



LakeLinks

Fall/Winter 2004

A multi-disciplinary forum for dialogue and expression of diverse viewpoints on issues of importance to the Great Lakes region

Special Points of Interest

National Water Crisis:

DIVERSION CONFERENCE

NOVEMBER 19, 2004

University of Toledo
College of Law
See page 8

See Inside....

Page 2 - An Environmentalists view of Implementing Annex 2001

Page 3 - Council of Great Lakes Industries Comments on Implementing Annex 2001

Page 8 - National Water Crisis: Drawing the Line on Diversion



Introduction Implementing Annex 2004

Frank S. Merritt, Chair
Legal Institute of the Great Lakes

This number of *LakeLinks* is devoted to comments on the proposed agreement and compact for the implementation of Annex 2001 to the Great Lakes Charter. In 2001 the governors of the eight Great Lakes States together with the Premiers of Ontario and Quebec signed the 2001 Annex to the Great Lakes Charter of 1985. The purpose of the Annex was to strengthen the system of regional cooperation for protection, conservation, restoration and improvement of the water of the Great Lakes for future generations. The Annex required the eight governors and two premiers to work together to develop a structure to control, inter alia, out of basin diversions of water. This would implement the authority given to the governors in the Water Resources Development Act of 1986 and the general agreements made in establishing the Great Lakes Charter.

In July of 2004 the Council of Governors released is proposed agreement to implement Annex 2001 for comment. The proposal is in two parts. The first is an agreement among the eight states and the two provinces. The second part is an interstate compact among the eight states. The former is a good faith/best efforts agreement relying upon the authority of the 1986 WRDA as amended in 2000. The latter would require the consent of Congress, but would not involve the provinces. The two documents are parallel and the compact draft refers to the agreement. Both call for registration of all new diversions and withdrawals from the waters of the basin. New or increased diversions in excess of 1 million gallons per day would require regional review by a body established by the

(Implementing Annexes continued on page 2)

Comments on Draft Annex 2001 Implementation Agreements

Mark Squillace, Professor of Law
University of Toledo

The Charter Annex of 2001 was designed to supplement the Great Lakes Charter of 1985. The purpose of the original Charter was "to protect and conserve ... the Great Lakes Basin ecosystem [through] ... cooperative programs and management ... by the ... States and Provinces...." Many of the commitments made by the parties to the Charter, however, were never met, and in 2001 the parties came together to sign the Annex. The purpose of the Annex was to reaffirm the commitments made in the Charter, and to further commit the parties to "developing an enhanced water management system that is simple, durable, efficient, respects authority within the Basin, and, most importantly, protects, conserves, restores and improves the waters and water-dependent natural resources of the Great Lakes Basin." (Emphasis added.)

The commitments made in the Charter and Charter Annex are laudable, and despite the failure to make significant progress in implementing the original Charter, the renewed effort following the signing of the Annex seems genuine and sincere. On July 19, 2004, the parties generously made their proposals available to the public for comment. While the parties should be commended for the open and inclusive process they have used, the proposals themselves suffer from a number of problems. Moreover, there are better, less intrusive, and less expensive ways to achieve the goals set out in the Annex than are offered by the current proposal. Set forth below is a brief critique of that proposal.

The basic approach taken by the parties in the proposal is to regulate "diversions" and "consumptive uses" of Great Lakes water. Diversions are expressly defined to mean all out of basin and out of watershed diversions. A two-tiered approach is used so that certain smaller

(ONT Groundwater continued on page 4)

An Environmentalist Perspective on Implementing Annex 2001

Noah Hall, Attorney
National Wildlife Federation
Reg Gilbert, Senior Coordinator
Great Lakes United

With any luck, the Great Lakes may finally see solid protection against diversions.

New agreements proposed this summer by the Great Lakes governors and premiers could achieve that aim, but they need several important changes to fully protect the lakes.

The widespread myth is that the Great Lakes are already well-protected from water diversions. After all, there's a federal law that allows any one of the eight Great Lakes governors to veto a diversion proposal for any reason.

The facts say something else. Two of the three diversion projects proposed since the states were granted veto rights have been approved. And other diversions take place without approval because they aren't covered by existing laws—10 million gallons a day leave the Lake Michigan basin due to groundwater pumping in Wisconsin alone. Worst of all, an independent legal study by the Great Lakes states came to a disturbing conclusion: a well-financed legal challenge, by water companies or perhaps out-of-basin states, might be able to overturn the veto law as unconstitutionally discriminatory.

