

# THE GREAT LAKES PROGRAM TO ENSURE ENVIRONMENTAL AND ECONOMIC PROSPERITY



— GREAT LAKES COMMISSION PRIORITIES TO “RESTORE THE GREATNESS” WORKING DRAFT— MARCH 2001

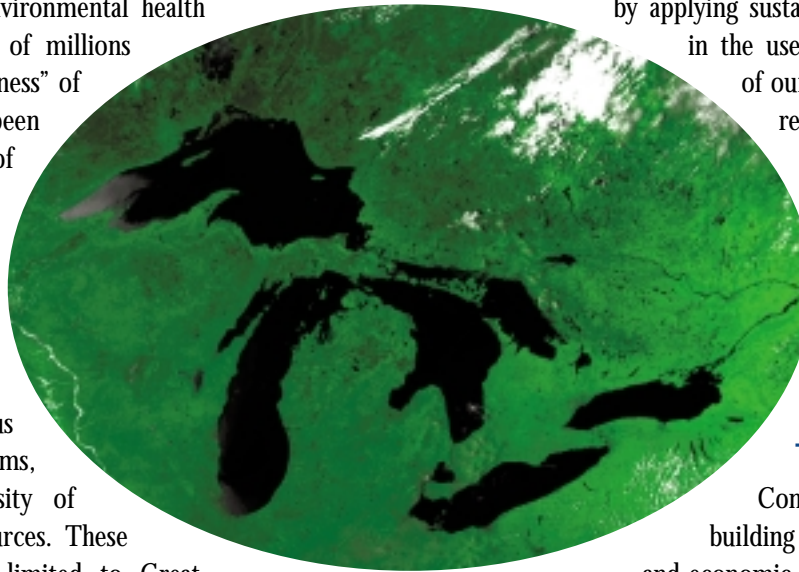
## THE PROBLEM

The Great Lakes are the centerpiece of the largest freshwater system on the face of the earth; they hold the key to the economic prosperity, environmental health and quality of life of tens of millions of residents. Yet, the “greatness” of this binational resource has been compromised by a legacy of misuse and abuse. Chemical and biological contaminants have been introduced, limiting our ability to eat the fish we catch, preventing us from swimming at our public beaches, making us vulnerable to health problems, and threatening the diversity of our fish and wildlife resources. These ecosystem threats are not limited to Great Lakes water; improper land-use practices, including urban and suburban sprawl, also threaten the ecological, economic and social health of our region. And, an aging infrastructure for water-based transportation limits the potential of what is aptly described as the industrial heartland of North America.

The Great Lakes have come a long way since they were declared “dead or dying” some three decades ago. The key has been strong

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leadership by our Great Lakes Congressional Delegation and our governors, and partnerships involving all levels of government in the United States and Canada, our citizen organizations, business and industry, and others with a stewardship role and responsibility. Progress, however, is stalling, given the steady erosion of federal support for this shared effort. We are in danger of compromising past progress and foregoing future opportunities. We need to restore our ability to manage this resource for environmental and economic prosperity; we need to “Restore the Greatness!”



## THE VISION

We seek a Great Lakes region that offers a prosperous economy, a healthy environment and a high quality of life for all citizens by applying sustainable development principles in the use, management and protection of our water, land and other natural resources. These principles call for stewardship practices that allow our present generation to enjoy the benefits of these resources without compromising the ability of future generations to do the same.

## THE OPPORTUNITY

Congress has already established the building blocks to ensure environmental and economic prosperity for the Great Lakes region. Many critical program authorities already exist, but are fragmented and have either received limited appropriations or none at all. Consequently, recent efforts to address Great Lakes needs have been a “band-aid” approach, and an injustice to our world-class resource. Incremental adjustments to the status quo will not “Restore the Greatness.” The opportunity for a bold new Great Lakes Program is now!

