sup>

A second requirement of the media is that the spokesperson be competent:

"If something comes up, I've got to be able to call somebody I trust, somebody I feel is well informed, and ask, 'What do you feel about this?' And then she [Botts] gives me her reaction. She won't be the only one, but she'll be one of the people that I would normally call.

"A reporter starts out with some kind of event, and then he has to find out what other people think, how they react to the thing. And preferably you want informed reaction, rather than this knee-jerk stuff. That's another reason I would get involved with Lee."<sup>4</sup>

In addition, of course, Botts' ability to express her informed, representative positions in a concise, quotable fashion is a very valuable asset.

The federation has been quite successful in obtaining exposure in the press. From October 1973 through September 1974, two Chicago newspapers (the Tribune and the Daily News) carried a total of 578 articles which could be broadly defined as related to environmental issues.<sup>5</sup> Of these 578 articles 218 (38%) were on issues or policy areas in which the federation was active.

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<u>LMF Issues</u>		<u>Non-LMF Issues</u>	
<u>Environmental Group Cited</u>	<u># of Articles</u>	<u>Environmental Group Cited</u>	<u># of Articles</u>
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Source: Author's clippings file.

a) LMF and BPI both cited in three articles.

Two-thirds of the articles either reported news without quoting or citing a source or cited only government officials. Environmentalists were cited in 72 of the 218 articles. As Table 4.1 shows, the LMF was cited in 23 of those articles. The LMF and BPI combined accounted for the majority of environmental citations in the newspapers sampled. Most BPI citations were in articles on the nuclear issue, while LMF citations were evenly distributed among nuclear,

thermal pollution, energy, water quality, erosion, land use, and preservation articles. Readers should be aware of two different interpretations of this exposure: the LMF's colleagues argue that the LMF is effective in that it obtains good media exposure; reporters, however, argue that the LMF gets good exposure because it is effective.

Most of the LMF citations (14 of 22) were in the Tribune (which carries more environmental articles than the Daily News, in large part because of its neighborhood insert, "The Trib"). Both the LMF and BPI were cited most often by Tribune environmental editor Casey Bukro, the dean of Chicago's environmental reporters. Reporters, of course, tend to rather jealously guard their "good" sources, so it is not surprising that the primary beat reporters (Bukro, the Daily News' Harlan Draeger, the Sun Times' Bruce Ingersoll, etc.) tend to monopolize the more important sources: LMF's Botts, BPI's Comey or Myron Cherry, the CACC's Richard Kates, etc. Executive Secretary Botts, as would be expected, is the most often quoted LMF official (in 15 of the 22 articles).

The LMF's effectiveness in working with the media cannot be measured solely by direct citations of the organization. The LMF, its colleagues, and reporters all note that a source may give a reporter a substantial amount of information and then not be quoted directly even though the source's point of view may be clearly represented in the article. Several interviewees mentioned one particular example of this phenomenon. The Tribune's science editor, Ronald Kotulak, wrote an article in early 1974 which generally reflected the AEC position on nuclear safety. After Botts sent Kotulak a critical letter, enclosing material on the subject, Kotulak interviewed an AEC safety official and wrote -- without citing any critics of the AEC -- an article which one environmentalist characterized as "absolutely devastating" the AEC's position on waste disposal.<sup>6</sup> One environmentalist argued that it is advantageous to have an organization's point of view printed without direct attribution, since an uncited position cannot be as easily devalued by readers as the position of only a small segment of the population.

While the obvious value of high media exposure is to have an organization's viewpoint before the general public, interest group leaders also view media exposure as an important method of indirectly pressuring public officials (Berry, 1974). The usefulness of the press is most clear in the case of "leaks," where the crucial aspect of the tactic is the public exposure of the official sinner. The same logic applies to all messages in the media. Messages transmitted through the media have a very high level of exposure, and are therefore considered more "important" than more routine messages by governmental officials and interest groups; while an official could, if he or she wished, ignore significant criticism contained in a letter or phone call, that same criticism could not be as easily dismissed if it appeared in a major metropolitan daily or on an important radio station. In addition, publication of an organization's point of view seems to be viewed by interest groups as a form of reinforcement of the organization's position.

While the LMF has been relatively successful in its relationships with the Chicago media, it has not been as consistently successful in obtaining exposure in the media outside of the Chicago media market. This differential success is similar to the differential access of the LMF to political decision makers. The LMF does distribute press releases to all of the media in the Lake Michigan basin. However, very effective press relations, like effective political

relations, depend on close, informal, personal contacts between the LMF and individual reporters. The LMF can easily (i.e., inexpensively) contact and be contacted by Chicago reporters over the phone, at meetings, etc. This advantage does not exist in other media markets. (In addition, there is probably a bias on the part of the non-Chicago media against using a nonlocal source on "local" environmental news stories.) This differential effectiveness in dealing with the press means that a substantial part of the LMF's potential constituency is beyond the range of impact of the federation's media effectiveness. However, most actual federation members are within the Chicago media market, as are very important target decision makers (U.S. EPA-V, the Corps, all Illinois agencies, and the Illinois congressional delegation).

#### Conference and Workshop Sponsorship

The second medium for public information which the LMF uses is the sponsorship and organization of quasi-educational meetings. During the course of the study the LMF sponsored three such major events: (1) and Energy Conservation Conference, cosponsored by LMF and a variety of other organizations, principally the American Association for the Advancement of Science (AAAS); (2) the Region V Water Quality Training Institute (WQTI) funded by U.S. EPA via a contract with the Conservation Foundation (CF); and (3) a special meeting at the Indiana Dunes National Lakeshore on the impact of pollution on Lake Michigan fish, cosponsored by the LMF and two of its principal Indiana sportsmen's group members, the Indiana Conservation Council and the Lake County Fish and Game Protective Association. As noted in the LMF's history (Chapter I), conferences are a traditional LMF activity; indeed, the federation was publically proposed at the first two Four-State Conferences on Lake Michigan. Immediately prior to this study the LMF organized and cosponsored the Lake Michigan Shoreland Planning Conference (focusing on the erosion-land use issue) and a series of workshops on the federal Water Bill (cosponsored with a variety of local groups, primarily, in many cases, the local leagues of the LWV).

A significant number of these events are funded by government agencies (e.g., U.S. EPA), often via private organizations (e.g., AAAS, CF, etc.). The experience of the LMF and other environmental groups, however, has been that these grants do not cover the dollar costs (personnel time, share of yearly overhead, etc.) of organizing the events. However, the federation is fairly adept at brokering funding for conferences and workshops from a variety of sources.

These conferences and workshops are usually very well organized and efficiently conducted. Fortunately, a comparative evaluation of the ten regional WQTI's is available. The Chicago institute, organized by LMF, was evaluated positively by CF:

"The Chicago conference was uniformly excellent. A combination of a flexible program, sophisticated and enthusiastic participants, and a very high level of information made it one of the best I've attended."<sup>7</sup>

Although Botts was singled out for excellent participation (the only person noted in such a way), the workshop was primarily organized by LMF staffer Leder. In general, however, conference organization is the primary responsibility of LMF staffer Flowers, who almost always does a good, efficient job.

The goals of workshops like the WQTI -- and, to a lesser extent, conferences like the Energy Conservation Conference -- are (1) to increase understanding of the complexities of issues or of administrative procedures (e.g., the NPDES program) and (2) to stimulate action with respect to decisions, either by mobilizing citizens to participate in the decision-making process or by influencing decision makers who attend the workshops and conferences. Conferences and workshops almost always seem to be very fruitful in fulfilling the first goal; as purely educational events for those who do attend, the events are probably very successful. The success of the second goal is more difficult to determine.

The WQTI illustrates the problems of evaluating the policy impacts of conferences and workshops. It was funded by U.S. EPA as (at least formally) a partial fulfillment of the agency's citizen participation responsibilities under section 101(e) of the Water Bill. The agency funded CF to organize workshops in each of the ten U.S. EPA regions. The LMF was the regional "consultant" (subcontractor) for Region V. In preparing for the regional WQTI, the LMF brought together 19 key environmental group leaders and state agency officials from a six Region V states (the Lake Michigan states, plus Ohio and Minnesota) to act as a steering committee. The committee's responsibilities included setting the institute agenda and recruiting the conference participants from their states. The main regional institute was held in Chicago the weekend of March 29 through March 31, 1974. The institute featured (a) twenty papers and/or speeches by agency officials (primarily from U.S. EPA-V), environmental group leaders (primarily LMF/BPI staff or LMF Council members), and two academics, and (b) fifteen small group sessions on a variety of topics (permit procedures, aspects of the Water Bill, state strategy sessions, etc.) After the main institute in Chicago, ten follow-up workshops were held throughout the region, organized by the participants at the main regional workshop and coordinated by LMF.

The primary goal of the WQTI workshops was, in theory, to mobilize local environmentalists to become involved in the Water Bill program, primarily by actively monitoring NPDES permits issued by U.S. EPA or the states' pollution control agencies. The workshops were definitely necessary to mobilize this sort of participation because of the extreme administrative and engineering complexities of the NPDES program. Agency officials view such "education" as essential, hoping that, as a result, their contacts with citizen activists will be precise and focus on narrow issues. The LMF hoped that the WQTI workshops would benefit the federation's Water Quality Program, either by increasing the number of colleagues Leder and Goodman could work with or by lightening the burden on Leder and Goodman. To date, however, there has been little evidence that the WQTIs have succeeded in mobilizing a large segment of midwestern environmentalists to become actively involved in the permit program.<sup>8</sup>

Several significant inherent limitations to the mobilization strategy behind the WQTI have been mentioned by professional colleagues of the LMF. One drawback is that monitoring permits is dull work; one interviewee put it this way:

"Part of my lack of enthusiasm for the water workshop is [because of] my feeling that there are other areas that are going to stimulate people, and get some of these volunteer groups excited so they will say, 'Yes, I want to do something.' And to have them sit down and read water permits isn't it.

- "But what the LMF is trying to do, in a quantum jump, is get more of those Leder types. But I don't know if you are going to get these people, or whether you are going to discourage those people by suggesting that the way they can get involved is by reading permits."

Because of the lack of appeal of routine permit reading, the education obtained at the WQTI is relevant only for major issues, as, for example, on the permit of a very major polluter. The second drawback of the workshops, in the eyes of a number of observers, is that because of a lack of popular interest, the trained cadre tends to lose its cohesiveness, forget the "fairly encyclopedic" information obtained at the workshops, lose its materials, etc. Then when the big issue comes up, it has to be essentially retrained.<sup>9</sup> Thus, permit reading is a professional staff job, not an activity around which citizens can be mobilized.

The WQTI's lack of success so far in attaining its primary goal does not negate the importance of the institutes. First, the institutes did serve as a major opportunity for "making contacts," not only for the LMF with fellow environmental leaders, but also for the leaders with each other and with important officials, particularly from U.S. EPA-V. In this regard, the WQTI was much like a governmental public meeting. As noted in Chapter II, the primary importance of these events tends to be the opportunity to "make contacts," rather than the substance of the meetings themselves. (See Chapter II on the importance of "making contacts.") Second, the WQTI created the appearance (if not yet the reality) of a large group of skilled watchdogs monitoring the permit program. That is, the state pollution control agencies (since five of six Region V states either now administer, or will soon administer, the NPDES program) must be cognizant in issuing NPDES permits that there are several dozen potential permit readers in their state, in addition to LMF's Leder and BPI's Goodman. Third, and primarily, the WQTI could be considered a major accomplishment for environmentalists like the LMF because the WQTI was a tangible manifestation of the alliance of the U.S. EPA with environmentalists. That is, the WQTI was symbolic of EPA support for environmentalists vis-a-vis dischargers and/or state regulatory agencies. In this way the WQTI closely parallels the "breathers' lobby" which the agency attempted to organize to support its administration of the Clean Air Act (see Sabatier, 1974). (However, the other side of this support for environmentalists is that environmentalists like LMF have an obligation to the agency to invest substantial amounts of organization time in conferences, even if the direct payoffs in terms of citizen mobilization are minimal.)

Most of the conferences and workshops which LMF organizes do not have the significant political implications of the WQTI. Organizing most conferences and workshops does seem to have two major benefits: (1) they serve as a medium for increasing contacts among the LMF, other environmentalists, and occasionally governmental decision makers; (2) they are one of the standard media for "educating" activists, which is an explicit LMF goal. This is true even though conferences do not generally seem to have an immediate political effect.

#### LMF as a General Environmental Information Source

Two major LMF activities focus on informing a relatively wide constituency of concerned citizens. The first activity is the publication of a more or less monthly Bulletin. The LMF Bulletin is sent to 400+ LMF members (both current

and lapsed) and to about 1000+ interested nonmembers. The nonmembers include individuals who are members of LMF member organizations (e.g., members of the board of the Four-State Interleague Group of LWV), and selected governmental officials. For many people, including some government officials and key environmental leaders, publishing the Bulletin is the most important function of the LMF, even though some noted that it contains more information than they could possibly use. In fact, the Bulletin is very concisely written and contains reports on a wide range of policy-relevant developments. Because the LMF uses inexpensive reproduction equipment and strenuously attempts to conserve paper, the Bulletin's layout is often cramped. This is probably irrelevant to most Bulletin readers, however. The Bulletin also tends to underplay or omit news items which occur early in the period of coverage.

A second LMF informational activity is responding to requests for information from ordinary citizens. These requests are usually not directly related to specific LMF advocacy activities (and are sometimes not even related to LMF issues). Such requests are cryptically characterized by one colleague of the LMF's as the "Tell me all you know about ecology" inquiry. Appearances by the LMF staff as guest speakers are similar to responses to individual inquiries because the appearances are typically before groups which have minimal involvement in and knowledge of LMF issues.

Because of the volume of both individual information inquiries and requests for speaking appearances, these two activities take up a significant amount of LMF staff time; the staff has only recently talked about learning how to say "No." During any given week during the course of the study, Botts would be committed to one or two speaking engagements and Flowers would be committed to almost as many. These engagements typically involved evening or weekend appearances. At these appearances the topics discussed by the LMF staff generally fell in the area of nuclear safety; in conjunction with these appearances, the staff occasionally used the good BBC-produced movie "How Safe Are American Nuclear Reactors?" As noted in Chapter I, these informational activities involve a considerable part of Flowers' staff time. In responding to individual requests, Flowers typically sends out standard reference material with a brief, boilerplate cover letter. The LMF has not, in responding to these requests, made a distinction between LMF members and nonmembers.

The LMF appears to perform well in these informational activities. Both Botts and Flowers are good public speakers who convey their enthusiasm and interest in issues, and Flowers is both competent and conscientious in responding to individual requests. There are, however, serious questions about the benefits of these activities. They appear to have almost no direct or immediate impact on the decision-making processes of government. A number of the LMF's colleagues argue that these activities can contribute to a general increase in societal awareness of LMF issues, a form of "consciousness raising." These colleagues imply that increased societal awareness is an important precondition for changing public policy, and cite the issue of nuclear safety as an example of increased societal awareness. This study did not (indeed, could not) obtain systematic evidence to either confirm or deny this belief. Although the LMF can reach only a small segment of the population through individual contacts or speaking appearances, in environmental policy making, like most other policy areas, only a small segment can plausibly participate in an informed manner anyway.

The LMF does recognize that the payoff of these small scale informational activities is questionable. However, it seems to view this role as a moral

and legal<sup>10</sup> - and often burdensome - obligation. The staff considers informational activities as something it ought to do because the LMF has defined itself as an "informational" organization, rather than because it contributes to the LMF's advocacy role.

The LMF does not have any particular commitment to systematic "environmental education" (e.g., programs for schools). In large part, the LMF has not conducted such programs because of the on-going Open Lands Project environmental education program, which was established by Botts while LMF was a program within OLP, and which is currently directed by Wayne Schlimpf.

TABLE 4.2

QUESTIONNAIRE RESPONDENTS, BY  
ORGANIZATIONAL AFFILIATION

<u>Type of Organization</u>	<u>N</u>	<u>Percent</u>
General environmental group	28	13.4%
League of Women Voters	13	6.2
Preservation, open space org'n	11	5.3
Government officials	11	5.3
Academics	11	5.3
Riparian groups	10	4.8
Izaak Walton League	7	3.3
Sierra Club	5	2.4
Audubon Society	5	2.4
Other organizations <sup>a</sup> (fewer than 5 respondents per organization)	36	17.2
LMF staff	5	2.4
Individuals w/ no identifiable organizational affiliation	<u>67</u>	<u>32.1</u>
Totals	209	100.0%

a) Includes three corporation respondents.

Source: Member questionnaire.

#### MEMBERSHIP RELATIONS

The base of support of the federation is its membership, including member groups and individuals. The following sections will discuss the views of the LMF by its members. This discussion is based in large part on the results of a mail questionnaire (see Appendix D), supplemented by interviews with a number of important LMF members.

#### Membership Characteristics

Although two thirds of the federation's members are officially listed by the LMF as individual members, the responses to the questionnaire suggest that a much higher proportion than a third are actually officials of some other environmental or citizen group: 51.1% of the respondents on the questionnaire were either officers, board members, or staff members of a citizens organization; another 2.4% were regular members.<sup>11</sup> Table 4.2 shows the organizational background of these respondents. (Henceforth questionnaire respondents will be called

simply "members," although the reader should recognize that the respondents may be somewhat biased sample of the membership. See Appendix D on the questionnaire response rate.) Of the groups for which information was available (94 of 137 group members), the median number of members of the groups was 289. Forty-nine LMF group members indicated that their organizations had at least one staff person; the median staff size for these organizations was 2.8.

A very interesting aspect of LMF membership is the high proportion of members located near Chicago. Table 4.3 shows the distribution of LMF membership in terms of distance from downtown Chicago (the Loop). Sixty percent of LMF members live within a sixty-mile radius of the LMF's offices, an area including the Chicago metropolitan area, east along the lake almost to Stevensville, Michigan, and north along the lake to Racine, Wisconsin. Over 75 percent of LMF members live within 120 miles of Chicago, primarily in urban southwestern Michigan. In terms of membership, the LMF is really a "South End of Lake Michigan Federation." However, the south end of the lake contains most of the population centers near the lake (with the exception of Green Bay, Wisconsin), so the LMF's concentration of membership in this area is to be expected.

TABLE 4.3

DISTANCE OF MEMBER-RESPONDENTS' HOME  
ADDRESS FROM CHICAGO LOOP

<u>Distance (Miles)</u>	<u>Major Cities in Zone</u>	<u>N</u>	<u>Relative %</u>	<u>Cumulative %</u>
0-20	Chicago and suburbs	79	37.8%	37.8%
20-40	Gary, Michigan City	33	15.8	53.6
40-60	Kenosha, Racine	14	6.7	60.3
60-120	Milwaukee, Kalamazoo, St. Joseph, Grand Rapids, Muskegon	35	16.7	77.0
120-180	Madison, Lansing, Indianapolis	23	11.0	88.0
180-240	Green Bay, Stevens Pt.	15	7.2	95.2
240-300	(Straits of Mackinac)	4	1.9	97.1
300-360	Duluth, twin cities	1	.5	97.6
360+	Washington, D.C.	5	2.4	100.0

Member Views on Overall LMF Characteristics

The member questionnaire contained a set of items designed to elicit member perceptions on a number of LMF characteristics. The questionnaire items were in the form of a "semantic differential" scale, in which respondents were asked to place the LMF on a continuum between sets of two antonyms (see Table 4.4 for an example).<sup>12</sup> Most of the scale items are obvious evaluative distinctions: it is "better" to be more knowledgeable, sophisticated, professional, etc. Some of the items, however, are judgemental items without obvious "good" and "bad" distinctions: national-local, simple-complex, etc. On these items respondents were also asked to specify what they thought the LMF's characteristics should be. (Note that numbers closer to 1.0 indicate ratings closer to the first, or only, named term.)

TABLE 4.4

## MEMBER PERCEPTIONS OF LMF CHARACTERISTICS

Example of Scale Item:<sup>a</sup>Personal (1) : (2) : (3) : (4) : (5) : (6) : (7) Impersonal

The antonyms of the main characteristics are in most cases omitted from the table.

"Evaluative"			"Operating Style"		
Evaluative Characteristic (N)	Mean <sup>b</sup>	Std. Dev. <sup>b</sup>	Evaluative Characteristic (N)	Mean	Std. Dev.
Knowledgeable (198)	1.89	1.26	Professional (200)	2.40	1.30
Comprehensive (192)	2.52	1.24	Sophisticated (195)	2.58	1.37
Scientific (198)	2.40	1.33	Energetic (200)	1.90	.97
Has Many Contacts (192)	2.44	1.54	Dynamic (193)	2.15	1.00
Timely (193)	2.36	1.47	Involved (199)	1.60	.86
Recognized (197)	2.89	1.47	Valuable (200)	1.61	.95
Powerful (195)	3.23	1.48	Relevant (199)	1.55	.91
			Free (192)	2.72	1.28
			Personal (192)	3.08	1.57
<u>Judgemental Charac-</u> <u>teristic (LMF Is:)</u>			<u>Judgemental Charac-</u> <u>teristic (LMF Should Be:)</u>		
National-Local (193)	4.30	1.64	National-Local (196)	3.93	1.85
Complex (190)	3.45	1.60	Complex (189)	3.76	1.56
Flexible (196)	3.05	1.42	Flexible (200)	2.09	1.25
Moderate-Radical (197)	3.53	1.52	Moderate-Radical (195)	4.10	1.67
Individual Dominated (189)	3.95	1.80	Individual Dominated (192)	5.03	1.80
Humanistic- Technical (199)	3.83	1.53	Humanistic- Technical (191)	3.89	1.69

Total number of Respondents = 209; Average number of missing responses on above items = 13.90.

- a) See Appendix D for exact scale items. The numbers were not present in the original scales, but are inserted here for interpreting the reported means. Note that a mean of 1.0 (not 0) is the baseline of the scale.
- b) The "mean" is the average of all responses, omitting nonresponses. The "standard deviation" measures how much individual responses differ from the average of all responses, that is, how widely responses are spread around the mean. (A low standard deviation means that responses are closely bunched around the mean; higher standard deviations indicate that responses are more widely spread around the mean.)

