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These are correspondence letters from Katie McGinty. They are
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KAM letters A-Z

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WASHINGTON

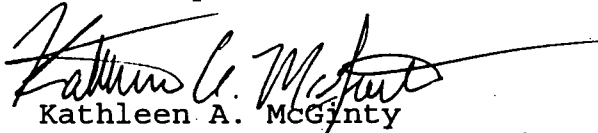
May 12, 1994

Mr. Braden R. Allenby., Ph.D.
Research Vice President, Technology and Environment
AT&T
Engineering Research Center
Room PR2-3081
P.O.Box 900
Princeton, N.J.
08542-0900

Dear Mr. Allenby:

Thank you for your note and article entitled Understanding
Industrial Ecology From A Biological Systems Perspective.

Sincerely,


Kathleen A. McGinty
Director, White House Office
On Environmental Policy



Braden R. Allenby J.D., Ph.D.
Research Vice President, Technology and Environment

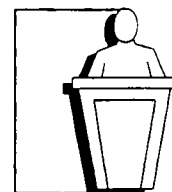
Kate - It was fun to chat
with you and your group about
industrial ecology and Design for
Environment - thanks for inviting
me! I'm sending you and Keith
a couple of recent papers I've done, one
exploring the linkages between biological
communities and industry structure, and
the other looking at whether private
firms should be redefined - to read if
you're really getting

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bored! Cheers!

— Brad 

UNDERSTANDING INDUSTRIAL ECOLOGY FROM A BIOLOGICAL SYSTEMS PERSPECTIVE



Braden R. Allenby and William E. Cooper

As the perception of environmental problems as localized in time, space, and media has become inadequate, the need has grown to develop a systems-based, comprehensive intellectual framework within which to manage these issues. Indeed, Total Quality Environmental Management, combined with technical approaches such as design for environment (DFE) and life cycle assessment (LCA), embodies just such a systems approach.

A far more fundamental shift in the relationship between economic and environmental systems is necessary, however, if they are to be successfully integrated. An understanding of what this may mean is being developed through the concept, and nascent multidisciplinary field of study, called "industrial ecology." A brief definition of the term may be found in the first technical textbook dealing with this subject:

Industrial ecology is the means by which humanity can deliberately and rationally approach and maintain a desirable carrying capacity, give continued economic, cultural, and technological evolution. The concept requires that an industrial system be viewed not in isolation from its surrounding systems, but in concert with them. It is a systems view in which one seeks to optimize the total materials cycle from virgin material, to finished material, to component, to product, to waste product, and to ultimate disposal. Factors to be optimized include resources, energy, and capital.¹

Our purpose in this article is to enhance the understanding of industrial ecology by considering some notable aspects of biological systems and, more importantly, to suggest areas where further research along these lines could prove productive. In particular, we will be discussing three interesting themes suggested by the analogy:

1. Economic activity since the Industrial Revolution somewhat resembles patterns in a rapidly evolving biological community, while a sustainable economic structure will resemble a mature biological community.
2. Information flows and system linkages in a sustainable economy will require far more reliance on distributed control and decision nodes (e.g., the price structure) and less on centralized, command-and-control mechanisms.

Braden R. Allenby is research vice president, Technology and Environment, for AT&T, where he is responsible for supporting the integration of technology and environment throughout AT&T's operations, products, and services worldwide. In 1992, he was the J. Herbert Holloman Fellow at the National Academy of Engineering. William E. Cooper is professor of zoology at Michigan State University. In addition to his teaching and research responsibilities, he currently serves on the U.S. EPA Science Advisory Board and directs the Relative Risk Assessment Program for the state of Michigan.

3. The high material and energy fluxes and objective function (unlimited growth) of current economic activity are strikingly dissimilar from the moderate fluxes and objective function (evolution within stable boundary conditions) characteristic of mature biological communities.

The term industrial ecology is remarkably evocative, redolent of casting human economic activity, especially industrial activity, in a "natural" or "ecological" role. The term suggests that industrial systems and biological systems are deeply similar. Indeed, it is clear that both are complex systems, and that, in general, they evolve to maintain themselves over time without discontinuous change. Further, economic systems are inextricably integrated into supporting biological, chemical, and physical systems; it is our failure to understand and appreciate this integration, and to act accordingly, that has generated the unacceptable environmental degradation that has accompanied the continuing evolution of the Industrial Revolution.

