

THESIS



A COMPARATIVE STUDY OF THE EFFECTS OF 208 WATER
QUALITY PLANNING ON THE DECISION-MAKING
PROCESS AT TWO REGIONAL PLANNING
COMMISSIONS IN CENTRAL MICHIGAN

By

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ABSTRACT

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The purpose of this thesis was to analyze the impact of key elements of Section 208 of the federal Water Pollution Control Act (PL 92-500) upon the decision-making process of two regional planning commissions responsible for preparing water pollution abatement plans. The elements analyzed were:

- (1) A mandate from the federal government to implement approved plans
- (2) A directive to build public input into the planning process from start to finish and be responsive to that input
- (3) Total funding of the planning process by the federal government
- (4) No guarantee of additional federal dollars to implement approved plans

- (5) The overall importance of the plan derived from the designation of implementing agencies and dispersal of funds

A secondary purpose was to try to account for differences noted between the commissions' perceptions of key elements. Objectives were accomplished through the statistical analysis of a questionnaire and through analysis of structural and procedural differences between the two water quality planning efforts.

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TABLE OF CONTENTS

	Page
I. INTRODUCTION TO THE STUDY	1
Introduction.	1
Objectives	3
208 Legislation.	3
Study Area	5
Tri-County Regional Planning Commission (Region 6)	6
West Michigan Regional Planning Com- mission (Region 8)	7
Scope and Limitations of the Study	10
Expected Results of the Study	11
Summary and Overview of the Study.	12
II. A REVIEW OF RELATED LITERATURE	14
Summary	28
III. METHODOLOGY.	30
Data Sources.	30
Description of the Questionnaire and Analysis of the Results	32
Summary	33
IV. AN ANALYSIS OF FINDINGS.	34
Introduction.	34
Characteristics of the Sample	35
Demographic Variables	35
Commitment to Goals of the Act	36
Process Roles Taken by Commissioners	39
Communication with 208 Staff.	41
Perceived Status of Serving on the Commission	42

	Page
Findings of the Study Related to Key Differences in 208 Legislation	43
Review of Key Points in 208 Legislation	43
Testing of Questionnaire Variables to Account for Observed Differences between the Commission Responses	53
Analysis of Structural Differences between the 208 Planning Efforts at the Tri-County Regional Planning Commission and the West Michigan Regional Planning Commission	55
208 Staff Makeup.	55
Use of Consulting Firms	57
Citizen Participation Effort.	59
Media Coverage	64
Methodology for Evaluating Water Quality Problems	66
Findings of the Study as They Agree or Disagree with Expectations in the Literature	69
Summary	73
V. SUMMARY AND CONCLUSION OF THE STUDY.	74
Objectives of the Study	74
Summary of the Findings	74
Findings of the Structural and Procedural Comparison of the 208 Planning Efforts at TCRPC and WMRPC	78
Conclusions of the Study.	78
Key Elements of PL 92-500, Section 208	83
Recommendations	90
TCRPC and WMRPC	90
Federal Government	91
Practicing Planners.	92
Further Research.	92
APPENDIX	93
SELECTED BIBLIOGRAPHY.	99

LIST OF TABLES

Table	Page
1. A COMPARISON OF TYPES OF GOVERNMENTAL UNITS REPRESENTED BY RESPONDENTS OF TCRPC AND WMRPC	37
2. ELECTED AND APPOINTED REPRESENTATIVES	37
3. RURAL AND URBAN GOVERNMENTAL UNITS REPRESENTED.	37
4. YEARS OF MEMBERSHIP ON THE PLANNING COMMISSION	38
5. TYPE OF GOVERNMENTAL UNIT RECOGNIZED BY CONSTITUENTS AS "LOCAL" GOVERNMENT	38
6. RECENT REPORTED MEMBERSHIP CHANGES OTHER THAN NORMAL POLITICAL TURNOVER	38
7. ROLES TAKEN BY COMMISSIONERS IN THE 208 DECISION-MAKING PROCESS	40
8. COMPARISON OF STRUCTURAL AND PROCEDURAL DIFFERENCES BETWEEN THE TCRPC AND WMRPC REGIONS AND 208 PLANNING PROGRAMS.	79

LIST OF FIGURES

Figure	Page
1. Study area	9

CHAPTER I

INTRODUCTION TO THE STUDY

Introduction

In 1972, the Congress passed the Federal Water Pollution Control Act (PL92-500) with an overall objective to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters" (Section 101 [a]). To achieve this objective the act states, "it is the national goal that whenever attainable, an interim goal of water quality which provides for the protection and propagation of fish, shellfish, and wildlife and provides for recreation in and on the water be achieved by July 1, 1983" (Section 101 [a][2]). To enable meeting the Act's objectives, "it is the national policy that areawide waste treatment management planning processes be developed and implemented to assure adequate control of sources of pollutants in each State" (Section 101 [a][5]). In each state as authorized by the act, the governor had the responsibility of designating the planning agency(s) to carry out the areawide planning process. Many options were available to state governors in selecting the

agency(s) best suited to formulate the plans and the selection could be based on hydrologic or political boundaries¹: i.e., (1) a state agency such as the Department of Natural Resources; (2) regional planning commissions or councils of government; (3) regional or metropolitan authorities; or (4) combinations of the above.

In the state of Michigan, Governor William Milliken selected the regional planning commissions or councils of governments located in the fourteen state planning and development regions to be responsible for preparing the Water Quality Plans outlined in Section 208 of PL 92-500. The focus of this paper is an analysis of the impacts that the responsibility for 208 plan preparation has had on the decision-making process in two of these regional agencies--the Tri-County Regional Planning Commission (TCRPC) headquartered in Lansing (Region 6) and the West Michigan Regional Planning Commission (WMRPC) headquartered in Grand Rapids (Region 8). Both of these commissions began their planning in the summer of 1975. TCRPC received \$704,000 and WMRPC \$1,012,000 for planning purposes.

¹Guidelines for State and Areawide Water Quality Management Program Development (Washington, D.C., US EPA, November 1976), pp. 12-13.

Objectives

Inherent to 208 planning are several key elements that make it different from other types of plans prepared in the past by these two regional agencies. An objective of this research was to identify these key differences and then determine if they had an effect on the commissioners' perception of their roles and their ability to carry out the decision-making process in a productive manner. With the first objective completed, a second was to try to account for the different impacts that 208 planning designation had on the two commissions studied.

208 Legislation

Foremost among the important elements of the Federal Water Pollution Control Act of 1972 is a mandate to implement the plans that are authorized. Never has such emphasis been placed on implementation of plans prepared at the state and local level and funded at the federal level. Both the urgency of the water pollution problem and the dollars that the federal government is investing in the plans dictate that solutions be carried out. It is easy to prepare a plan that threatens no one and will sit on the proverbial shelf gathering dust. It is far more of a challenge to construct a plan that is

politically, economically, and environmentally possible. How this challenge is being addressed by the Region 6 and 8 planning commissions is a key point of this research.

Another unique feature of the legislation is a directive to build public input into the planning process from start to finish--and be responsive to that input. During the last decade, citizen participation has moved from the periphery of planning technique more into the accepted mainstream of day to day operations. The right of the public to be heard and involved is established. Yet to have this involvement specified in such detail in a federally funded project is a new development. This study attempts to analyze to what degree this added emphasis on citizen participation has been in line with the commissioners' own thoughts on the subject and how effectively the charge to involve the public has been carried out.

Additionally, two variables related to funding have potential impact on the planning commissions' ability to devise workable plans. First, the 208 planning process is 100 percent federally funded for agencies approved to participate in the program by the end of 1975, requiring no matching commitment from either the regional planning commissions or local units of government.

Both of the agencies in this study fall in this category. Secondly in a 180 degree about-face, the federal government is not providing any money for implementation of the 208 plans beyond what is specified in other sections of PL92-500 at this time.

An implementable water pollution abatement plan translates into control of millions of dollars and considerable power for agencies holding the pursestrings. Since the planning agencies have the responsibility of delegating who will be in control, it is reasonable to assume that the planning commissioners might be under a great deal of pressure from a variety of interest groups. The perceived responsibility of preparing the regional Water Pollution Abatement Plan and its impact on the commissioners' constituencies is evaluated in this report.

Study Area

The two agencies selected for this study were chosen for a variety of reasons. Foremost, both commissions and their staffs agreed to participate in the project. Secondly, the author worked at the Tri-County Regional Planning Commission and was thoroughly familiar with the 208 planning process. Thirdly, the West Michigan Regional Planning Commission was considered a good comparative case study because there were a number of significant contrasts between the two regions, commissions, and 208 programs. As well as the differences there were

important similarities between the agencies such as similar funding dates, the same state hierarchy, and a shared river basin (Grand).

Tri-County Regional Planning
Commission (Region 6)

Organized under State of Michigan Public Act 281 of 1945--the Regional Planning Commission Act--TCRPC is the oldest such commission in the state. In the mid-1960s this agency began a comprehensive Land-Use - Natural Resource - Transportation Planning Program encompassing the entire sphere of planning-related activities in the region. This program was designed to fulfill the requirements of the Federal-Aid Highway Act of 1962, as well as various other local, state, and federal planning requirements. The objectives of this program have been substantially met and a comprehensive development plan to 1990 was adopted in 1968. The Commission is currently involved in updating the 1968 comprehensive plan and conducting specialized studies in housing, sewer and water facilities, solid waste management, law enforcement and criminal justice, and transportation. The Tri-County Regional Planning Commission is also responsible for the review of applicants for federal funds in the Tri-County Region and provides planning assistance to local units of government within the region on a contract basis.

The Tri-County region, consisting of Clinton, Eaton, and Ingham counties, is located in the south-central part of Michigan's lower peninsula and covers approximately 1,700 square miles. The Lansing-East Lansing urban area is at the region's geographical center. Three counties, twelve cities, fifteen villages, and forty-eight townships comprise the seventy-eight governmental units in the region. According to the most recent U.S. Census, the region had a population of 378,433 in 1970. Nearly 72 percent of the total population resided in the metropolitan Lansing area.

While the economy of the Tri-County region is diversified, the largest employment sector is government, followed by the transportation-related industry. This reflects the fact that Lansing/East Lansing is the state capital, home of Michigan State University and the headquarters for the Oldsmobile division of General Motors.

West Michigan Regional Planning
Commission (Region 8)

Established under PA 281, the West Michigan Regional Planning Commission was not created until May of 1973. Consequently, integrated planning at the regional level is a much newer endeavor in this region as compared to the Tri-County area. The major planning programs of the Commission presently include land use, transportation, housing, criminal justice, water quality

management, and economic development. Like Tri-County, the WMRPC conducts the federal review process for the region and contracts for local assistance planning.

Three significant differences between the two commissions' work programs should be noted. First, TCRPC is engaged in solid waste planning while WMRPC is not. Currently the Region 8 commission conducts Coastal Zone Management planning and is also responsible for preparation of a composite or "District" Overall Economic Development Program (OEDP) for their region (as well as assisting each of the counties in preparing individual county OEDP's). Staff at Tri-County has assisted each of the three counties in Region 6 in developing their own OEDP.

The West Michigan Regional Planning Commission serves the nine county-area of Allegan, Ionia, Kent, Lake, Mason, Mecosta, Montcalm, Newaygo, and Osceola which is located in the west central portion of Michigan's lower peninsula. Including the nine counties, there are 242 local units of government. The region encompasses a land area of 6,021 square miles or nearly 11 percent of Michigan's land area. While Region 8 is approximately 3.5 times larger than Region 6, only about twice as many people live in the bigger region. The 1970 U.S. census listed Region 8's population as 662,222. According to census definition, nearly 40 percent of these persons resided in rural areas.