Source: Membership Questionnaire, See Appendix D.

Overall, members rated the federation positively on all the evaluative items. That is, the LMF was rated closer to the positive side of the scale than to the negative: more "professional" than "amateur," more "sophisticated" than "naive," etc. The LMF was rated most positively on several very generalized (or, vague) evaluative scales -- valuable, relevant, and involved. The federation was also perceived as knowledgeable, energetic, and dynamic. It was viewed less positively on a number of items which relate quite closely to political effectiveness -- professionalism, sophistication, comprehensive, scientific, and extent of contacts. The LMF got its lowest marks on perceived political influence ("powerful"); although the score, 3.23, is close to the midpoint of the scale (4.0), it is still in the direction of powerful rather than powerless. That is, while members' views of the LMF are all very positive, they see the federation as (1) most clearly very active and useful, (2) slightly less competent (e.g., professional, comprehensive) than active and useful, and (3) less influential than it is either active and useful or competent.

TABLE 4.5

FACTOR ANALYSIS OF MEMBER PERCEPTIONS OF  
LMF CHARACTERISTICS

<u>Characteristic</u>	<u>Factor 1: "Effectiveness"</u>	<u>Factor 2: "Operating Style"</u>
Many contacts	.75	.11
Knowledgeable	.71	.29
Timely	.66	.10
Recognition	.58	.24
Powerful	.54	.19
Comprehensive	.54	.44
Scientific	.51	.33
Professional	.13	.78
Sophisticated	.19	.71
Energetic	.36	.60
Dynamic	.37	.60
Involved	.17	.52
Valuable	.30	.52
Free	.08	.48
Eigenvalue	5.09	1.16
% of Variance	81.5%	18.5%

Member perceptions of the LMF fall into two general types of responses. When the items in Table 4.4 are factor analyzed, the two factors shown in 4.5 are obtained. (Factor analysis is a technique for reducing a large set of data to a smaller number of "factors," or underlying variables which account for the interrelations in the larger set of variables. The numbers in the columns, "factor loadings," indicate how closely related a particular variable is to the underlying factor; a factor loading above .50 indicates a significant relationship.)<sup>13</sup> The first factor, "effectiveness," includes the characteristics most closely associated with political influence (contacts, recognition, powerful) and the variables related to what was called competence in Chapter III (knowledgeable, comprehensive, scientific). The second factor includes two important aspects of the federation's style of operations: the full-time staff organization

of the LMF (professional, sophisticated) and federation aggressiveness (energetic, dynamic, involved). Note that the more important underlying factor of member perceptions of the federation is the "effectiveness" factor (accounting for 81% of the variance among the various items).

Members rate the LMF higher on the "operating style" factor items than on the "effectiveness" factor items. (See Table 4.4, and compare the means for the upper-right-hand characteristics with the upper-left-hand characteristics. The average mean for the "operating style" characteristics is 2.18, while the average mean for the "effectiveness" characteristics is 2.53.) This pattern of member responses parallels other evaluations of the LMF, as presented in Chapter III. The members rate the LMF's operating style highly, but as a whole do not attribute quite as high political influence to it.

There are several interesting differences between members' perceptions of and preferences about the items which do not represent an obvious "good-bad" distinction (the judgemental characteristics in Table 4.4). The greatest difference (mean difference = 1.05)<sup>14</sup> is on individual domination, where the pattern of responses indicates a preference for a less individually dominated LMF, even though both perceptions and preferences are close to the midpoint of the scale between "individual dominated" and "not individual dominated." Respondents indicate that the LMF should be more flexible (mean difference = +.93). Differences of a smaller magnitude are that the LMF should be somewhat more radical (mean difference = -.58) and focus somewhat more on national, as opposed to local, issues (mean difference = +.31).<sup>15</sup> In addition, differences on flexibility, individual domination, and professionalism are all moderately interrelated ( $R^2 = .22$ ), with preferred differences on flexibility and professionalism negatively related to differences on individual domination. That is, the members seem to be saying that the federation should be more flexible and more professional and at the same time individually dominated.

#### Member Views on LMF Issue Involvement

Another set of questions asked members to rate the LMF commitment to a number of issue areas, and to specify their feelings about what the federation's commitment should be on each of those issues. The results of that set of questions are presented in Table 4.6.

Members' perceptions of the ordering of LMF priorities on issues are roughly congruent with actual observed LMF commitments and activity. Water pollution, the nuclear-related issues (thermal pollution, nuclear safety, and plant siting), and erosion are all ranked as very important or extremely important. There are some discrepancies between members' perceptions and the author's observation of LMF activity during the course of the study. The LMF was active in both land use planning and energy conservation, particularly through the Mann Committee, Botts' association with the Ford Energy Policy Project, and more recently "Project Independence" (federal energy planning). The ranking of natural area preservation (2.44) seems to overstate federation activity in this area during the course of the study. Lastly, the perception of the importance of the Water Quality program (1.41) seems low since it is the only formally designated LMF advocacy program, probably consumes more personnel resources (Leder, Botts, and BPI's Comey and Goodman) than any other issue area, and is the most conspicuously effective LMF

TABLE 4.6

MEMBER PERCEPTIONS OF AND PREFERENCES  
FOR LMF ISSUE INVOLVEMENT

Example of the Scale:

Air Pollution	Extremely Important	Very Important	Somewhat Important	Not Very Important	Not Important		
	1	2	3	4	5		
	Perception of LMF Commitment (LMF Does) <sup>a</sup>		Preference about LMF Commitment (LMF Should Do)		Difference (Does-Should Do) <sup>b</sup>		
Issue Area <sup>c</sup>	Mean <sup>d</sup>	Std. Dev.	Mean	Std. Dev.	Mean	Std. Dev.	
Water pollution	1.41	.68	1.17	.42	+ .25	.58	
Thermal pollution	1.35	.65	1.50	.87	- .11	.94	
Power plant siting	1.41	.73	1.53	.94	- .06	.93	
Shoreline erosion	1.69	.86	1.73	.99	- .01	.87	
Nuclear safety	1.54	.80	1.74	1.05	- .14	.92	
Land use planning	2.20	1.20	1.79	1.00	+ .49	.83	
Natural area preservation	2.44	.94	2.11	1.01	+ .38	.88	
Energy conservation	2.38	1.03	2.16	1.12	+ .34	.96	
Solid waste disposal	3.01	1.23	2.50	1.21	+ .55	.90	
Air pollution	3.04	1.13	2.64	1.23	+ .45	.88	

- a) Total sample N = 209. Average valid responses on "Does" and "Should Do" is 179.5; range is 177 to 184 (higher numbers of valid responses on nuclear-related, water pollution, and erosion items)
- b) Average valid responses for differences is 168.1 range is 163-177. Differences in valid responses on both "Does" and "Should Do" account for discrepancy between the means of the differences and the differences of the means. Positive numbers mean "increase commitment."
- c) Listed in order of the means on "Should Do."
- d) See footnote b, Table 4.4.

Source: Membership questionnaire.

program (along with thermal pollution, which has, essentially, also been handled by the Water Quality Program of LMF/BPI). There seems to be a slight time lag in members' perceptions of LMF commitments and/or a lack of visibility of some of the more informal, "insider" staff activities. For example, the Mann Committee commitment, which represented a major LMF activity, was made during 1974, and thus does not appear to be as well known to the members as more long-standing LMF issues, such as the nuclear issues. On energy conservation a large part of the LMF commitment has been via Bott's personal role with the Ford Energy Policy Project advisory board, which is also relatively recent and also very much an informal, insider activity.

Members' responses indicate that present LMF issue priorities (as seen by members) are about the same as members feel they should be. (That is, the ordering of perceived issue commitment is almost identical with ordering of preferred issue commitment.) Members almost unanimously view water pollution as the LMF's top-priority issue. The nuclear-related issues, erosion, and land use are ranked close together in a second group, with the rest of the issues ranked as less than "very important." A few issues switch their rank order but stay at about the same priority (for example, water pollution is seen as second priority but should be first, while thermal pollution is seen as first priority but should be second). In most cases the difference in the average response is very small (for example, .01 between erosion and nuclear safety). Most important, the most common individual response was that actual LMF commitment on a given issue was exactly what it should be.<sup>16</sup>

Generally members seem to feel that the LMF should increase its overall commitment. Because the members also rate the LMF very high on the "energetic" evaluative item, this pattern of responses should not be viewed as an injunction to the LMF to work harder, but as a recognition that there are many important environmental issues, even if the LMF cannot realistically treat all as "extremely important" or "very important."

There is a definite positive relationship between members' commitment to particular issues and their feelings about whether LMF should be committed to those issues (see Table 4.7). That is, if members are more committed to an issue than they perceive the LMF is, they feel the LMF should increase its commitment to that issue.

TABLE 4.7

CORRELATION BETWEEN THE DIFFERENCE BETWEEN MEMBERS  
COMMITMENT TO AN ISSUE AND PREFERENCES FOR LMF COMMITMENT<sup>a</sup>

<u>Issue Area</u>	<u>r<sup>b</sup></u>
Energy conservation	.50
Erosion	.47
Land use planning	.41
Water pollution	.37
Nuclear safety	.34
Natural area preservation	.33
Thermal pollution	.31
Power plant siting	.28
Solid waste disposal	.26
Air pollution	.16

- a) The two variables are (1) the difference between member's statement of his/her commitment to the issue and perception of LMF commitment to issue and (2) the difference between LMF perceived and preferred commitment.
- b) Simple Pearson product-moment correlation. Air pollution is significant at 5%, all others at .1%.

Members do, however, differentiate somewhat among the various issues, de-emphasizing the nuclear-related issues and erosion in favor of the other issues. Members indicate that the LMF should slightly decrease its commitment on the

nuclear and erosion issues (from  $-.01$  to  $-.14$ ), while indicating a preference for somewhat more substantial increases ( $+.25$  to  $+.55$ ) on the other issues (see Table 4.6). Because of the small magnitude of differences on the nuclear-related and erosion issues, this pattern could be viewed as a preference to more or less hold constant on these issues while increasing emphasis on the other issue areas. However, it is probably more correct to view these responses as a real preference for decreased emphasis on nuclear issues; since the pattern of responses advocated overall increased commitment, any preference for a decrease represents a real net decrease. That is, the average of the mean differences between "LMF Does" and "LMF Should Do" is  $.21$ ; thus the mean of  $-.11$  on thermal pollution is actually  $.31$  less than the "average" member response on changes in LMF issue involvement.

Member preferences on LMF issues fall into two highly interrelated categories (see Table 4.8, the results of a factor analysis<sup>17</sup> of issue preferences). The first factor, or pattern of preferences, is correlated with the three nuclear-related issue areas. The second factor is correlated with the five issue areas which members view as lower priority (the issue areas which are ranked as the five least important issues the LMF should be involved with in Table 4.6). That is, not only do the nuclear-related and low-priority issues fall together in the same relative position as priorities, but members rather consistently rank them together.

TABLE 4.8

FACTOR ANALYSIS OF MEMBER PREFERENCES  
ON LMF ISSUE INVOLVEMENT

Issue ("LMF Should Do")	Factor 1: "Nuclear-related"	Factor 2: "Low-priority Issues"
Power plant siting	.86	.03
Nuclear safety	.73	.13
Thermal pollution	.60	-.04
Land use planning	.31	.66
Natural area preservation	-.001	.66
Air pollution	.07	.53
Energy conservation	.33	.50
Solid waste disposal	.01	.50
Erosion	.30	.12
Water pollution	.22	.10
Eigenvalue	2.41	1.25
Percent of variance	65.9%	34.1%

Member Views on LMF Operating Activities

A series of questions about LMF operating activities were also asked. The results are set forth in Table 4.9.

TABLE 4.9

MEMBER PERCEPTIONS OF AND PREFERENCES  
ABOUT LMF OPERATING ACTIVITIES

Example of the Scale:

	<u>Extremely Important</u> 1	<u>Very Important</u> 2	<u>Somewhat Important</u> 3	<u>Not Very Important</u> 4	<u>Not Important</u> 5			
	Perception of Actual LMF Commitment (LMF Does) <sup>a</sup>				Preference About LMF Commitment (LMF Should Do)		Difference (Does-Should Do) <sup>b</sup>	
<u>Operating Activity</u>	<u>Mean</u> <sup>c</sup>	<u>Std. Dev.</u>	<u>Mean</u>	<u>Std. Dev.</u>	<u>Mean</u>	<u>Std. Dev.</u>	<u>Mean</u>	<u>Std. Dev.</u>
Litigation	1		2		3		4	
Testify/inform legislators	1.58	.87	1.35	.66	+25	.66		
Watchdog adm. agencies	1.60	.88	1.40	.74	+22	.69		
Pressure adm. agencies for new policies	1.76	.97	1.53	.87	+21	.82		
Litigation	3.21	1.26	2.51	1.39	+71	1.32		
Inform citizens to facilitate participation	1.77	.92	1.37	.66	+39	.90		
Sponsor research	2.92	1.18	2.27	1.20	+71	1.05		
Stimulate/coördinate citizen participation	2.12	1.02	1.63	.82	+51	.96		
Environmental education	2.48	1.11	2.19	1.10	+34	.89		
Work with the media	1.95	.98	1.43	.67	+50	.96		

a) Total sample N = 209. Average valid response for "Does" and "Should Do" is 181.6; range is 167 to 188.

b) Average valid response for differences is 167.1; range is 157 to 171. Difference in valid responses for both items accounts for discrepancy between the means of the differences and the differences of the means.

c) See footnote b, Table 4.4.

Source: Member Questionnaire.

Members view three of the explicit advocacy activities (legislative testimony, monitoring and pressuring administrative agencies), informing citizens to facilitate participation and maintaining media relations as the most important LMF activities. Stimulating participation, environmental education, and sponsoring research come next, and litigation is viewed as the lowest priority activity. Members' perceptions of what the LMF does are roughly congruent with the author's observation of actual LMF activities, except that the members' perceptions seem to somewhat overstate the importance of legislative testimony and information.

As with member views on issue involvement, the overall pattern of responses indicates that members feel the present LMF activity priorities are about the same as they should be. (That is, the order of perceived LMF activities is almost identical with the order of preferred activities.) The major difference is that informing citizens to facilitate participation shifts from fourth to second highest priority. However, the difference between the four highest ranked preferred

activities is not significant (1.35 to 1.43). As with preferences about issues, members seem to say the LMF should increase its commitment overall. The greatest differences between perceptions and preferences are on litigation and sponsoring research, but these two activities are still the lowest ranked priorities. Also, all the activities except litigation are ranked as either "very" or "extremely" important.

An interesting aspect of members' responses is the role of "testify/inform legislators." As noted in Chapter I, the question of LMF "lobbying" is one of the few activities about which there is significant disagreement. There are basically three positions on lobbying which colleagues of the federation related in interviews. The first position is that, by not lobbying, the LMF is less effective than it could be because (1) interest groups must try to influence legislation to obtain basic policy changes since agencies and the courts operate within statutory constraints, and (2) the LMF is limited in its ability to support "friendly" agencies, particularly on appropriations. The second position is that the LMF should not lobby because this would detract from LMF specialization in other activities. One interviewee put it this way:

"Legislative work, in many ways, is easier than agency work because, I think, groups have more experience with it. I don't think we need another legislative lobbying group. We don't need the federation as an active lobbying group as much as we need it to be a resource base and to do some of the more obscure agency work that the other organizations find so much more difficult."<sup>18</sup>

The third position, of course, is that the LMF needs the financial benefits of its 501(C)(3) tax status more than it needs to do active lobbying. The item on testifying and informing legislators is not very helpful on the issue of LMF lobbying. First, the item was phrased so that it included activities not considered lobbying in the legal sense of the term (that is, after the fact, it is clear that the question was not designed properly by the author). Nonetheless, members seem to be saying that working with legislators is and should be an important LMF activity, even if the questionnaire responses do not provide any useful insights into their preferences about explicit, direct lobbying.

Members' responses on LMF activities fall into two general patterns. Table 4.10 shows the results of a factor analysis<sup>19</sup> of member preferences about LMF operating activities. Direct advocacy activities, particularly vis-a-vis administrative agencies, are the most important (interrelated) factor, with citizen participation activities being an interrelated second factor. Note that media relations is equally related to both factors.

#### Differences of Views Among Types of Members

There appear to be significant differences on preferences about and perceptions of the federation among different types of federation members. Tables 4.11 to 4.14 show the differences of the mean (average) responses to a number of questions of four types of LMF member. The first type of member is the LMF staff person or council member. The second type is a key environmental leader; most of this group of respondents are leaders of important environmental groups in the region, or important individual environmentalists.<sup>20</sup> The third and fourth categories include regular (i.e., not "key") members: the third type is a member who is an officer in another organization, and the fourth is a member with no

known formal position in another organization. The majority of those in the first category are council members, most of whom would be considered key environmentalists were they not on the LMF board.

TABLE 4.10

FACTOR ANALYSIS OF MEMBER RESPONSES ON  
PREFERRED LMF ACTIVITIES

Operating Activity ("LMF Should Do")	Factor 1: "Administrative Advocacy"	Factor 2: "Citizen Participation"
Pressure adm. agencies	.80	.03
Watchdog adm. agencies	.74	.21
Testify/inform legislators	.44	.21
Litigation	.32	.06
Work with media	.46	.53
Stimulate citiz. participation	.24	.65
Inform citizen participation	.30	.52
Environmental education	.06	.49
Sponsor research	.00	.44
Eigenvalue	2.59	.78
Percent of Variance	76.9%	23.1%

Table 4.11 shows the different responses of the four types of respondents on LMF issue involvement. In general LMF officials and key environmentalists discriminate much more accurately in their perceptions of what the federation actually does. For example, LMF and key respondents listed solid waste (correctly) as a lower-priority issue than do other members. (This same pattern of more precise differentiation by LMF and key members was present for all issues, only without statistically significant differences.)<sup>1</sup> LMF and key respondents also differentiate more precisely than other members on perceptions of LMF operating activities, particularly on litigation (see Table 4.12).

LMF respondents tend to be more committed to recent LMF issues (e.g., land use planning and energy conservation) than are other members. On peripheral issues like solid waste disposal, both LMF and key environmentalists generally realize and approve of LMF's lack of specialization in these issues. The most important differences, however, are on the nuclear-related issues, to which LMF people are considerably more committed than are other members. These patterns of differences among types of members--though statistically significant--do not affect the relative rankings of priorities among types of respondents (that is, the different types of members rank issues in roughly the same order).

A more interesting difference among types of members concerns preferred LMF operating commitments. As Table 4.12 shows, LMF officials uniformly view citizen participation activities as more important than do other types of members. On the most explicit citizen participation activity, "Inform citizen participation," only one of the 25 LMF officials did not rank the activity as extremely important. On the other hand, key environmentalists tend to view citizen participation activities as less important than do other members.

TABLE 4.11

MEMBER RESPONSES ON SELECTED<sup>a</sup> ISSUE AREAS,  
BROKEN DOWN BY TYPE OF RESPONDENT

Issue Area	Total <sup>b</sup> (N = 209) <sup>c</sup>	LMF Staff & Council (N = 25)	Key Env't'l Leaders (N = 51)	Other Members, Organization Officials (N = 64)	Other Members, Individuals (N = 69)	F <sup>d</sup>
Land use planning ("Should do")	1.79	1.35	1.64	1.87	2.02	3.0
Energy conservation ("Does")	2.38	1.87	2.45	2.56	2.36	2.6
Energy conservation ("Should do")	2.16	1.57	2.36	2.25	2.16	2.8
Solid waste disposal ("Does")	3.01	3.08	3.40	2.91	2.70	2.9
Solid waste disposal ("Should do")	2.50	2.65	2.89	2.45	2.15	3.4
Power plant siting ("Should do")	1.53	1.09	1.47	1.63	1.68	2.5
Thermal pollution ("Should do")	1.50	1.09	1.57	1.52	1.60	2.1
"Nuclear-related" ("Should do") factor score <sup>e</sup>	-.002	+.43	-.01	-.05	-.11	2.6

- a) Variables with significant or almost significant (F greater than 2.0) differences among mean responses; 8 of 22 possible variables are reported.
- b) Except for "F," all entries in the table are mean (average) responses.
- c) Total number of respondents in such category. Actual N on each item not reported, but in general "other members" have more nonresponses than either "LMF" or "key" respondents.
- d) The "F" statistic measures whether the differences among mean responses is statistically significant; an "F" greater than 2.6 is significant at the 5% level.
- e) This is a composite index based on the factor scores of the first factor reported in Table 4.8. Positive numbers indicate higher preference for commitment to nuclear-related issues than the average respondent. See Nie et al. (1970, pp. 226-227) for a description of factor scores.

Source: Membership questionnaire.

All four classes of respondents rate direct advocacy activities and informing citizen participation as more important than the more peripheral activities (sponsoring research, environmental education, etc.). However, key environmentalists do not advocate nearly so much emphasis on the citizen participation activities as do other types of members, and particularly LMF respondents.

The most significant difference among members is that LMF and key environmentalist members characterize the LMF as more effective than do other members (see Table 4.13), particularly on the key variables associated with political influence (powerful, recognized, and contacts). Also, LMF and key environmentalist

members characterize the LMF as more personal and timely than do other members. Note that these are very clear-cut distinctions (almost a whole scale point in most cases).

TABLE 4.12

MEMBER RESPONSES ON SELECTED<sup>a</sup> LMF OPERATING ACTIVITIES, BROKEN DOWN BY TYPE OF RESPONDENT

Activity	Total (N = 209)	LMF Staff & Council (N = 25)	Key Env't'l Leaders (N = 51)	Other Members, Organization Officials (N = 64)	Other Members, Individuals (N = 69)	F <sup>b</sup>
Inform cit. partic. ("Should do")	1.37	1.04	1.50	1.39	1.37	2.7
Sponsor Research ("Should do")	2.27	1.96	2.63	2.41	1.98	3.4
Environmental educ'n ("Should do")	2.19	1.83	2.58	2.15	2.05	3.3
Work with media ("Does")	1.94	1.44	1.98	1.93	2.17	3.3
Litigation ("Does")	3.21	4.26	3.53	2.89	2.72	11.7
Litigation ("Should do")	2.51	3.37	2.45	2.44	2.27	3.9
"Citizen participation" ("Should do") factor score <sup>e</sup>	+ .003	+ .43	- .31	+ .002	+ .08	6.2

a) Eight of 29 possible variables reported.

b) This variable is a composite index based on the "factor scores" of the second factor reported in Table 4.10. Positive numbers indicate a higher preference for citizen participation activities than the average respondent.