## THE PROGRAM

“The Great Lakes Program to Ensure Environmental and Economic Prosperity” is the key to achieving our vision. It’s a bold, new, ten-year initiative that emphasizes federal/state and U.S./Canadian partnerships, the interdependence of environmental health and sustainable economic development, and our shared obligation as stewards of the world’s largest surface

## THE ISSUES

- Cleaning up toxic hot spots
- Shutting the door on invasive species
- Controlling nonpoint source pollution
- Restoring and conserving wetlands and critical coastal habitat
- Ensuring the sustainable use of our water resources
- Strengthening our decision support capability
- Enhancing the commercial and recreational value of our waterways

freshwater system. It's based largely on federal programs that have been authorized, yet inadequately (or never) funded, as well as on important "new-start" initiatives. Future iterations of the Great Lakes Program will focus increasingly on regional goals and identifying state/federal programs (both current and new-start) that will allow us to realize these goals.

The Great Lakes Program constitutes a ten-year, \$4.45 billion investment in the world's largest and greatest freshwater system. This includes only the *Great Lakes-specific* programs identified within. They will be augmented by the Great Lakes portion of various national programs (e.g., Clean Water Act, Conservation Reserve Enhancement Program), as well as state and local match.

The Program is focused on seven actions that hold the key to our environmental and economic prosperity: 1) cleaning up toxic "hot spots," 2) shutting the door on invasive species, 3) controlling nonpoint source pollution, 4) restoring and conserving wetlands and critical coastal habitat, 5) ensuring the sustainable use of our water resources, 6) strengthening our decision support capability, and 7) enhancing the commercial and recreational value of our waterways.

## THE PARTNERS

"The Great Lakes Program to Ensure Environmental and Economic Prosperity" has been endorsed by the Great Lakes Commission on behalf of its eight member states. Founded in state and U.S.

The Great Lakes Program . . . provisions are consistent with, and build upon, the many federal authorities, regional agreements and strategic plans associated with the individual and collective members of the Great Lakes community.

federal law, the Commission is responsible for promoting sound public policy decisions on issues of environmental protection, resource management, transportation and sustainable development. The Great Lakes Program was developed following consultation with many sectors of the larger Great Lakes community. It reflects, however, only the views of the Great Lakes Commission membership. Its provisions are consistent with, and build upon, the many federal authorities, regional agreements and strategic plans associated with the individual and collective members of the Great Lakes community. Further, the Great Lakes Program recognizes the binational status of the resource and the need to honor U.S. commitments under the U.S.-Canada Great Lakes Water Quality Agreement and associated binational programs.

## THE ELEMENTS

Presented within are seven Great Lakes Program goals that enable us to realize our vision. Each provides a basis for congressional actions that direct the focus of various programs, authorizations and appropriations. Collectively, they comprise the Great Lakes Program and advance its promise to "Restore the Greatness." The Great Lakes Program elements presented here are limited primarily to activities specific to this region, although some national initiatives with large regional components are identified. However, it is critically important that all relevant national appropriations and programs are supported (e.g., Clean Water Act, Great Waters Program, Conservation Reserve and Enhancement Program), and that their Great Lakes components are funded consistent with documented needs.

## THE REQUEST

The Great Lakes Commission, acting on behalf of its eight member states, invites the larger Great Lakes community to 1) embrace the vision, focus and goals of the "Great Lakes Program to Ensure Environmental and Economic Prosperity," 2) consider the associated "priority actions" as legislative and appropriations

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initiatives are developed and pursued, and 3) work together to review and refine these elements and contribute to a large-scale, consensus-based package.

The Great Lakes Program is a work in progress; it will evolve over time. And, we recognize that the Program's vision cannot be attained through enhanced federal funding alone. It requires strategically targeted and efficiently managed programs, strong intergovernmental partnerships, stakeholder support and involvement, unity of purpose, and a willingness to move beyond the status quo to act in bold and creative ways. We welcome the opportunity to work with the Congress, and all our partners, to achieve our shared vision.