State Planning & Development Regions

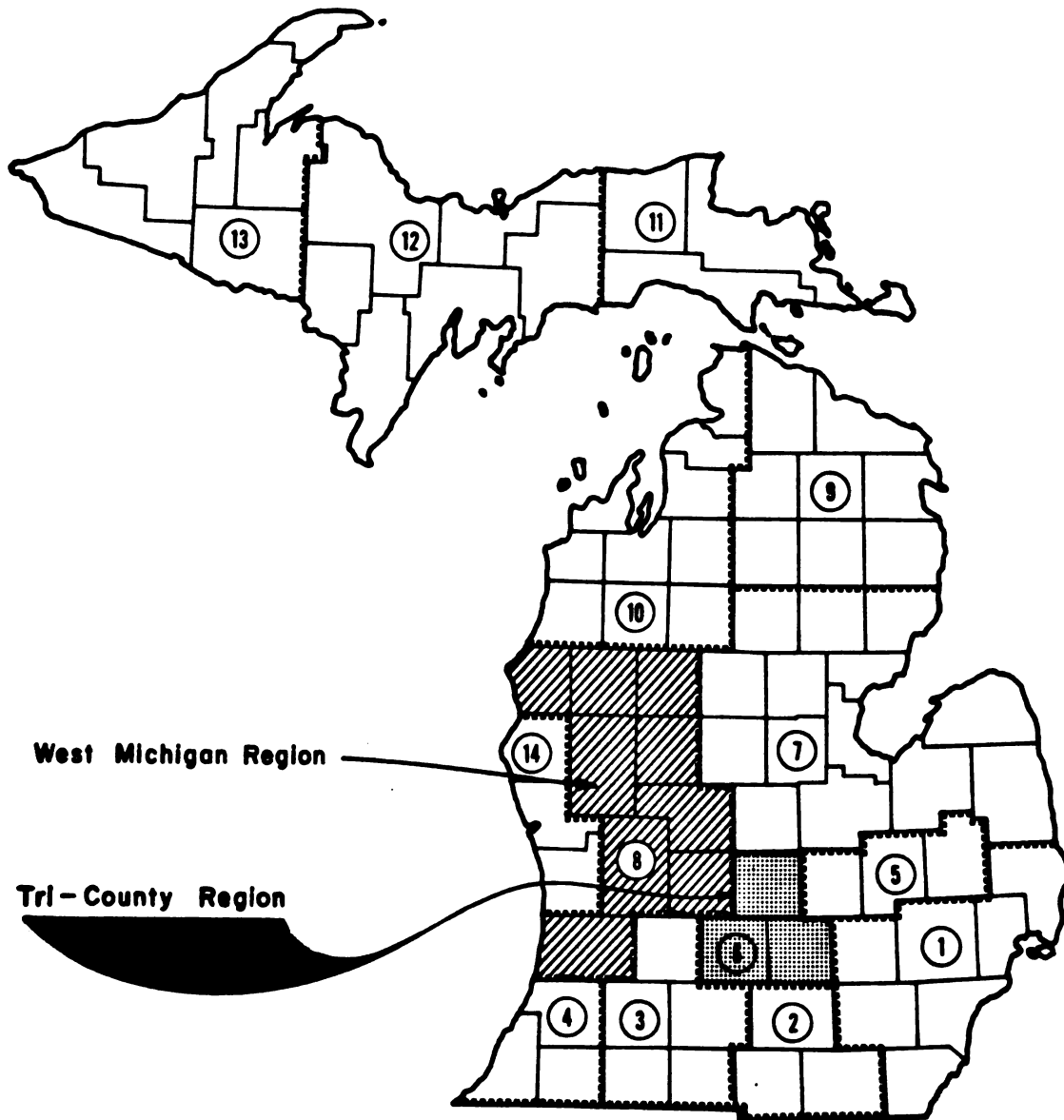


Fig. 1. Study area

The City of Grand Rapids is the economic hub of the region. The economy is widely diversified among the fields of business and finance, manufacturing and service industries, agriculture, and tourism/recreation.

Scope and Limitations of the Study

This study sets forth the hypothesis that several key elements of Section 208 have had an impact on the decision-making processes at the regional planning commissions responsible for preparing the areawide water pollution control plans authorized by PL92-500 (Section 208). To test this hypothesis a comparative case study was conducted focusing on the perceived importance of the decision-making process as loosely measured in time devoted to the process and the ease in arriving at decisions in comparison with the development of other plans at the respective commissions studied. As the plans have not yet been implemented, it is too early to gauge the quality of the decisions in relation to their success in achieving fishable and swimable water by 1983.

While statistical tests could not account for differences noted between responses from the two commissions studied, conclusions and recommendations of this study may be useful for subsequent planning efforts, especially for regional planning agencies that have a similar political makeup and purpose.

Expected Results of the Study

Little research has been carried out to date concerning the impact of 208 plan preparation upon the designated agencies. Consequently, because this study is breaking new ground, more questions are expected to be raised than answered. Conclusions of this study center around a set of hypotheses generated from the data collected. These hypotheses would provide suitable avenues for further testing.

An analysis of the data obtained in the study may also yield a set of recommendations that will be useful for several purposes. As the Region 6 and 8 planning commissions move into their final stages of plan adoption, the results of the study may be useful in highlighting areas where the planning staffs' commissioners and their constituencies need to develop a more balanced relationship. A workable 208 plan can only be the result of compromise, a delicate marriage among many interest groups.

Lessons learned from studying these two planning agencies should be applicable to other 208 agencies that are not as far along in the process. Both Regions 6 and 8 were in the second round of funding from the Environmental Protection Agency (EPA). Numerous projects in other regions were funded subsequently. To date, very few recommendations have resulted from the first and second year 208 projects that would serve as guidelines

to other agencies. As water pollution planning of this scope and magnitude is a relatively new endeavor, there are many lessons to be learned.

Conclusions of this report may also be useful in planning efforts of a similar nature. Congress has already passed a bill (PL 94-580, Resource Conservation and Recovery Act) to fund regional solid waste planning. In all likelihood, the same agencies that conducted 208 planning will also prepare the solid waste plans. It is important not to ignore knowledge gained during the 208 experience, particularly related to process.

Summary and Overview of the Study

The main focus of this thesis is an analysis of the impact of preparing areawide water quality management plans upon the decision-making process of two regional planning agencies in Michigan. Specifically, key elements of the federal Water Pollution Control Act PL 92-500, Section 208, are analyzed for their impact upon these agencies. Structural differences between the 208 planning programs are examined to help account for differences in impact of the legislation.

A review of the literature relative to this study is contained in Chapter II. A detailed description of the instrument and statistical analysis can be found in Chapter III. Findings of the analysis and an evaluation

of expectations and assumptions derived from the literature are presented in Chapter IV. A statement of hypotheses drawn from the research, recommendations, and conclusions are contained in Chapter V.

CHAPTER II

A REVIEW OF RELATED LITERATURE

While a review of the 208 Water Quality Management planning process has received little attention in the literature to date, several important studies have been done that are closely related to the subject. Topics such as the relationship of planning and politics, bureaucracy, decision-making theory, and the role of the planning staff in the planning process all have implications for this study. This section will focus on key authors that have addressed these subjects in their writing.

Allensworth focuses on the problems that regional planning agencies have in seeing that their plans are implemented. He notes that regional planning commissions rarely have programs of their own and must rely on others such as local and state bureaucracies and elected officials to carry out their plans.¹ The Tri-County Regional Planning Commission and the West Michigan Regional Planning Commission are both representative of this description.

¹Don T. Allensworth, The Political Realities of Urban Planning (New York: Praeger, 1975), p. 66.

Ironically, in an attempt by the federal government to promote water quality management planning at the regional level the task was assigned to regional planning agencies that have a weak track record of plan implementation. This is not to imply that TCRPC and WMRPC have produced poor plans in the past; it only points out the fact that their basic powers are advisory and that they must rely on others for implementation. Because of the large number of governmental units represented by both TCRPC and WMRPC and the rural/urban difference of their constituencies the opportunity for disagreement is large.

Allensworth says:

Metropolitan planning commissions and councils of government tend to be reflections of the local political subdivisions in the metropolitan area--they can do little more than their local government constituency will permit. Their constituency base serves as a major inhibiting force. Two countervailing forces--federal financing and an aggressive staff--are rarely sufficient to overcome this inhibition. It is scarcely surprising that such agencies have not been able to do much.¹

However, MacDougall and Harker reported in their research of state 208 officials that,

A significant lubricant to the process has been funds. Most state officials surveyed reported that local governments were satisfied with the level of funding, and all considered federal funding largesse essential to whatever progress has been made so far.

¹Ibid., p. 131.

²Rob MacDougall and Harry Harker, "Role of the State," 208 Planning What's It All About (Westport, Conn.: Technomic Pub. Co., 1976), p. 70.

Martin notes that regional councils are successful when the problems they solve are noncontroversial, when their solutions are not damaging in any way to any member of the council, when the execution of a policy does not require implementation by any local units of government, and when the action required costs little or nothing.¹ Ranney states that these conditions are rarely present in the formulation of meaningful metropolitan-wide policy.²

Bolan and Nuttal concur that the characteristics of public issues affect the decision outcome of plans related to the issues. The authors state, "The general hypothesis relating to how public agenda characteristics influence decision outcomes is that positive action can usually be expected in any decision system where proposals are easily predictable in their consequences; are easily accomplished (both economically and administratively); and generally lie within a social value or preference field."³

¹Roscoe C. Martin, Metropolis in Transition: Local Government Adaptation to Changing Urban Needs (Washington, D.C.: Government Printing Office, 1963), pp. 49-50.

²David C. Ranney, Planning and Politics in the Metropolis (Columbus, Ohio: Charles E. Merrill, 1969), p. 107.

³Richard S. Bolan and Ronald L. Nuttal, Urban Planning and Politics (Lexington, Mass.: Lexington Books, 1975).

Intuitively one can say that the outcome of the 208 planning process is not highly predictable and cannot be easily accomplished (both economically and administratively). It is unlikely that either of the planning commissions studied were not aware of this when they undertook the project. In spite of these strikes against a successful plan emerging from the decision-making process the one thing that was a positive influence was the commissioners' commitment to clean water. Public opinion generally recognizes the social and long-run economic value of solving the water pollution problem in this country.

With these major impediments against a regional planning agency, the obvious question arises as to why such an agency would want to get involved in the preparation of a 208 plan. An important insight into this matter is given by Niskanen who states that because a regional planning agency is essentially bureaucratic in nature, it will attempt to expand its range of services in order to maximize its budget potential and also to reduce the monopoly of other agencies within the bureaucracy supplying the same service. He adds, "Competition in a bureaucracy is as important a condition for social efficiency as it is among profit-seeking firms."¹

¹W. Niskanen, Bureaucracy and Representative Government (Chicago: Aldine Publishing Co., 1971), p. iii.

In the state of Michigan the regional planning agencies were in direct competition with the state Department of Natural Resources for the right to prepare the regional water quality plans. One hundred percent federal funding and the chance to retain local control over the plans would seem to have been two key reasons why 208 planning was attractive to regional planning agencies, in spite of the difficulties encountered.

A word of caution relative to the expansion of the preparation of regional environmental plans by the same agencies who have prepared the 208 plans is given by MacDougall and Harker.

There has been much discussion of folding clean air and solid waste planning into the 208 framework and such ideas sound very good on paper. Certainly both kinds of planning need to be done on an area-wide level and most state water quality planning officials agree that existing 208 agencies appear to be the natural instruments for it. But first things first. We should think long and hard about adding solid waste and clean air functions before we know how 208 is going to work.¹

As was stated in Chapter I, one of the objectives Congress hoped to achieve in PL-500 was to actively involve the public in the water quality planning process. While this is workable on a theoretical level, there is much in the literature to suggest complications in practice. Niskanen sets the stage with this comment: "By 1964 I came to recognize that there is nothing inherent

¹MacDougall and Harker, p. 72.

in the nature of bureaus and our political institutions that leads public officials to know, seek out or act in the public interest."¹

There is a real problem in being able to even identify what is in the public interest. Ranney notes that many potential groups needed to articulate interests in water quality may never form and there is no guarantee if they do form that they will have sufficient access to political decision makers to get their view represented.² Allensworth concurs that the general public is not organized and consequently has little influence over planning policy or the deliberations of a planning commission. He summarizes the problem in this statement:

We live in a democracy in which all decisions, including those of planning commissions, must ultimately be traced to the public; and of course they can be. The public elects local and state officials who have at least general control over the planning commission and its activities. The public elects the federal officials who appropriate the money that funds some local planning agency programs. But these generalities have little meaning in practice. One reason is that public officials who are elected also represent groups and interests, in addition to the public and its interests. Particular groups (interest groups and bureaucracies) are much more likely to have an influence over any policy than the public; this is partly due to the nature of the policy making processes and to the more concrete

¹Ibid., p. vi.

²Ranney, p. 73.

interests that groups have in particular areas (with such interests, groups are willing to spend money and political capital to achieve their ends).¹

Schumpeter says that what happens in practice is that each group involved in the formulation of public policy, while claiming to represent the public or the public's position, does so mostly to advance its own interests and to discredit its adversaries.²

In addition to the general public not usually impacting planning commission decisions, there are, according to Fox, certain fundamental characteristics of water management that tend to encourage powerful well-organized groups to support the production of water quality policies not at public expense. Most significantly, "the benefits accruing to those who use streams for effluent disposal are quite concentrated, while the costs to down-stream users are quite diffused."³ Since groups receiving benefits are more likely to be represented in the public decision-making process than those bearing diffused costs, public policies are apt to give

¹Allensworth, p. 73.