Source: Membership questionnaire.

To summarize the differences among types of members:

- (1) LMF and key environmentalist members are more precisely aware of differences in LMF issue involvement and operating activities;
- (2) key environmentalist members are less favorably inclined towards citizen participation activities than other types of members especially LMF members; and
- (3) LMF and key environmentalist members are much more favorably impressed with the effectiveness of the LMF than are other members.

One very important reason for these differences is suggested by Table 4.14. Key environmentalists and LMF council members have vastly more frequent contacts with the federation (i.e., the staff) than do ordinary members, and report that they take action much more frequently on LMF issues than do ordinary members. Overall, there is a strong relationship ( $r = +.54$ ) between total contacts with LMF and total actions taken as a result of contacts with LMF; that is, the more contacts members have with LMF, the more likely they are to take actions to influence decisions, or the more members take actions to influence decisions, the more likely they are to have contacts with the federation.

TABLE 4.13

MEMBER RESPONSES ON SELECTED<sup>a</sup> LMF CHARACTERISTICS  
BROKEN DOWN BY TYPE OF RESPONDENT

Characteristic	Total (N = 209)	LMF Staff & Council (N = 25)	Key Env't'l Leaders (N = 51)	Other members, Organization Officials (N = 64)	Other Members, Individuals (N = 69)	F
Powerful	3.23	2.52	2.71	3.54	3.59	6.4
Recognized	2.89	2.42	2.41	3.12	3.23	4.4
Many contacts	2.44	1.63	1.83	2.67	3.02	8.9
Personal	3.08	2.63	2.53	3.30	3.46	4.4
Relevant	1.55	1.27	1.37	1.67	1.65	2.2
Energetic	1.90	1.71	1.68	1.88	2.15	2.7
Dynamic	2.15	1.46	2.00	2.21	2.49	7.3
Comprehensive	2.52	2.08	2.22	2.56	2.88	3.8
Knowledgeable	1.89	1.38	1.74	1.97	2.14	2.6
Flexible	3.05	2.42	2.92	3.08	3.35	2.8
Timely	2.36	1.67	2.04	2.48	2.77	4.5
Difference: National/Local <sup>b</sup>	+ .31	+ .27	+ .04	- .08	+ .90	- 5.2
"Effectiveness" factor score <sup>c</sup>	+ .001	+ .46	+ .29	- .13	- .26	7.6

a) Thirteen of 31 possible variables reported.

b) That is, "Should" minus "Is." Positive numbers mean that the LMF should be more nationally oriented.

c) This variable is a composite index based on the factor analysis presented in Table 4.5 (first factor). Positive numbers indicate higher perceived effectiveness than the average of all respondents.

Source: Membership questionnaire.

The federation has two different and relatively distinct types of relationships with members. The federation's staff is in close, frequent, informal contact with a relatively limited segment of its membership, primarily the leaders of important member groups. LMF contacts with key environmentalists (and staff contacts with the council) are typically on a colleague basis, mutually sharing information and insights, participating in advocacy coalitions on particular issues, etc. One colleague of the LMF described the relationship in this way:

"I find Lee (Botts) a very useful contact in any number of different fields. She is a tremendously knowledgeable person; she keeps her finger on the pulse very well; (she) knows what is going on. I think that is the chief value that I have had in my relationship with Lee, and to a lesser extent with the other staff members: learning what is going on; in a sense divying up responsibility for who goes to what meetings, making common judgements of what is of importance and what isn't of importance, and this sort of thing. That is, I have found, more useful than the formal kinds of activities of the federation."<sup>22</sup>

TABLE 4.14

MEMBER CONTACTS WITH LMF AND ACTIONS TAKEN AS A  
RESULT OF LMF CONTACTS, BY RESPONDENT TYPE

Item <sup>a</sup>	Total (N = 204)	LMF Council <sup>b</sup> (N = 20)	Key Env't'l Leaders (N = 51)	Other members, Organization Officials (N = 64)	Other Members Individuals (N = 69)	F
<u>Contact With LMF</u>						
Personal; telephone	.93	2.70	1.71	.55	.20	61.1
Written correspondence	.74	2.45	1.24	.44	.17	44.7
Met at hearings, etc.	.69	1.80	1.16	.47	.23	31.7
Total contacts <sup>c</sup>	2.36	6.95	4.10	1.42	.61	61.8
<u>Actions Taken as a Result of LMF Contacts</u>						
Wrote letters; sent telegrams	1.52	2.05	2.10	1.42	1.04	12.5
Telephoned/spoke with decision maker	1.09	1.95	1.78	.84	.55	23.1
Participated at hearings, etc.	1.18	2.00	1.76	1.18	.55	22.5
Total actions <sup>d</sup>	3.80	6.00	5.65	3.45	2.12	27.5

- a) The reported means (averages) are not the absolute number of contacts or actions, but means of scale categories. The scales are:  
 Type of contact (past 12 months): 0 = 0-1 yr; 1 = 2-5 yr; 2 = 6-11 yr;  
 3 = 1-3 mo; 4 = 1+ wk.  
 Type of action (past 12 months): 0 = Never; 1 = Rarely; 2 = Occasionally;  
 3 = Frequently.

Note that the scoring procedure dampens differences in absolute amount of contact; for example code "2" would average about 8½ contacts per year, while "4" would be 52 or more contacts.

- b) LMF staff excluded since responses would be meaningless and misleading.  
 c) Composite index of contacts: Total contacts equals the sum of the codes for the first three types of contact.  
 d) Composite index of actions: Total actions equals the sum of the codes for the first three types of action.

Source: Member questionnaire.

For these key environmentalist members the LMF is a very valuable advocacy partner, and in activities like coordinating citizen participation, environmental education, and sponsoring research detract from the LMF's value to them because they are not as directly useful to them.

In interview situations, key environmentalist members offer a variety of reasons for LMF usefulness. First, as with government officials and the press, key environmentalists perceive the personal competence of the staff, particularly Botts, as a major reason for LMF usefulness. Second, the LMF is seen as having specialized interests, which allow other environmental groups to concentrate on other areas because the LMF is handling functions that they need not cover. From the point of view of the LMF, this perception of specialization may be more of a debit than a benefit. For example, since other key environmentalists know that the LMF specializes in the NPDES program, their feeling is, essentially, "Let LMF do it." This means that they are not inclined to become involved in the permit program, via such things as the WQTI workshops. The federation's citizen participation work seems to fall into this category. Since the LMF specializes in this type of work, other environmentalists do not have to bother with things like public information. In addition, the fact that the LMF is organized to disseminate information (e.g., has an existing mailing list) means that other groups do not have to invest organizational resources to get a message out to a wide variety of citizens.

The bulk of the federation's membership, however, do not have the close, informal relationship that key environmental leaders have with the federation. The Bulletin is the main contact with the federation of the regular member. If members are directly participating in issues, their participation is probably the result of mass mailings like the Alerts. A number of unsolicited, marginal notes on the questionnaire indicated that regular members view the Bulletin very favorably, perhaps in part because it is a more important source of information for those not as highly involved on issues as key leaders. For these members, the primary benefit of the LMF is the knowledge of the staff, which is continuously abreast of developments the ordinary member would not normally be cognizant of. It should be pointed out that for some members the LMF Bulletin is an important source of information, but not the only source of information.

The style of LMF operations influences regular members' perceptions of LMF effectiveness, particularly political effectiveness. Because of the federation's informal, insider method of dealing with government officials, only people who have actively participated with the LMF on issues know about the federation's effectiveness. The regular member, who knows about the LMF primarily through the Bulletin, has only a dim perception of LMF effectiveness. For obvious reasons of propriety, the LMF does not use the Bulletin as a public relations sheet; when a decision is reached which represents a victory for the LMF, the Bulletin will usually refer to the decision as a "victory for environmentalists." (Of course, as pointed out in Chapter III, this perspective of the influence of the movement, rather than of one particular group, is probably the more correct perspective in any case.)

In short, the LMF appears to be very successful in working with the most active segment of its constituency, the key environmentalist leaders, but not quite so useful to the rest of the federation's membership. Since the success of the federation's relationships with key environmentalists is based on close, informal, personal contacts, this differential pattern of success is understandable: staff time is a fundamental constraint which makes it unlikely that the federation could have intimate contacts with all 400+ members. Given that the federation can only have contacts with a relatively restricted set of colleagues, the key environmentalists are logically the people the LMF will deal with, since they are

already highly active (do not require mobilizing) and contacts with them will be more of a benefit to the federation than contacts with less active and informed members.

Aside from differences between LMF people, key environmentalists, and other members, there are no other (statistically) significant differences in respondents' views of the federation. Specifically, respondents' geographic locations (either distance from Chicago or state of residence) did not significantly affect responses on issue involvement, activity, or overall evaluations of the LMF.

#### FINANCES AND THE LMF MEMBERSHIP DEVELOPMENT PROGRAM

The federation's membership development program is concerned with a basic problem of voluntary associations -- money. It has little to do with the LMF's primary policy goals, except in a negative sense (that is, as an "extraneous" demand on the political staff's time).

The LMF has a pressing need to expand its membership financial base because its foundation funding, on which it depends heavily (84% of its income in fiscal 1973; Rome and Zeitlin, 1974), is eroding. This erosion has three main causes. First, foundations traditionally award grants to organizations like the LMF as "seed money," expecting the organizations to develop an independent financial base after a few years of "getting on their feet." Since the federation has been in existence for three to five years (depending on when one wants to define the federation's official starting date) the LMF can no longer rely on foundation "seed money." Furthermore, the federation has tended to rely on a small number of Chicago foundations (plus, of course, the Ford Foundation) for funding; that is, the federation has been going to the well too often. Second, the federation's heavy dependence on foundations has resulted in the LMF's being threatened by the IRS with reclassification as an "operating foundation." Foundations are reluctant to award grants to "operating foundation" because such grants lead to increased reporting and accounting requirements and present the donor foundations with unwanted tax complications. (Reclassification to "operating foundation" status, however, would not affect the federation's 501(C)(3) tax status.) Third, foundations have been generally decreasing their grants to all organizations because of the falling stock market (Egelhof, 1974). Also, because of the financial difficulties of its parent corporation, CNA a long-time LMF funding source which has contributed about 10% of the LMF budget, will apparently not be supporting the LMF in fiscal 1975. Because of these threats to the LMF's foundation financial base, the LMF has been forced to attempt to increase membership through a "membership development program."

The LMF is attempting to increase its membership revenue (individual and group) at a difficult time. There are three primary difficulties. First, environmental group membership nationally appears to be either stagnant or slightly decreasing after the period of rapid expansion from 1970 to 1972. Second, the current economic situation, combining inflation with recession, has rapidly attacked personal discretionary income (that part of an individual's income from which voluntary association dues would come). Third, since member environmental groups face the same financial problems as the LMF, the LMF can not greatly increase its income by raising member group rates (that is, by graduating its currently flat dues structure).<sup>24</sup>

Before the membership development program was organized, the major systematic emphasis of the LMF's fund-raising activities was on foundation solicitation, and Botts is very successful in this area. Other financing efforts were, however, much less systematic, and met with rather mixed success. For example, a benefit concert ("Playing for Keeps," featuring pianist Jeffrey Hollender and harpist Edward Druzinsky) held September 14, 1973, was a marginal money-maker, but consumed a huge chunk of staff time.

The federation formally organized a membership development program in late 1973. The first step in the program was to hire a staff person for development, Mary Morris; an acquaintance of Botts', Carol Beckenstein, volunteered to act as a consultant. The second step was to organize a development advisory committee composed of fourteen Chicago-area people with good business connections. During the first several months of the program, Morris has focused on a number of tasks:

- (1) organizing the rather chaotic LMF membership records, in particular systematizing membership renewals;<sup>25</sup>
- (2) providing most of the stations in Chicago and the other cities around the lake with a commercial, the intent of which was to stimulate membership enrollment;<sup>26</sup>
- (3) sending out a series of mailings soliciting memberships to the 1000+ nonmember recipients of the Bulletin and to 1500+ individuals on lists supplied by a variety of sources (e.g., LMF council members).

The LMF has also attempted, through the development advisory committee, to obtain increased support from corporate donors.

While this study has not attempted to evaluate the LMF's membership development program in any systematic way, primarily because the author has no particular competence in this field, one thing is clear. The program has not as yet begun to show a profit; that is, the increased revenues which the program has generated so far have not been sufficient to cover the personnel costs of the development director, Morris.

#### SUMMARY

The LMF's relationships with the press and other media are important to the federation's advocacy and general public information roles. Because of the journalistic competence of the staff and because of the media perception that the LMF is a legitimate representative of environmental interests, the federation has been accepted as an important source on environmental issues by environmental reporters in Chicago. This has allowed the LMF to obtain good public exposure of its positions, even though the federation is not always directly credited in individual news stories. This success, however, is most noticeable in the Chicago media market.

Federation staff members devote considerable time to other public information activities, such as sponsoring workshops and conferences, making speaking appearances, and responding to individual requests for information, and are quite competent in these activities.

The overall evaluation of the LMF by its members is quite favorable, and members tend to perceive LMF issue involvement and operating activities to be about what they should be. The major finding about LMF members is that the LMF

has a different, and in a sense "better," relationship with a small set of key environmental leaders than it has with regular LMF members. LMF contacts with key environmentalists are typically on a colleague basis, while contacts with regular members are more routinized (the Bulletin) and infrequent. Because of the difference in relationships, regular members do not appear to appreciate the federation's effectiveness nearly so much as key environmentalists do.

In conclusion, the federation's performance in the area of citizen participation is somewhat more mixed than its performance in direct political advocacy activities. The federation does a number of things very well, including working with the media and working with key environmental colleagues. However, in some ways the LMF's performance has fallen short of its stated goals.

First, the direct payoff of a number of activities, such as sponsoring conferences and workshops and responding to informational requests, seems questionable in terms of either realizing the LMF's public policy goals or bringing about wide-spread public awareness of and participation in issues.

Second, the bulk of the LMF membership is less effectively served than are key members. However, this differential effectiveness is understandable, expectable, and in fact quite common among voluntary associations. It is very difficult to mobilize large segments of the population to direct action, even if they are sufficiently sympathetic to a cause to formally join an organization. Without having any really systematic evidence to support this point, it seems that members in a sense "pay" the federation to save the lake for them. That is, even though the LMF is committed to citizen participation, it--and its key colleagues--have ended up participating for citizens.

#### FOOTNOTES TO CHAPTER IV

1. Author interview.
2. Author interview: Reporter.
3. *Ibid.*
4. *Ibid.*
5. Source: Author's clippings file. There may be a slight variation between reported number of news items and actual total items since the clippings were taken from the home editions of the papers. News articles, advertisements, letters to the editor, and editorials are included in the totals.
6. Kotulak (1974). Interviewees carefully noted that they "can't prove" the second article was the result of Botts' criticism; however, they do in fact believe it was. After the article, Botts wrote a very complimentary article to the Trium editor (which was, of course, printed) praising Kotulak's previous article.

7. Source: Conservation Foundation memoranda on the 10 regional WOTI, February 12-May 23, 1974; thanks to CF's Jeannette Brinch for making the evaluation memoranda available. It should be noted, however, that these reports appeared to be designed for use by consultants to improve future institutes, and generally accentuated the positive aspects of the workshops. The reports were based on the impressions of the CF coordinators. A more detailed follow-up evaluation, focusing on citizen action stimulated by the workshops, will be prepared in the near future.
8. The follow-up evaluation (see footnote 7) will of course evaluate this question more systematically.
9. Author interview.
10. That is, public information activities are a "responsibility" of the LMF's 501(c)(3) tax status.
11. An inspection of response rate to the questionnaire indicates, however, that there was a tendency for organizations to have a higher response rate than individuals. The overall response rate for LMF members was 47%, while the response rate for identifiable organizations was 59%.
12. See Osgood et al. (1957), the seminal presentation of semantic differential methodology.
13. Factor loadings are the correlation between the factors and the variables, and the regression weights of the variables in terms of the common factors. Factor loadings range from +1.0 to -1.0; +1.0 is perfect positive correlation, 0.0 is no relationship, and -1.0 is perfect negative correlation. See Nie et al. (1970, pp. 208-218) or Mallock (1960, pp. 383-389) for good brief descriptions of factor analysis (including eigenvalue and percent of variance).  
  
Technical note: The factor analysis solution presented in the table is an orthogonal, varimax rotation; the two-factor solution was selected on the basis of largest decrements (size of decrease) in eigenvalue (the solution also represented the conceptually neatest solution); items were excluded from the factor analysis on the basis of low communality (lack of high correlation with other semantic differential variables); before rotation, the first two factors had eigenvalue of 5.62 and 1.68, accounting for 52.1% cumulative variance.
14. The mean difference is slightly different from the difference of the means as reported in Table 4.4. This is because fewer respondents answered both items than answered either of the items separately. Because of the different sample size, the mean of the difference differs slightly from the difference of the means.
15. All of the differences between means on individual domination, moderate-radical, flexible, and national-local are statistically significant at the 5% level.

16. The percentages of respondents who ranked "LMF Does" and "LMF Should Do" the same are:

Water pollution	61.2%	Air pollution	44.5%
Power plant siting	59.3	Natural area preservation	44.0
Thermal pollution	57.4	Solid waste disposal	43.5
Nuclear safety	56.5	Land use planning	43.5
Erosion	55.0	Energy conservation	41.6

17. See the text, page 83, paragraph 2 and footnote 15, above, for a description of factor analysis.

Technical note: this factor solution is also an orthogonal, varimax rotation; no items were excluded from the analysis; before rotation, the first two factors had eigenvalue of 2.95 and 1.80, accounting for 29.6% and 18.0% of the variance.

18. Author interview.

19. See the text, page 83, paragraph 2 and footnote 15, above, for a description of factor analysis.

Technical note: orthogonal, varimax rotation, no items excluded, eigenvalue of the first two factors before rotation equal 3.14 and 1.37, accounting for 34.9% and 15.2% of variance.

20. This category was constructed from the "special handling" mailing category; see Appendix D, especially on response rate. Members were placed in this category because they were known by the author to be "important"; it was possible that the author's perceptions of their importance were colored by his experience with LMF. If so, findings like Table 4.14 (high contacts with and actions taken by key environmentalists) would be circular.

21. In addition, in a number of important issue areas (e.g., land use planning) the standard deviations of other members' responses were higher than key environmentalist and LMF respondents'.

22. Author interview.

23. This is called "509" status, after section 509 of the Internal Revenue Code.

24. Current dues are \$10 for both groups and individuals. The LMF does have several other dues rates (contributing, \$25; donor, \$50; patron, \$100; student, \$5), but these categories are voluntary additions to dues.

A "flat" rate structure is one in which the same rate applies to all classes of members (or customers, taxpayers, etc.). A graduated rate charges different rates; in the LMF there have been recurring proposals to charge member groups higher dues than individuals.

The standard rebuttal is that lost revenue from dropped memberships tends to offset increased revenue per membership.

The previous section suggests at least one good reason for a graduated dues structure--groups, especially key groups, tend to receive better "service."

from the LMF. On the other hand, the LMF has never really "sold" its services, since the LMF provides services to members and nonmembers alike; in economic terms, this is called the "free-rider" problem.

25. This may seem like a trivial problem. However, one interviewee claimed to have half a dozen acquaintances who had not received a LMF membership renewal notice in three years of membership.

As of August 6, 1974, the LMF still had a substantial number of unrenewed members, with some 30% of formally designated members in arrears on dues. The most notable problem area is individual Michigan members, as the following table illustrates.

PERCENTAGE OF LMF MEMBERS WHO ARE  
IN ARREARS ON DUES

Location of Member

<u>Member Category</u>	<u>Ill.</u>	<u>Mich.</u>	<u>Ind.</u>	<u>Wisc.</u>	<u>Other</u>	<u>Total</u>
Individual	24%	51%	32%	32%	(55%)	33%
Group	35	13	14	37	(0)	27
Other	(0)	(25)	(33)	(25)	(20)	26
Totals	25%	43%	24%	33%	40%	30%

See Table 1.1, page 84 in the text for total number of LMF members in each category.

( ) indicates categories with less than 5% of total LMF membership.

Source: LMF membership files, as of August 6, 1974.

26. The commercial was a shrinking closeup shot of a shoreline, with narration about the problems of eutrophication and the "Fate of Lake Erie." It was developed by Lee King & Associates, produced by Chicago's WBBM-TV (CBS), and funded by Standard Oil Company (before the LMF made a major commitment to energy conservation). Interestingly, WBBM was the only Chicago station to decline to run the ad as a public service, claiming that its content was "too controversial."

## V. LAKE MICHIGAN FEDERATION LEADERSHIP

The leadership of the LMF can be divided into two branches: the LMF's chief executive and functional leader, Executive Secretary Lee Botts, and its governing body, the Executive Council. (After October 18, 1974, the council will be renamed the Board of Directors.) This chapter will examine four aspects of LMF leadership: (1) leader selection (recruitment); (2) the nature of the relationship between the Executive Secretary and the Executive Council; (3) the apparent reasons for this relationship; and (4) the implications of this relationship.

### RECRUITMENT

Since Lee Botts has been, is, and will be as long into the foreseeable future as she wishes to be, the federation's Executive Secretary, this discussion of leadership recruitment will be limited to the method of selecting council members. Formally the council is elected by the federation's membership (before the constitutional revision, by member groups only). However, since council members are routinely elected from an uncontested slate of nominees, the important aspect of LMF council recruitment is the method of nomination.