# ISSUES

## Cleaning up Toxic Hot Spots

### GOAL

Restore and maintain beneficial uses in each of the 31 U.S. and binational Areas of Concern, with a special emphasis on remediation of contaminated sediment.

### BENEFITS

Contaminated sediments are a persistent source of toxic pollution to the Great Lakes at every one of the 31 U.S. and binational Areas of Concern (AOCs). They are at least partially responsible for 11 of the 14 beneficial use impairments identified in the U.S.-Canada Great Lakes Water Quality Agreement, including fish consumption advisories, fish tumors and deformities, and restrictions on dredging activities. The remediation of contaminated sediments through environmental dredging and the application of other technologies

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is a key step toward restoration of beneficial uses and delisting of AOCs. Also important are prevention programs to keep sites off the AOC list. A shared emphasis on remediation and prevention is necessary for Great Lakes communities to achieve their recreational and redevelopment potential.

### SELECTED PRIORITY ACTIONS

- *Cleaning up U.S. and binational Areas of Concern:* to restore beneficial uses at 31 toxic “hot spots” — \$50.0 million annually to the U.S. Environmental Protection Agency.

## Shutting the Door on Invasive Species

### GOAL

Restore and protect the ecological and environmental health of the Great Lakes by preventing the introduction of new invasive species and limiting the spread of established ones.

### BENEFITS

Invasive species represent a growing and potentially devastating threat to the economy and environment of the Great Lakes. Costs to date are documented in the hundreds of millions of dollars, and are estimated to be as high as \$5.0 billion over a ten-year period if measures to address the problem are not taken. Aquatic and ter-

restrial species, such as the zebra mussel, ruffe, round goby and purple loosestrife, are insidious forms of biological pollution that prey upon and displace native animals and plants, reduce biodiversity, limit water use activities, and damage public and private infrastructure. Preventing new infestations and limiting the spread of established ones will help restore and protect the environment, as well as

- *Environmental dredging:* to provide cost-shared support to Great Lakes states for Areas of Concern cleanup — \$50.0 million annually to the U.S. Army Corps of Engineers.

- *Remedial Action Plan support:* to develop and demonstrate promising sediment remediation technologies including a focus on beneficial reuse of dredged materials — \$8.0 million annually to the U.S. Army Corps of Engineers, in cooperation with the U.S. EPA.

- *Natural Resource Damage Assessments (NRDA):* to accelerate efforts to ensure that polluters responsible for sediment contamination pay their fair share — \$5.0 million annually to the U.S. Fish and Wildlife Service for Great Lakes projects (e.g., Fox/Wolf River, Kalamazoo River.)

- *Restoration of Coastal Environmental Management (CEM) funding:* for continued support for implementation of Remedial Action Plans, Lakewide Management Plans and related activities on all Great Lakes — \$15.0 million annually to the U.S. EPA.

- *Collaborative use of Superfund and cost-shared programs:* to develop and apply sediment remediation technologies through a combination of polluter-pay and cost-shared options. New legislation enabling concurrent use of these programs will be required.



water-dependent economic activity valued in the billions of dollars annually in every Great Lakes state.

## SELECTED PRIORITY ACTIONS

- *Reauthorization of the National Invasive Species Act (NISA)*: to strengthen national and regional programs and develop ballast management standards and regulations consistent with

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recommendations of the Great Lakes Commission and the Great Lakes Panel on Aquatic Nuisance Species.

- *Implement Comprehensive State Management Plans (NISA, Sect. 1204)*: to partner with Great Lakes states on critically important prevention and control programs — \$5.0 million annually to the Great Lakes states through the U.S. Fish and Wildlife Service.
- *Support the Great Lakes Panel on Aquatic Nuisances Species (NISA, Sect. 1203)*: to ensure effective, efficient and well coordinated

regional prevention and control programs — \$0.3 million annually to the Great Lakes Commission through the U.S. Fish and Wildlife Service.