²Joseph A. Schumpeter, Capitalism, Socialism, and Democracy (3d ed.; New York: Harper and Row, 1947), p. 208.

³Irving K. Fox, "Essays on U.S. Water Resources Policies" (paper presented in lecture series, Madison, Wisconsin, February 1968).

less attention to these costs. This creates policies that favor subsidies for water quality improvements.

In his doctoral dissertation, Califf examined many of the problems in involving local officials and citizens in regional water quality studies. Commenting on the role of the public he says:

At issue is the dilemma over participatory democracy and technical expertise. On one hand, democratic principles dictate that the public or its elected officials should participate in decisions which affect them. On the other hand, many water quality issues are so complex as to preclude lay participation in decision making. However, because it is often difficult to distinguish between technical and nontechnical issues, the proper role for the public remains unclear.¹

In light of these few observations, the problems of carrying out the legislative charge to involve the public in 208 planning seem large. And yet, if an attempt to sincerely involve the public is not made many problems can also arise. Grava points out that this is particularly so in the water pollution control field because "almost invariably large expenditures are involved that require bond issues which, in turn, means that the local citizens have to approve a new financial burden for themselves."² Grava says that the most successful

¹Joseph Mark Califf, Jr., An Approach for Involving Local Officials and Citizens in Regional Water Quality Studies (Stanford, Calif.: Stanford University Press, July 1971), p. 105.

²Sigierd Grava, Urban Planning Aspects of Water Pollution Control (New York: Columbia University Press, 1969), p. 100.

results involving the public have come "where the public has been involved from the very beginning starting with the establishment of goals, not only at a point where specific amounts of money may have to be found."¹

Most authors on the subject seem to be in agreement that in spite of the problems in involving the public in a meaningful way in the planning process, the need to do so is clear. Dysant capitulizes this thought in the following manner.

If local government, planning agencies, and consulting engineering firms are to make real progress in water quality improvement, they must address themselves to these public preferences and feelings. Otherwise, it is quite likely that many water quality improvement plans may be designed which are technically sound but can never be implemented due to lack of public support and confidence in the investigations that resulted in such plans.²

Another aspect of PL 92-500 that is proving difficult for planning commissions to deal with is the expectation of the Environmental Protection Agency that the planning process will be comprehensive and rational within a two-year time frame. A review of the literature indicates that complex decision making is not synoptic but

¹Ibid.

²Benjamin C. Dysart, Use of Advanced Water Resources Planning Techniques in the Development of Regional Water Quality Management Programs (Clemson, S.C.: Water Resources Institute Clemson U., December 1972), p. 8.

fragmented, disjointed and incremental.¹ As noted by Rabinowitz, ". . . many limitations on perfect planning are imposed by the interrelationship of urban planning with the nonrational process of urban decision-making."² The latter process is not at all suited to a compressed time frame such as the 208 two-year planning period.

Commenting on the comprehensive approach to environmental planning envisioned by EPA, Cross observes,

The "integrative" and "holistic" approach to planning is now forcibly with us as a part of a growing body of federal legislation and regulations. Section 208 plans, authorized by the 1972 Water Pollution Control Act Amendments, are the first such conceptually oriented plans to challenge our planning process. Therefore, to meet the water quality goals of the Act, it is necessary for the planning process to modify its methodological approaches at a number of levels. Hierarchically, "integration" and "holism" are key concepts in the revamped planning process from the level of regulatory program interrelationships to the level of data collection and analysis. A successful water quality management program can occur only if these concepts are incorporated into every planning activity from program start-up onward.³

It should be noted again that the urban decision-making process is in conflict with an integrative and holistic approach to planning.

¹Charles E. Lindblom, The Intelligence of Democracy (New York: The Free Press, 1965), p. 331.

²Francine Rabinowitz, City Politics and Planning (New York: Atherton Press, 1969), p. 155.

³Harry Harker III, "Developing the 208 Planning Process," 208 Planning, What's It All About (Westport, Conn.: Technomic Pub. Co., 1976), p. 4.

Given the problems the literature indicates 208 planning might encounter, one must also examine some possible solutions. Several authors have studied the effect of planning institutions on the planning function. Rabinowitz and Pottinger concluded from their research that many people have overestimated the ability of the planning agency organization to enhance the effectiveness of the planning function.¹ Ranney states that given the research to date, "there is no way of resolving the debate over which kind of planning organization is best."² In her own study of the subject, Rabinowitz found that there are many important variables that influence the effectiveness of planning besides the organizational setup. She says,

The level of planning effectiveness is related to the role of the planner. This role may be aided or hindered by the form of the organization in which the planner works. But role and organization do not entirely explain planning effectiveness. The impact of planning is to some extent dependent on the type of political system in operation.³

However, Rabinowitz finds that effective planning can take place all along the continuum.⁴

¹Francine Rabinowitz and S. J. Pottinger, "Organization for Local Planning: The Attitudes of Directors," Journal of the American Institute of Planners (January 1967): 27-32.

²Ranney, p. 59.

³Rabinowitz, pp. 155-56.

⁴Ibid., p. 78.

Within the context of this study, the organization and political system of the two samples are quite similar. Thus, the role of the planner carries added weight in determining planning effectiveness. Traditionally in his/her role as a technical expert, the planner has been somewhat divorced from political reality. In the strictest sense, planning theory is synoptic, comprehensive, and rational. Yet to be successful, a planner must bridge the gap from theory to reality. Rabinowitz states, "If professional norms can be altered to condone, indeed to promote, the coexistence of technical and political roles for planners, urban planning can influence urban development."¹

Bolan and Nuttall conclude that, "The ideal role that the planner can play is to bring into being coalitions of experts and nonexperts and of interest groups and activists who can marshal the social resources, the leadership and the activity to organize and sustain a fragile and often difficult process."² Rabinowitz concurs that planners can make important contributions not only in finding technical solutions to physical problems but

¹Ibid., p. 157.

²Richard S. Bolan and Ronald L. Nuttall, Urban Planning and Politics (Lexington, Mass.: Lexington Books, 1975), p. 147.

also in creating a framework for decision making and value reconciliation between conflicting community goals and interests.¹

An additional variable that Bolan and Nuttall found to be influential in the decision-making/planning process was the importance of the players (i.e., planning commissioners) themselves--their positions within the structural system, what stakes they have in the outcome of the process, the political resources which they possess, and also their skills and commitment to the game.² The authors advised that planners not only be trained in providing technical expertise to these decisionmakers but also in the management of planning episodes--in other words, the social process skills that can bring about a framework of support for the players. Davis asks a key question related to this matter, "How many planners know how to build the coalition needed to implement 208?"³ He leaves his question unanswered but the obvious innuendo is that not enough planners are good coalition makers.

¹Rabinowitz, p. 156.

²Bolan and Nuttall, p. 141.

³Ron Davis, "208 - A Report," Practicing Planner (September 1976), p. 44.

Both Davis and Altshuler offer constructive advice on ways of building a coalition or framework. Altshuler advises the planner to seek out and concentrate where consensus exists and adds that consensus can be the absence of articulate opposition--not just the pressure of unanimous support.¹ Along these same lines Davis says:

One way to almost assure local implementation of 208 is to show how it can accomplish some of the existing desires of the community. The elected officials want tangible evidence of their positive deeds in office which can be translated into reelection votes. If the plan can produce tangible results, it is more than fifty percent adopted. The rest comes when the plan can be used to accomplish something that the community wanted anyway, such as a new treatment plant, a clean recreational lake, balanced growth, or increased land value in certain areas.²

Califf notes that the water resources planner has a role as both advisor and advocate to the decision-making process as well as the responsibility of presenting his own professional views and providing the leadership necessary to obtain serious considerations for his recommendations.³ The planner is thus often put in the difficult position of trying to defend his professional opinions and having to temper his views by political and economic reality if he wishes to see a measure of his proposals accepted.

¹Alan A. Altshuler, The City Planning Process (Ithaca, N.Y.: Cornell University Press, 1965), p. 359.

²Davis.

³Califf, p. 2.

Summary

One element of this study was an attempt to determine if 208 planning fits the expectations and assumptions suggested in the literature. A summary of these assumptions as reviewed in this chapter are:

1. Regional planning agencies have a weak track record of meaningful plan implementation.
2. Federal funding and an aggressive staff are rarely sufficient to overcome this dilemma. However, federal funding of 208 planning may have an impact on the chances for implementation.
3. The outcomes of the community decision-making process are more likely to be implemented if their results are predictable, easily accomplished, and in line with the values and desires of the citizenry.
4. Planning projects of the scope and magnitude of 208 are attractive to regional agencies in spite of the problems involved.
5. While involving the general public in the planning process is necessary to ensure an implementable plan, the general public is likely to remain a nebulous entity that is overshadowed by organized special interest groups.

6. Conflicts between the theoretical rational planning process and the nonrational process of urban decision making will arise.
7. Planning agency organization, the role of the planner, type of political system, and the roles taken by the planning commissioners all influence the effectiveness of the planning process and outcome.
8. The planner can positively influence the outcome of the planning process by being involved in the political process and acting as a coalition maker.

CHAPTER III

METHODOLOGY

Data Sources

Material used to prepare this thesis was gathered from a variety of sources. As stated in Chapter I, a questionnaire was prepared and given to all commission members in Regions 6 and 8. The author attended a regular commission meeting of both agencies, explained the goals of the research, and distributed the questionnaire. Members not attending the meeting received a questionnaire by mail. All questionnaires had enclosed a self-addressed stamped envelope in which to return the completed form. The questionnaires were distributed at approximately the same point during the planning process. TCRPC's timeframe was slightly more advanced than WMRPC's.

The rate of return for the questionnaire at Tri-County was 65 percent (13 out of 20) and the rate of return for West Michigan was 37 percent (16 out of 43). The low return rate at WMRPC may have been due in part to the low attendance (which is average) at the commission meeting when the questionnaires were distributed.

While the small sample certainly influenced the ability to draw statistically reliable conclusions, it did not preclude the development of very suggestive patterns that can be profitably pursued in further research.

The questionnaire used by Bolan and Nuttal in their research on community decision making provided a guide for the makeup of the questions (Appendix) used in this study. The Bolan and Nuttal questionnaire was helpful because it provided an example of questions evaluating the decision-making process that could be statistically evaluated. Questions were formulated to fit the specific area of inquiry--decision making in water quality management by regional planning commissions. Both the content and structure of the questionnaire were examined by several people knowledgeable in the fields of urban planning and survey design. Adjustments in the design and content were made prior to distribution.

In addition to the questionnaire and material in the literature, planning documents and working papers from both agencies were used. Both formal and informal interviews were conducted throughout the research and writing with members of the 208 staffs at both commissions. The author's own personal experience as a member of the TCRPC 208 staff cannot be overlooked as a valuable input to the paper.

Description of the Questionnaire
and Analysis of the Results

The questionnaire was composed of twenty-nine questions falling into two basic categories--demographic and attitudinal. In the demographic category for each question only one correct answer could have been selected by a respondent. In the questions assessing attitude, the respondent was given a range of choices and asked to select the one that came closest to his own values.

Attitudinal questions related to four basic areas of inquiry: (1) A question related to work on the planning commission in general (6); (2) Questions related to roles and process involving 208 (7, 9, 10, 11, 12, 13); (3) Questions related to content of PL 92-500 (14, 15, 16, 17, 18, 21, 27, 28, 29); and (4) Questions related to 208 work versus other work that the planning commission had completed or was involved in.

Results of the questionnaire were first tabulated by frequency. Upon examination of the frequencies for each question, a clear pattern of differences and similarities was noted between the two planning commissions. While commissioners from both agencies agreed on several of the issues related to key points in the legislation, they disagreed on the importance and impact of 208 plan preparation upon themselves and their constituencies.

Using an SPSS program, key variables included within the questionnaire were examined in order to try

to account for the differences noted. While no strong statistical correlations could be accounted for by variables in the questionnaire, several points were suggested. In order to follow up these leads an examination of the structural differences between 208 planning efforts at each of the planning agencies was made. Areas that were examined included 208 staff makeup, use of consulting firms (number, task, working relationship), citizen participation effort, media coverage, and methodology for evaluation of problems.