The slate of nominees for council seats is proposed by a nominating committee composed of LMF Executive Council members (in 1973, four nominating committee members). The committee has tended to follow the guidance of the Executive Secretary in nominating council members. Nominees are chosen from:

1. Representatives of major regional affiliates of the federation;
2. Persons with technical expertise in subject areas of concern to the federation;
3. Representatives of interests and/or organizations who share common interests with the federation, especially representatives of organizations who have worked closely with the federation on issues."<sup>1</sup>

The first category includes representatives of groups such as the Four-State Interleague Group of the LWV, and NOREC. The second and third categories involve some discretion, and Botts plays a crucial role in selections from these categories. Certain people have been constant council members, some from the first meeting of the Lake Michigan group advisory committee under the Open Lands Project, and are more or less *de facto* permanent council members.<sup>2</sup> The remainder of the nominees are essentially replacements for inactive council members<sup>3</sup> or, especially in the 1973 nomination/election when the council was expanded from 21 to 28 seats, additions to the council.

In nominating council members, Botts and the nominating committee attempt to (1) balance the council to reflect the approximate distribution of federation membership, both geographically and in terms of issue interests; and (2) coopt important potential key members into active involvement in the federation. Potential council members' availability is also an important consideration; in many ways the process is not so much a nomination as a determination of which potential candidates

are willing to be drafted. Determination of willingness is in many ways the most important part of the process, and it is the part in which Botts plays the crucial role. In the past two years the nominating committee has played a more important role, although Botts still is the most important figure. In any case, the process is still one in which the LMF leadership recruits new leaders, rather than a process by which the LMF membership sends representatives to the federation.

#### RELATIONSHIP BETWEEN COUNCIL AND STAFF

The most important function of the Executive Council has been to formally associate key environmental leaders with the federation. Most of the direct contacts between council members and the LMF staff are in connection with advocacy activities on specific environmental issues. Council members are the most important links in staff communication to local LMF members and to the larger set of local environmentalists who are not LMF members, as well as the most important partners of the staff in advocacy coalitions. As noted in previous chapters, the inclusion of important technical specialists on the council formalizes the LMF relationships with several broad classes of specialists. In short, council members are the most important (to the LMF) of the "key environmental leaders" discussed in Chapter IV.

The formal role of the council is to act as a policy-setting body for the federation, particularly in terms of setting priorities for the staff. This is not only the official function of the council (as stated in the LMF Constitution) but also the primary explicit role attributed to the council by members themselves. One LMF council member put it this way:

"The Executive Council provides the direction for the federation. It provides guidance on policy. And that is a recurring question because environmental issues are so broad, and you have to constantly evaluate and reevaluate how we can serve the special interest in Lake Michigan and adjacent lands, and be able to separate those issues that are really appropriate for our concern from those that are not."

However, discussions about LMF policy tend to be initiated by Botts. She sets the agenda of council meetings. She reports on staff activities including commitments which had to be made quickly and therefore without full council approval, and identifies problems or issues which the organization could possibly address in the future. However, after initiating an agenda item, Botts by no means "manages" the council so that her personal preferences are ratified by the council. The council serves as a sounding board for Botts' ideas, not as a rubber stamp. (The discussion below of "council policy issues" amply demonstrates several areas in which Botts has not been able to obtain council support for programs she advocates.)

Formal council meetings are only one facet of the relationship between Botts and the council. Between meetings Botts sends the council members more-or-less monthly memos relating the staff's activities, organizational problems, etc. Informal, one-to-one contacts (usually over the phone) are a more important and more frequent type of contact. Often discussions of LMF policy questions are secondary topics, which take place within discussions of substantive environmental issues. Botts most frequently contacts the LMF president (during the course

of the study, Harold Olin), who acts as an informal representative of the whole council. She typically calls Olin and/or other council members to obtain their reactions to her proposals on policy questions which require an immediate answer. For example, if the federation staff feels it should make a commitment to lobby for a specific piece of legislation, Botts will check with Olin to see if he feels the issue is sufficiently important to commit part of the federation's limited lobbying time. In short, personal informal contacts serve the same function as formal meetings; they are sounding boards for Botts to obtain council members' reactions to her proposals.

Council members generally recognize that they are not actively controlling the federation, but are in the passive position of responding to staff initiatives. They acknowledge this relationship and express a desire for a more active council role, stating that "the council has to bring more issues to the staff."<sup>4</sup>

While the overall policy choices of the federation have been set by council agreement (or disagreement) with staff initiatives, the day-to-day management of the federation's affairs are primarily a responsibility of the Executive Secretary with some consulting assistance from Norris Love, a management professor. Although management duties include a variety of tasks (personnel management and supervision, budgeting, supervising accounting, etc.), perhaps the most crucial management problem has been fund raising. Fund raising from nonmembership sources has been almost solely Botts' responsibility.

Staff responsibility for organizational management is both a common and an appropriate arrangement: the staff is intimately familiar with routine and extraordinary business questions. Furthermore, fund raising, particularly from foundations, requires the participation of the head of the fund raising organization. However, Botts defines this responsibility as a "problem" because she experiences the very common and natural frustration of a professional who is forced to spend a great deal of time on organization management. She views time spent on management as an "interference" with her preferred activities in pursuit of the LMF's primary political missions. At one point during the course of the study, Botts had to devote herself full-time for about a week to an accounting of the federation being conducted by the Ford Foundation, the federation's most important funding source. Another time she was forced to devote considerable time to an IRS investigation of the federation's "operating foundation" status.<sup>5</sup>

This pattern of staff-centered leadership is not the result of aggrandizement by Botts, but of a disinclination by a majority of the council to increase its control of the organization. Botts argues convincingly that she has a strong preference for increased council control of the organization.

#### The New LMF Constitution and By-Laws

The new federation constitution, which will formally take effect October 18, 1974, makes three basic changes in the official structure of the federation. First, the Executive Council is renamed the Board of Directors. The basic authority of the new board is the same as the authority of the old council. Second, the new constitution creates an Executive Committee composed of the federation's officers, plus other members of the board as needed "to provide adequate representation of either geographic areas or policy interests."<sup>6</sup> (It is expected that, in practice, "members as needed to" will be interpreted as "members who wish to.") The committee will function as a policy-setting

and interpreting body between regular board meetings; provision is made in the constitution for informal (e.g., telephone) consultation between the Executive Secretary and the Executive Committee. Third, the revised constitution eliminates the distinction between group and individual membership; both individual and group members are entitled to vote for the new Board of Directors. (In addition, board elections are to be conducted by mail ballot.)

These changes bring the LMF constitution into conformance with recent LMF practice. First, renaming the Executive Council the Board of Directors clears up the rather minor confusion of the old structure in which the Board of Directors was a largely mythical electoral college. The second change formally designating an interim policy body is somewhat more important because it formalizes what had been an informal process of consultation. Third, while the federation has had closer, informal, personal ties with key environmental leaders, particularly key group leaders (as discussed in Chapter IV), than with ordinary members, no legalistic distinction has been made between member groups and individuals in terms of LMF service. This minor procedural change is also appropriate because the federation is currently attempting to increase its membership significantly, which implies increasing individual memberships.

### Council Policy Issues

Federation policy includes, basically, deciding in which issues and decisions the federation will become involved. In almost all cases Botts initiates the involvement. She decides which activities the staff will participate in -- participating in a hearing, phoning decision maker on some public policy matter, etc. She also initiates the more major LMF commitments. The primary importance of the council in LMF policy setting has been to act as a restraint on some of Bott's initiatives.

During the course of the study, on three fairly significant policy questions the council resisted the initiatives of the federation's staff (Botts). The question which recurred most frequently was whether the federation should officially expand its focus to encompass the entire Great Lakes region. This is a perpetual agenda item; as noted in Chapter I, it was raised at the very first meeting of the advisory committee to the Lake Michigan group of OLP. Botts has raised this question as an agenda item at four of the five council meetings held during the course of this study. Her argument is that (1) many of the issues on which the federation works are not geographically restricted to Lake Michigan, but have implications for the region as a whole, and (2) decisions are made on these issues by governmental officials located outside of the Lake Michigan basin, as, for example, the International Joint Commission and the Great Lakes Basin Commission. Therefore to "save Lake Michigan" the federation must address issues more broadly, in effect attempting to save all the lakes.

The council has consistently resisted Botts' attempts to expand the geographic focus of the LMF. It seems to feel that the LMF focus on Lake Michigan is an important strength of the organization: while the LMF approaches issues in a comprehensive fashion, its interests are seen as distinct and identifiable (especially by governmental officials) because of its systematic focus on one geographic resource. A secondary council concern is that it would be exceptionally difficult to develop an organizational base (i.e., membership) over such a large area.

The conclusions reached in Chapters III and IV also suggest that it would be much more difficult for the LMF to maintain its high degree of effectiveness if it expanded its focus beyond Lake Michigan. That is, it would be much more difficult to operate in an insider, "informational" style with decision makers and in an informal, personal way with environmentalist colleagues since these people would be farther from the LMF's Chicago office.

The council told Botts that she is free to pursue any issue which affects Lake Michigan, even if the decisions are made on regional level. Of course this is what the LMF has done anyway; one major example, the thermal issue in the past year has been contested on a national level, with the LMF seeking to influence U.S. EPA's rule making under section 316 of the Water Bill.

Environmental education is the second organizational policy question on which the council has resisted staff initiatives. At three of the five council meetings during the course of the study, Botts attempted to obtain council approval for a LMF program of environmental education. One possibility discussed was for the LMF to operate an environmental education center in conjunction with the National Park Service facility at the Indiana Dunes National Lakeshore. A major consideration behind this proposal seems to be that environmental education programs can be marketed to funding sources, particularly corporations, more successfully than can general operating proposals for what is essentially political advocacy. While there has been somewhat more support for an educational program within the council than there has been for a geographic broadening of LMF involvement, the council as a whole has resisted an educational program as a dilution of the federation's "advocacy role."

The third staff initiative which the council has resisted was a proposal to increase LMF involvement in issues not directly related to the lake. Two main types of issues have been advanced by Botts as possible new involvements: (1) increased emphasis on air pollution questions; and (2) increased emphasis on other (and as far as the author can determine, general) "urban" environmental problems. (The only example of the latter type of issue discussed thus far is garbage disposal, which, if not handled promptly and properly, leads to vermin infestation in low-income areas of central cities.) Two primary motives for suggesting these issues are: (1) to increase LMF individual membership, the LMF will have to address issues more personally relevant to a larger segment of the population, and (2) addressing these sorts of issues will allow the LMF to be more responsive to a working-class, and particularly black, constituency (that is, it will allow the federation to counteract the embarrassing image of environmentalism as an upper- or middle-class social movement). For example, the conventional wisdom among environmentalists is that, to appeal to residents of Gary, an organization would have to focus on air pollution, which is the issue in Gary. The LMF feels that it has fewer Gary members than it should, given the geographic proximity of Gary to Chicago. The question of adding new substantive issues to the LMF's agenda has not been as systematic and regularly advanced by Botts as have the education and geographic expansion ideas; in any case, the council has resisted those advances that have been put forth.

While each of these issues has specific pros and cons, all three seem to reflect an underlying tension between Botts and the council. Botts is basically restless. After five years of organizing the federation and working on essentially the same set of broad policy issues, she wants to move on to new and different

fields -- she wants to avoid, as she puts it, "becoming bureaucratized." The council, on the other hand, recognizes the value of the LMF's previous work and recognizes that, on most of these issues, the job is not yet completed. In addition, as has been pointed out several times in this report, there are definite advantages to a consistent, logically integrated, precise focus on issues. Because the LMF has hardly been stagnant, Botts' attempts to obtain an "official" reinforcement for new programs is further indication of her restlessness. During the course of the study, the federation has increased its commitments to land use planning and energy conservation (e.g., via the Mann Committee staff contract and Botts' participation in the Ford Energy Policy Project advisory committee). Both of these commitments are logical extensions of past LMF work, but both are also quite distinct issues (that is, distinct from opposition to shoreline erosion control structures or to individual nuclear power plants) and both are in the forefront of crucial environmental issues.

#### REASONS FOR STAFF-CENTERED LMF LEADERSHIP

To summarize the points made in previous sections:

- (1) The Executive Council (board) is essentially recruited by Botts;
- (2) The primary behavior of the council has been to formalize working relationships between the staff and local environmentalists active on LMF issues;
- (3) Botts has almost always set the agenda of council meetings, and is almost the only proponent of new LMF program commitments;
- (4) The primary policy impact of the council has been to restrain Botts from expanding or shifting the substantive or geographic focus of the federation;
- (5) Botts has almost sole responsibility for the daily management of the federation.

In short, the LMF is characterized by a staff-centered leadership. This is not unusual among voluntary associations, and particularly among environmental groups. Nonetheless, the central role of the Executive Secretary is described as a "problem" both by Botts and by the council. At the very least, it is seen as an ironic failure of a citizen participation organization to function in a fully participatory manner.

There are a number of apparent reasons for this pattern of staff-centered leadership. First, the lack of closure at council policy discussions is a minor procedural problem. Council meetings (and informal, one-to-one conversations) are typically very open-ended. Proposals are often made and discussed, but are often not definitively resolved. The "resolution" of the environmental education proposal discussed above is a good example of this lack of closure. At the November 17, 1973, council meeting, the proposal was discussed at great length. During the course of the discussion the council passed a resolution that Botts should, in effect, "explore the matter further." A resolution which leaves policy questions unresolved does have a value: it allows the council to resist proposals without formally voting down a fellow board member's point of view. Since the council contains representatives of some rather heterogeneous points of view on a number of issues, the potential exists for disruptive or rancorous disagreements. A lack of closure in policy debates can be a very helpful tool for

avoiding conflict. However, it also results in rather aimless, unproductive and frustrating council meetings.

Second, not all members of the council are fully active in the federation's affairs. While attendance at council meetings is not the only important type of participation, a tabulation of council members' attendance at meetings is a good indicator of council member activity in the federation. An average of 12.2 council members attended the five council meetings held during the course of this study. (For those interested in such things, note that the average attendance is less than a quorum.)

Table 5.1 ATTENDANCE AT LMF COUNCIL MEETINGS  
Number of Meetings Attended

Number of council members	None	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	All 5
		4	7	5	5	6

ATTENDANCE AT COUNCIL MEETINGS<sup>a</sup>, BY MEMBERS' STATE OF RESIDENCE

State	# Council Members	# Meetings Attended	Average Meetings Per Member	Attendance Rate <sup>b</sup>
Indiana	7	25	3.5	72%
Michigan	5	11	2.2	44%
Illinois	9	14	1.5	31%
Wisconsin	<u>7</u>	<u>10</u>	<u>1.4</u>	<u>29%</u>
Total	28	61	2.2	44%

Average Attendance Per Meeting = 12.2 Members per Meeting

a) Council meetings of 10/11/73, 11/17/73, 1/26/74, 4/6/74, and 6/1/74. Includes two council members who sent alternatives to the 11/17/73 meeting.

b) Attendance rate =  $\frac{\text{\# Meetings attended}}{\text{Max. possible meetings attendable}}$ ; "Max. possible meetings attendable" is the number of council members times five meetings.

Source: LMF Council minutes.

During the course of the study four members attended no meetings of the Council; only one, Helen Bieker of the AAUW, attended all meetings. All members who attended three or more of the meetings, and all but one of the members who attended two meetings, are generally active in federation affairs. In other words, only about 16 of the 28 council members are fully active in the federation. As Table 5.1 also shows, Indiana council members are the most active group of council members; as noted earlier (in Chapter I) most of these Indiana council members are closely related to the Save the Dunes Council, as was the LMF Executive Secretary, Lee Betts.

Third, the positions of many members of the council contain some degree of conflict of interest. Most of the council members are leaders of at least one other organization which has their primary loyalty. This organizational conflict of interest has only very rarely led to situations in which council member faces conflicting interests on an organizational policy issue. The only such substantive conflict of interest which arose during the course of the study, in which council members refused to do something for the LMF because it might potentially violate their primary loyalties, involved the LMF membership development program. At the January 26, 1974, council meeting, LMF's Morris proposed that council members supply her with lists of potential LMF members. Several council members said that they could not supply lists of their own organizations' members because they did not want to risk people dropping membership in their organizations to join the LMF. A more common problem is the time demand of leadership in a number of organizations. As noted in Chapter I (footnote 19), the average LMF council member is active in about six organizations; also, of course, most are employed full time. Thus, for most council members, while LMF leadership may be an important commitment, it cannot receive the bulk of their attention; a smaller number of council members, do not seem to give the LMF any of their time. In addition, most members of the council seem to be more interested in using the LMF as an advocacy colleague than in controlling the organization.

Fourth, the same qualities which make the federation's Executive Secretary, Lee Botts, very effective in representing the federation to decision makers (energy, aggressiveness, knowledge, etc.) make it very easy for the council to abdicate control of the organization to her. As one member of the council put it:

"Lee is doing such a good job, you do not want to say 'don't do such a good job,' so that other people are forced to give in and take things up."<sup>8</sup>

#### IMPLICATIONS OF STAFF-CENTERED LEADERSHIP

In a review of the academic literature on organizational effectiveness, Price (1968) advances three propositions which are relevant to LMF leadership functioning. Those propositions can be summarized as follows:

- i) Organizations in which decision making is performed by occupants of positional authority roles are more likely to be effective than organizations in which decision making is of a charismatic type;
- 2) Organizations with high centralization of decision making are more likely to be effective than organizations with low centralization;
- 3) Organizations which practice cooptation, particularly major elite cooptation, are more likely to have higher effectiveness than organizations which do not practice cooptation.<sup>9</sup>

Price defines effectiveness as an organization successfully attaining its goals (see Mohr, 1974, on the question of goals and organizational effectiveness). In the first proposition, the difference between decision making by "occupants of positional . . . roles" and by "charismatic" leaders is that leadership in

the former is vested in a position or role, while in the latter leadership is a function of the personal qualities of an individual. This distinction closely parallels Weber's (Gerth & Mills, 1946) contrasting of "bureaucratic" (role-occupant) and "charismatic" organizational structure. In the third proposition "cooptation" means recruiting people into the organization to increase support for the organization; the "major elite" are the most important decision makers in some referent environment.

Price's propositions suggest that the LMF's pattern of leadership interrelations is likely to be conducive to organizational effectiveness.

LMF leadership is a mixture of bureaucratic and charismatic decision making, (viewing Lee Botts as the primary decision maker in the organization). While the Executive Secretaryship is certainly a "positional authority role," much of Botts' influence in the organization is attributable to her "charismatic" qualities. Price (1968, p. 59) notes that a certain amount of charisma is required for effectiveness, as long as decision making is carried out by occupants of positional roles.

Price's second and third propositions demonstrate the theoretical effectiveness of the LMF leadership structure more clearly. The centralization of LMF decision making in Botts allows for a good deal of flexibility in responding to public-policy developments. (Several interviewees mentioned this as an important factor in LMF political influence, particularly in terms of getting LMF positions into the media in a timely manner without having to clear positions with many other decision makers in the organization.) Centralization also gives the LMF a personality by whom the media, government officials, and private organizations can identify the federation. Lastly, it allows the federation to follow a reasonably cohesive, integrated policy.

The federation does practice cooptation, as the section above on recruitment suggests. While the federation does not attempt to coopt representatives of its most important target group, the government, it has consciously and successfully sought to obtain the support of other key environmentalists by formally associating them with the federation (by making them council members). This is a classic example of what Price calls "major elite cooptation," and the LMF has used it very effectively to institutionalize staff communication with local environmentalists.

While the federation's pattern of semi-charismatic, centralized, coopting leadership is conducive to organizational effectiveness under current operating conditions, it does present one major problem. The organization and its effectiveness are very closely tied to Botts' leadership. As mentioned above, Botts appears to be restless about "being in a rut" working on the same Lake Michigan issues, and appears to be frustrated by the "interference" of organization management, particularly fund raising, with her political advocacy activities. Her charismatic centralization of leadership has meant that alternative, institutionalized sources of leadership are only very weakly developed in the federation. If Botts were to leave the federation, the LMF would undergo a substantial change. To maintain its present level of effectiveness, either the LMF would have to recruit a new Executive Secretary with Botts' talent and skills or the council would have to significantly increase its role in the organization. Even if the LMF could recruit a sufficiently talented replacement for Botts, the style of the LMF's operations would probably still be quite different.

FOOTNOTES TO CHAPTER V

1. Memorandum, Lee Botts to members, Lake Michigan Federation, "Report of Nominating Committee," September 13, 1974.
2. This key group includes LMF President Olin, past President VanLaanen, officers Norris Love and Donna Asselin, and council members Helen Bieker, Jonathan Ela, Ted Falls, Gerald Lindquist, Thomas Murphy, and Louise Rome.
3. For example, council members dropped for failure to attend meetings. In addition, a number of council members are rotating representatives of member organizations. Two of these rotating representatives should be considered among the de facto permanent nominees mentioned in 2 above; these are the representatives of NOREC and the Four State Interleague Group of LWV (in the 1973-74 council, Walter Pomeroy and Mary Woodland, respectively).
4. Author interview: Several council members.
5. See Chapter IV, page 96, for the implications of this status. Essentially an organization must derive more than a third of its revenue from nonfoundation sources to avoid being classified as an "operating foundation."
6. New LMF constitution, Article IV, Section 1.
7. Based on author's observations, supplemented by personal communication between the author and the one council member who attended two meetings but was not classified as "active."
8. Author interview.
9. Proposition 1 is Price's proposition 3.2 (p. 55); proposition 2 is a combination of Price's propositions 3.3 and 3.4 (p. 60); proposition 3 is a combination of Price's propositions 4.6 and 4.7 (p. 110).

All of Price's propositions are culled from a review of fifty primary studies of organizational effectiveness, including three classics on environmentally relevant federal agencies, Kaufman (1960), Maass (1951), and Selznick (1949).

While the propositions discussed in the text are relevant to the LMF's internal leadership, one of Price's propositions (4.10, p. 124) is relevant to an understanding of the LMF's external effectiveness (as discussed in Chapters III and IV). The proposition is:

"Organizations which have a major elite constituency are more likely to be effective than organizations which do not have a major elite constituency."