- *Ballast technology development and demonstrations*: to address a leading vector for invasive species (commercial vessels in ballast or “no ballast on board” status) — \$3.0 million annually for each of several federal agencies/facilities with special expertise: Great Lakes Environmental Research Laboratory (National Oceanic and Atmospheric Administration), Great Lakes Science Center (United States Geological Survey), and Great Lakes Sea Grant Program (through the National Sea Grant Program); and \$1.2 million annually to the U.S. Coast Guard.
- *Public facility research and development*: to complete the design, construction and evaluation of a dispersal barrier in the Chicago Sanitary and Ship Canal, and undertake related control activities — \$3.0 million annually to the U.S. Army Corps of Engineers.
- *Sea lamprey barriers*: to dramatically reduce infestations with an emphasis on nonchemical alternatives — \$3.0 million annually to the U.S. Army Corps of Engineers.
- *Best Available Technology on commercial vessels*: to secure authorizing language for a program to support retrofitting of commercial vessels to eliminate/reduce infestations and spread — \$25.0 million annually to the U.S. Coast Guard.

## Controlling nonpoint source pollution

### GOAL

Improve Great Lakes water quality and economic productivity by controlling nonpoint source pollution from water, land and air pathways.

### BENEFITS

Responsible use of our water, land and air resources is vitally important to the environmental quality and economic productivity of the Great Lakes region. Yet, nonpoint source (i.e., diffuse) pollution is the leading source of contaminants to the Great Lakes, with pathways that include urban and agricultural runoff and air

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deposition. Hundreds of millions of tons of topsoil erode into the lakes each year and millions of tons of airborne contaminants are deposited as well. Irresponsible resource use practices generating such pollution are particularly damaging because they simultaneously degrade the environment and compromise the economic use and value of the resource. The Great Lakes region has

started to “turn the corner” on this problem with innovative programs that feature state/federal partnerships. The challenge

is an immense one,

however, and enhanced federal support for selected initiatives is critical.



## SELECTED PRIORITY ACTIONS

- *Great Lakes Basin Program for Soil Erosion and Sediment Control*: to measurably improve water quality and responsible land use through local projects — authorizing legislation and appropriations of \$5.0 million annually to the Great Lakes Commission through the Natural Resources Conservation Service-U.S. Department of Agriculture, for competitive grants to the Great Lakes states for demonstration and technical assistance projects.
- *Section 319 of the Clean Water Act*: to adequately fund U.S. EPA’s primary tool for addressing nonpoint source pollution problems in the Great Lakes basin and nationally — \$250.0 million annually at the national level, with an equitable share

for the Great Lakes states.

- *Great Waters Program*: to improve environmental quality through inventory, research and monitoring of toxic contaminants and assessing their contribution to water quality problems — \$3.0 million annually to the Clean Air Act Great Waters Program, with no less than \$1.5 million directed to the Great Lakes region.

## Restoring and conserving wetlands and critical coastal habitat

### GOAL

Restore 100,000 acres of wetlands and critical coastal habitat while protecting existing, high quality fish and wildlife habitat in the Great Lakes basin.

### BENEFIT

Wetlands and coastal marshes provide critical habitat for Great Lakes fish and wildlife, help store and cycle nutrients, prevent erosion of soil and shorelines, and provide a tremendous recreational value to the region. Their loss is progressive; only 300,000 acres of coastal wetlands remain in the Great Lakes basin. Similarly, the loss of small streams and associated floodplains due to urbanization impairs critical habitat and compromises ecological and economic benefits. A program to preserve existing wetlands and other critical habitat, and restore 100,000 acres of degraded wetlands and other habitat, will greatly enhance fish and wildlife resources.