Summary

In order to evaluate the impact of key points in 208 water quality legislation upon the decision-making process at two regional planning commissions in Michigan, a questionnaire was distributed to commissioners from the Tri-County Regional Planning Commission and the West Michigan Regional Planning Commission. Results of the questionnaire were tabulated by frequency and then analyzed to determine possible correlations between variables. Because the SPSS program analysis of the questionnaire results proved inconclusive, an analysis of the structural differences between the 208 planning programs at TCPPC and WMRPC was made. Conclusions of this study are therefore the byproduct of both the questionnaire results and comparative structural analysis of the two planning operations.

CHAPTER IV

AN ANALYSIS OF FINDINGS

Introduction

The major objectives of this study were to identify key procedural differences in Section 208 of the Federal Water Pollution Control Act (PL 92-500) and then determine if these differences had an impact on the decision-making process of two regional planning commissions in Michigan. A third objective of the study was to try to account for the different impacts that the responsibility for 208 planning preparation had on the decision-making process at the commissions studied.

A questionnaire (Appendix) administered to the planning commissioners from the West Michigan and Tri-County regional planning commissions revealed many important characteristics of the two bodies. Findings related to five elements--(1) Demographic variables, (2) Commitment to the goals of PL 92-500 Section 208, (3) Process roles taken by commission members, (4) Communication with 208 staff and consultants, and (5) Perceived status of serving on the regional planning commission--are discussed in the first section of Chapter IV.

Findings of the study related to key differences in the 208 legislation as they have affected the decision-making process are discussed in section two. Elements reviewed are (1) the mandate to implement, (2) citizen participation, (3) 100 percent federal funding for planning, (4) lack of federal money for implementation, and (5) the importance of the plan.

The third section of the chapter is an analysis of the questionnaire to account for differences noted in the commissions' attitudes about 208 planning. Section four is an analysis of the structural differences between the 208 planning efforts at WMRPC and TCRPC. The purpose of this discussion is to examine differences in attitude that could not be otherwise accounted for. Structural elements reviewed include 208 staff makeup, use of consulting firms, citizen participation efforts, media coverage, and methodology for evaluating water quality problems.

Characteristics of the Sample

Demographic Variables

Generally speaking, those who responded to the questionnaire from both of the planning commissions studied revealed similar demographic characteristics. The number of (1) type of governmental units represented; (2) elected and appointed representatives; (3) rural and urban governmental units represented; (4) years of

membership on the planning commission; (5) type of governmental unit that constituents would recognize as "local government"; and (6) recent reported membership changes other than normal political turnover were statistically comparable. Tables 1 - 6 summarize these findings.

Because the demographic makeups of the Tri-County Regional Planning Commission and the West Michigan Regional Planning Commission were comparable, differences noted in the perceived importance of the 208 plan in relation to other plans prepared by each commission can most likely be attributed to other sources.

Commitment to Goals of the Act

Commissioners were asked whether or not they agreed with the basic intent and timetable of the Federal Water Pollution Control Act (PL 92-500), Section 208)--fishable and swimmable waters by 1983. Four (25%) of the West Michigan respondents and four (31%) of the Tri-County respondents strongly agreed with both the intent and timetable of the act. Eight (50%) from the WMRPC sample and five (39%) of the TCRPC sample were generally supportive of the intent and timetable. Two (12.5%) of the respondents from West Michigan felt the intent of the act was good but impossible to achieve within the time frame. Four (31%) from the Tri-County response fell in this category. Two (12.5%) of the WMRPC respondents said they would have preferred less stringent goals.

TABLE 1

A COMPARISON OF TYPES OF GOVERNMENTAL UNITS REPRESENTED
BY RESPONDENTS OF TCRPC AND WMRPC

	TCRPC	WMRPC
	Number	Number
City	3	6
County	7	7
Township	3	3
Total	13	16

TABLE 2

ELECTED AND APPOINTED REPRESENTATIVES

	TCRPC	WMRPC
	Number	Number
Elected	8	10
Appointed	5	6
Total	13	16

TABLE 3

RURAL AND URBAN GOVERNMENTAL UNITS REPRESENTED

	TCRPC	WMRPC
	Number	Number
Rural	7	7
Urban	6	9
Total	13	16

TABLE 4

YEARS OF MEMBERSHIP ON THE PLANNING COMMISSION

	TCRPC	WMRPC
	Number	Number
Less than 6 months	2	3
Six months to 2 years	8	5
Two + to 5 years	1	4
Five + years	2	3
Total	13	15

TABLE 5

TYPE OF GOVERNMENTAL UNIT RECOGNIZED BY CONSTITUENTS
AS "LOCAL" GOVERNMENT

	TCRPC	WMRPC
	Number	Number
Village	1	0
City	4	8
Township	7	4
County	1	4
Total	13	16

TABLE 6

RECENT REPORTED MEMBERSHIP CHANGES OTHER THAN NORMAL
POLITICAL TURNOVER

	TCRPC	WMRPC
	Number	Number
No	7	12
Yes	4	4
Missing	2	0
Total	13	16

Summing up these responses, 93 percent of the respondents were generally or strongly supportive of the intent of the act. Consequently, differences noted in the perceived importance of the 208 plan in relation to other plans prepared by each commission cannot be attributed to a lack of agreement with the goals of the act.

Process Roles Taken by Commissioners

The commissioners were presented with a list of well-defined roles played by participants in any decision-making process. They were asked to identify which of these roles they had played during the 208 planning process. The roles were: (1) Politically knowledgeable, (2) Initiator, (3) Technical expert, (4) Expert on process, (5) Mediator, (6) Public leader, (7) Veto power, (8) Judge, and (9) Coalition maker. The results of this question are summarized in Table 7.

In the West Michigan sample the roles that were taken most frequently by the respondents were (1) Politically knowledgeable (44%), (2) Initiator (44%), (3) Mediator (38%), and (4) Judge (56%). The roles least frequently taken were (1) Technical expert (12.5%), (2) Expert on process (12.5%), and (3) Veto power (6.3%).

The roles taken most frequently by the Tri-County respondents were (1) Politically knowledgeable (69%) and

(2) Judge (39%). Roles taken least frequently were (1) Technical expert (7.7%), (2) Expert on process (0%), and (3) Veto power (0%).

TABLE 7
ROLES TAKEN BY COMMISSIONERS IN THE 208
DECISION-MAKING PROCESS

Roles	West Michigan Regional Planning Commission	Tri-County Regional Planning Commission
	Percentage of Respondents	Percentage of Respondents
Politically Knowledgeable	44	69
Initiator	44	
Mediator	38	
Judge	56	39
Technical Expert	12.5	7.7
Expert on Process	12.5	0
Veto Power	6.3	0

A pattern of similarity emerges when the responses from both commissions are compared. Overall, the most popular roles were those of political expert and judge and the least popular were technical expert, process expert, and veto power. It appears that both commissions were relying on their 208 staffs and consultants to provide technical expertise in water quality management. Given the facts, the commissioners felt it was their

responsibility to judge which alternatives were the most politically feasible. Because a similar pattern of response developed for both commissions on this issue, differences noted between the two commissions' attitudes toward the importance of 208 planning cannot be attributed to this potential source.

Communication with 208 Staff

Commissioners were asked in their discussions with their 208 staff and consultants if they (1) understood what was being said, (2) were being talked down to, or (3) were being bombarded by too much technical language. Eleven (69%) of the respondents from WMRPC felt they understood, two (12.5%) felt they were being talked down to, and three (19%) felt that the staff and consultants were talking over the commissions' heads. In comparison, twelve (92%) of the Tri-County respondents felt they understood their staff and consultants and one (8%) felt that the staff and consultants were talking over the commissioners' heads.

Enough dissimilarity existed between the responses from the two commissions on the issue of staff and consultant communication with their commission to warrant further investigation into this matter as a potential cause for differences noted in the commissions' attitudes about the importance of 208 planning.

Perceived Status of Serving
on the Commission

In order to ascertain what level of status working on the regional planning commission carried within the community, commissioners were asked whether their efforts had (1) high status--much respect; (2) some status--some respect; (3) low status--little respect; (4) no status--no awareness of the commission's work by the general public; and (5) don't know.

One (6%) of the WMRPC respondents felt their work carried high status, five (31%) some status, and nine (56%) no status. One commissioner in the sample did not know. In the TCRPC sample the general feeling of worth was more positive. Seven (54%) of the respondents felt their work was accorded some status and four (31%) no status. One respondent (8%) did not know and one (8%) did not answer the question.

Because there was a difference in the pattern of the response between the two planning commissions, this item was investigated as a potential cause for differences noted between the commissions' attitudes about the importance of 208 planning in relation to other plans prepared by each commission.

Findings of the Study Related to Key
Differences in 208 Legislation

Review of Key Points in
208 Legislation

As stated in Chapter I, there are many special elements contained in PL 92-500, Section 208, that set it apart from other planning legislation. To recapitulate, the differences analyzed in this study for their effect on the decision-making processes of two regional planning commissions are:

- (1) A mandate from the federal government to implement approved plans
- (2) A directive to build public input into the planning process from start to finish and be responsive to that input
- (3) Total funding of the planning process by the federal government
- (4) No guarantee of additional federal dollars to implement approved plans

Another feature of Section 208 that is not unique, but extremely important, is the responsibility given to each planning agency to diagnose a major problem, find solutions to the problems, and then select (with final designation granted by the Governor) the agencies to carry out the solutions. The designated implementing

agencies will be the beneficiaries of a great deal of power and money. This study sought to analyze the importance as perceived by commission members of carrying out these responsibilities for water quality management planning in comparison with other plans prepared by TCRPC and WMRPC.

Mandate to implement. Concerning the mandate from the federal government to implement a water pollution abatement plan, commissioners were asked whether or not as a result of this mandate they felt under more pressure to approve a plan that would really work in their region. Eleven (69%) of the West Michigan commissioners who responded to the survey felt more pressure to approve an implementable plan because of the mandate. Seven (54%) of the Tri-County respondents felt likewise. Five (31%) of the respondents from WMRPC and four (31%) from TCRPC felt that the mandate caused them to feel no additional pressure to implement a workable plan. Two respondents (15%) from the TCRPC sample did not answer this question.

Although the Environmental Protection Agency, while strongly stressing implementation, never came out with more than potential threatening consequences for agencies that did not produce feasible plans, a large majority of commissioners (66.7% of the total respondents) apparently took the potential risks of inaction seriously.

These findings are significant because they demonstrated that the threat of reprisal for inaction was enough to spur a majority of commissioners to an intensified effort to produce an implementable plan. The mandate to implement provided a positive impetus to the decision-making process at both the Tri-County and West Michigan Regional Planning Commissions.

Citizen participation. Commissioners were asked whether or not they agreed with the intent of PL 92-500 to involve the public at any early stage of the planning process and keep them actively involved throughout. Twelve (75%) of the West Michigan respondents answered "Definitely yes" to this question. The other three (19%) had reservations about involving the public in this manner. One respondent (8%) from the WMRPC sample did not answer this question. Ten (77%) of the Tri-County respondents agreed with the intent to actively involve the public and one (8%) had reservations. Two of the respondents (15%) from the TCRPC sample did not answer this question. None of the commissioners from either sample disagreed totally with the concept of actively involving the public.

An overwhelming majority (85%) of those commissioners answering this question agreed with the intent of Congress to actively involve the public. By involving the public from the beginning of the planning process, the

commissioners have appeared to endorse a more active role for the public in the decision-making process. The commissioners who responded favorably to this question have endorsed in principle the concept of shared power. They seem to be aware that in order for a plan to be implemented it must be truly reflective of the needs and desires of their constituents. Actively involving the public from the beginning is a way to acquire this input.

In order to gauge how effectively each of the planning commissions studied was reaching out to involve the public, commissioners were asked in relation to other plans that their commission had prepared, whether or not the 208 planning process had a greater, same, or less degree of visibility with the general public. Responses to this question from the two planning commissions were highly divergent.

Only four (25%) of the West Michigan respondents felt that 208 had a greater degree of visibility. Eleven (69%) felt that 208 was receiving the same degree of visibility and one (6%) felt that 208 was less visible to the general public. In contrast to these results, nine (69%) of the Tri-County respondents felt that the 208 planning process had higher visibility than other plans prepared by TCRPC. Three (23%) of the Tri-County respondents felt that visibility was the same. One respondent (8%) from the Tri-County sample did not answer this question.