To their credit, the states have responded with action rather than denial. They have worked with the Canadian provinces to create a new system that, for the first time, would judge all water withdrawals—whether intended for diversion or for use inside the basin—according to clear standards that would protect the lakes. The result is two proposed agreements that could provide increased protection without being “protectionist.” That is, by defending the lakes from both diversions and unwise water use here in the basin, they could shield our laws from claims of discrimination. The draft agreements are available for public comment through October 18.

We have a number of concerns about how well the proposals in fact protect the lakes, detailed at www.speakongreatlakes.org. But we have concluded that the agreements *do* meet the most important test: they better protect the Great Lakes against diversions.

We've reached this conclusion in part by evaluating how the agreements would have affected the diversions approved by the governors over the last twenty years. Take the last one, a 5-million-gallon-per-day diversion at Akron,
Continued page 7

(Implementing Annex 2001 from page 1)

compact. New or increased withdrawals in excess of 5 million gallons per day average over a 120 day period would be subject to the same regional review. The state or province would have to review any new or increased diversions under 1 million gallons per day average within their jurisdiction in excess of 100,000. There would have to be the same state or provincial review of new or increased diversions over 100,000 per day. Draft standards for determining whether to permit these diversions and withdrawals are included.

The Institute will be conducting a conference on the topic of regulating diversions and withdrawals with an emphasis on the implementation of Annex 2001 on November 19, 2004 in the College of Law Auditorium. Information regarding this will be found on page.

The full text of this draft can be found at <http://www.cglg.org/1projects/water/Annex2001Implementing.asp>. This web site includes summaries of the working group meetings, background documents and public comments. Additional information and comments can be found at the web site of Great Lakes United, a bi-national environmental group. <http://www.speakongreatlakes.org/>



Annex 2001: An industry view

*George Kauper, President
Great Lakes Council of Industries*

It is vitally important for the Great Lakes Governors and Premiers to retain their authority to prevent large-scale diversions of Great Lakes water out of the Great Lakes basin. The Council of Great Lakes Industries (CGLI), representing a group of U.S. and Canadian businesses and associations with operations in the Great Lakes region, has been privileged to be represented on the advisory committee to the Annex 2001 Working Group to meet this goal. We recognize the Working Group and the Council of Great Lakes Governors staff deserve great respect for the significant time, effort and commitment invested in the task.

However, CGLI and many other industrial groups in the region believe that the policy embodied in the Annex 2001 implementing documents is focused on the wrong target. And further, the opportunities within the current legal framework under which we now operate in the basin are being inappropriately ignored.

Background

In 1985 the Governors and Premiers signed "The Great Lakes Charter: Principles for the Management of Great Lakes Water Resources", a non-binding agreement that set up a prior consultation process amongst the States and Provinces and necessitated each State /Province to set up its own legal regime for protecting the eco-system. The Charter and the delegation of legal authority from the U.S. Federal Government to the States by the 1986 Water Resources Development Act (WRDA) resulted in a system where Michigan became the de-facto chief watch dog over major diversions of water out of the Great Lakes (e.g. Pleasant Prairie, Wisconsin; Akron, Ohio; - both approved - and, Lowell, Indiana; - not approved).

In the late 1990's the Governors/Premiers retained a western water law expert, James S. Lochhead, to head a panel that concluded control over the resource by the States had to be related to the management of environmental impacts, not just water use. This legal argument has been refuted by a number of legal experts, and recently – for the second time – by the International Joint Commission. But, the Governors proceeded to construct the Annex 2001 (to the 1985 Charter) utilizing an undefined concept of compensating "eco-system improvement" as a justifying criterion for Great Lakes water diversion. The Annex drafters thereby ignored the argument that application of an "improvement standard" would effectively make water a commodity. As a commodity, large diversions of surface fresh water would have to be approved if the criteria for improvements were met.

and shared the results of extensive legal analysis. These legal experts continue to report:

- Ignoring the established body of riparian rights law in our States makes implementation of the compact very difficult, if not impossible and is an open invitation to law suits which will go on for lengthy periods.
- Much of the new and possibly unwieldy regulatory scheme being proposed appears redundant and/or conflicting with the existing authority of State and Provincial environmental regulatory agencies and permitting systems.
- Rather than an indefinable "improvement" standard, the focus should be on protecting the water bodies from adverse effects through the use of objective, scientific criteria.
- And, perhaps most importantly, the Governors already have sufficient legal authority to prevent the diversion of Great Lakes water out of the basin.