The most ephemeral industrial processes both depend on natural systems and affect them.² For example, computer-executed stock transactions are carried out on machines made of materials synthesized from natural resources. Each stock transaction could, with a little effort, be related to specific wastes of consequence to natural systems such as those that occur in the generation of the necessary electricity and in the heat thrown off by a working computer. Further, the transaction itself—an exchange of ownership in a company for money—is likely to have an impact, however small and unmeasurable, on the actions of the company being traded and thereby on the net environmental impact associated with the company's activities. This does not, however, mean that the interaction of biological and other natural systems with anthropogenic, or human, systems necessarily will lead to desirable outcomes: unbalanced interaction between these two systems may lead to serious environmental degradation, famine, plague, global climate change, cultural disruption, and even significantly reduced biological diversity.

What we seek to understand, then, is human economic activities in light of their relationships to natural environmental systems, and to make the interaction of those two sets of systems—which, again, are in reality one system—more sustainable. The goal is to allow our species to enjoy a high quality of life—including environmental values such as biodiversity and "clean" (i.e., minimally perturbed by human activity) air and water—into the indefinite future. The focus is on sustainability and stability: Can human affairs be organized (or organize themselves) so that they proceed, long-term, in a controllable, stable manner given inevitable complexities in the relationship between economic and natural global systems?

By studying industrial ecology, we are attempting to achieve this goal by understanding human economic and sustenance activity through the use of an analogy with the science of biological ecology.

The similarities are almost intuitive, powerful, and suggestive.³ As with any analogy, however, considerable care must be taken not to let attractive similarities blind one to significant differences, especially where an understanding of those differences can be equally valuable. There is a long, and somewhat spotty, history of attempts in the literature to directly equate economic and biological systems. We intend nothing so specific in this article. Rather, we view industrial ecology as the study of the evolution of human industrial and economic systems and their complex interaction with biological systems.

The study of industrial ecosystems is firmly based in biology (humans are, after all, biological), but it differs from the ecology of traditional, nonhuman biological communities, and the differences, while not fully identified at this point, are important. Furthermore, we are not trying to contrast industrial ecology with the traditional study of ecology—that is a task that will require considerable further study and far more communication between ecologists and “industrial ecologists” than has occurred to date. What we can do is point to some of the significant differences between biological and human economic systems, some of the similarities, some of the previous work that may be of interest, and end with a call for greater attention to this new and fascinating intellectual endeavor. We are speculating here, in hopes of encouraging rigorous research in an important, and potentially quite enlightening, area.

Characteristics of Biological and Anthropogenic Systems

It would be a mistake to think that biological systems—communities—are similar or easily characterized. For example, ecosystems at different stages display significantly different behavior and characteristics (see Exhibit 1). In general, communities that are developing under conditions of plenty may not exhibit closed nutrient cycling, and selective pressures will favor organisms capable of rapid growth (“r-selection”). Such growth will, in theory and within broad limits, fit the logistic exponential curve until resource constraints begin to be felt. At that time, the carrying capacity will be approached asymptotically. In contrast, in mature communities, nutrient cycles will tend to be closed, and selective pressures will favor “quality” individuals over sheer quantity of individuals (“k-selection”). Mature communities remain, however, highly dynamic systems, and many subsystems will be in flux at any given time (for example, exhibiting spatial “patch dynamics”). Maturity is not stasis.

In gross terms, we might restate the industrial ecology analogy somewhat more precisely by saying that industrial economic activity since the Industrial Revolution resembles a biological community in the developmental stage; or, in other words, the Industrial Revolution in essence created relatively unlimited resources permitting the dramatic growth in population of the human species. Now, however,

Exhibit 1: Model Ecological Succession

Ecosystem Attributes	Developmental Stages	Mature Stages
<i>Community Energetics</i>		
1. Gross production/community respiration (P/R ratio)	Greater or less than 1	Approaches 1
2. Gross production/standing crop biomass (P/B ratio)	High	Low
3. Biomass supported/unit energy flow (B/E ratio)	Low	High
4. Net community production (yield)	High	Low
5. Food chains	Linear, predominantly grazing	Weblike, predominantly detritus
<i>Community Structure</i>		
6. Total organic matter	Small	Large
7. Inorganic nutrients	Extrabiotic	Intrabiotic
8. Species diversity—variety component	Low	High
9. Species diversity—equitability component	Low	High
10. Biochemical diversity	Low	High
11. Stratification and spatial heterogeneity (pattern diversity)	Poorly organized	Well-organized
<i>Life History</i>		
12. Niche specialization	Broad	Narrow
13. Size of organism	Small	Large
14. Life cycles	Short, simple	Long, complex
<i>Nutrient Cycling</i>		
15. Mineral cycles	Open	Closed
16. Nutrient exchange rate, between organisms and environment	Rapid	Slow
17. Role of detritus in nutrient regeneration	Unimportant	Important
<i>Selection Pressure</i>		
18. Growth form	For rapid growth ("r-selection")	For feedback control ("K-selection")
19. Production	Quantity	Quality
<i>Overall Homeostasis</i>		
20. Internal symbiosis	Undeveloped	Developed
21. Nutrient conservation	Poor	Good
22. Stability (resistance to external perturbations)	Poor	Good
23. Entropy	High	Low
24. Information	Low	High

continued growth at the same pace using existing technologies is increasingly perturbing natural systems, and it is desirable that economic systems more resemble a mature biological community. Let us follow this idea briefly.