A possible conclusion from these responses is that while commissioners from WMRPC believe in the concept of actively involving the public in water quality planning, in practice the 208 planning process has been no more visible than any of the commission's other projects. If WMRPC actively involved the public in all of its projects, a discrepancy in thought and action would not exist. However, it is highly unlikely that the commission has had the same impetus to involve the public in a like manner in any of its other projects. One must ask why this discrepancy exists because it certainly affects the commitment to meaningfully involve the public in the decision-making process. One must also question the chances for successfully implementing a plan that has not achieved a high level of visibility with the public who must pay for it.

The response from the Tri-County Commission is in conformity with what might be expected--strong agreement with the intent to actively involve the public and a higher than average degree of visibility for the planning process with the general public.

One hundred percent (100%) federal funding.

Respondents from both of the planning commissions studied were in strong agreement that 100 percent (100%) federal funding of the planning process did not make the 208 plan any more important than any of the other plans prepared

by their respective commissions. Twelve (75%) of the respondents from WMRPC and ten (77%) from TCRPC felt this way. Three (19%) of the West Michigan respondents and three (23%) of the Tri-County respondents felt that 100 percent federal funding did make the 208 project seem more important. One respondent (6%) from WMRPC felt the opposite--that the 208 plan was less important because all of the planning money came from the federal government.

The fact that 100 percent of the 208 planning money came from the federal government did not seem to impress the regional planning commissioners regarding the importance of the plan and did not appear to add any appreciable impetus to the decision-making process.

Lack of federal dollars for implementation. Commissioners were asked whether or not the uncertainty of receiving additional implementation funds from the federal government would impede the adoption of a final plan. Eight (50%) of the West Michigan respondents and seven (54%) of the Tri-County respondents felt that the lack of federal commitment to providing funds for implementation would definitely slow up the adoption of a final plan. Six (38%) of the respondents from WMRPC and four (31%) from TCRPC felt that this circumstance would possibly impede adoption. One respondent (6%) from the West Michigan sample and two respondents (15%)

from the Tri-County sample felt that the uncertainty of receiving federal dollars would not impede adoption of a final plan.

These responses indicate fairly strongly that a lack of commitment from the federal government to provide additional dollars for implementation perhaps seriously impeded the decision-making process and subsequent adoption of final plans at both of the planning commissions studied. Comparing the responses on this issue to those from the question concerning the mandate to implement, the commissions wanted implementable plans and yet they were leery of the federal government's lack of commitment to these plans. One can hypothesize that in order to maneuver around the federal lack of support to commit dollars for implementation that the final plans from these two commissions will be as lean as possible. The goals of PL 92-500--fishable and swimmable waters by 1983--will be compromised in spite of the commissioners' commitment to achieving these goals.

Importance of the plan. The commissioners were asked a series of questions comparing the 208 plan to other plans prepared by the two commissions in order to assess the relative importance of the water quality management plan. This was the one major area of the study where an important trend of differences developed between the two commissions. Respondents from the Tri-County

sample attached a higher importance to the 208 plan than did the respondents from the West Michigan sample.

The first question in this series asked, "In comparison with other issues your regional planning commission has dealt with, does the adoption of a final 208 plan and management structure seem more important or less important?" Ten (62.5%) of the West Michigan respondents felt that the 208 plan was of about the same importance as other plans. Six (37.5%) felt the 208 plan was more important. In contrast, eight (61.5%) of the Tri-County respondents felt the 208 plan was more important and five (38.5%) felt the plan was of about the same importance.

Next, the commissioners were asked, "In relation to other plans your regional planning commission has prepared, do you feel the final 208 plan will (a) have a greater chance for implementation, (b) have about the same chance for implementation, or (c) have less chance for implementation?" Only three (19%) of the West Michigan respondents felt that the 208 plan would have a greater chance of being implemented. Eleven (69%) felt it would have less chance of being implemented. One commissioner (6%) from the sample did not respond. In the Tri-County sample seven (54%) of the respondents felt that the 208 stood a better chance of being implemented.

Five (39%) felt 208 had about the same chance of being implemented. Again, one commissioner (8%) from the sample did not respond.

The third question in the series assessing the importance of the plan was, "In relation to other plans prepared by your regional planning commission, do you feel that the final plan will (a) have a higher degree of impact on your constituents, or (c) have less impact on your constituents?" Five (31%) of the WMRPC respondents felt that the 208 plan would have more impact and nine (56%) felt that the 208 plan would have about the same impact. Two commissioners (12.5%) from the sample did not respond. In contrast, eleven (85%) of the TCRPC respondents felt that the 208 plan would have more impact on their constituents and two (15%) felt that the 208 plan would have about the same impact. The difference in response between the two planning commissions was significant at the .01 level.

The last question in this series asked, "In comparison with other issues your regional planning commission has dealt with, do you feel there are more or fewer pressures on you to change your personal position on the 208 final plan?" The responses to this question were quite mixed but still followed the trend established in the three previous questions.

Two (12.5%) of the West Michigan respondents felt more pressure, eight (50%) about the same pressure, two (12.5%) less pressure, and three (19%) did not know. One commissioner (6%) from the sample did not respond. Five (38%) of the Tri-County respondents felt under more pressure, six (46%) about the same pressure, one (8%) less pressure, and one (8%) did not know.

Citing Rossi, Bolan and Nuttal state that "issues that create substantial ideological tension, that have significant and widespread impacts of costs and benefits, that suggest substantial changes in the distribution of power or wealth, or that entail high levels of risk are generally debated with greater intensity and over longer periods of time than are issues that are more incremental or of lesser impact."¹ If the above statement is true, one can hypothesize that the decision-making process surrounding the development of the 208 plan at TCRPC would have been more heated and occupied a larger amount of time than the decision-making process for other plans prepared by the commission. Conversely, the West Michigan commissioners should not have had a more difficult time reaching their decisions on the plan or spent an inordinate amount of time arriving at their decisions in relation to

¹Peter H. Rossi, "Power and Community Structure," in Urban Government: A Reader in Administration and Politics, ed. Edward C. Banfield (New York: The Free Press, 1961).

other plans prepared by WMRPC. Approval of the 208 plan by each commission occurred after the collection of data for this study and this hypothesis was not tested by the questionnaire.

Testing of Questionnaire Variables to Account
for Observed Differences between
the Commission Responses

In order to try to account for the differences noted between the Tri-County and West Michigan planning commissioners' perceptions of the importance of the 208 plan in relation to other plans prepared by their commissions, tests for correlation were made between those elements of the questionnaire assessing importance of the plan and divergent characteristics of the samples. As was stated earlier in the chapter, demographic variables, commissioners' commitment to the goals of the act, and the process roles taken by the commissioners were ruled out because of similarity as possible causes for the differences in perception of the importance of the plan.

The two characteristics of the samples that were divergent were communication with staff and consultants and the perceived status of serving on the regional planning commission. While the response patterns were not divergent at a statistically significant level, it seemed important to analyze any trends that existed for possible relationships.

Using either a chi-square or Fishers Exact test, the importance of the 208 plan, its chances for implementation, its impact upon the people of each region, and the amount of pressure felt by the commissioners to change their stand on 208 issues were analyzed for a possible correlation with the commissioners' perceived status and communication with 208 staff and consultants. In many instances not enough data were present for the tests to be run. In all of those cases where enough data were present, the variables assessing the total importance of the 208 plan in relation to other plans that the commissions had prepared were not correlated with commission/staff communication or perceived status.

In the analysis of the variable that was the most statistically reliable--the impact of the plan--it became clear that the determining factor that correlated with high impact was belonging to the Tri-County planning commission as opposed to the West Michigan planning commission. This correlation was significant at the .05 level using Fisher's Exact Test. Tri-County commissioners that understood the staff felt that the impact of the plan would be higher than other plans, whereas the West Michigan commissioners who understood the staff did not think the impact of the plan would be higher than other plans. Therefore, an understanding of what the staff was saying did not account for a feeling that the impact

of the plan would be higher than other plans prepared by the commission. This is of course assuming that both plans had the potential for higher impact. This issue is pursued further in the next section describing the structural differences between the 208 planning efforts at Tri-County and West Michigan.

Analysis of Structural Differences between the
208 Planning Efforts at the Tri-County
Regional Planning Commission and the
West Michigan Regional
Planning Commission

The following section is a description of the structural differences that existed between the 208 planning efforts at TCRPC and WMRPC. The differences noted may possibly have contributed to different attitudes held by the commissioners in regard to the importance of the 208 plan compared to other plans.

208 Staff Makeup

After an agency was designated as an official 208 planning agency, few restrictions were placed upon them by EPA concerning the makeup of the staff to prepare the plan. Consequently a great deal of variety resulted. Both Tri-County and West Michigan chose to hire both additional staff and consulting firms to supplement the staff.

At Tri-County a core group of five staff members worked on the project. Key areas of expertise that this

group brought to the project included land use planning, community development and citizen participation, environmental engineering, aquatic biology, soil analysis, and environmental planning. During the planning period several other individuals worked with the staff either on a part-time or student intern basis. The staff was supported in its efforts by the TCRPC information coordinator, and clerical, graphics, and printing staffs.

The Tri-County staff was responsible for preparing the 208 work program, interviewing and selecting consultants (with final approval granted by the commission), collecting data for both technical and management portions of the plan, preparing land use and population projections, analyzing data in conjunction with the consultants, coordinating work done by the consultants, preparing and presenting material to the public, carrying out the citizen participation effort, and arranging for media coverage.

The 208 staff at the West Michigan Regional Planning Commission was made up of two full-time persons, a director with background in public administration and a citizen participation coordinator who did not have training or background in planning. A part-time planner with expertise in environmental planning and soil analysis and a secretary completed the staff.

The West Michigan staff was responsible for preparing the work program, coordinating work done by the

consulting firms who did the major portion of data collection and analysis, carrying out the citizen participation effort, and arranging for media coverage.

The Tri-County 208 staff usually made a presentation about the status of the project at each regular monthly commission meeting. Attendance at commission meetings was usually good. This was probably reflective of two factors--(1) the meetings are held at night after most commissioners' regular working hours and (2) travel time to the meetings which are held in Lansing is at most forty-five minutes.

The 208 staff at West Michigan did not begin making regular reports to the commission meeting until six months into the planning program. Attendance at commission meetings was often poor (on the average one-third of the entire commission was usually present). Attendance problems are reflective of the problems inherent in getting people together from a large geographic region. Due to the travel time in getting to Grand Rapids where the commission meets, regular commission meetings are held during the day. Consequently, many people cannot attend because of job conflicts.

Use of Consulting Firms

Seven contracts for consulting services were negotiated with firms and agencies doing a portion of the Tri-County plan. Three major consultants did the

greatest share of this work which included the engineering analysis, water sampling analysis, preparation of technical alternatives, river modeling, the environmental impact assessment (EIA), and preparation of management alternatives.

Staff members from the engineering and management consulting firms resided in the region which facilitated communication with the Tri-County 208 staff and commission. Communication with the firm responsible for the modeling and the EIA was often restricted to the telephone and mail service because the agency was located out of state.

The West Michigan Planning Commission negotiated twenty separate contracts with approximately fifteen different firms. Initially the consulting firms were approached by the WMRPC executive director. At the time, the 208 director had not yet been hired. Originally several out-of-state consultants were to be hired but the commission received strong negative feedback and eventually a local firm was hired. This firm finished the data collection for the project. Several out-of-state firms were then hired to complete the analysis of the data.

The 208 Director at West Michigan had the difficult job of overseeing and coordinating all of the various contracts and participants in the planning effort. The consultants were responsible for data collection,

water quality modeling, engineering analysis and technical alternatives, management alternatives, and the environmental impact assessment--essentially everything but the citizen participation program.

Citizen Participation Effort

TCRPC. The citizen participation program, developed to involve the public in the earliest phases of the planning process, was a two-tier arrangement. The Technical Planning Coordinating Committee (TPCC) consisted of seven technical subcommittees: Land Use, Solid Waste, Water Quality and Supply, Point Source, Agriculture and Nonpoint Source, Management and Economic Development, and Environmental. Membership on the committees was open but composed primarily of planners, engineers, educators, health officials, conservationists, farmers and industrialists. Key individuals in these fields were identified at the onset of the project and asked to participate. TPCC advised the 208 staff, consultants, and Areawide Planning Advisory Council on all phases of the planning effort. Over 120 people were members of TPCC. Attendance at meetings of the whole was usually between twenty and forty. Individual technical committees had better attendance records. The committee of the whole met quarterly and the individual committees more frequently.