Water Quantity Management

Unfortunately the Annex 2001 and its draft implementing documents, "Great Lakes Basin Sustainable Water Resources Agreement" and the "Water Resources Compact", have not been able to stay focused on the issue: management of water quantity. These documents can be viewed instead as an effort to 'fix' what some perceive to be the gaps in the myriad of existing environmental and water quality regulations. It is not clear what those redundant environmental water quality controls are meant to accomplish. Existing policies and supporting regulations currently provide the means to assure water quality. By confusing the objectives of water quantity with water quality, the Governors/Premiers have significantly missed their stated objectives for the Annex to be "an enhanced water management system that is simple, durable, efficient, and retains and respects authority within the basin..."

What is it that we should be trying to accomplish?

The real management challenge remains how to deal with the critical issues related to Great Lakes water supply for future human use while continuing to protect water-based resources in the basin.

Missing from our policy understanding and deliberations is the fact that water is an eminently recyclable resource. If we are truly concerned about water quantity in the basin, we should focus on how to ensure its reusability, how to use water wisely and efficiently, and how to make certain our usage is sustainable. We should be addressing how to increase the number of useful 'turns' we can get out of a drop of surface fresh water before it flows into the Atlantic.

Unfortunately, the Annex 2001 doesn't lead us in this direction. In fact, the tendency currently embodied in
Continued page 6

(Squillace continued from page 1)

diversions and uses will be regulated only by the States and Provinces, while larger diversions and uses will be subject to a complex review by three separate entities – the host State, the Council (established by the proposed Compact), and the Regional Review body, (established by a separate Agreement among all the States and Provinces.) Approval of new diversions and uses will be subject to strict conditions and requirements. By and large, however, pre-existing diversions and uses are ignored by the proposals. This is especially problematic because some of these existing uses – such as the Long Lac and Ogaki diversions into Lake Superior, the Chicago Diversion out of the Lake Michigan watershed, and the Welland Canal diversion from the Lake Erie to the Lake Ontario watershed have a far greater influence on the water resources of the Great Lakes than all of the new diversions and uses of Great Lakes water are likely to have for many years to come. This problem aside, there are many other reasons to revisit the current proposal. Before describing some of these problems, it is worth noting some positive aspects to the current proposal

First, Section 3.1, ¶2 of the draft Compact wisely requires the new Council to go beyond the specific proposals in the Compact and to develop, adopt, and effectuate any plans or policies that promote the conservation and management of the Great Lakes. This language would be much improved if the parties were to include a provision that made the plans and programs to be adopted by the Council as rules following notice and comment, and if it were made clear that the plans and programs were binding on the parties. But as written it will help insure that the parties have sufficient flexibility to adopt new approaches to addressing water resources issues as new problems arise.

Section 7.2 of the draft Compact also deserves praise for requiring every water user -- new or old -- who withdraws more than 100,000 gallons per day to register their use with the Council and the appropriate State. The 100,000 gpd threshold, however, is too high. Registration is a minor burden for using a public trust resource and the parties should consider registration for all water uses over a nominal amount. A 10,000 gpd threshold would be a more reasonable requirement.

Related to the registration requirement is the requirement at Section 9.3 of the draft Compact for managing and regulating all withdrawals in excess of 100,000 gpd. As with the registration provisions, this proposal should be expanded to encompass all withdrawals in excess of 10,000 gpd. Moreover, the current proposal allows these withdrawals to be averaged over 120 days, which will have the affect of exempting many and perhaps most of the agricultural users. Since agricultural use is the largest and fastest growing segment of water use in the basin, exempting this group from regulation would be a mistake. Averaging use over 30 days would be a fairer way to include all significant water users in the Basin. (This problem should be fixed in all parts of the draft Compact, including Sections 8.2, 8.3, 9.2 and 9.3, where 120 averaging is currently proposed.)