The term "major elite" is defined on page 110. A "constituency" is a group outside an organization which directly benefits from the activities of the organization. This proposition of Price's is confirmed by the findings that the LMF is more effective in influencing U.S. EPA (Chapter III) and in working with its key environmental leader members (Chapter IV).

## VI. CONCLUSIONS

This concluding chapter will examine the implications of this study by asking two questions. First, what does the study tell the Lake Michigan Federation about itself? Second, what does the study tell a wider audience of readers about interest groups in general? That wider audience includes: (1) leaders of other interest groups, particularly environmental interest groups, for whom LMF performance may be relevant as a guide in examining their own organization, and (2) social scientists and other students of politics who are interested in the implications of this case study for theories of interest group behavior.

### IMPLICATIONS OF THIS EVALUATION FOR THE LAKE MICHIGAN FEDERATION

#### Political Effectiveness

In its primary role as a political interest group, the federation functions very effectively. It has developed the characteristics (competence and informal access to decision makers) necessary for the "informational" style of advocacy it has chosen as an operating strategy. While it has not been uniformly successful in all issues in which it has participated, a number of important policy developments have occurred which are attributable to the LMF's influence. The LMF is viewed by decision makers and other government officials as the most or one of the most recognized environmental groups in the region. Most important, it plays a major structural role in the system of environmental politics.

The informational operating style of the federation seems to be very appropriate and effective, given the federation's goals and the constraints on the organization. It is particularly appropriate in dealing with U.S. EPA, possibly the most important decision-making body on LMF issues. The informational strategy also allows the LMF to effectively and legally interact with legislators, while still maintaining a tax-exempt 501(C)(3) status. Since most tactics associated with an informational strategy are perfectly legitimate for a 501(C)(3) organization, the issue of whether the LMF should be a more active "lobbying" organization seems to be a dead horse that should be beaten no further.

In short, the LMF is a politically effective interest group, and probably more effective than could be expected given the federation's size.

#### Membership Relations

The federation's informal, informational style appears to be just as effective in dealing with other key environmental leaders as it is in influencing decision makers. However, the LMF's pattern of close, informal contacts with key environmental leaders has two consequences.

First, there is an inherent tension between the LMF's collegial relationship with key leaders and its goal of fostering broad public participation. One very important effect of the collegial relationship has been an informal specialization or division of labor. The LMF (along with BPI) is viewed by environmental colleagues as specializing, for example, in monitoring NPDES permits issued under Water Bill. Therefore, its colleagues tend not to give high priority to issues

which are covered by the federation. However, at the same time the federation, because of its commitment to citizen participation, often attempts to stimulate others to take action on LMF issues; the WQTI is a good example of an LMF attempt to stimulate citizen participation. But the "best" potential citizen participants (those with the closest relationships with LMF) have already decided not to participate on these issues because they see that the federation is doing a good job on them. This reduces the likelihood that the LMF will succeed in its stated goals of stimulating continuous citizen participation. On the other hand, this pattern of informal specialization probably is efficient for the environmental movement as a whole, since it increases overall coverage of environmental issues.<sup>1</sup>

Second, the informal, collegial LMF style of relationship with other environmentalists seems to limit knowledge of LMF political effectiveness to a relatively small group of key leaders (plus, of course, government decision makers). This is not a problem for the federation in terms of its primary goals of influencing public policy. However, it is a problem for the federation if it seeks to increase membership, for potential LMF members are not sufficiently aware of LMF effectiveness.

Revenue is the major current problem of the LMF. The federation is faced with a significant decline in revenue, due primarily to decreased revenue from foundations. It feels that it must increase membership revenue to offset this declining foundation support. But if the federation is to significantly increase membership revenue, it must treat differential perceptions by members as a marketing problem. It could consciously attempt to increase its public information and broadscale citizen participation activities at the expense of decreasing its usefulness to its key environmentalist colleagues, or it could market itself to potential members for what it is, a "professional" (full-time) staff organization which works in the place of members (and with other environmental activists) to influence decisions on crucial environmental policy issues.

The latter approach would be more conducive to continued federation influence of public policy than the former. In addition, it would probably have more appeal to potential members; members could financially contribute to saving the lake without volunteering to participate in efforts to save the lake.

In connection with marketing itself as an active, policy-influencing group, it might be advantageous for the federation to engage in at least a few activities with high public visibility. It might wish to abandon its traditional opposition to being explicitly named as a litigant. The membership survey indicates that litigation is a high-visibility advocacy tactic, and that a group can be highly identified with issues in which it is a litigant, while issues in which it plays an insider, but equally important role go relatively unnoticed. Because of past LMF association with interventions into AEC licensing procedures, the LMF is closely associated with nuclear-related issues. However, during the course of this study issues such as land use planning and energy conservation were relatively higher priority issues for the staff than federation members seemed to realize, probably because the LMF played an insider role in these issues.

Since the federation has in the past been involved in litigation, organizing coalitions and so forth, becoming a named litigant would involve minimal increased staff time commitment and minimal unfavorable decision-maker perceptions of increased LMF "radicalism." Litigation is a permissible activity under 501(C)(3) tax status (BPI, for example, is a 501(C)(3) organization). However, it might

well involve a trade-off of increased perceptions of aggressiveness by some potential members at the expense of unfavorable reactions by some present funding sources. Needless to say, the LMF should not engage in litigation solely for the sake of building its image. Most environmental groups, however, see a plethora of potential defendants--their only question is whether litigation is the best strategy for dealing with those defendants.

While marketing itself as an advocate, the LMF might also consider the implications of its name. Most organizations with names like "Save the XYZ Group" are fairly parochial groups, interested in protecting their own restricted segment of nature. While the LMF in theory focuses on its own segment of nature -- a focus which is uniformly viewed as beneficial by decision makers and environmentalist colleagues -- the LMF approach to issues is, in reality, comprehensive and sophisticated; the federation realizes that issues affecting a wide variety of ecological systems are more important than those affecting a single body of water.

### Organizational Leadership

Chapter V described the LMF leadership as very centralized and dependent on the work of the organization's Executive Secretary, Lee Botts. This centralization is effective for the federation as it has operated under Botts' leadership, and would become a problem for the federation only if she should leave the organization.

Chapter III and part of Chapter IV suggest that staff-centered leadership is, in part, imposed on the federation by the external system in which it operates. Decision makers and the media both require a single spokesperson to represent the federation in advocacy situations or as a news source. Furthermore, the staff is at the center of most communications on federation affairs, which gives it a measure of control over information relevant to the organization.

Four internal organizational reasons for the pattern of staff-centered leadership in the LMF were suggested in Chapter IV:

- (1) the procedural problem of a lack of closure in council policy discussions;
- (2) the relative inactivity of roughly a third of the council;
- (3) the problem of competing time demands between council members' primary organizations and the LMF;
- (4) abdication of control of the LMF by the council to Botts because of her leadership qualities.

The federation could take steps to alleviate two of these problems, although the requirements of the external system would still give the staff a measure of control of the organization.

First, the new Board of Directors and Executive Committee could systematically enforce the section in the LMF Constitution which provides that inactive board members may be replaced after three absences at board meetings. The federation should attempt to have inactive board members designate alternative representatives of their organizations, and at the earliest opportunity these alternatives (if they become active in the LMF) should be nominated to full status on the board. In particular, the LMF could attempt to recruit board members from the second leadership rank of member organizations, if it appears that the top leadership of organizations is unable to actively participate in LMF affairs. Several of

the LMF's most active and valuable council members are not the top positional leaders of their primary organization, but board members or officers other than president or chief of the organization's professional staff. The second-tier leaders would be less likely to have as significant competing time demands as top leaders, and could therefore devote more time to the LMF. The only drawback to this approach is that it would mean that the LMF board would not so effectively formalize relationships with those leaders of other environmental groups which Price (1968) calls the "major elite." Having broad members who are top positional leaders has benefits in terms of lending the prestige of a diverse number of key environmentalists to the LMF and formalizing communications with those people, even if they take little or no part in intraorganizational affairs. A primary reason for getting more active board members is that the function of the board would have to change if Botts' resigned from a medium of communication with members and a source of legitimacy for the staff to a group which actively leads the organization.

Second, the federation could take steps to make board meetings more focused than they were during the course of the study; particularly, the board should more rigorously attempt to obtain closure on policy questions which come before it. One way to accomplish this would be to formalize proposals brought before the board by (1) specifying precisely and in writing what actions the staff or other members of the organization would take to implement a proposal, and (2) explicitly amend the proposals (if necessary) and vote them up or down. As noted in Chapter V, the present informal style of council policy discussion has the advantage of avoiding situations in which council members "lose" if their proposals are defeated. However, the informal method of council decision making seems to have inhibited clear council control of the organization. If the council is to more actively lead the organization, it seems that this very useful tactic of conflict avoidance should be sacrificed for procedural efficiency.<sup>2</sup>

As noted in Chapter V, increased council (board) leadership is one course of action which could contribute to maintaining the LMF as an effective organization. Another would be to, in effect, recruit a strong Executive Secretary to replace Botts if she were to leave the organization. In this regard, it would be helpful to list those properties of the LMF Executive Secretaryship under Botts' leadership which are properties of the position and not simply characteristics of Botts' personal style. In this way her successor would have the skills to maintain the essential characteristics and current effectiveness of the federation. A list of the properties of the LMF Executive Secretary would include:

- (1) substantive familiarity with the complexities of environmental policy issues, and particularly with the technical complexities of policy issues;
- (2) familiarity with the nature of the governmental decision-making process, particularly with the complexities, constraints, and procedures of administrative agency decision-making;
- (3) possession of and ability to develop contacts inside decision-making bodies;
- (4) ability to advocate policy positions to decision makers in an informal "informational" manner (this is the most effective method of influencing agency decision makers, and is essential given 501(C)(3) tax status, in advocating policy positions to legislative bodies);

- (5) ability to deal effectively with the media (the personal skills required for media effectiveness are similar to skills required for number 3 and 4 above);
- (6) the ability to maintain a viable membership constituency, reinforced by relationships with a large number of environmentalist colleagues, and formalized by affiliating significant environmentalist colleagues with the federation through the LMF board (to maintain LMF legitimacy in the eyes of decision makers);
- (7) ability to manage a small business office staffed primarily by professionals;
- (8) ability to raise funds from sources other than general membership dues and contributions (e.g., from foundations, government, private agencies, etc.).

It should be noted that, if Botts leaves the LMF and if a successor with these characteristics is recruited in her place, the organization's leadership is likely to remain staff-centered.

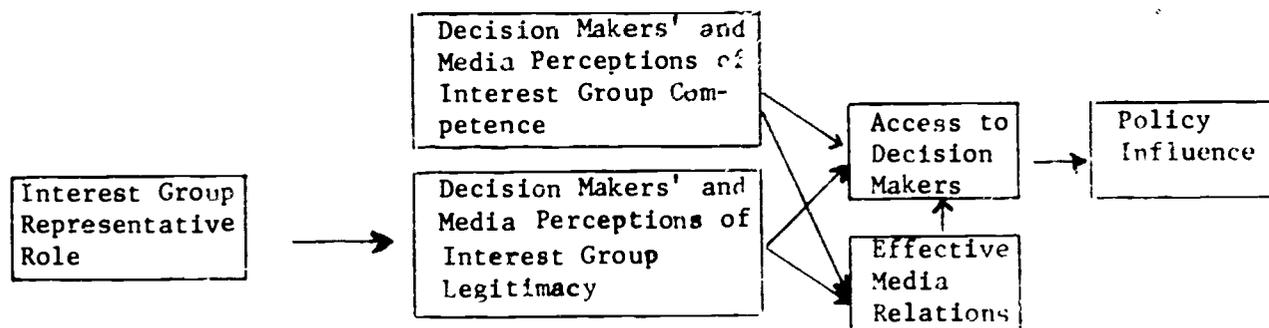
#### IMPLICATIONS OF THE STUDY FOR THEORIES OF INTEREST GROUP BEHAVIOR

This section will discuss the findings of this study of the Lake Michigan Federation in terms of interest group behavior. The discussion will be divided into four parts. First, the effectiveness of the LMF will be used to present a generalized model of interest group effectiveness. Second, the LMF's relationship with U.S. EPA will be discussed as a case study in regulatory agency behavior and as a special case of interest group effectiveness. The third section will discuss the implications of the LMF's operation under its 501(C)(3) tax status. The fourth will discuss the implications of the study for an understanding of internal organization of interest groups.

#### A General Model of Interest Group Effectiveness

Figure 6.1 summarizes the relationships discussed in Chapter III which contribute to Lake Michigan Federation effectiveness. The LMF's role as a representative of a membership constituency gives it legitimacy in the eyes of both government decision makers and the media. Because of the professional staff organization of the federation, it is seen as both technically and politically competent. Because of these perceptions of competence and legitimacy, the federation is able to obtain informal access to decision makers and is regarded as an important source of environmental news by the media. Access to the media is important because it provides an indirect but highly visible link to decision makers and provides the LMF with public exposure of its point of view.

FIGURE 6.1 MODEL OF LAKE MICHIGAN FEDERATION EFFECTIVENESS



These findings about the LMF are an elaboration of Easton's (1965) concept of "interest articulation." In the case of the LMF, interest articulation is a process involving three key variables, perceptions of competence, perceptions of legitimacy, and access. For the LMF, perceptions of competence and legitimacy lead to access. As was noted in Chapter III, these perceptions and access vary from agency to agency.

The LMF's operating style is what Berry (1974) calls an "informational" interest group strategy. This strategy assumes that interest groups will be influential if they provide decision makers with "information" about public policy decisions. "Information" is critical because decision makers are viewed as open-minded (objective), but operating with imperfect information. The LMF's information is of two types: (1) "factual" information about some physical, social, economic, or legal-administrative phenomenon or process, and (2) "political" information about the interests or points of view of that part of the decision maker's constituency which the LMF represents. The importance of "factual" information should be obvious, given decision makers' self-images as rational decision makers. "Political" information is given attention by decision makers because of the formal public participation requirements of environmental legislation (e.g., section 102(2)(C) of NEPA and section 101(E) of the Water Bill). Thus the LMF, or any other informational interest group, is influential because of the rectitude of its "information."

Berry (1974) also discusses other interest group strategies which are not based on informational influence, but on what might be called "pressure" or "power." Berry's litigation and confrontation strategies are clear examples of strategies in which groups impose sanctions on officials whose decisions are not in accord with the groups' interests. The model of interest group influences presented in Figure 6.1 is not applicable to groups which use these "pressure" strategies. In fact, lack of access may be almost a requirement of these strategies. Cutler (1972), in his study of litigation involving the U.S. Forest Service, argues that the lack of consultation with significant interest groups before decisions were made was a cause of subsequent litigation by those groups. Similarly, in Alinsky-style confrontation tactics an official's alleged lack of openness to the confronting group is typically used to increase the conflict level of the confrontation; confrontations are rancorous precisely because the confronting group pictures itself as having been ignored by (not having had "access" to) the offending official.

The typical decision-making agency responds to interest groups in two ways. (The response of an atypical agency--U.S. EPA in the case of the LMF--will be discussed in the next section.) The two types of responses are incremental decision making and decision making according to the "rule of anticipated reactions."

The typical response to a group's articulated interests in a particular decision-making situation is what Lindblom (1959) calls "incremental" decision making -- officials respond to interest groups by making changes in proposals which bring policy decisions gradually (incrementally) closer to a group's position. For example, if the LMF points out to the Corps that areas in which dredging spoils are being deposited are leaking polluted material into a waterway, the incremental response is not to cancel the dredging, but to build extra (or higher or better) retaining dikes to prevent the leakage.

Friederick's (1937) "rule of anticipated reactions" states that decision makers will modify proposals before making them public so that predictable opposition will be minimized. Thus, for example, the opposition of groups like the LMF, BPI, and the Sierra Club to Lake Michigan nuclear power plants became so predictable that the AEC required utilities to conduct studies and modify plant design so they could answer environmentalists' criticisms when environmentalists intervened in the licensing proceedings. In many cases decision makers will not merely intuitively speculate about what criticisms environmentalists might make, but will consciously consult with people like LMF's Borts or BPI's Comey to determine specifically what their objections will be.

Incremental and "anticipated reaction" decision making can be logical responses to an informational interest articulation strategy. That is, incremental changes on a particular decision can be made after decision makers "learn" about new facts because of interest group response to a proposal, and previous "learning" can be incorporated into future proposals. However, it appears that decision makers view even informational interest articulation as a form of pressure. In the case of the LMF's informational style of operations, this assumption of pressure is quite appropriate. Decision makers quite properly recognize that the federation's information is reinforced by BPI's litigation capability.

The implication of incremental and "anticipated reactions" decision-making processes for interest groups is that public policy changes only gradually. Groups like the LMF which seek very broad and fundamental public policy changes must recognize that on any given decision their fundamental objectives will not be met, but that particular decisions can contribute to long-term realization of their goals. The issue of siting power plants on Lake Michigan is a good example of this process. In the various interventions LMF, BPI, the Sierra Club, and the other local intervenors were fundamentally opposed to the proposed power plants. In all cases the proposed power plants were licensed; that is, the fundamental position of the environmentalists "lost." However, as a result of the conflict generated by the interventions, the costs of siting on Lake Michigan were increased since the utilities had to undertake extensive thermal and limnological studies, improve intake structures or build closed cycle cooling systems, increase quality control for safety, etc. Because of these costs, the utilities eventually decided it was easier not to site more plants on the lake. That is, environmentalists lost all the battles and won the war (or, to take the environmentalists' perspective, lost all the skirmishes, won the battle, and moved on to the rest of the war). In an ideal process, interest groups obtain incremental changes which progressively constrain decision makers to the point where they are forced to capitulate to the interest group's fundamental position.

#### The LMF Relationship With U.S. EPA as a Case of Regulatory Agency-Interest Group Cooptation

There is a fairly well developed literature in political science which suggests that regulatory agencies have a tendency to become captured by their interest group constituents.<sup>3</sup> Bernstein (1955) argues that regulatory agencies are established in response to pressures to counteract supposed abuses in certain industries. However, after the agency is established, the public interest constituency which supported the agency's creation disappears, leaving the

agency to confront only one constituent, the regulated industry, alone. Because the agency requires support to continue to exist as an institution, it is forced to accommodate itself to its regulated industry. This accommodation leads to what Bernstein calls a decline in regulatory agency vigor, and to what Huntington (1952) calls a "marasmus" (a progressive emaciation).

As Sabatier (1974) first pointed out, the U.S. EPA has proved to be an exception to this pattern of regulatory agency decay, at least during its first few years of operation. Sabatier argues that the agency actively sought to build and support a constituency of public interest environmental groups which would support its air pollution program. This environmental support allowed the agency to avoid accommodation with industrial polluters.

The relationship between LMF/BPI and U.S. EPA in the water pollution field confirms Sabatier's findings in the air pollution field.<sup>4</sup> However, the relationship between U.S. EPA and the LMF/BPI is subject to an interpretation which is slightly different from Sabatier's. The U.S. EPA-LMF/BPI relationship seems to be a classic case of mutual cooptation. Not only does the agency benefit from the relationship, but the interest group (i.e., LMF/BPI) also benefits. Sabatier's interpretation of agency capture-avoidance certainly describes the motivation of the agency in the relationship, but the mutual cooptation interpretation describes the reciprocal nature of the relationship more accurately, and is of more interest as a confirmation of the general notion of "agency capture." That is, the LMF/BPI relationship with U.S. EPA suggests that public interest, environmentalist "good guys" can capture an agency, just as public interest advocates and environmentalists have perceived (and decried the fact) that agencies like the AEC or the Forest Service have been captured by industry "bad guys." In this sense the EPA-LMF/BPI relationship indicates that the environmental movement is becoming institutionalized.

#### The Effects of 501(C)(3) Tax Status

The ostensible purpose of section 501(C)(3) of the Internal Revenue Code is to exclude supposedly political organizations from the indirect subsidy of a tax-free and tax-deductible status. However, as should be clear from this report, the LMF is a political interest group.

As was noted in Chapter I, the restrictions of 501(C)(3) are very narrow. Only legislative lobbying is prohibited. This has not, however, precluded LMF contacts with legislators or their staffs. Because of the narrow construction of the law, a wide variety of legislative contacts are perfectly legal. The federation can even, as it did during the course of this study, contract itself to act as the staff of a legislative committee and be perfectly within the bounds of its nonpolitical tax status. But the LMF does not treat the prohibition against lobbying frivolously. It has scrupulously avoided activities proscribed by section 501(C)(3) and perceives and discusses its tax status as a significant and real constraint. However, since the LMF follows an informational advocacy strategy, its most effective advocacy tactic--personal presentations to decision makers-- is perfectly legal (as long as the LMF avoids advocating a particular vote on a particular bill).<sup>5</sup> In short, the restrictions of 501(C)(3) tax status are a minimal constraint on an interest group like the LMF which adopts an informal, informational operating style. Section 501(C)(3) tax status may force a group to adopt a particular style of advocacy, but that style can be effective.

In one way 501(C)(3) restrictions are not only relatively ineffective, but systematically biased against public interest or environmental groups. Financial constraints tend to force environmental groups to accept 501(C)(3) status restrictions. However, most environmentalists' opponents are not affected by such constraints. Corporations, for example, can and do carry people who do the same sort of work as Lee Botts, David Comey, or Arnie Leder on the regular corporate payroll. That payroll is, of course, a cost of doing business and is therefore analogous to a perfectly legal tax-deduction subsidy of political advocacy.

Apart from the effectiveness or ineffectiveness, or justice or injustice, of 501(C)(3) status, the restrictions of the status have stimulated the LMF to deal most heavily with administrative agencies. The classic studies of interest group behavior (for example, Bauer, Pool, and Dexter (1963) and Millbrath (1963)) have studied interest groups as organizations which influence legislators. While environmental interest groups by no means ignore legislative lobbying, they also make a substantial commitment to administrative agency advocacy, and some groups like the LMF and BPI in effect specialize in this activity.