The Areawide Planning Advisory Council (APAC) was composed of representatives from the units of

government who signed the Resolution of Intent to join in the planning process, the Soil Conservation Service, the U.S. Geological Survey, the U.S. Army Corps of Engineers, the Grand River Watershed Council, the Michigan Department of Natural Resources, TPCC, and TCRPC. APAC was a policy body that acted upon the recommendations of the technical committees and staff. Usually, at least half of the APAC members attended meetings regularly.

All meetings of TPCC and APAC were open to the general public and press who usually attended for information purposes. It is difficult to list all of the impacts that these two organizations had on the recommended plan. They were instrumental in giving the staff and consultants direction and support throughout and kept them from being insulated in the detail of data collection and analysis.

The staff attended several regular and special meetings of various agricultural groups, neighborhood association and other community groups to make presentations on 208 and receive feedback throughout the planning process. In the spring of the second year presentations were made at key local units of government. Later in the spring and summer, public meetings were held on the six major river basins in the region. The meetings were well attended (20 - 100 people) and the staff received much feedback. A questionnaire was

distributed at the end of each meeting and generally about half of those in attendance filled them out. While the results of the survey were not statistically valid, they did provide a significant level of response from the concerned public.

Utilizing the data from this public input process, TCRPC prepared the Draft 208 Water Quality Management Plan and submitted it to the public and local, state, and federal governments. After adopting the draft plan TCRPC distributed copies to the public, affected agencies, and elected officials.

A month later a regionwide public hearing was held. Over one hundred people attended and about twenty persons had questions or offered comments. Additionally, over fifty written communications were received regarding the draft plan. Many significant changes were made in the draft plan to reflect the views of the general public and affected local units of government.

WMRPC. Although hampered by slow startup in its citizen participation effort, the 208 staff made a good effort to solicit comment and reaction to the data-gathering phase of the project. A series of public meetings was held in each of the Region's nine counties. Participants were asked to identify water pollution problems in their communities and to suggest solutions.

Four work groups (Lake and Stream, Growth and Development, Sedimentation and Erosion, and Municipal and Industrial) were established to identify problems and goals as well as to provide data input and evaluate the project's progress in dealing with these problems and issues. Because the work groups were issue oriented rather than geographically based, participants often had to travel long distances to attend work group sessions. This, plus the broad scope of each work group's mandate, resulted in poor attendance and participation at work group meetings.

At the completion of the data-gathering phase of the project, three geographically based Clean Water Task Forces were established as part of a major reorganization of the public participation program. These Task Forces were established to provide effective communication between Project staff and consultants and members of the public and local units of government. The Task Forces were Northern, Southern, and Metropolitan.

Building on the base provided by earlier public participation efforts, the Task Forces held numerous meetings to address several items of concern. Two of the task forces functioned well; the third never developed into a strong group.

The 208 staff also made numerous presentations at meetings of civic, agricultural, and conservation groups during the planning process.

The report presenting the Alternative Basin Plan for Region 8 was reviewed by each task force and also by local public officials and citizens in a series of review meetings held in each county. Attendance averaged about forty persons per meeting. The results of these reviews were used by the 208 staff and consultants in making revisions to the plan and were transmitted to the regional planning commission members to assist them in their decision to select an areawide plan. Two final public hearings on the recommended plan were held, one in Grand Rapids and one in Big Rapids, with an afternoon and evening session at both locations.

The citizen participation effort at West Michigan was directed toward achieving the requirement set forth in PL 92-500 for involving the public. The large geographic area hampered active citizen involvement. Another problem arose because key people that should have been invited to participate in the planning process were not identified early in the program.

Taking into consideration the difficulties incurred by the citizen participation effort and the necessity for reorganization halfway through the project, one can conclude that the effort, although successful in involving a great many people, could have been more comprehensive.

Media Coverage

TCRPC. Tri-County's policy of maintaining regular contact with the news media made it much easier to obtain consistent coverage of the region's clean water planning efforts throughout the two-year process. Stories linking the Tri-County 208 project to the activities of other agencies and to related issues such as solid waste and groundwater as well as TCRP's own agency-generated news releases kept clean water planning continually in the public eye.

In addition to news releases, TCRPC sent meeting agendas and monthly calendars to all news media representatives serving the area. Tri-County deals with personnel from over thirty (3) newspapers, radio, and television stations on a regular basis. All contact with the media was coordinated by the agency public information officer.

Public service announcements were prepared for all information sessions and workshops. They were sent to all radio and television stations serving the target audience. In addition, announcements were placed in the calendar sections of the newspapers. Public service and calendar announcements were used over 90 percent of the time. The Tri-County 208 plan also received coverage from three special television shows or portions thereof and numerous television and radio interviews devoted to the topic.

Media coverage of the 208 project at Tri-County was based on: (1) a well-established relationship between the planning commission and the media, (2) the expertise of a staff member whose sole job was to communicate with the media and provide them information, and (3) a high level of emphasis placed on good media coverage by the 208 staff.

Sixty-nine percent of the respondents in the Tri-County questionnaire sample felt that the 208 plan was more visible than other plans the commission had prepared. This attests to the high level of coverage the plan received from the media in relationship to other plans prepared by the commission.

WMRPC. The 208 staff at West Michigan was responsible for all media contact concerning the project. The agency does not have a public information officer and contact with the media does not follow the established routine that exists at Tri-County. Because the citizen participation staff member had little background in media coverage, this area was overseen by the 208 Director. He reported that as a rule the West Michigan Regional Planning Commission was not well covered in the press. Consequently, encouraging 208 coverage from the media was even more difficult.

WMRPC prepared information releases for the news media throughout the planning process. Rural newspapers

and radio stations usually used the material provided. Coverage in the metropolitan area was initially poor but picked up considerably as the planning process moved into its final stages.

Inserts on the water quality plan and a calendar of meetings was published in eight of the Region 8 newsletters.

The West Michigan Clean Water Plan also received coverage on one television program and two radio programs devoted to the topic. Radio coverage of news relating to the plan was good.

Taking into consideration the fact that 69 percent of the West Michigan respondents felt that the plan had about the same degree of visibility and 6 percent felt that it had less visibility than other plans prepared by the commission, one can conclude that the coverage by the media could have been expanded.

Methodology for Evaluating Water Quality Problems

TCRPC. As stated in the adopted Tri-County 208 Water Quality Management Plan:

A variety of research activities were performed by TCRPC staff and others in assessing past, present, and future water quality conditions of surface and groundwaters in the region. A thorough attempt was made to review previous work before analyzing water quality conditions in a field sampling and monitoring program designed to close data gaps and provide additional input data for the river water quality modeling activities.

These analytical procedures allowed the TCRPC staff and consultants to identify major water quality problems and quantify municipal, industrial and private point sources, combined sewer overflows, and nonpoint sources of pollution in the Tri-County region. Subsequent modeling of the major rivers in the region provided additional information concerning the relative importance of each category to in-stream water quality conditions.¹

The three problem areas that surfaced as being most important were combined sewer overflows, urban stormwater runoff, and agricultural runoff. All of these things contributed to a low level of dissolved oxygen in the rivers near urban areas.

Essentially, through its sampling and modeling work, the Tri-County 208 project unmasked sources of pollution that had previously been overshadowed by industrial and municipal pollution. As these latter sources of pollution are well on the way to be eliminated in the Tri-County region, the remaining pollution is due to the newly revealed sources.

The Tri-County data painted a new picture--one that the commissioners were unfamiliar with. As the commissioners became aware of the fact that little federal money was available for correcting the nonpoint sources of pollution that were revealed, the data took on added significance.

¹Tri-County 208 Water Quality Management Plan, p. 73.

WMRPC. The West Michigan Regional Planning Commission gathered its water quality data from existing data which were fed into a computer model. Conclusions drawn from the water quality modeling efforts and other data indicated that point sources are currently causing and can be expected in the future to cause the major water quality problems in the region. The modeling efforts did not indicate major water quality problems or violations of the State Water Quality Standards due to nonpoint sources. The plan does make recommendations for potentially critical nonpoint sources such as landfills, stormwater runoff, and areas of high density septic systems.

It is possible that a different approach by WMRPC to evaluate water quality problems in the region could yield results similar to those of Tri-County. It is a fact that if the results of the Tri-County sampling program had not been used in the modeling effort nonpoint sources of pollution would not have stood out so strongly. In its review of the West Michigan plan, the Michigan Department of Natural Resources felt that WMRPC should not use its particular water quality model during future planning. Other models are more reliable.

Regardless of the reliability of the methodology used, the West Michigan 208 staff and consultants did identify point sources (municipal and industrial wastes)

as the prime pollutants in the region. These are problems that most commissioners were probably already familiar with. Money is available from the federal government to pay for a large portion of point source pollution cleanup.

The findings of the West Michigan 208 plan did not reveal new problems--rather they reiterated old ones. The plan sought to find a comprehensive solution to the problems but its solutions were not nearly as threatening as those of the Tri-County 208 plan.

Findings of the Study as They Agree
or Disagree with Expectations
in the Literature

This section briefly discusses both the assumptions made going into the study and findings of the study as they relate to expectations of the literature. The format will follow the order established in Chapter II.

(1) Assumption: Regional planning agencies have a weak track record of meaningful plan implementation.

This statement seems to apply well to both the West Michigan and Tri-County Regional Planning Commissions. They are primarily advisory bodies and were not held responsible for plan implementation prior to 208 water quality management planning.

(2) Assumption: Federal funding and an aggressive staff are rarely sufficient to overcome the dilemma outlined in the first assumption.

This assumption was not tested in the study because the data collection was completed prior to plan implementation. However, the response on the question asking the commissioners if they perceived 208 planning as more important because it was 100 percent federally funded indicated that the majority of respondents were not overly impressed by the federal money.

(3) Assumption: The outcomes of the community decision-making process are more likely to be implemented if their results are predictable, easily accomplished, and in line with the values and desires of the citizenry.

This assumption was not tested in the study because data collection was completed before plan implementation had begun. If the findings of the study are accurate and the above assumption is correct, plan implementation in both regions should have mixed success. This is because: (1) the results of neither of the plans are highly predictable due to an emphasis on voluntary compliance; (2) neither of the plans can be easily accomplished (economically and administratively); and (3) the goals of the plan, to improve water quality to a level where it is fishable and swimmable, are in line with the values of the people in both regions.

(4) Assumption: Planning projects of the scope and magnitude of 208 are attractive to regional agencies in spite of the problems involved.

The fact that both West Michigan and Tri-County chose to apply for designation after much discussion at both commissions about the pros and cons of the project bears out the validity of this assumption.

(5) Assumption: While involving the general public in the planning process is necessary to ensure an implementable plan, the general public is likely to remain a nebulous entity that is overshadowed by organized special interest groups.

Both of the Tri-County and West Michigan regional planning commissions made a sincere effort to involve the public in the water quality planning process from the beginning. These efforts met with varying degrees of success. Both agencies found that it was much easier to direct public participation efforts toward groups that were already established. Likewise, when people began to voice their opposition or approval to the alternative 208 plans, they usually did so through an organized group or governmental unit. This conforms with the expectations of the literature.

(6) Assumption: Conflicts between the theoretical rational planning process and the nonrational process of urban decision making will arise.

While not a specific finding of this study, this assumption does seem to be true in relation to the 208 water quality planning process. During the planning

period it became quite apparent from the wording and content of memos and guidelines distributed by the Environmental Protection Agency that they had little appreciation for the complexities of the local decision-making process. Most 208 agencies found the two-year time frame too short and needed to apply for extensions to complete their projects.

(7) Assumption: Planning agency organization, the role of the planner, type of political system, and the roles taken by the planning commissioners all influence the effectiveness of the planning process and outcome.

The findings of the study generally support this assumption. In this particular case a difference in the organization of the planning effort and the roles taken by the planning staff seemed to have had an influence on the perceived importance of the plan in relation to other plans prepared by the commissions.

(8) Assumption: The planner can positively influence the outcome of the planning process by being involved in the political process and acting as a coalition maker.

This assumption was not specifically tested in the study. However, results of the study pointed to the role of the planning staff as being a contributing factor in the commissioners' perception of the importance of the 208 plan.

Summary

This chapter outlined and reviewed the distinctive elements of PL 92-500, Section 208 as they have affected the decision-making process at two regional planning commissions in Michigan. A questionnaire was distributed to the commissions involved to aid in this evaluation. Elements reviewed were: (1) the mandate to implement, (2) citizen participation, (3) 100 percent federal funding for planning, (4) lack of federal money for implementation, and (5) the importance of the plan.