In addition, the draft Compact gives the parties ten years to implement this modest requirement. This is far longer than is necessary or appropriate. If the States are serious about

taking appropriate action to protect the water resources of the Great Lakes then this requirement can be in place in no more than five years. Another potential problem with this proposal is that it apparently does not mean what it says. Under the proposed language all withdrawals – new and old – would be covered, just as they are under the registration requirements of Section 7.2. Apparently, however, the parties intend to exempt pre-existing withdrawals. This would be a grave mistake because it would give pre-existing users a competitive advantage over new users, thereby encouraging pre-existing and more wasteful water use practices to continue and even thrive.

Despite these positive aspects to the proposal, there are many troubling parts as well. First and foremost, as presented to the public, the proposal is far too narrow. There are many options for better managing the Great Lakes water resources, and the narrow “command and control” approach proposed in the draft Compact is among the least attractive of the options. Moreover, the proposal does not meet the criteria established by the Governor and Premiers in Annex 2001. It is not simple, efficient, or respectful of State authority, and it will not do much to protect the Lakes. In order to have a truly open process, the parties should have invited comment on a wide array of options. Set forth below are a few of the possible approaches that might have been offered for public debate.

- **A Delaware River Basin-Style Compact and Commission** which would exercise authority over every major aspect of river management, including water quality, water allocation, hydropower generation, recreational use, flood control, and watershed protection. By most accounts, the Delaware River Basin Compact has worked extremely well. *See e. g., R. Timothy Weston, Interstate Water Management – The Delaware and Susquehanna Basin Experience*, in EASTERN WATER RESOURCES LAW AND POLICY (ABA Conference, May, 2004). A similar program for the Great Lakes would undoubtedly raise difficult, and perhaps insurmountable, political problems, but the potential advantages of such a system are too important to ignore during the public process.

- **A Cap and Trade Program** for Water Resources in the Great Lakes Basin. Simply stated, this program would provide for capping total water use within particular States and drainage basins, and then allowing the individual states to manage the total quantity of water under the cap. Trading would be one way that States could use their water efficiently, but that could be left to the States to decide. The only State obligation would be to accurately report total consumption, something that will be required even under the proposed system.

- **A Cap and Trade Option** might also have been

Squillace continued from page 4)

proposed. Under this approach, the parties would establish a regulatory approach such as that proposed in the draft Compact, but would give each State the option of living under a cap on total water usage. The incentive for the State to accept a cap would be that its diversions and uses would not be subject to Council or Regional review.

One of the reasons for supporting a more robust discussion of options is the fact that the current proposal suffers from so many problems. Most fundamentally, the proposal wrongly focuses on the trees when it should be looking at the forest. Individual new diversions are unlikely to cause significant impacts by themselves. Only by looking at the impact of all uses and diversions together – including pre-existing diversions and uses -- can the parties begin to see the best way to protect the Great Lakes. The provision at Section 10.1 of the draft Compact appears to recognize this by requiring periodic reviews of the cumulative impacts of all withdrawals. But the provision is not coupled with any regulatory requirement.

Moreover, the review process will not be simple or efficient and it will be expensive to administer. If done right, it will require the equivalent of a full-blown environmental assessment, requiring the services of hydrologists, economists, ecologists, and other experts

Furthermore, the proposal invites abuse. It encourages users to keep their total diversion or use just below the thresholds established in the proposal. At the margins, optimistic projections and clever strategies will almost certainly provide new users with ways to avoid Council and Regional Review.

The proposal also fails to respect State authority. On the contrary it seems to invite conflict by providing for simultaneous review by State and Council officials. Differing interpretations seem inevitable. It makes no sense to invite these conflicts if there are other viable options.

The most worrisome part of this proposal, however, is that it may give the public the impression that the Council is actually managing and protecting the Great Lakes water resources for future generations. It is doubtful that the proposal will accomplish this goal. On the contrary, the draft Compact will likely spawn a major bureaucracy that will involve itself in relatively minor diversions and uses, which will leave little time for the far more important task of comprehensively managing the Great Lakes water resources.

If despite these concerns, the parties proceed along the lines of the current proposal several things might be done to improve it. First and foremost, the parties should provide the public with the kind of information that is necessary to properly evaluate the proposal. In par-

ful.