### SELECTED PRIORITY ACTIONS

- *Restoration of fish and wildlife resources in the Great Lakes basin*: provide cost-shared grants to Great Lakes states through the Great Lakes Fish and Wildlife Restoration Act — \$8.0 million annually to the U.S. Fish and Wildlife Service.
- *Great Lakes fishery and ecosystem restoration*: appropriate authorized funds to the U.S. Army Corps of Engineers under the Estuaries and Clean Waters Act of FY2000 — (\$50.0 million for FY2002 increasing to \$75.0 million in FY2005 nationally), with an equitable amount to the Great Lakes region for coastal restoration activities.
- *Wetland and critical habitat restoration*: to implement, via cost-shared support, the Joint Strategic Plan for Management of Great Lakes Fisheries — \$10.0 million annually to the U.S. Army Corps of Engineers, in consultation with the Great Lakes Fishery Commission.
- *Wetlands Reserve Program*: to purchase long-term easements that return agricultural lands to wetlands essential for Great Lakes hydrology and critical habitat — \$35.0 million annually to the Natural Resources Conservation Service-U.S. Department of Agriculture for Great Lakes region programs.

- *Great Lakes Sediment Management Program*: to assist states and localities in reducing nonpoint source pollution by developing and applying sediment transport models to priority Great Lakes tributaries — \$1.0 million annually to the U.S. Army Corps of Engineers under the Water Resources Development Act of 1996.



- *Conservation and Reinvestment Act*: to reinvest in Great Lakes coastal resources through restoration projects including contaminated site cleanup, stormwater controls, wetland restoration, buffer/greenway acquisition, related pollution control and coastal restoration activities — ensure an equitable Great Lakes region share of this national program, with \$30.0 million annually to NOAA for Great Lakes Coastal Restoration Grants.
- *North American Wetlands Conservation Act*: to stimulate public/private partnerships to protect, restore and manage a

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diversity of wetland habitat in the Great Lakes region and nationally — \$40.0 million annually to the U.S. Fish and Wildlife Service at the national level, with an equable share for the Great Lakes region.

- *Conservation Reserve Program (CRP)*: to take highly erodible land out of agricultural production and apply best management practices — enhanced funding to the Natural Resources Conservation Service-U.S. Department of Agriculture with an equitable share for the Great Lakes region.
- *Conservation Reserve Enhancement Program*: to assist states in targeting priority areas and using financial incentives to encourage farmers to remove erosion-prone land from production through the CRP program — enhanced funding to the Farm Services Agency-U.S. Department of Agriculture with an equitable share for the Great Lakes region.

# Ensuring the sustainable use of our water resources

## GOAL

Ensure the sustainable use and management of Great Lakes water resources to protect environmental quality and accommodate water-based economic activity in the Great Lakes states.

## BENEFITS

The environmental and economic prosperity of the Great Lakes region is fundamentally dependent on access to abundant quantities of high quality water. Yet, continuing reductions in federally funded monitoring, data gathering, analysis and program implementation have severely compromised our ability to assess the status of our

The federal government, in partnership with the Great Lakes states, must ensure regional prosperity through programs that strengthen our ability to manage our water resources for environmentally sound, sustainable use.

water resources, track trends in usage, and develop regionwide programs to manage use and withdrawals for sustainable use. Lacking this capability leaves the world's greatest freshwater resource and the economy that depends on it in a highly vulnerable state. The federal government, in partnership with the Great Lakes states, must ensure regional prosperity through programs that strengthen our ability to manage our water resources for environmentally sound, sustainable use. Enhanced federal support will complement state and provincial

efforts under both the Great Lakes Charter of 1985 and Annex 2001 presently under development.



## SELECTED PRIORITY ACTIONS

- *Water Use Management Program*: authorizing legislation to establish a federal/state partnership and grants program to provide the data, analysis and programs needed for informed decisions on water withdrawal and use. Forecasting, monitoring, mapping and trend analysis capabilities must be enhanced for surface and groundwater management — \$14.0 million annually through USGS, with funding for USGS (\$3.0 million), NOAA (\$3.0 million), the U.S. Army Corps of Engineers (\$3.0 million), and the Great Lakes Commission (\$5.0 million for state grants program).
- *Real-Time Great Lakes Water Level/Environmental Monitoring Network*: to provide recreational and commercial vessel operators, as well as resource managers and scientists, with instant access to data from 49 water level stations — \$3.0 million annually to NOAA, with \$1.0 million pass through to the U.S. Army Corps of Engineers.
- *Inventory and evaluation of federal water-related data and future trends*: to provide Congress and the Great Lakes states with information on the capability of existing programs to address current and anticipated needs — \$1.5 million to the U.S. Army Corps of Engineers (one-time cost).