### Organization Development and Maintenance

Three primary features of internal LMF organizations were discussed in Chapter V: (1) the "charismatic" leadership of the LMF Executive Secretary, Lee Botts; (2) the centralization of organizational control in the Executive Secretary; and (3) the pattern of formalizing relations with key environmental leaders via the Executive Council (Board of Directors).

The first and third features have been crucial in building the LMF. First, Botts was the important figure in the organizing of the federation. Not only did she essentially found the LMF, but her personal talents were instrumental in establishing the LMF as a legitimate and competent interest group in the eyes of decision makers and the media and as a worthwhile grantee in the eyes of foundation funding sources. LMF leadership is centralized because of the importance of Botts in establishing the organization. Second, the "cooptation" of the council, as Price (1968) would call it, has increased both the legitimacy of the federation and its ability to be effective in its primary advocacy and citizen participation goals. Price discusses the role of cooptation almost exclusively as a mechanism by which an organization increases its support among its constituency (in the LMF's case, among key environmentalist colleagues). The council has played that role, if only by formally legitimating the activities of the staff. However, the most important role of the council in practice has been to formalize communication linkages with local environmentalists. These linkages facilitate staff efforts to stimulate and coordinate public participation and environmentalist advocacy.

While this pattern of internal organization (Botts' centralized, "charismatic" leadership and council recruitment intended to further the LMF's primary goals) has been very effective--even necessary--for building the LMF as an organization, it has been somewhat dysfunctional in terms of maintaining the organization. The primary problem of "charismatic" leadership, as discussed in Chapter V, is an organization maintenance problem--could the LMF continue to function effectively without Botts? This contrast between the effectiveness of "charismatic" leadership for building and operating an organization and the dysfunction of "charisma" for organization maintenance is the reason Price (1968) argues that decision making by occupants of positional authority roles is more effective than "charismatic" decision making. The federation's recruitment of leadership into

the council (board) has created a potential base of leadership to maintain the organization, but the role of the council has been more significant in terms of the federation's advocacy goals than it has been for organization control.

#### A FINAL REITERATION OF A FEW POINTS

The Lake Michigan Federation appears to be effective in its goals of influencing public policy making. Its main problem is to insure that it continues to function effectively. Maintenance of the organization involves two problems. First; the LMF needs to survive its current financial difficulties. If the federation seeks to do this by substantially increasing membership revenue, this study suggests that it must confront the fact that it is viewed as differentially effective by different types of members. This study has concluded that the federation ought to confront these differential perceptions as a marketing problem. Second, the LMF needs to take steps to insure continued organization leadership. It can do this by increasing the control of the council (board) over the organization and/or by recruiting, should the need arise, a strong successor to the present Executive Secretary.

#### FOOTNOTES TO THE CONCLUSION

1. *This pattern of specialization is at odds with the common notion of coalition behavior. Both the classic studies of interest groups and the formal theoretical work on coalitions (Riker, 1962; Gamson, 1961) describe the process as aggregating participants in a decision-making situation to form a "winning coalition." The environmental movement builds particular coalitions on specific issues. However, it also informally divides up responsibility for issues, decision makers (e.g., a given agency), or types of advocacy strategies. An environmental coalition may be active in a large number of decisions, but a different "lead interest groups" will organize and lead different issue coalitions. In short, specialization and division of labor add complexity to the process of coalition building.*
2. *Although this discussion has referred to the new Board of Directors, the same suggestion applies to the new Executive Committee.*
3. *The most important works in this tradition are Leiserson (1942), Selznick (1949), Huntington (1952), Bernstein (1955), Calef (1960), and McConnell (1966).*
4. *Readers should note that both this study and Sabatier's (1974) study focused on interest groups which dealt primarily with Region V of U.S. EPA (the LMF and the Chicago CACC). Thus it is plausible that the findings might reflect a strategy of the regional office rather than a national agency strategy. However, two of the clearest examples of the agency's relationship with environmentalists, the "Breathers' Lobby" and the WQTI, were national agency programs planned by the agency's national public affairs office. The author feels that the agency's relationship with environmentalists is a national phenomenon which just happened to be studied twice in Region V.*

5. *In addition, the LMF or any other 501(C)(3) organization can legally testify before legislators under certain circumstances. For example, if during the course of an informal discussion of an issue with a legislator's staff assistant, the assistant feels that some point Botts has made would be important testimony at a committee hearing, the assistant can invite the LMF to testify for informational purposes. If she feels that the LMF can afford the expense of a trip to testify (in comparison with the importance of the hearing), Botts will ask the assistant to put the invitation in writing to verify that LMF participation is by invitation. This is standard operating procedure for 501(C)(3) interest groups.*

APPENDIX A.  
INTERVIEW AND OBSERVATION METHODOLOGY

The bulk of the findings reported in this study were drawn from interviews with key contacts of the Lake Michigan Federation and from observation of LMF activities, particularly staff activities.

Formal interviews were conducted with twenty-two individuals, and specialized interviews with two other individuals. All of the formal interviews except two were conducted in person; the exceptions were telephone interviews (1) with a government official with whom it was very difficult to arrange a face-to-face interview, and (2) a very brief, specialized interview which did not require a personal interview. A typical interview lasted about forty-five minutes. Interviews were tape recorded and transcribed (the average transcript length was about 12 pages, single spaced). All interviewee quotes used in the report are taken directly from the transcripts, with minor corrections of syntax; underscoring in the quotes represents verbal inflections from the original tape recording, not the author's emphasis of certain points.

The formal interviews were open ended in nature. After a number of background questions, a very broad question was asked:

"Based on your experience, what do you think is the most important thing to understand about the Lake Michigan Federation?"

This question was designed to elicit interviewees' primary perceptions about the LMF. Next, a series of questions were asked which were designed to determine how extensively the LMF was involved in the interviewees' organization's activities:

"Would you briefly enumerate the most important issues, programs, or events of the past year for your organization?"

"In which did the LMF play an important role?"

The next series of questions were designed to elicit interviewees' perceptions of the role the LMF played in interactions with their organizations, and the interviewees' perceptions of LMF effectiveness in performing those roles:

"In those issues in which the LMF participated, what role did it play?"

"How well does the LMF perform those roles (the various roles the interviewee listed in response to the previous question)?"

Table A-1

DESCRIPTION OF INTERVIEWEES

<u>Type of Interviewee</u>		<u>State of Residence of Interviewee</u>	
Environmentalists	8	Illinois <sup>*</sup>	16
LMF Council	5	Michigan	3
Other	3	Wisconsin	3
Government Officials	11	Indiana	1
Federal	8	D.C.	1
State	3		24
Corporate Executives	2		
Other	3		
Total	<u>24</u>		

\* Includes 8 Illinois residents who are employed by federal agencies with region-wide responsibilities.

"Why do you think it performs these roles well (or poorly)?"

"Does its performance seem to vary with the situation or the issue?"

Next, interviewees were asked to compare the LMF with other interest groups with which they have had contacts.

After these basic questions, which were asked of all interviewees, government officials were asked how they respond to LMF advocacy, and LMF council members were asked about their perception of the role of the council and about their relationships with the LMF staff. In addition, most interviews contained a number of questions designed for the particular interviewee. Two of the interviews were very specialized, dealing exclusively with the LMF's 501(C)(3) tax status. All questions used in the interviews were intended to be as broad as possible, that is, they were designed to initiate an interviewee monolog as neutrally as possible.

All interviews were conducted on a confidential basis ("not for attribution"). If interviewees requested that a particular observation not be quoted at all, that request was honored. No one who was asked refused to consent to an interview.

The second major data gathering method used in the study was direct observation of the activities of the federation. During the course of the study, the author observed approximately forty events, on which systematic notes were taken. (Those events are summarized in Table A-2.) In general, events were selected for observation to cover as wide a range of events as possible. In addition, the author attempted to attend all possible events related to three LMF activities: the Mann Committee, the Water Quality Training Institute (WQTI), and LMF Executive Council meetings. The observation of these events was open ended. That is, while extensive notes were taken, no attempt was made to code aspects of the events according to some variable format.

The observations listed under "staff office activities" in Table A-2 do not include a number of very useful observations (for which systematic notes were not kept). The author and a research assistant, Terry Stranke, spent about 15 days in the LMF offices in connection with other data-gathering methods (searching LMF files, coding correspondence, using the LMF mailing list to address the mail questionnaire envelopes, etc.). This time spent in the federation office allowed the author to unsvstematically observe the "normal" activities of the staff, that is, to eavesdrop.

Interviews with contacts of the federation and observation of LMF activities

Table A-2

LMF EVENTS OBSERVED

<u>Type of Event</u>	<u>Number of Observations</u>
Staff office activity	10
Political meetings, hearings, etc.	15
Mann Committee	9
Water Quality Program	3
Other	3
Public information events	11
WQTI	2*
Other	9
Executive Council meetings	<u>4</u>
Total	40

\*) includes the three-day Institute itself.

activities were supplemented by three more or less structured interviews with the LMF staff and about four dozen informal conversations with LMF staff members, particularly with Lee Botts, the LMF Executive Secretary. The informal conversations were used to keep abreast of substantive developments on LMF issues or intra-organizational developments.

Two aspects of the interviewing and observation are possible sources of methodological bias. First, most of the observation was of the activities of the LMF staff, and potential interviewees were selected on the basis of observation of staff activities, search of staff files, and staff identification of important LMF contacts. Actual interviewees were selected from among potential interviewees to maximize geographic and substantive representativeness. These methodological strategies may have had the effect of overstating the role of the LMF staff in the organization. Second, simple budgetary constraints dictated that interviewees and observation events be primarily located in the Chicago area. Only six of the 24 interviews were conducted outside of the Chicago metropolitan area, and only two of the 40 observation events took place outside of Chicago. Thus interviewees and observed events somewhat underrepresent LMF's non-Chicago activities. The implication of this bias is that, as noted earlier in the report, LMF effectiveness seems to be related, in part, to whether decisions take place in Chicago or not.

APPENDIX B.  
CORRESPONDENCE ANALYSIS

A sample of LMF written correspondence was coded for the purpose of illustrating LMF activity. As was pointed out earlier in the study, written correspondence is only one of the means of communication the federation uses in attempting to carry out its mission; in many ways, written correspondence is less significant than other types of communication. However, written correspondence is the only type of communication which is physically available for systematic coding and sampling since the federation does not maintain records of communications such as telephone logs or notes of person-to-person meetings.

Because of the large volume of LMF correspondence, only correspondence from the period of January 1974 through July 15, 1974, was sampled. This sampling period introduces a certain bias into the results of the correspondence analysis, and the results presented should not be taken as a representative sample of LMF activity from its inception to the present, but rather as a sample which represents recent LMF activity. In particular, the sample includes correspondence from the period during which the LMF was under contract to act as the staff of the Mann Committee; therefore Illinois correspondents and land use issues are relatively overrepresented in this sample of correspondence.

The sampling procedure was not random. Correspondence was divided into three categories: (1) hearing statements; (2) "important" correspondence, which was primarily correspondence directly related to LMF political advocacy activities, environmental group coalition formation, or significant intra-organizational correspondence; (3) "routine" correspondence which did not meet the criteria for "important" correspondence, for example, invitations to meetings, thank you notes, document cover letters, etc. The difference between hearing statements and other types of correspondence is fairly clear cut; the difference between "routine" and "important" correspondence is largely judgemental. All hearing statements were included in the coding sample; every other piece of "important" correspondence was included in the sample; and every tenth piece of "routine" correspondence was coded. Table B-1 shows the number of pieces of correspondence in each sample category; the total number of pieces of correspondence coded was 274, or about 22% of a theoretical total of 1237 pieces of correspondence during the sampling period.

Better than half of the correspondence (56.2%) is out-going correspondence (that is, correspondence written by a LMF person), 33.9% is in-coming correspondence, 6.9% is a copy of some third party's correspondence, and 2.6% is hearing statements

Table B-1

SUBSAMPLE CHARACTERISTICS

Type of Correspondence	# Pieces of Correspondence	%	Sampling Criterion	Theoretical Total Corresp.
"Important" Corresp.	180	65.7	1 of 2	360
"Routine" Corresp.	87	31.8	1 of 10	870
Hearing Statements	7	2.6	all	7
Total	274	100.0	----	1237

(which could be subsumed under "outgoing" correspondence).

Table B-2 presents the frequency distributions for correspondence analysis variables, if those frequencies have not been reported earlier in the report. The salutation, signature and tone of the correspondence were coded in a (fruitless) attempt to use correspondence as an unobtrusive measure of LMF relationships with different types of correspondents.

Table B-2. CORRESPONDENCE ANALYSIS, FREQUENCY DISTRIBUTIONS

1. "LMF Party," the person associated with the LMF who was the addressee on incoming correspondence or the signatory on outgoing correspondence.

LMF Party	Botts	Leder	Flowers	Smith Mann Commt	Morris McClure	Tiernan	Exec. Counc.	Other None	Total
N	157	45	25	20	13	2	1	11	274
%	57.3%	16.4%	9.1%	7.3%	4.7%	.7%	.4%	4.0%	100%

2. "Correspondent Location," the state of residence of the non-LMF correspondent; most of the "regional federal agency" are, of course, Illinois correspondents, for example U.S. EPA-V officials.

Location	Ill.	D.C.	Wisc.	Reg'l Fed'l Agency	Ind.	Mich.	Other	Indetermin.	Total
N	118	57	24	20	17	17	19	2	274
%	43.1%	20.8%	8.8%	7.3%	6.2%	6.2%	7.0%	.7%	100%

3. "Referent Decision Maker," the governmental decision-making body, if any, which was either the explicit or implicit subject of the correspondence.

Agency	N	%	Agency	N	%
U.S. EPA	31	16.8%	Ill. Legislature	5	2.7
Mann Committee	25	13.5	Gr. Lks. Bas. Comms.	4	2.2
Fed. energy decis-mkrs	20	10.8	NOAA	3	1.6
Corps	15	8.1	Wisc. DNR	2	1.1
AEC	11	5.9	Ind. Legislature	2	1.1
U.S. D. Interior	11	5.9	Chgo D.Dev. & Plan.	2	1.1
U.S. Senate	7	3.8	Other	36	19.5
Ill. EPA	6	3.2			
U.S. House of Rep.	5	2.7			
Michigan DNR	8	4.3			
			Total	185	100%

(89 pieces of correspondence, or 32.5% of total correspondence, did not have a specific referent decision making-agency.)

4. "Salutation," the form of the salutation on the letter.

Type of Salutation	Last Name	First Name	Generic	Indeterm.	Total
N	158	87	27	2	274
%	57.7%	31.8%	9.9%	.7%	100%

5. "Signature," the form of the signature on the letter. The large number of "indeterminate" signatures is attributable to the fact that coding of outgoing correspondence was done from the second, or carbon copy (which did not, obviously have a signature).

Type of Signature	First Name	Last Name	Indeterminate	Total
N	29	85	160	274
%	10.6%	31.0%	58.4%	100%

6. "Tone" of the correspondence .

Tone	Warm	Informal	Formal	Hostile	Total	(Missing)
N	73	85	98	17	273	1
%	26.6%	31.0%	35.8%	6.2%	99.6%	.4%

7. For "Correspondent type" see Table 2.3, page 35.  
For a list of government bodies who were correspondents, see Table 3.1, page 46.  
For "Issue areas," see Table 2.1, page 22.  
For "Nature of message," see Table 2.3, page 35.

APPENDIX C.  
ISSUE ANALYSIS

The purposes of the Issue Analysis were to (1) provide a description of LMF issue involvement, and (2) allow a crude, heuristic analysis of LMF impact on decisions. The data were generated in the following fashion. First, "issues" were identified from the LMF Bulletin, LMF Alerts, LMF press releases, and the author's observation and interview notes. Second, aspects of the decision-making process on these issues were coded by the author on the basis of his personal knowledge; if the author was uncertain about a particular aspect of a decision, for example the size of the environmental coalition or the current status of the decision, he asked the LMF staff for that information. As noted on page 51 and in footnote 15, page 69, the judgemental coding means that these data possibly have high measurement error on certain variables. However, the coding of certain other variables (the decision-making agency, the site of the decision) is relatively straight forward. All identifiable issues in which the federation was involved from January 1973 to July 1974 were coded. A list of those issues is presented in Table C-2. Table C-1 presents the simple frequency distributions of the variables coded in the analysis, and, where appropriate, an explanation of coding categories.

Table C-1

ISSUE ANALYSIS MARGINALS AND  
CODING CATEGORY EXPLANATION

1. "Decision-Making Site," the location, usually, of the physical area to be affected by the decision, or, if that is inappropriate, the location of the decision-making body. The coding categories are self-explanatory.

Site	D.C.	Ill.	Reg'l.	Mich.	Wisc.	Ind.	Minn.	Total
N	37	28	24	10	6	5	2	112
%	33.0%	25.0%	21.4%	8.9%	5.4%	4.5%	1.8%	100%

2. "Issue Precision," an indication of whether an issue was very broad or very particular.

Issue Precision	Broad Issue	Specific Decision Related to Broad Issue Area	Very Particular Decision	Total
N	13	77	22	112
%	11.6%	68.8%	19.6%	100%

3. "Coalition Size," the number or size of the other environmental groups which are actively involved in the issue along with LMF.

Coalition Size	Many groups; important national groups inv'd	Moderate # of groups, no imp. nat'l groups	Few; None	Missing Inform.	Total
N	19	49	36	8	112
Adjusted %	18.3%	47.1%	34.6%	deleted	100%

4. "LMF Role," the role the LMF played in the environmentalist coalition.

LMF role	Coalition organizer; sole env. participant	Coalition participant	Peripheral LMF role	Total
N	46	40	26	112
%	41.1%	35.7%	23.2%	100%

5. "LMF Commitment" is the degree to which the LMF has been committed to the issue over a long period of time, and an approximation of the amount of organizational effort which has been devoted to the issue.

LMF commitment	High effort & long-term comm't	Lo effort, long-term; or hi effort, short-term comm't	Low effort, short-term	Total
N	14	50	48	112
%	12.5%	44.6%	42.9%	100%

6. "Decision Makers," a tabulation of the entities, usually governmental entities, which were the decision-making bodies on the various issues. Three types of decision makers were coded: (1) the lead agency, the primary decision maker, usually the entity with statutorily-defined decision making authority; (2) secondary and tertiary agencies, other entities with some formal (usually legal) authority in the decision-making process. For example, on the Reserve Mining case, the federal court would be the "lead agency," the U.S. EPA (the primary plaintiff) would be the secondary agency, and the Minnesota Pollution Control Agency (also a plaintiff) would be the tertiary agency.

Agency/Gov't entity	Lead Agency		Secondary Agency		Tertiary Agency		Cumulative	
	N	%	N	%	N	%	N	%
U.S. EPA	20	17.9	16	20.5	5	16.1	41	18.6
AEC	10	8.9	7	6.3	1	3.2	18	8.2
Corps	11	9.8	5	4.5	1	3.2	17	7.7
U.S. Senate	5	4.5	5	6.4	2	6.5	12	5.4
Ill. Adm. Agenc.(other than IEPA)	4	3.6	4	5.1	3	9.7	11	5.0
Mich, DNR	5	4.5	4	5.1	1	3.2	10	4.5
Other Fed'l adm. agencies	6	5.4	4	12.9	0	0	10	4.5
Ill. EPA	2	1.8	5	6.4	1	3.2	8	3.6
Chgo. D.Develop. & Plan'g.	3	2.7	2	2.6	2	6.5	7	3.2
Wisc. DNR	2	1.8	2	2.6	3	9.7	7	3.2
Ill. Legislature	5	4.5	0	0	1	3.2	6	2.7
U.S. House of Rep's	4	3.6	2	2.6	0	0	6	2.7
Exec.Off.of U.S. President	5	4.5	0	0	0	0	5	2.3
IJC	2	1.8	3	3.8	0	0	5	2.3
Ill. PCB	2	1.8	3	2.7	0	0	5	2.3
NOAA	2	1.8	2	2.6	1	3.2	5	2.3
Non-gov't'l (e.g., corporations, Ford E.P.P.)	2	1.8	2	2.6	1	3.2	5	2.3
U.S. D.Interior (+N.P.S.)	1	.9	4	5.1	0	0	5	2.3
Other state agencies	3	2.7	2	2.6	0	0	5	2.3
Federal energy dec.makers	2	1.8	1	1.3	1	3.2	4	1.8
Oth.states' poll.agencies	1	.9	2	2.6	1	3.2	4	1.8
Other <sup>a</sup>	14	12.5	7	6.3	3	9.7	24	11.8
None	1	deleted	34	deleted	81	deleted	116	deleted
Totals	112	100.0%	112	100.0%	112	100.0%	336	100.0%

a) Includes the Grt.Lks. Basin Comm's, federal and state courts, Wisc. legislature, MSD, municipalities, other state legislatures, and "other"; each with 3 cumulative issu

7. See page 51, and Table 3.2, for a definition of the nine coding categories of "Issue Outcomes" and the frequency distribution of those outcomes. See Table 2.1, page 22, on the distribution of issues among the broad categories of issues; the issue areas are discussed in Chapter II.

Table C-2

LIST OF ISSUES CODED FOR ISSUE ANALYSIS

NUCLEAR ISSUES

General issue of nuclear safety.  
Amer.Nucl.Stds.Comm't participation.  
Quad Cities nucl. plant leak.  
EPA-AEC Radiol. emmiss. author. transfer.  
AEC regulatory budget cut.  
AEC w/holding of Rasmussen Report.  
Palasades nucl. plant leak litigation.  
Mich. Radiol. health hearings.  
Pt. Beach plant leukemia study.  
Bailey plant intervention.  
Koskonong nuclear plant.  
Cook plant intervention.  
Rudolph nuclear plant site.  
Byron nuclear plant site.  
General issue of siting on Lk.Mich.  
Ill. Comm's on Atom. Energy--plant siting.  
Minn. and Wisc. nuclear moratoria.  
AEC combined license hearing proposal.