- (a) Total withdrawals and total water consumption broken down by jurisdiction. (If this would not include diversions like the Ogaki, Long Lac, and Welland and Erie Canals, this information should otherwise be described)
- (b) Total number of withdrawals, diversions, and consumptive users broken down by categories and uses
- (c) Anticipated number of diversions, withdrawals, and consumptive users that will be subject to Council review annually at various levels of regulation. (For example, if Council review was required for consumptive uses in excess of 1 mgd averaged over 30 days, how many users would likely require Council review.)
- (d) Anticipated number of diversions, withdrawals, and consumptive uses that will be subject to State review annually at various levels of regulation.

Second, the parties should rethink their wholesale aversion to diversions. The parties are understandably nervous about proposals to divert massive quantities of Great Lakes water far out of the basin. But the political and practical problems associated with large-scale diversions make highly unlikely. Moreover, it is possible to prohibit such diversions without unduly restricting diversions that can provide significant benefits to the region. If this proposal makes it too difficult or costly to for small users near but out of the Basin to obtain Great Lakes water these parties will likely opt to take their water from inland streams and groundwater reserves where real water conflicts are far more likely to occur. . Pay back requirements, and demands that applicants show no other alternatives will inevitably pressure water users to look to these inland sources at the expense of stream ecology and other water users.

Third, the proposal should require that all decisions granting the parties the right to use Great Lakes water resources be limited to a term – perhaps 5 years. Water users should have the right to renew but the parties should reserve the right to revisit the permitting standards in light of new technologies, new demands, and changing societal values. This will help insure that the parties are able to manage their water resources in ways that will promote greater efficiency over the long term.

Finally, for what I believe are obvious reasons, the criteria ought to establish a clear preference for taking water from or near the Great Lakes, rather than from or near the headwaters of streams and more isolated groundwater basins. Most of the water resource conflicts that occur in the Great Lakes Basin occur in these isolated areas where localized water supplies are limited. Taking water from or near the Lakes rarely causes water resource concerns.

This may well be the only chance we will have in our lifetime to fundamentally change the way that these water resources are managed. We should seize this opportunity before it slips away.

CGLI comments *continued from page*

the Annex is just the opposite: to lock up water for fear of losing it.

If our region is to prosper and our precious fresh water and water dependent resources are to be protected, we must avoid these urges to restrict or limit water's use. We should not be bowing to political pressures that come from fear, lack of understanding, and a failure to plan wisely for the future. We should be committing policy and providing incentives to increasing fresh water's re-use.

Will the Annex work?

In spite of this huge policy shortcoming and the significant legal challenges the Annex will elicit, industry representatives have been working in good faith to help get to a workable approach to the Annex. Unfortunately, the draft Annex 2001 implementing documents are neither the most effective nor efficient way to accomplish the objectives set out by the Governor/Premiers for the following reasons:

- As mentioned above, the implementing principles required by the draft documents conflict with existing riparian water use principles embodied in the laws of each Great Lakes State.
- The un-defined "improvement standard" requirement is impossible to administer and viewed by some policy experts as a license to divert [see the University of Toronto Monk Center report entitled: *Political Diversions: Decision time on Taking Water from the Great Lakes* by Andrew Niki-foruk available at www.powi.ca, under 'Research'].
 - Our region is not linked in a common economic unit. Our States do compete for economic development opportunities. The draft implementation documents call for a regional review body that would require economic development projects to be approved at a regional level by possible competitors for the same projects! Regional review as now proposed would erode the ability of individual Governors/Premiers to attract new jobs to their respective jurisdictions.
 - The implementation plans outlined in the documents would also

create bureaucratic chaos because of the number of projects at the 100,000 gallons per day (gpd) level. These projects would have to be reviewed by the individual States and Provinces. Projects at a five million gallons per/day consumptive use threshold would require regional review. And, petitioners requiring regional approval would have to make the case for the withdrawal to 10 different jurisdictions!

To put these quantities in perspective a municipal swimming pool holds about half a million gallons. At a public meeting in Muskegon, the representative of the municipal water system expressed concerns about his system's ability to serve a growing community with the regulation levels proposed. He set these small quantities in context when he said: "two million gallons per day is a pump change and 100,000 gpd is a filter wash."

The future

Industry continues to believe the basic policy direction on which the Annex 2001 is built is fatally flawed and when challenged, would cause the loss of local control.

There are serious questions about the viability of the Annex implementation as currently drafted.