A major difference in the response patterns between the two commissions only occurred in the elements analyzing the importance of the plan. In order to try to account for the difference noted, variables in the questionnaire were tested for possible correlations. When none were found, an examination of the structural and procedural differences between the two 208 planning efforts was made to see how these might have accounted for the varying perceptions of the plan's importance.

The last section of the chapter evaluated the expectations of the literature as they applied to the assumptions and findings of this study.

CHAPTER V

SUMMARY AND CONCLUSION OF THE STUDY

Objectives of the Study

The major purpose of this paper was to analyze the impact of key elements of Section 208 of the federal Water Pollution Control Act (PL 92-500) upon the decision-making process of two regional planning commissions in Michigan responsible for preparing regional water pollution abatement plans. A secondary purpose of the paper was to try to account for differences noted between the two commissions in their perception of the key elements. Both objectives were accomplished through the statistical analysis of a questionnaire administered to the commissioners and through an analysis of the structural and procedural differences between the two water quality planning efforts.

Summary of the Findings

A questionnaire was distributed to all commissioners from both organizations. Thirteen out of twenty responded from Tri-County and sixteen out of forty-three

responded from West Michigan. Findings of the study related to the key elements of Section 208 were as follows:

1. The mandate to implement the plan had a strong impact on the commissioners from both samples. Sixty-seven percent of the total felt under more pressure to adopt a workable plan because of the mandate.
2. Approximately 75 percent of both samples agreed with the charge in the act to actively involve the public in the water quality planning process.
3. A large majority of respondents from both commissions (TCRPC-77%, WMRPC-75%) felt that 100 percent (100%) federal funding of the planning process did not make the 208 plan any more important than any of the other plans prepared by the respective commissions.
4. Fifty-four percent of the TCRPC respondents and 50 percent of the WMRPC respondents felt that the uncertainty of receiving additional money for implementation from the federal government would impede adoption of a final plan. An additional 31 percent from Tri-County and 38 percent from West Michigan felt that this circumstance would possibly impede adoption.

Findings of the study comparing the importance of the 208 plan to other plans prepared by each commission were as follows:

1. Sixty-two percent of the Tri-County respondents felt that the 208 plan was more important than other plans. Conversely, 63 percent of the West Michigan respondents felt that the 208 plan was of about the same importance as other plans.
2. Fifty-four percent of the TCRPC sample felt that the 208 plan had a greater chance of being implemented compared to other plans. In contrast, only 19 percent of the WMRPC sample felt likewise.
3. Eighty-five percent of the Tri-County respondents felt that the 208 plan would have a greater impact on their constituents than other plans. Only 31 percent of the West Michigan respondents felt that their 208 plan would have more impact.
4. Thirty-eight percent of the Tri-County respondents and 12½ percent of the West Michigan respondents felt under more pressure to change their personal position on the final 208 plan in comparison with pressure to change position on other plans.

Additional findings of the study attained from the questionnaire were as follows:

1. Respondents from the two commissions revealed similar demographic characteristics which included (1) type of governmental units represented, (2) elected and appointed representatives, (3) rural and urban governmental units represented, (4) years of membership on the planning commission, (5) type of governmental unit that constituents would recognize as "local government," and (6) recent reported membership changes other than normal political turnover.
2. A strong majority of respondents from both commissions (93% of the total) were committed to the goals of the act--fishable and swimmable waters where attainable.
3. The most popular roles played by the respondents from both commissions during the 208 decision-making process were those of political expert and judge. The least frequently taken roles were technical expert, process expert, and veto power.
4. Ninety-two percent of the Tri-County respondents felt that they understood their 208 staff and consultants. Eight percent felt the staff was overly technical. Sixty-nine percent of the West Michigan sample felt that they understood, 12½ percent felt that they were being talked down to, and 19 percent felt that the staff was too technical.

5. Fifty-four percent of the TCRPC respondents felt that their work on the planning commission was accorded some status within their community and 31 percent felt their work was accorded no status. The other respondents did not know or did not respond. Six percent of the WMRPC respondents felt that their work on the commission was accorded high status, 31 percent some status, 56 percent no status, and 6 percent did not know.
6. The level of understanding between the commissions and their staffs and consultants and the commissioners' perceived level of status from serving on the regional planning commission could not be statistically correlated with the perceived importance of the plan.

Findings of the Structural and Procedural
Comparison of the 208 Planning Efforts
at TCRPC and WMRPC

The following table compares a variety of structural elements pertaining to the 208 plan at the Tri-County and West Michigan regional planning commissions. (See page 79.)

Conclusions of the Study

It should be reiterated that due to the small sample size and the nature of the research as an exploratory case study that the conclusions of this paper are

TABLE 8

COMPARISON OF STRUCTURAL AND PROCEDURAL DIFFERENCES BETWEEN THE TCRPC AND WMRPC REGIONS
AND 208 PLANNING PROGRAMS

	TCRPC	WMRPC
1. Population of Region	1. 378,433 (1970)	1. 662,222 (1970)
2. Size of Region	2. 1,700 sq. miles	2. 6,021 sq. miles
3. Number of Commissioners	3. 20	3. 43
4. Amount of 208 Planning Grant	4. \$704,000	4. \$1,012,000
5. Meeting Schedule	5. monthly	5. monthly
6. Meeting Location	6. Lansing	6. Grand Rapids
7. Travel time to Meeting (Regular)	7. 45 minutes (longest)	7. 2 hours
8. Age of Commission	8. 22 years	8. 4 years
9. Number of Governmental	9. 78	9. 242
10. 208 Staff	10. 208 Director-Land use planner a. Aquatic biologist b. Environmental planner c. Citizen participation/land use planner d. Environmental engineer e. Part-time employees: 1) public information coordinator 2) clerical staff 3) printing and graphics staff 4) water sampling crew (4)	10. 208 Direction-Public Administration a. Citizen participation coordinator b. Secretary c. Part-time employees 1) environmental planner

TABLE 8 (Continued)

	TCRPC	WMRPC
	<p>5) land use projection crew (4)</p> <p>6) aquatic biologist (1)</p> <p>7) student interns (3)</p>	
11. 208 Staff Responsibilities	<p>11. 208 Work Program, interviewing and selecting consultants with commission approval, collecting technical and management data, land use and population projections, analyzing data in conjunction with consultants, preparing and presenting material to the public, coordinating consultation effort, media coverage</p>	<p>11. 208 Work Program, analyzing data in conjunction with consultants, coordinating consultants, preparing and presenting material to the public, citizen participation effort, media coverage</p>
12. 208 Consultants and Responsibilities	<p>12. 3 major, 4 minor Engineering analysis, water sampling analysis, preparation of technical alternatives, river modeling, environmental impact assessment, preparation of management alternatives</p>	<p>12. 4 major, 11 minor, 20 contracts Collection of technical and management data, engineering analysis, preparation of technical alternatives, river/lake</p>

TABLE 8 (Continued)

	TCRPC	WMRPC
13. Citizen Participation Effort	<p>13. Two-tier arrangement</p> <p>A. Technical Planning Coordinating Committee (TPCC)</p> <ol style="list-style-type: none"> 1. Land Use 2. Solid Waste 3. Water Quality and Supply 4. Point Source 5. Agriculture/Non point Source 6. Management/Economic Development 7. Environmental <p>B. Area-wide Planning Advisory Council (APAC), made up of officials from local units of government, signing Resolution of Intent, SCC, USGS, USACE, GRWC, Mich. DNR, TPCC, and TCRPC</p>	<p>modeling, environmental impact assessment, preparation of management alternatives</p> <p>13. A. First Year</p> <ol style="list-style-type: none"> 1. Four work groups 1. Lake and Stream 2. Growth and Development 3. Sedimentation and Erosion 4. Municipal and Industrial <p>B. Second Year</p> <ol style="list-style-type: none"> 3 Geographically based Clean Water Task forces--Northern, Metropolitan, and Southern

TABLE 8 (Continued)

	TCRPC	WMRPC
14. Media Coverage	14. Handled by TCRPC public information coordinator in a manner well established by prior Tri-County contact with the media. TCRPC had received good media coverage prior to 208 planning.	14. Handled by 208 Director based upon his personal knowledge of media personnel in the region. WMRPC had not received good press coverage prior to 208 planning.
15. Methodology for Evaluating Water Quality Problems	15. Collection and analyzation of prior data, extensive water quality sampling and analysis program, Thomann's water quality model	15. Collection and analyzation of prior data, STORM and SWMM water quality models.
16. Major water quality problems identified	16. Combined sewer overflows, urban stormwater runoff, agricultural runoff	16. Municipal and industrial point sources

not definitive. Findings are suggestive of trends, some of which are quite strong, that cannot however be verified statistically. As a first step in researching the area of study, the conclusions can hopefully provide a basis for further inquiry.

Key Elements of PL 92-500,
Section 208

Throughout the 208 planning process the Environmental Protection Agency could never guarantee what sanctions would be brought against 208 planning regions that failed to produce implementable plans. In spite of this, both the Tri-County and West Michigan planning commissions were spurred to an intensified effort to produce implementable plans because of the mandate to implement within the act. The decision-making process took on added importance because the commissioners saw the mandate to implement the plan as having serious implications, however imprecisely stated.

A large majority of respondents from both agencies agreed with the concept of involving the public throughout the water quality planning process. This seems to demonstrate a willingness to share the decision-making process--an act that will probably result in a more acceptable plan to the citizens of both regions.

However, agreement with a principle does not necessarily guarantee its enactment. This was borne out

by the West Michigan Regional Planning respondents' general agreement with the intent to involve the public coupled with no perceptible increase in the visibility of the plan vis a vis other plans prepared by the agency.

One hundred percent federal funding of the planning process did little to impress the majority of the respondents (76%) regarding the importance of the plan and consequently probably did not heighten the perceived importance of the decision-making process. It is possible that the 100 percent federal funding diminished local participation in the decision-making process because local funds were not directly involved. However, it is very likely that the 100 percent federal funding affected the outcome of the decision-making process to apply for a 208 planning grant. It is hypothesized that the 100 percent federal dollars for planning purposes were instrumental in making the 208 effort an attractive risk, especially with the many potential problems involved.

When the questionnaire was administered, approximately 50 percent of the respondents from both commissions thought that the lack of federal money for implementation of many aspects of the plans would slow up adoption of a final plan. The decision-making process was in fact prolonged, particularly at Tri-County, as commissioners, perhaps influenced by the public, spent time deleting expensive and mandatory portions of the recommended plans.

It is a hypothesis of this thesis that the lack of federal commitment to provide additional implementation dollars resulted in plans that are substantially weaker than recommended by the 208 planning staffs. To make the plans economically palatable to the public, the final plans probably will not achieve fishable and swimmable water by 1983.

Respondents from the Tri-County sample perceived the 208 plan as more important in a variety of ways compared to other plans prepared by the commission. This was not a finding applicable to the West Michigan sample. Regardless of why the commissions perceived the importance of the plan differently, it is hypothesized that the decision-making process for 208 at TCRPC should have taken a longer period of time and been more complex in comparison with the decision-making process for other plans prepared by the commission. Conversely, 208 planning at WMRPC should have been appreciably no more complex and time consuming than for other plans the commission has dealt with.

Because potential variables in the questionnaire could not be held accountable for differences in how respondents from the two commissions perceived the importance of the plan, structural and procedural differences between the 208 planning efforts were examined. Following is a set of hypotheses drawn from this analysis:

1. The geographical size of the West Michigan region in contrast to that of the Tri-County region hampered citizen involvement efforts. This in turn meant that fewer people were putting pressure on the West Michigan Commissioners. This situation did not strengthen the commissioners' perception of the importance of the plan. A larger, more dispersed population in the West Michigan region also contributed to the problems of actively involving the public.
2. Attendance at regular WMRPC meetings was poor, probably due to the long travel time to meetings and the daytime meeting schedule. This decreased the chance of regular contact between the 208 staff and commissioners and could not have helped raise the perceived level of importance of the clean water plan.
3. The level of staffing may have played a role in how the plans were perceived by the commissions. The TCRPC 208 staff was knowledgeable in most phases of the planning effort and had a relatively small number of commissioners to work with. The ratio between full-time staff and commissioners was 1 to 4. The smaller staff at West Michigan had a less comprehensive background and had twice as many commissioners to

pass this knowledge onto. The ratio between full-time staff and commissioners was 1 to 14. Contact between the West Michigan 208 staff and commissioners was more sporadic than at Tri-County.