OTHER ENERGY/ENERGY CONSERVATION

Ford Energ.Pol.Proj. participation.  
Federal Energy Regulation Study.  
Energy Conservation Conference.  
Ill. Energ.Crisis Invest.Comm't.  
CWE rate intervention.  
Ill. coal gasification.  
765 KV transmission lines.  
Wisc. power plant siting bill.  
Mich. power plant siting bill.

THERMAL POLLUTION

316 thermal effluent guidelines.  
"Love letters."  
Cooling water panel participation.  
Cook plant thermal mixing zone.

WATER QUALITY

General monitor. NPDES permits.  
Fox Riv. (WI) permits & modeling.  
Ind. Harb. waste load allocation.  
Amer. Can Co. adjudacatory hearing.  
Plannel Paper Co. permit.  
Toxic Substances List.  
Canning Industry Report.  
Wisc. NPDES authority transfer.  
Mich. NPDES authority transfer.  
Minn. NPDES authority transfer.  
Ohio NPDES authority transfer.

(Water Quality, continued)

EPA 101(e) guidelines.  
"Purdy memo."  
Water Quality Training Institute.  
U.S. EPA-V citizen particip. staff position.  
EPA Citiz. Ad. Brd. participation.  
WQTI resolution on institution continuation.  
OMB proposed cut-back of state pollution grants.  
EPA Great Lakes program.  
Safe Drinking Water bill.  
Enforcem't of US-Canada Grt.Lks. treaty.  
Nat'l Water Comm's report.  
Ill. EPA budgetary dispute.  
Ill. PBC NPDES transfer regulations.  
CBE-Ill.EPA noncompliance litigation.  
Ill. EPA Water Qual. standards.  
Ill. PCB conflict of interest.  
Ft. Sheridan pollution.  
Fox Riv. (IL) pollution.  
Mich. seagull die-off.  
Ill v. Kenosha, Racine pollution suit.  
Ind. phosphate ban repeal.  
Reserve Mining case.  
Air-borne pollution of Lake Michigan.

SANITARY DISTRICT-RELATED ISSUES

Impoundment of construction grant funds.  
Distribution of FY74 construct.grant funds.  
MSD priority ranking.  
Whitting sanitary district case.  
Deep Tunnel (Chgo. MSD).  
Interim munic. san.dist. NPDES permits.  
MSD Fulton Co. Project.  
Chgo-South End of Lk. Mich. study.

EROSION

General issue, structural erosion approaches.  
S.1266, et.seq., priv.prop.eros.prot. bills.  
Moritorium on corps projects.  
Wilmette Hi-rise erosion damage case.  
Shoreline Conference.  
Shore. Damage Reduct. Task Force.  
S.1265 Lake research bill.  
Recent lake processes research proposals.  
General lake levels control issue.  
IJC lake levels report.  
Lk. Superior lake level control.  
Lk. Survey Center lake levels predictions.

(Table C-2, continued)

**LAND USE PLANNING**

Mann Committee staff contract.  
U.S. Steel landfill.  
Chgo. Lakefront Plan/Ordinance.  
Meigs Field closure proposal.  
Ill. CZMA plan submission.  
Mich. Coastal Zone Adv. Brd. particip.  
Four-state Lk. Mich. Reg'l Authority.  
GLBC public participation.  
IJC appointments.  
Nat'l Land Use Bill.

**WATER RESOURCES DEVELOPMENT**

Ind. Harbor dredging.  
St. Joseph harbor lll study.  
Winter navigation season.  
Corps-BSF&W waterways conflict.  
Corps promotion of commercial navigation.

**NATURAL AREA PRESERVATION**

Ind. Dunes N.L. revetment.  
Ind. Dunes N.L. expansion.  
NPS Midwest office.  
Mich. dunes sandmining case.  
So. Shore C.C. case.  
Hosah park boat launch.

**MISCELLANEOUS**

Project Sanguine.  
Clean Air Act defense.  
Lk.Mich . commercial fishing ban.  
Alaska pipeline.

APPENDIX D.  
MEMBERSHIP QUESTIONNAIRE

The purpose of the membership questionnaire was to obtain a more systematic sampling of member views of the federation than could be obtained from interviewing a relatively small sample of members. Questionnaires were sent to two types of respondents: (1) all persons carried by the federation as "members" as of mid-July 1974 (this included both paid-up members and members whose dues are in arrears); (2) selected persons carried on the federation's "general mailing list," persons who receive LMF materials, but who are not formal federation members. Respondents were selected from the general mailing list if they were explicitly listed as having some organizational affiliation. The federation's addressograph machine was used to directly address questionnaire envelopes from their addressograph plates. All questionnaire envelopes contained a printed questionnaire, a printed cover letter, and a business-reply return envelope. A copy of the cover letter is reproduced at the end of Appendix D. The questionnaire was printed on both sides of a legal size sheet of paper; questions #1 to #5 (reproduced separately below) were on page one of the questionnaire, and questions #6 and #7 were on page two.

Four hundred and eighty-four questionnaires were mailed on July 23, 1974. By August 8, only 119 (25%) had been returned; due to the low response rate a second mailing was sent out on August 9, 1974. This second mailing was sent only to regular LMF members (that is, the "special handling" and "ordinary members" categories in Table D-1). (The "special handling" category is composed of LMF members known to the author, in general, persons who are either LMF council members or people who are called key environmental leaders in Chapter IV. The "special handling" was that the generic salutation on the cover letter was lined out and the person's name written in in longhand.) Since all of the return envelopes were numbered, the second mailing was sent to nonrespondents only.

Table D-1

QUESTIONNAIRE RETURNS: VALID RETURNS,  
VALID MAILEES, AND RESPONSE RATES

Q'naires Returned <sup>a</sup> Q'naires Sent Response Rate	Addressee Location					Totals
	Ill.	Mich.	Wisc.	Ind.	Other	
Special Handling	40	13	9	13	1	76
	51	15	15	22	9	112
	78.4%	86.6%	60%	59.1%	11.1%	67.8%
Ordinary Members	63	29	15	15	3	125
	153	73	31	34	7	298
	41.2%	39.7%	48.4%	44.1%	42.8%	41.9%
Selected "General Mailees"	1	2	1	4	0	8
	26	12	10	12	1	61
	3.8%	16.6%	10%	25%	0%	13.1%
Totals	104	44	25	32	4	209
	230	100	56	68	17	471
	45.2%	44%	44.6%	47.1%	23.5%	44.4%

a) All returns, less questionnaires returned as "undeliverable" by the post office, respondents who indicated they receive the Bulletin for library holdings only, and refusals.

b) All questionnaires sent, less "undeliverable" and library holdings only.



to calculate the distance of the respondent from Chicago (Table 4.3). The only part of question #1 not presented earlier in the report is the respondents' positions in their own organizations: 40.7% either did not answer the question, or were individual LMF members not associated with any other organization. Of the remaining respondents, 48.8% were organization officers, 18.4% were board members, 8.8% were chairpersons of some special committee of an organization, 16.8% were staff persons of the organization, 4% were regular members, and 2.4% had some other connection with an organization.

The second set of questions asked respondents to rank the importance of ten issue areas for their organization (or themselves, if they were individual members of the LMF; the "\*" in this and future questions instructed respondents, "If you are not an officer, board member, or staff person of an organization, please treat the word 'organization' as 'myself' in the questionnaire"). The question also asked for respondents' perceptions about LMF commitment to these issues and their preferences as to what LMF commitment should be on those issues. The purposes of the question were: (1) to ascertain, essentially, how accurately members understood LMF commitment to various issues, and (2) to find out if LMF commitment, as perceived by members, was "correct." The results of "LMF Does" and "LMF Should Do" are presented in Table 4.6, page 85. The purpose of the first column of rankings, "My Organization Does," was to determine if members' own personal issue commitments influenced their preferences about what the LMF should do. As Table 4.7, page 86, shows, they do. Also, see Table 4.11, page 91, on the differences among types of respondents on these items.

2. Would you please rate the following issues on the priority that (a) your organization\* is involved in the issue, (b) your Perception of the level that the Lake Michigan Federation IS involved in the issue, and (c) the priority You Personally feel the Federation SHOULD place on the issue.

Please circle a number in each category for each issue according to this format:

Extremely <u>Important</u>	Very <u>Important</u>	Somewhat <u>Important</u>	Not Very <u>Important</u>	Not At All <u>Important</u> (and Not Applicable)
1	2	3	4	5

<u>ISSUE AREA</u>	<u>My Organization* DOES</u>					<u>L.M.F. DOES</u>					<u>L.M.F. SHOULD DO</u>				
Air Pollution	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5
Natural Area Preservation; Recreation	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5
Land Use Planning and Control	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5
Nuclear Safety	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5
Power Plant Siting	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5
Energy Conservation	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5
Thermal Pollution	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5
Water Pollution (non-Thermal)	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5
Shoreline Erosion	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5
Solid Waste Disposal	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5
Other (explain) _____	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5

The third set of items on the questionnaire asked for similar information as the second set of items, only about LMF operating activities. The results of these items are presented in Table 4.9, page 88. Also, see Table 4.12, page 92, on the differences among types of respondents on the "activities" items.

The fourth and fifth questions were designed to find out how often members had contacts with the federation and took action as a result of contacts with the federation. The results of these questions are presented in Table 2.2, page 33.

3. The Lake Michigan Federation (Staff and Council) engages in a variety of activities. Would you please indicate (a) your Perception of the priority the Federation Currently places on the various activities listed below, and (b) what You Personally feel the Federation's priorities Should be. (Please use the same rating format as question #2: 1 = "Extremely Important", 2 = "Very ...", etc.)

ACTIVITY	L.M.F. DOES	L.M.F. SHOULD DO
Identify/Provide Information to Legislative bodies	1 2 3 4 5	1 2 3 4 5
Watchdog Administrative Agencies	1 2 3 4 5	1 2 3 4 5
Pressure Administrative Agencies for New Policies	1 2 3 4 5	1 2 3 4 5
Litigate Issues in the Courts	1 2 3 4 5	1 2 3 4 5
Inform Citizens to Facilitate their Participation	1 2 3 4 5	1 2 3 4 5
Sponsor Scientific & Technical Research	1 2 3 4 5	1 2 3 4 5
Stimulate & Coordinate Citizen's & Specialist's Testimony	1 2 3 4 5	1 2 3 4 5
Provide General Environmental Education	1 2 3 4 5	1 2 3 4 5
Inform the Press and other Media	1 2 3 4 5	1 2 3 4 5
Work with the Federal government	1 2 3 4 5	1 2 3 4 5
Work with State Governments	1 2 3 4 5	1 2 3 4 5

4. Please indicate the extent of your contact with the Lake Michigan Federation during the past twelve months by checking the appropriate spaces. Please count only individually personalized contacts (either to or from the Federation,) not general mailings, such as the Bulletin or "Alerts."

TYPE OF CONTACT (past 12 Months)	0-1/yr	2-5 /yr	6-11 /vr	1-3 /mo	1+ /wk
Personal/Telephone Conversations	( )	( )	( )	( )	( )
Written Correspondence	( )	( )	( )	( )	( )
Met at Public Meetings, Hearings, Conferences, etc.	( )	( )	( )	( )	( )

Do You (or a member of your organization)<sup>\*</sup> read the L.M.F. Bulletin and "Alerts?" ( ) Yes ( ) No

Does your Organization<sup>\*</sup> have a procedure for passing information in the L.M.F. Bulletin and "Alerts" along to other members? ( ) Yes ( ) No

If "Yes," Please describe briefly \_\_\_\_\_

5. During the past twelve months, how often have You Personally taken the following types of ACTION as a RESULT OF CONTACTS with the Lake Michigan Federation? (Please check appropriate space.)

TYPE OF ACTION (past 12 Months)	Never	Rarely	Occasionally	Frequently
Written Letter(s) / Telegram(s)	( )	( )	( )	( )
Telephoned / Spoke with Person in Government	( )	( )	( )	( )
Participated at Public Meeting, Hearing, etc.	( )	( )	( )	( )
Other (explain) _____	( )	( )	( )	( )

and Table 4.14, page 94. One item which was not reported earlier was the question of whether the respondent or his/her organization had a procedure for passing on information in the Bulletin or Alerts to other people. 18.2% of the respondents did not answer this question. Of the respondents who did answer the question, 14.8% said that LMF information was reprinted in their own organization's newsletters or was passed on in special mailings, 10% said LMF information was passed on by word of mouth, 5.3% said LMF information was related to others at meetings of the organization, 6.2% said LMF information was passed on by word of mouth in emergencies and at meetings or via newsletters if the information did not require immediate action, 2.9% routed LMF information to other specialists in the organization, and 34% said they had no pass-on procedure; nine individuals (4.3%) said they passed LMF information on to friends or acquaintances.



7. Now, please use the same format to indicate what you think the Federation Should be on the following scale .

LAKE MICHIGAN FEDERATION  
(Should Be)

Flexible	__ : __ : __ : __ : __ : __ : __	Rigid
Radical	__ : __ : __ : __ : __ : __ : __	Moderate
Simple	__ : __ : __ : __ : __ : __ : __	Complex
Individual-Dominated	__ : __ : __ : __ : __ : __ : __	Not Individual-Dominated
National	__ : __ : __ : __ : __ : __ : __	Local
Professional	__ : __ : __ : __ : __ : __ : __	Amateur
Humanistic	__ : __ : __ : __ : __ : __ : __	Technical

Questions #6 and #7 were semantic differential scales designed to obtain members' perceptions of the federation on a number of very general properties (see Osgood, 1957, on semantic differential methodology). Most of the scale items were selected on the basis of concepts mentioned by LMF members in the in-depth interview situations. The results of these items are presented in Table 4.4, page 82. Also, see Table 4.5, page 83, the factor analysis of items in question #6, and Table 4.13, page 93, the breakdown of responses by type of respondent.

Readers will note that the ordering of the pairs in certain items is "reversed," that is, in some items the "good" characteristic is first and the "bad" is second, while in other items the "bad" is first and the "good" second. The order of pairs was randomly altered essentially to force respondents to use the whole scale and prevent a "halo effect" due to questionnaire layout. In addition the order of the items was determined randomly. Items which were "reversed" on the questionnaire were rescaled for the analysis and presentation of results.

Most of the items in question #6 asked respondents to rate the LMF on a continuum between obvious "good" and "bad" characteristics ("relevant," "valuable," etc.). Some of the items, however, did not have this good-bad connotation. The purpose of question #7 was, therefore, to have the respondents state what they thought the LMF's characteristics should be on those items.

QUESTIONNAIRE COVER  
LETTER, FIRST MAILING

NORTHWESTERN UNIVERSITY

EVANSTON, ILLINOIS 60201

PUBLIC LANDS PROJECT

2040 SHERIDAN ROAD  
EVANSTON, ILLINOIS 60201  
TELEPHONE (312) 492 3559

July 1<sup>o</sup>, 1974

Dear Lake Michigan Federation Member:

The Public Lands Project is conducting an evaluation study of, and for, the Lake Michigan Federation.

A very important part of the study is an evaluation of the Federation's relationship with member groups and individuals. The enclosed questionnaire is designed to obtain your perceptions of the Federation, preferences about Federation activities and issue involvement, and recollection of contacts with the Federation. The study, and your response to this questionnaire, will help the Federation give better service to its members.

The questionnaire will take just a few minutes to complete.

A return envelope is enclosed for your convenience. The envelope is numbered solely to allow us to record responses. Individuals' responses will not, of course, be published or divulged -- only summary tabulations of responses.

The Federation includes both groups and individuals. If you are an officer, board member (or former board member), staff person, or committee chairperson of an organization which is a Federation member (or has another, special relationship with the Federation), please note this in the first question. Your answers, however, should be your own personal opinion.

Please complete both pages of the questionnaire.

The results of this questionnaire and of the full evaluation study will be published by Northwestern University in September 1974, and will be available through the Lake Michigan Federation. If you wish to receive a copy of the report, please note this (with your name and address) at the bottom of page 2 of the questionnaire.

Your cooperation is sincerely appreciated. It will help both the Public Lands Project in this study, and the Lake Michigan Federation in its goal of working better with its members.

Sincerely,



Paul J. Culhane  
Research Associate

Enclosure

APPENDIX E.  
SPECIAL EXECUTIVE COUNCIL QUESTIONNAIRE

The members of the LMF Executive Council were sent a special questionnaire for the purpose of obtaining basic background information on the council. The questionnaire form is reproduced on the next page. The results of this survey of the LMF council are presented in Chapter I, pages 7-10, especially Table 1.2, page 8, Table 1.3, page 9, Table 1.4, page 10, and footnotes 19 and 20, pages 18-19.

Questionnaires were sent to all 28 council members. Twenty-three returned completed questionnaires for an 82% response rate, one returned a blank questionnaire (declined to complete the form) and the other three ignored the questionnaire.

All information gathered from the questionnaires is presented in the report.

-141-  
LAKE MICHIGAN FEDERATION  
EXECUTIVE COUNCIL  
SPECIAL BACKGROUND QUESTIONNAIRE

1. Name (optional): \_\_\_\_\_

2. Present Occupation: \_\_\_\_\_

If not presently employed in a salaried or wage-earning position,  
please answer either 2-A or 2-B (or, if you prefer, both.)

2-A. What was your most recent salaried or wage-earning  
occupation? \_\_\_\_\_

2-B. What is your spouse's occupation?  
\_\_\_\_\_

3. Please state either (a) your major field in college or (b) your post-graduate  
professional specialty:  
\_\_\_\_\_

( ) Not applicable.

4. Would you please list those organizations in which you serve as an  
officer, board member, or professional staff person. (Include non-  
environmental organizations; exclude the Lake Michigan Federation.)

<u>Organization</u>	<u>Position/Title</u>
_____	_____
_____	_____
_____	_____
_____	_____

(Please use back of page if more space is required.)

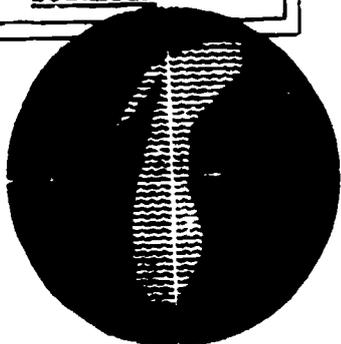
5. Would you please list any other organizations (other than those listed  
in number 4, above) in which you are active (regularly attend meetings,  
participate in activities of organization, etc.)

<u>Organization</u>
_____
_____
_____
_____
_____

(Please use back of page if more space is required.)

Thank you very much.

August, 1974



## Bulletin of the Lake Michigan Federation

Index  
on  
Page 10

# Heat Applied To Keep Hot Water In Lake

The utility industry is still campaigning to force the U.S. Environmental Protection Agency (EPA) to weaken control of waste heat in waterways, including Lake Michigan. Citizen support for strict control is a counterforce with regulatory authorities.

In July, Federation staff members took part in two meetings in Washington, D.C., to urge EPA to maintain proposed limits on thermal discharges despite the intense utility pressure to undermine them. The utilities claimed costs would outweigh benefits of control of thermal pollution (see story on page 5).

The utility attack is aimed at the thermal effluent guidelines under the 1972 Federal Water Pollution Control Act. A representative of Senator Edmund Muskie told the utilities that Congress intended to stop water pollution, including thermal pollution, by passing the bill. The final guidelines will be published on August 26.

Washington EPA has received more requests from Lake Michigan states for guidelines that will regulate wasteheat strictly than any other region. Many citizens have said they believe continued pollution will cost more in the long run. One fear is that other industries will seek relaxation of controls on their pollutants if EPA bows to utility pressure on the thermal guidelines.

While some improvement has been achieved in Lake Michigan, the future of the lake is not yet safe. In 1973, the City of Chicago found evidence of worse pollution after improvement between 1969 and 1972 (see story on pages 3-4). The 1973 data may or may not signal a new trend toward degradation, but do warn against allowing additional biological stress.

Public pressure was critical in raising the issue of thermal pollution for Lake Michigan in the first place. Continued citizen action is necessary to reinforce EPA's efforts to stop it now. To express your opinion on keeping hot water out of Lake Michigan, write to Francis Mayo, Administrator, Region V, U.S. Environmental Protection Agency, One North Wacker, Chicago, Ill. 60606.-Editor

## VISUAL AIDS AVAILABLE TO CONSERVATIONISTS

Citizen groups may want to obtain visual presentations for their meetings or for public meetings sponsored in their area. Listed below are several alternatives that would be of interest to people in the Lake Michigan region.

- "OUR ENERGY CHALLENGE" - an hour long documentary about alternatives in energy resources in meeting future needs. Sources discussed include hydroelectric power, atomic fusion, solar, geothermal and the breeder reactor. While this 16mm film does give an over-view of alternatives, it emphasizes consumption rather than conservation. Available free from Gordon Tuell, General Manager, KWSU-TV, Murrow Communication Center, Washington State Univ., Pullman, Wash. 99163.
- "SHORELINE EROSION" - a slide show produced by the Lake Michigan Inter-league Group of the League of Women Voters. This presentation is a discussion of causes and problems of erosion on Lake Michigan, as well as of solutions to the problems. Available for a fee to cover costs from Mary Lee Strang, 1831 Balmoral Lane, Glenview, Ill. 60025.
- "THE AQUATIC ECOLOGIST" - a 16mm film about 35 minutes in length. This film is a discussion of fisheries management work being done in the Great Lakes and in the oceans. It would be of particular interest to sports fishing enthusiasts and is available for \$10 rental from Robert Werner, P.O. Box 86, Colvin Station, Syracuse, N.Y. 13205.
- "ENERGY: THE NUCLEAR ALTERNATIVE" - a 30-minute discussion of nuclear power production in America with emphasis that the option for nuclear should be a public policy question. The issues are narrowed to three primary concerns including safety in operation of the plant, transportation of radioactive materials and long-term storage of radioactive wastes. Slightly over-simplified, but the emphasis on public policy is good. Available for preview free from Churchill Films, 662 North Robertson Blvd., Los Angeles, Calif. 90069.
- "THE STORY OF POLLUTION AND THE SOUTH END OF LAKE MICHIGAN" - a slide show discussion of the problems industrial and municipal pollution have contributed to the south end of Lake Michigan. The 40-minute show produced by Lake Michigan Federation will be available for a fee to cover costs from the Federation office after Sept. 1.