- 1) Will all the individual State legislatures pass these implementing documents?
- 2) Will Governors be willing to cede the authorities they currently depend upon for the exercise of their economic development responsibilities?
- 3) Will industrial development efforts in the region successfully endure the additional insecurities and time delays related to their water withdrawals? Will they go elsewhere? From industry's perspective, the current draft implementing documents have the potential to both penalize existing businesses as well as provide a significant negative impact on new economic development of the region.

The Governors/Premiers should revisit the basic authorities they currently have to address Great Lakes water diversion and quantity management. They will find those authorities are not inadequate as their previous advisors suggested.

Water management is an emotional issue. But, given the major policy shortfall of the Annex 2001 and the

significant shortcomings of the related draft implementing documents now being reviewed by the public, our regional leaders need to drive through the emotion to provide a more realistic vision. It is vitally important for local governance to maintain the availability of Great Lakes water resources in support of all of the Region's needs.



**FOR MORE
INFORMATION
ABOUT THE
LEGAL INSTITUTE OF
THE GREAT LAKES,
CONTACT US AT:**

Legal Institute of the Great Lakes
University of Toledo
College of Law
Toledo, OH 43606-3390
(419) 530-2949
[Http://www.law.utoledo.edu/ligl](http://www.law.utoledo.edu/ligl)

Chair of the Faculty Management Committee: Prof. Frank Merritt (Chair); Research Fellow: Charles Herman

River, diverts it to suburban communities across the basin Ohio. That diversion takes water from the Cuyahoga line, and returns an equal amount of water via canal. This "no net loss of water" concept has two terrible flaws at Akron: 1) the return water comes from an out-of-basin source, opening yet another door to the devastating threat of invasive plants and animals, and 2) the water is returned to the Cuyahoga River twelve miles downstream from where it is diverted, seriously damaging the long stretch of river in between.

Under the proposed new agreements, the Akron diversion would certainly have been rejected. The agreements require proposals to cause no "significant adverse impact" to the environment, to include significant water conservation, and to provide an additional "improvement" to the basin environment on top of any steps taken to prevent the forbidden adverse impacts. None of these expensive, time-consuming conditions were considerations in the Akron project.

But most significantly, the bank requirement was not part of the original Akron proposal and would have made the diversion completely unprofitable. In fact, it is hard to picture any major diversion proposal that can feasibly return the exact same water.

Under these agreements, every Great Lakes diversion proposal ever made, whether vetoed, abandoned, or approved, either wouldn't have been proposed (because it would cost too much) or would have been rejected (because it didn't meet the new standards). The possible large-scale diversions that worry every citizen of the Great Lakes basin—to the Mississippi River, to the Midwest grain belt, to the U.S. South and Southwest—all become impractical or impossible under the proposed new rules, even factoring in the possibility of substantial federal or state subsidies. perhaps most importantly, the new rules seem likely stand up in court in the long run. Their diversion provisions may be fairly strong, but the agreements still need to be strengthened to protect the Great Lakes. An exemption from returning water for certain very small diversions must be deleted. The proposed water conservation standards need to be much more specific. And withdrawn water should be required to be returned to the source, not anywhere in the same Great Lake watershed.

The governors and premiers got the main thing right—preventing diversions. Now they need to work on improving the rest of the agreements.



Legal Institute of the Great Lakes
College of Law
The University of Toledo
2801 W Bancroft Street
Toledo, OH 43606-3390

Address Service Requested

The National Water Crisis:
Drawing the Line
Limiting Diversion and Withdrawals

Friday November 12, 2004

University of Toledo, College of Law Auditorium
8:30 AM—3:15 PM - Free Admission

Faculty

Professor Robert J. Glennon, *University of Arizona*; **Larry MacDonnell Esq.**, *Boulder Colorado*; **Rita Pearson Maguire**, *Phoenix, Arizona*;
Prof. Gregory A. Hicks, *University of Washington School of Law*; **Professor Robert H. Abrams**, *Florida A&M University, School of Law*
Pamela Bush, *Delaware River Basin Commission*; **Joy Mulinex**, *Bipartisan Senate and House Great Lakes Task Force* ;
Michelle Diffenderfer Esq., *West Palm Beach, Florida*; **Prof. Mark Squillace**, *University of Toledo, College of Law*; **Sam Speck**, *Chair, Great Lakes Commission*, **David de Launay**, *Ontario Ministry of Natural Resources*; **Noah Hall**, *National Wildlife Federation*

To Register call 419-530-2628