# Strengthening our decision support capability

## GOAL

Meet domestic and international Great Lakes commitments through adequate funding for, and the efficient and targeted operation of, federally funded management and research agencies.

## BENEFITS

The management of Great Lakes water and related land and air resources is a responsibility shared by two countries, eight states and two provinces. A number of international and domestic agreements and plans have been formulated to safeguard the sustainable use of these resources, and, in the United States, are implemented through a variety of federal research and management agencies. The continuing erosion of federal funding for these agencies and their research, monitoring, data gathering and analysis programs has severely compromised our abil-

ity to assess the status of our Great Lakes resources, track trends in usage, and develop regionwide programs to manage for sustainable use. This declining capability to manage the world's greatest freshwater resource has forced federal and state stewards to work in a "crisis management" mode, where agencies react to problems only after they occur, rather than in a proactive or strategic manner. Restoring our regional capability will ensure that federal laws, policies and programs, as well as international commitments, are carried out efficiently and effectively. Benefit will accrue to the environment and economy. Federally funded agencies and programs that



support resource management decisions are key to the health of numerous multibillion dollar-a-year industries in the region, including sport fishing, recreational boating and water-based tourism, among many others.

To ensure the efficient and effective operation of this collective decision support system, the Great Lakes Commission recognizes that the federally funded Great Lakes research community must be fully responsive to our resource management and related public policy priorities. To that end, the Commission recommends that the Great Lakes Congressional Delegation request the U.S. General Accounting Office to undertake a comprehensive review and analysis of federally funded research and offer recommendations to maximize its contributions to the region's environmental and economic prosperity.

### SELECTED PRIORITY ACTIONS

- *Center for Great Lakes Research and Policy*: to house multiple federally funded institutions (Ann Arbor, Mich.) with pronounced benefits in collaboration and efficiency, and significant reductions in operating costs for individual institutions — authorization and \$55.0 million for construction through NOAA (one-time cost).
- *NOAA/Great Lakes Environmental Research Laboratory*: to provide scientific expertise for decisions concerning lake levels and flows, ice cover, and coastal processes — \$15.0 million annually.
- *USGS/Great Lakes Science Center*: to provide critical information for sound management of Great Lakes fish populations, coastal habitat and other natural resources — \$15.0 million annually.
- *U.S. EPA/Great Lakes National Program Office (GLNPO) and Research Facilities*: to coordinate, undertake and support federal, state and local planning, management and research programs that improve the environmental health and economic vitality of the resource and its uses through the Remedial Action Plan and Lakewide Management Plan initiatives, among others

## Enhancing the commercial and recreational value of our waterways

### GOAL

Maximize the commercial and recreational value of Great Lakes waterways and other coastal areas by repairing/replacing critical infrastructure and implementing programs for sustainable use.

### BENEFITS

Great Lakes waterborne transportation is the foundation on which the U.S. and Canadian regional and national manufacturing economies were built. Total annual commerce (U.S. and Canadian) has averaged about 200 million tons

— \$25.0 million annually to GLNPO (Chicago, Ill.) and \$10.0 million annually to U.S. EPA facilities in Duluth, Minn. and Grosse Ile, Mich. for the Great Lakes components of their research.