### FOUR STATES OF U.S. EPA V APPROVED TO ADMINISTER NPDES

Region V of the U.S. Environmental Protection Agency (EPA), including Michigan, Wisconsin, Ohio, Minnesota, Illinois and Indiana, has more state programs approved to administer the National Pollutant Discharge Elimination System (NPDES) than any other of the 10 regions.

Michigan, Wisconsin, Ohio and Minnesota have been approved to issue permits to dischargers under NPDES. Indiana's application may be submitted in a few months, and Illinois has not yet indicated when it will apply for the authority to issue the federal permits to control water pollution. Four other regions have two states approved, and only 15 states have been approved in the nation. Each state's pollution control agency must meet minimum criteria outlined by the law to be approved by U.S. EPA to administer the NPDES program.

## WATER QUALITY OF LAKE REMAINS POOR DESPITE CLEAN-UP EFFORTS

"We are forced to conclude that, while there was improvement in some respects for a limited time, that improvement was partly lost during 1973. We must conclude that the Lake is 'dirtier' now than it was earlier in this decade, although it is 'cleaner' than it was in the mid-1960's, and that it may be difficult even to maintain it in its present condition, much less to restore it to anything like its pristine state."

-Richard A. Pavia, June, 1974  
Acting Commissioner of Water  
and Sewers, City of Chicago

## SCIENTIFIC MONITORING OF LAKE WATER QUALITY INDICATES PROBLEMS

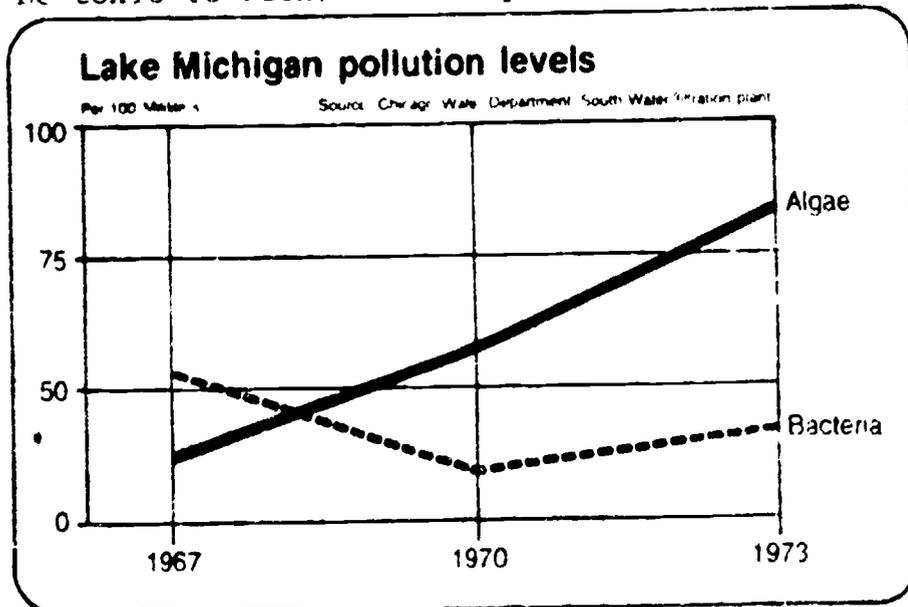
Data gathered by the City of Chicago in analyzing the water taken from Lake Michigan to be treated for drinking water supply indicates that the lake still has a troubled future. Pavia's statement (above) was the conclusion of his testimony to the Illinois House Committee on Lake Michigan's public hearing on the lake's water quality in June. It is too soon to determine if the degradation recorded in 1973 is the beginning of a trend of poorer water quality or an exception to the trend toward improvement recorded in the few years immediately preceding, he said.

At the hearing, Richard Snow of the Illinois Institute of Technology, which is doing research on industrial pollution in the south end of Lake Michigan, identified "the most noticeable and harmful pollutants" (in the southern end of the lake) as ammonia-nitrogen and phosphorus.

### PHOSPHORUS, AMMONIA-NITROGEN ARE MAJOR POLLUTANTS OF LAKE

"Ammonia-nitrogen can be toxic to fish;" Snow explained, "Phosphorus, and to a secondary extent nitrogen, promote eutrophication of near-shore waters, and result in extensive growths of algae that clog water intake screens and form unpleasant conditions on local bathing beaches."

Despite the possible trend for an increase in phosphorus content of the lake, a 700 ton/year reduction has been achieved in 1973, an April, 1974, report to the International Joint Commission (IJC) by the Great Lakes



-Reprinted, courtesy of the Chicago Tribune  
by the Great Lakes  
(cont'd. on page 4)

## SCIENTIFIC MONITORING OF LAKE WATER QUALITY INDICATES PROBLEMS (cont'd. from page 5)

Water Quality Board said. The report indicated that 90 per cent of the phosphorus input to the lake was contributed by drainage from tributaries.

According to a schedule developed pursuant to the Canadian-U.S. Agreement to clean up the Great Lakes, 1972 was the target date for programs in the Lake Michigan basin to control the gross phosphorus load in the lake. Only 89 per cent of the population served by municipalities whose effluent goes to Lake Michigan will have adequate treatment in 1975, the report said.

### REPORT TO IJC CONFIRMS SOUTHERN LAKE MICHIGAN WATER DEGRADATION

The Report to the IJC confirmed the conclusion of Snow that the Southern end of the lake still suffers from contamination from municipal and industrial sources. "The main source of effluents in the area," Snow said, "is the Indiana Harbor Canal, which carries effluents from the major steel mills, refineries, and municipal sewage treatment plants into the lake." However, Snow noted that "some of the phosphorus and ammonia-nitrogen pollution in the near-shore waters could come from more distant sources, including the north shore of Illinois."

### FISHERIES RESOURCE AFFECTED BY WATER QUALITY DEFICIENCIES

Man's activities in the basin of Lake Michigan have "seriously affected" the quality of the lake as a fishery resource, the water quality report said. Virtual elimination of some species was attributed to practices in commercial fishing, elimination of some natural reproduction areas and introduction or invasion of some new species.

While the predominant species were lake trout, white fish, lake herring, chubs, walleye and sturgeon at the turn of the century, carp, smelt, alewife and perch were the major species of annual commercial landings in 1973. Recreational fishermen have created fishing opportunities by catching game species they prefer, the report said, and that effect has improved the quality of catch.

"The last remaining constraint to natural fish production in the Great Lakes, locally in the upper lakes, and generally in the lower lakes," the report said, "is degraded water quality."

On Lake Michigan, "BOD and PCB" monitoring data "found... water quality... levels... present... of... degradation..."

The Lake Michigan Federation Bulletin is published monthly by the Lake Michigan Federation at 53 W. Jackson, Chicago, Ill. Third Class postage paid at Chicago, Ill.

#### STAFF:

Mrs. Lee Botts, Executive Secretary  
Nancy Flower, Information Director  
Fred...  
Veg...  
Biological Director



## UTILITIES PUSH EPA FOR LAX CONTROL OF THERMAL POLLUTION

The Atomic Industrial Forum, Inc. and the Utilities Water Act Group (UWAG), arms of the collective power industry, argued for weakened thermal pollution regulation at two recent unprecedented forums in Washington, D.C.

Federation Executive Secretary Mrs. Lee Botts participated in the Industrial Forum-sponsored conference designed to attune elected representatives to industry arguments. Nancy Flowers, a member of the Federation staff, testified at the U.S. Environmental Protection Agency (EPA) hearing convened to discuss the UWAG comments on the proposed guidelines for regulation of thermal effluent under the Federal Water Pollution Control Act.

### GUIDELINES TO REGULATE THERMAL EFFLUENT RESISTED BY INDUSTRY

The power industry has resisted implementation of the provision of the Federal Water Pollution Control Act from the beginning. The Act specifies "steam electric power plants" as an industry which must have guidelines regulating the effluent and "thermal discharge" as a pollutant deserving attention by a special section of the law. The original deadline for EPA to promulgate the guidelines passed in October, 1973. The agency is under court order to publish the final version by August 26.

### EPA PROPOSES NO HOT WATER DISCHARGE TO LAKE MICHIGAN

Conservationists argue that the requirement for closed cycle cooling proposed by EPA in the effluent guidelines (Section 306(b)(1)(a)) is appropriate for protection of a balanced aquatic population. Representatives of the utilities contend that once-through cooling should still be used wherever feasible.

A clause of the thermal guidelines allows specific site exemptions from the closed cycle cooling requirement if the utility can show that there has been no harm to the balanced aquatic population from previous discharges. Conservationists fear that it will be impossible to distinguish damage from heat from damage due to other pollution and that utilities will exploit the exception clause.

### REGIONAL ADMINISTRATORS MAY USE DISCRETION IN APPLICATION OF CONTROL

Spokesmen within EPA indicate that regional administrators will be authorized to exercise some discretion in applying the regulations for control of thermal pollution when they are final. Citizens who still insist on keeping hot water out of Lake Michigan and this region's waterways should write to Francis Mayo, Administrator, Region, V, U.S. Environmental Protection Agency, One North Wacker, Chicago, Ill. 60606

The message to EPA is KEEP CLOSED CYCLE COOLING as a part of the thermal regulation. For more specific information about the regulations or the Federal Water Pollution Control Act, contact the Federation. For historical information on the thermal guidelines and the continued debate about them, see earlier issues of the *Bulletin* including Oct., 1973, pp. 13 and 19; Jan., 1974, pp. 3-4; Feb., 1974, p. 1; March, 1974, p. 3; April, 1974, p. 9.

## HEARINGS ON IJC LAKE LEVELS STUDY TO BE IN OCTOBER, NOVEMBER

The International Joint Commission (IJC) announced that public hearings on the report of the IJC Lake Levels Board on regulation of the levels of the Great Lakes will be convened in 11 cities during October and November. Summaries of the report are available from the IJC on request.

Hearings will be held in Duluth, Minn.; Milwaukee, Wis.; Muskegon, Mich.; Detroit, Mich.; Cleveland, Ohio; Rochester, N.Y.; and in Canada at Thunder Bay, Owen Sound, Sault Ste. Marie, Hamilton and Montreal. Exact locations and dates will be announced soon. Copies of the summary of the Lake Level Report are available free on request from IJC, Suite 203, 1717 H Street, N.W., Washington, D.C. 20440.

### DECLINE IN EAGLE POPULATION ATTRIBUTED TO POLLUTION

*Pesticide pollution, destruction of habitat and hunters' bullets were the reasons eagle populations on the shores of the Great Lakes have declined while populations remain steady or increased in interior regions of the states, researchers report. A 1973 survey by the U.S. Department of Interior's Fish and Wildlife Service concludes that control of pesticide pollution and protection of habitat should help the bald eagles reproduce naturally but the necessity of control and education of hunters was stressed by the scientists.*

### COURT MAY AGAIN CLOSE RESERVE FOR REFUSAL TO ABATE POLLUTION

Judge Miles Lord of the U.S. District Court in Minnesota has recommended to the Appellate Court that Reserve Mining Company be closed for refusal to propose adequate plans for abatement of their pollution of Lake Superior with asbestos fibers. The mining company was under court order from the courts to prepare plans to solve the pollution problem.

Judge Lord ruled in early August that the plan presented in his court was inadequate and recommended that the plant be closed. A court order to close the plant will not stop work, however, as the workers there are currently on strike. A ruling of the Court of Appeals is expected by late August.

### HEARING REVIEWS WILDERNESS DESIGNATION FOR SLEEPING BEAR DUNES

The opportunity for protection of one of the last remaining wilderness areas on Lake Michigan was discussed at a recent Michigan hearing to consider whether portions of Sleeping Bear National Lakeshore should be designated as wilderness area. Gary Nabhan, Federation member, presented testimony for the Federation calling for balancing the "desire to protect the integrity of the lake's waters and shores and man's needs to use the lake for his own purposes."

## DRINKING WATER, TOO, THREATENED BY POLLUTION

*Editor's Note:* Some people would argue that control of pollution in our nation's waterways cannot be justified because fish do not pay taxes to cover the costs. However, these waterways are the source of drinking water as well as fish habitat, and taxpayers pay to have pollutants removed for drinking water supply, so money spent to prohibit pollution in the first place is probably most efficient. There is increasing concern about pollutants that undetected make their way to the consumer's tap. Here is recent information that addresses the problem.

## THOUSANDS DRINK LAKE MICHIGAN WATER DAILY

Almost 50 communities on Lake Michigan draw water for drinking supply directly from the lake, and others would like to. Many thousands of other people who visit these cities also drink Lake Michigan water. Pollutants are so pervasive now that drinking water from almost all sources is potentially unsafe. Treatment of water supply is a major expense for most municipalities.

Some 46,000 Americans became ill from water-borne diseases from 1961 to 1970, *Newsday* magazine reported, "and 20 of them died." The number of unreported cases is suspected to be much higher. Information collected by the U.S. Department of Health, Education and Welfare in 1969 and '70 and cited by the magazine indicated that 8 million Americans are supplied impure drinking water. And that number does not include the 30 million people who are drinking untreated water from wells or springs.

## TESTING OF MUNICIPAL WATER SUPPLIES REVEALS CONTAMINATION

Testing of municipal drinking water supplies since 1969 by health and environmental regulatory officials has found toxic and carcinogenic substances that have escaped to the consumer, reports June 1973 *Newsday* magazine. Testing for bacteria which has been the traditional criteria for "safe" water is still required, but improvement in technology enabling testing for toxic and carcinogenic substances has not been added.

However, a survey of testing for the Public Health Standard (PHS which involves the bacteria test only) found that, in 1969, 85 per cent of municipalities in a national sample had not collected and tested as prescribed, the Community Water Supply Study of 1969 reported. A 1973 General Accounting Office study that surveyed similarly found that 72 per cent of a sample group of 446 municipal systems failed to gather an adequate number of samples even for the bacterial contamination test.

## PUBLIC HEALTH STANDARDS NOT MET BY 18% OF U.S. CITIES

In 1969, 12 per cent of the sample failed even the PHS criteria, and 18 per cent of the 1973 sample failed the PHS standard. Major cities as well as smaller municipalities were included in the samples. Generally, the reports conclude that monitoring of the quality of drinking water is an area that is in much need of careful attention.

## STATES, FEDS, FAIL TO WORK TOGETHER ON SHORELAND PROBLEMS

Again, state and federal agencies are failing to get together to solve Lake Michigan problems--this time under the Coastal Zone Management Act of 1972. The bill provides federal funds to assist states in development of shoreland management plans. In Milwaukee on July 11 Federation Secretary Lee Botts pleaded with the national Coastal Zone Advisory Committee to force state and federal agencies to meet the law's requirements for coordination.

She urged coordination in research on lake currents and the processes that build up and erode beaches, for example, to meet the law's requirements for cooperation in problems "of more than local significance." As an example of lack of coordination in management policy, she pointed out that the Army Corps of Engineers is responsible for approving permit applications for erosion control structures on the lake, but that the states have no set criteria for review of such permits.

The Coastal Zone Management Act is the most significant Congressional action so far to encourage state land use planning. The law also requires that the state provide for public participation in development of shoreland plans. To find out what the states are doing under the Coastal Zone Management Act, request copies of state applications for funds and to be notified of hearings on policy questions from the persons listed below:

Ralph Fisher  
Department of Conservation  
605 State Office Building  
Springfield, Ill. 62706

William Marks  
Department of Natural Resources  
Stevens T. Mason Building  
Lansing, Mich. 48926

William Andrews  
Department of Natural Resources  
608 State Office Building  
Indianapolis, Ind. 46204

Allen Miller  
State Planning Office  
1 West Wilson  
Madison, Wis. 53701

### MICHIGAN SETS UP CITIZEN SHORE ADVISORY GROUP

A Shorelands Advisory Council has been established in Michigan to advise the state's Natural Resources Commission on development of a shoreland management program.

Donna Asselin, a member of the Federation Executive Council, has been appointed to serve on the Council. She joins Gerald Lindquist, who is Council chairman and a member of the Federation Executive Council, and F. R. Hames, member of the Federation, as members of the advisory group (see page 11 of April, 1974, Bulletin).

### MICHIGAN LEGISLATURE PLANS SHORELANDS CONFERENCE

A three-day conference on causes and solutions of problems on Great Lakes shores will be held at the Park Place Hotel in Traverse City, Michigan, September 4, 5 and 6. For information, write Rep. Raymond Smit, 1101 University Bldg., Ann Arbor, Mich. 48014. The conference is sponsored by the Michigan State Legislature, and is open to all interested parties.

## CITIZENS OF REGION TO REVIEW "PROJECT INDEPENDENCE" IN CHICAGO

President Nixon's plan to achieve energy independence by 1980, "Project Independence," will be discussed at a public hearing at the Conrad Hilton Hotel in Chicago September 9-13. Nuclear power is the topic for discussion the first day of the Chicago hearing, and conservation will be the subject of the Thursday session. Other topics will be more technically oriented.

Conservationists anticipate that resources would be exploited at all costs to produce the most energy fastest if the Project Independence is implemented in its present form. Draft summary reports about Project Independence are finally available from Administrator John Sawhill, Federal Energy Administration, 12th and Pennsylvania Ave. N.W., Washington, D.C. 20461, but the long-awaited detailed report has still not been made public.

Invitations to testify at the Chicago hearing were sent to representatives of utilities, industries and transportation interests, and a spokesman for the regional coordinator said more than 300 people are expected to attend the hearing. Requests to testify from citizens who would balance that testimony with insistence that conservation and protection of natural resources must accompany development of resources for energy independence should be sent to David Stein, Region V, Federal Energy Administration, 175 West Jackson, Chicago, Ill. 60606. Contact the Federation for more information.

## IN THE LAKE MICHIGAN REGION....

WISCONSIN/ILLINOIS - The Littoral Environment Observation Program of the U.S. Army Corps of Engineers has been expanded into Illinois and Wisconsin. Under the Program the purpose of the Corps is "to plan, design and construct shore protection projects for public property, private property in full public use, prevention and mitigation of shore damage attributable to federal navigation works and other coastal structures."

INDIANA - The Expansion Bill for the Indiana Dunes National Lakeshore is in committee now, but proponents are hopeful that it will be favorably reported out of committee for a vote on the House floor soon.

MICHIGAN - Scientists at the University of Michigan as well as others are increasingly convinced that "the problem of atmospheric contamination will have to be approached before we can expect to see significant improvement in overall water quality in the lake (Michigan)."

Research done by Dr. Thomas Murphy of the Federation Executive Council (see pg. 17 of May-June, 1973, Bulletin) indicates the rainfall contributes significant amounts of phosphorus to the lake. Zinc and copper called "trace metals" are among pollutants of the lake whose concentration is increased by atmospheric presence, research as early as 1972 indicated. University of Michigan scientists estimate that "20 per cent of the daily emissions" (in the regions south from Milwaukee, Wis. to northwest Indiana) "enter the lake."

You are invited to a weekend

### FEDERATION FAMILY FALL FEST

at

### INNISFREE

Near Leland, 20 miles north of Traverse City, Mich.

OCTOBER 12-13, 1974

It's an extraordinary camping spot at the "ripe" time for autumn splendor.

#### A WORKSHOP ON PUBLIC ACCESS TO SHORELANDS

with a discussion of the Sleeping Bear Dunes as one special focus of shorelands where public policy must resolve which of conflicting uses will be chosen.

#### A FALL VACATION

Bring your family, friends to Innisfree.

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\$18 per adult or school aged child.  
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\$70 Maximum cost per family.  
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Deadline for reservations: Sept. 13

Contact the Federation for more information or to make reservations.

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APPENDIX G.  
LAKE MICHIGAN FEDERATION 1973-74 EXECUTIVE COUNCIL

Harold Olin, LMF President Lake Michigan Regional Planning Council Beverly Shores, Indiana	John Langum, LMF Vice-President <u>Business Economics</u> Chicago, Illinois
Norris "Mike" Love, LMF Treasurer Clean Air Coordinating Committee Winnetka, Illinois	Donna Asselin, LMF Secretary Grand Mere Association St. Joseph, Michigan
Helen Bieker American Assn. of University Women Munster, Indiana	Dr. Robert Bradburn Michigan Audubon Society St. Joseph, Michigan
Gertrude Dixon League Against Nuclear Dangers Stevens Point, Wisconsin	Lewis Drain W. Mich. Group, Sierra Club Grand Rapids, Michigan
Jonathan Ela Sierra Club, Midwestern Representative Madison, Wisconsin	Ted Falls Izaak Walton League, Indiana Division Wheeler, Indiana
Karen Griggs Izaak Walton League, Indiana Division Ashley, Indiana	Jim Jontz Indiana Conservation Council (NWF affil.) Williamsport, Indiana
Robert Kuehny Paris Preservation Council Kenosha, Wisconsin	Gerald Lindquist Tri-Cities Environmental Action Council Spring Lake, Michigan
John Macnak Lake Co. Fish & Game Protect. Assn. Hammond, Indiana	Lois McClure Winnetka Environmental Council Winnetka, Illinois
Judith Miessner Junior League Milwaukee, Wisconsin	Stephen Merrick Committee on Lake Michigan Pollution Wilmette, Illinois
Thomas Murphy DePaul University, Chemistry Dept. Chicago, Illinois	Gordon Pirie Univ. of Wisconsin--Milwaukee, Geology Dept. Milwaukee, Wisconsin
Walter Pomeroy Northern Environmental Council Ashland, Wisconsin	Norman Rabbers consulting engineer Chicago, Illinois
Mark Reshkin Ind. Univ.--Calumet Cent. Publ. Affrs. Gary, Indiana	Louise Rome League of Women Voters of Illinois River Forest, Illinois
Vance VanLaanen, Past LMF President Wisconsin Resources Conserv. Council Green Bay, Wisconsin	Henry Westerville Michigan Lakes & Streams Association Kalamazoo, Michigan
Mary Woodland League of Women Voters, 4-state group Homewood, Illinois	Louise Young Open Lands Project Winnetka, Illinois

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