4. The working relationship between the Tri-County staff and consultants, while having its problems, did not detract measurably from the work product. In contrast, because many of the West Michigan consultants were selected before the staff was hired and because of the large number of contracts let, the working relationship between the 208 staff and consultants was potentially less satisfactory. It is hypothesized that the resulting problems detracted from the real message the staff was trying to get across to the commissioners, thus contributing little to their perception of the importance of the plan and the decision to be made.
5. Involving the public to the degree that both TCRPC and WMRPC attempted was a new endeavor for both commissions. The Tri-County effort was possibly more successful in involving more people from the beginning of the planning process due to a comprehensive effort to involve key people in the beginning and a smaller geographic

area. Regardless of why or whether one citizen participation effort was more successful the fact that West Michigan had to revamp the structure of its program midway through the process again probably diverted the commissioners' attention from content problems to procedural problems.

6. Tri-County had a more established base from which to run its 208 media campaign as well as good prior media coverage of the commission's activities. These factors appeared to be lacking at WMRPC and probably contributed to less coverage of the 208 plan compared to TCRPC 208 plan coverage. It is hypothesized that both commissions were influenced by the relative level of media coverage received by the plan in forming their own opinions of the importance of the planning process.
7. Analysis of the water quality problems in the two regions yielded a different set of major contributing factors. The ways in which the data were collected and analyzed were different in each region. Had the methodology been the same, results quite possibly could have been different. Regardless of this factor, the Tri-County commissioners were presented with a new set of

problems to deal with in their region and the West Michigan commissioners were presented with an old set of problems. There is little money available from the federal government to correct many of the problems identified in the Tri-County region and in contrast, substantial money available from the federal government to help correct the type of problems identified in the West Michigan region. These factors could have influenced the perceived importance of the plan in both regions, upgrading it in the Tri-County region and doing nothing to set it apart in the West Michigan region.

In addition to the above hypotheses and conclusions, several other implications can be drawn from the study. It was apparent from the response from both agencies that the commissioners were heavily reliant on their 208 staffs and consultants for technical expertise. This underscores the importance of good working relationships between these groups. The commissioners saw their role in the decision-making process as primarily being responsible for judging which technical and management alternatives were the most politically feasible. It seems important for the staffs to be aware of how the commissioners viewed themselves fitting into the process in order that roles may be meshed appropriately. A

better plan results when the technical and political experts are sensitive to each others' needs.

Recommendations

Recommendations stemming from this study fall into four basic categories: (1) TCRPC and WMRPC, (2) the federal government, (3) practicing planners, and (4) additional research.

TCRPC and WMRPC

The study revealed that structural and procedural differences between the two agencies' 208 programs probably contributed to how importantly the plan was perceived by the commissioners. Assuming that the commissions want plans of this type to be taken more seriously, it seems imperative that both agencies evaluate their procedural successes and failures related to 208 planning and apply that information to future efforts. In general, the West Michigan commission could work on its public image through improved media relations. Also because the large geographic area of Region 8 proved to be such a handicap in carrying out a successful citizen involvement program and hampered attendance at regular commission meetings, some means for counteracting this problem need to be found. The Tri-County planning process, on the other hand, would probably profit from greater coordination and cooperation between urban and rural interests.

This might be done by tackling the problem early in the planning process instead of letting it come to a head towards the end when discussions often become highly emotional.

Federal Government

This study further emphasized the need for the federal government to come up with additional funds for implementation of the 208 plans. Also, it underscored the importance of the Environmental Protection Agency taking punitive action against the 208 planning regions that fail to implement an approved plan. The credibility of the federal government is at stake in this matter. The decision-making process for future plans of a similar nature, such as the solid waste plans soon to be developed, will have little meaning if local units of government discover that the EPA did not really take the water pollution problem very seriously. Additionally the bureaucrats at their desks in Washington need to be more sensitive to the complexity of the decision-making process at the local level. Hopefully the 208 planning programs throughout the nation have demonstrated to the federal government how seriously local elected officials take the responsibility of serving the interests of their constituents.

Practicing Planners

This study demonstrated that in a matter as technical as water pollution the role of the planner in the decision-making process is critical. The planner must bring a high degree of technical expertise as well as political sensitivity to the situation and have the ability to bring a sense of order to the planning process. This is especially important because of the tremendous amount of work that must be accomplished in a relatively short time frame. Facts and figures must be available to the commissioners in time for the final decision-making process to work itself out. Otherwise, the commissions feel that they are having something pushed at them that they have had too little time to digest.

Further Research

Hypotheses presented in this paper need to be tested for verification. Additional research testing these hypotheses could be fruitfully conducted at either the agencies evaluated in this study or similar agencies that were or are involved in 208 planning.

APPENDIX

APPENDIX

208 WATER QUALITY PLANNING COMMISSION SURVEY

PART I

Please complete each question by filling in the blank or selecting the best possible answer by placing an "x" in the brackets.

1. What type of governmental unit do you represent?
a. village () c. country ()
b. city () d. other () Please specify

2. Are you an elected or appointed official?
a. elected () b. appointed ()
3. Is your governmental unit predominantly urban or rural in nature?
a. urban () b. rural ()
4. How long have you been a member of your regional planning commission?
____years and ____months
5. What type of governmental unit do you feel most of your constituents most closely identify as "local" government?
a. village () c. township () e. state ()
b. city () d. county ()
6. What level of status do you feel that your work on the regional planning commission carries within the community?
a. high status; much respect from the public ()
b. some status; some respect from the public ()
c. low status; little respect from the public ()
d. no status; most people have no awareness of the regional planning commission's work ()
e. don't know ()

7. A change in regional planning commission membership can affect the outcome of any decision. What kind of impact do you feel that the turnover in regional planning commission members has has on the 208 decision-making process?

a. high disruptive () d. slightly positive ()
 b. slightly disruptive () e. highly positive ()
 c. no impact () f. don't know ()

8. Has your regional planning commission gone through any recent membership changes other than normal political turnover?

a. no () b. yes () If "yes," please describe briefly:

PART II

9. When people in a group have a decision to make they play many different roles. It is important to understand how each of us affects the outcome of decisions. The following statements should help you become more aware of the roles that you and your fellow commissions play. Please circle the letter to the left of all of the roles, if any, that you feel you have played or are likely to play during the 208 planning process.

A. Politically Knowledgeable:

A person who is especially sensitive to his or her constituent's view of the problem and preferred solution.

B. Initiator:

A person who calls attention to issues or makes suggestions or proposals that later get serious consideration by the planning commission.

C. Technical Expert:

A person who is effective in bringing technical information into the discussion.

D. Expert on Process:

A person who can give especially good advice on how to get a proposal acted upon--one who is very good on whom to approach and how to do it; one who knows about the sensitive points of others and can predict well how others are going to react to proposals.

E. Mediator:

A person who is especially good at getting persons and groups with different points of view to communicate with each other.

F. Public Leader:

A person who is especially effective in gaining public support for or against proposals for action.

G. Veto Power:

A person who can block most actions if he or she chooses to do so, whose objections would in general be fatal to proposals for action.

H. Judge:

A person who has a talent for seeing things impartially seeing both sides of the issue and making a distinction between the merits of a case and the various interests affected by it.

I. Coalition Maker:

A person who is able to get different groups of people to work together to form coalitions or groups who share interests when dealing with proposals for action.

10. Look over the roles from question 9 again:

- | | |
|------------------------------|--------------------|
| a. politically knowledgeable | f. public leader |
| b. initiator | g. veto power |
| c. technical expert | h. judge |
| d. expert on process | i. coalition maker |
| e. mediator | |

Do you feel that all of the above roles have been taken by someone on your planning commission during the 208 decision-making process?

- a. yes () b. no () Please list the roles not taken:

11. Would you say that during the discussion of 208 management and technical alternatives you have tried to stick to your basic ideas and goals, or have you been open to compromise and bargaining?

- a. been receptive to compromise ()
 b. tried to stick to basic goals ()
 c. don't know ()

12. Would you say that most of the time regional planning commissioners who have disagreed with you on 208-related matters have been willing to compromise?

- a. most of the time () c. seldom ()
 b. some of the time () d. never ()

13. Would you say that regional planning commissioners whom you respect are in agreement on the basic elements that should be part of the final 208 plan, or are some people whom you respect in favor of other alternatives?
- a. commissioners whom I respect agree with me ()
 - b. commissioners whom I respect are in favor of other alternatives ()
 - c. commissioners whom I respect both agree and disagree with me ()
 - d. don't know ()
14. In relation to your preference for particular 208 plan elements, how firm in your convictions are you?
- a. very strong ()
 - b. middle of the road ()
 - c. no strong feelings in any direction ()
 - d. don't know ()
15. Do you agree with the basic intent and timetable of the Federal Water Pollution Control Act (PL 92-500, Section 208)--fishable and swimmable waters by 1983?
- a. strongly agree with intent and timetable ()
 - b. generally supportive of intent and timetable ()
 - c. would prefer less stringent goals ()
 - d. intent good, but impossible to achieve within the time frame ()
 - e. strongly disagree with both intent and timetable ()
16. Once a final plan is adopted, whether you totally agree with it or not, will you work for its implementation?
- a. definitely yes ()
 - b. probably will ()
 - c. probably not ()
 - d. definitely not ()
 - e. don't know ()
17. If a 208 plan is adopted which you seriously oppose, will you:
- a. actively oppose its implementation ()
 - b. do nothing to hinder or help implementation ()
 - c. work for implementation in spite of negative feelings ()
 - d. don't know ()
18. Do you feel that the uncertainty of receiving additional implementation funds from the federal government will impede the adoption of a final plan by your commission?
- a. yes ()
 - b. perhaps ()
 - c. no ()

19. Because of the federal mandate in PL 92-500 (Federal Water Pollution Control Act - Section 208) to implement a pollution control plan, do you feel under more pressure to approve a final plan that will work in your region?
- a. more pressure because of mandate ()
 - b. federal mandate doesn't make any difference ()
 - c. less pressure because of mandate ()
20. Does the fact that the 208 planning grant is 100% federally funded make you feel that this plan will be more important than other plans prepared by your commission?
- a. more important ()
 - b. no difference ()
 - c. less important ()
21. In your discussions with the 208 staff and consultants, do you feel that:
- a. you have understood what they are saying ()
 - b. they have been talking down to you ()
 - c. they have been way over your head with too much technical language ()
22. In comparison with other issues your regional planning commission has dealt with, does the adoption of a final 208 plan and management structure seem more important or less important?
- a. seems more important ()
 - b. seems of about the same importance ()
 - c. seems less important ()
23. In relation to other plans your regional planning commission has prepared, do you feel that the final 208 plan will:
- a. have a greater chance for implementation ()
 - b. have about the same chance for implementation ()
 - c. have less chance for implementation ()
24. In relation to other plans your regional planning commission has prepared, do you feel that the 208 planning process:
- a. has a higher degree of visibility with the general public ()
 - b. has about the same degree of visibility with the public ()
 - c. has less visibility with the general public ()

25. In relation to other plans prepared by your regional planning commission, do you feel that the final 208 plan will:
- a. have a higher degree of impact on your constituents ()
 - b. have about the same level of impact on your constituents ()
 - c. have less impact on your constituents ()
26. In comparison with other issues your regional planning commission has dealt with, do you feel there are more or fewer pressures on you to change your personal position on the 208 final plan?
- a. more ()
 - b. same ()
 - c. fewer ()
 - d. don't know ()
27. Do you feel that because your regional planning commission has been given the responsibility of developing and selecting a preferred 208 plan that the status of the organization has risen in the eyes of the (I) General Public and (II) The Government or Agency You Represent?
- | | |
|--|---|
| <p>I. General Public</p> <ul style="list-style-type: none"> a. definitely yes () b. probably yes () c. probably not () d. definitely not () e. don't know () | <p>II. Government or Agency Represented</p> <ul style="list-style-type: none"> a. definitely yes () b. probably yes () c. probably not () d. definitely not () e. don't know () |
|--|---|
28. Do you believe that your constituents, the voting public whom you represent, will take note of the way you vote on the final selection of a plan alternative?
- a. definitely yes ()
 - b. probably yes ()
 - c. probably not ()
 - d. definitely not ()
 - e. don't know ()
29. Do you agree with the intent of PL 92-500 to involve the public at an early stage of the planning process and keep them actively involved?
- a. definitely yes ()
 - b. have reservations () Please state: _____
-
- c. definitely not ()

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