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- *Great Lakes Fishery Commission*: to protect a multibillion dollar binational sport fishery by controlling the sea lamprey and other invasive species, and managing a sustainable, economically productive fishery — \$15.0 million annually.
- *International Joint Commission*: to meet treaty obligations with Canada and address/resolve water quality and quantity problems that threaten the ecological health and economic viability of the Great Lakes system and its uses — \$8.0 million annually.
- *U.S. Army Corps of Engineers*: to develop a Great Lakes strategic plan, with input from all sectors of the Great Lakes community, to assess needs and direct Corps programs to regional environmental and economic priorities — \$0.75 million (one-time cost).
- *Great Lakes Commission*: to develop and maintain an on-line geographic information system (GIS) database to serve agency research, management, policymaking and infrastructure/education needs — \$1.5 million annually.
- *National Sea Grant College Program*: to promote and support scientific research and outreach programs on topics ranging from aquatic nuisance species to sustainable coastal development — \$75.0 million annually, with an equitable portion to the programs in the Great Lakes states.



in recent years. The Great Lakes navigation system includes 68 deep-draft harbors, 71 shallow harbors, 734 miles of navigation channel, 150 miles of breakwater and 26 locks chambers. However, the bulk of Great Lakes navigation infrastructure was constructed between 50 and 100 years ago, and has not had major rehabilitation or modernization. Studies show that waterborne transportation on the Great Lakes is

preferable to rail and over-the-road options from environmental, fuel efficiency and safety standpoints.

Similarly, Great Lakes waterways and other coastal areas offer tremendous recreational opportunities and associated economic benefits. Recreational boating, for example, is a multibillion dollar-a-year industry, and the Great Lakes states are home

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to one of every three registered boats in the United States. (Michigan alone has approximately one million registered boats, more than any other state in the country.) The viability of other water-based recreational activities and facilities (e.g., Great Lakes beaches, parks, sport fishing) is also dependent on federal/state partnerships. The Great Lakes Circle Tour, a 6,500-mile designated scenic roadway established by the Great Lakes Commission, showcases our world-class binational resources and provides access to the water-based recreational opportunities available within our communities and along our shoreline.

## SELECTED PRIORITY ACTIONS

- *Replacement lock at Sault Ste. Marie:* to ensure the safety and reliability of waterborne transportation — \$171.0 million for construction to the U.S. Army Corps of Engineers (one-time cost).
- *Maintenance and repairs to Great Lakes harbors and channels:* to ensure continued safe navigation by eliminating a backlog of much-needed projects and compensating for expected low water conditions — \$20.0 million annually to the U.S. Army Corps of Engineers.
- *Federal priorities for funding recreational navigation projects:* to use results of the economic study authorized by the John Glenn Great Lakes Basin Program — \$0.5 million to the U.S. Army Corps of Engineers (one-time cost).
- *Great Lakes Navigational System:* to complete the reconnaissance study of potential capital improvements to optimize Great Lakes navigation system infrastructure — \$0.5 million to the U.S. Army Corps of Engineers (one-time cost).
- *Vessel safety:* to promote safe navigation and support commercial and recreational vessel operators — \$78.6 million (one-time cost) to the U.S. Coast Guard for two new buoy tenders; \$2.6 million annually to implement an automated identification system for traffic, particularly for the St. Mary's River; and \$20.0 million annually for the Great Lakes component of a National Distress and Response System.



NATHANIEL E. ROBINSON, CHAIR

*The Great Lakes Commission, chaired by Nathaniel E. Robinson (Wisconsin), is a nonpartisan, binational compact agency created by state and U.S. federal law and dedicated to promoting a strong economy, healthy environment and high quality of life for the Great Lakes-St. Lawrence region and its residents. The Commission consists of state legislators, agency officials and governors' appointees from its eight member states. Associate membership for Ontario and Québec was established through the signing of a "Declaration of Partnership." The Commission maintains a formal Observer program involving U.S. and Canadian federal agencies, tribal authorities, binational agencies and other regional interests. Commission offices are located in Ann Arbor, Michigan.*

### FOR FURTHER INFORMATION CONTACT:

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