For example, a current concern about modern economic activity is the way that materials flow through the economy, a large portion ending up as waste with little or no reuse or recycling. This bears considerable similarity to food chains in a developing biological community. Such food chains are predominantly linear, a characteristic revealed by comparison to the food chains in most mature ecological communities, which are characterized by food webs and cycles within those webs. Additionally, detritus plays a very important part in the food webs of mature communities as a critical compartment in nutrient recycling, as opposed to the situation in developing communities. Mature communities "care" about waste, developing ones far less so.

Moreover, in a developing community, organisms are generalist; they tend to be specialist in a mature community. A developing community tends to be somewhat confused and unstable; a mature community is better organized, with organisms displaying comparatively longer and, at least in some cases, more complex life cycles.

If we accept it as a working assumption that "sustainable" economic systems should more closely resemble mature biological communities, we can then begin to generate some hypotheses. For example, the importance of activities concerning detritus in mature biological communities is notable. It suggests that, if humans want to move toward a sustainable state, more attention must be paid to "waste" streams, perhaps explicitly designing them for reuse at other points in the industrial web. It also suggests that the consumption and recycling of detritus, and the organisms that execute that function in a system, are critical to the health of the community as a whole.

In contrast, the equivalent functions in human industrial structures—often handled by recyclers, scrap dealers, secondary smelters, or junk yards—have been slighted or regarded only as problems in many environmental policy debates. Manufacturing, with its resource draws and effluent streams, and new products and techniques, has been the focus. Consider, for example, how much R&D and policy attention, and how many human and financial resources, are committed to manufacturing and consumption, and how few are directed toward reuse and recycling of products and materials. The gap, although perhaps narrowing, is still huge. Perhaps, then, the structural and functional importance of the waste reuse and processing component of industrial economies needs to be reevaluated. The current mindset, which tends to view "waste" collection, management, treatment, and recycling activities as secondary to "real" economic activity might be replaced with one that sees these activities as underpinning the movement toward a sustainable industrial structure.

What Could a Sustainable Industrial Structure Be?

Exhibit 1 indicates that most mature biological communities are characterized by diversity, and well-structured, complex, interconnected relationships among organisms. Does this have any implications for the most environmentally propitious forms of industrial structure? Might it imply, for example, that countries, cultures, and firms that currently operate in a more interconnected, structured mode, such as the Japanese, may be in some sense more "sustainable"? This is a particularly interesting question given current trends in the globalizing economy toward more interconnection—for example, tighter supplier-customer relationships fostered by just-in-time manufacturing techniques and increasing reliance on "virtual firms," trends that are counterbalanced somewhat in Japan by the erosion of the existing industrial structure as a result of domestic recession and global competition.

Less speculatively, note that the biological analogy does not necessarily preclude strong reliance on market forces; in fact, it supports such reliance where appropriate (e.g., where economic costs and social costs are not strongly divergent). Mature biological communities are both interconnected and self-organized, without any centralized controlling function. Similarly, a market system is self-organized, without the clumsy and ultimately untenable imposition of external control that characterized the former Eastern European and Soviet states—or the rigid centralized command-and-control environmental regulatory structures that now characterize the United States. In fact, it is probable that, without the efficiency characteristic of market economies, it would be even more difficult to achieve the transition to a sustainable economic state which is clearly necessary.

Other sets of differences between developing and mature biological communities lead to further questions. For example, unlike mature communities, developing communities are characterized by rapid nutrient exchange rates, open mineral cycles, and high gross production/standing crop biomass ratios. Does this imply that to move toward economic sustainability requires a reduction in industrial activity per unit population, with slower cycling of materials through each unit of the economy (a slow "economic nutrient exchange rate")? Interestingly enough, this appears to be along the lines of the "functionality economy"—characterized by longer-lived goods—discussed by Stahel.⁴ This analogy also might imply lower levels of capital stock (lower levels of production/unit biomass), a not counterintuitive notion mentioned by ecological economists such as Daly.⁵ Further research along the lines of these speculations might be useful.

Let us expand this theme. Some of the most obvious differences to an ecologist are the differences in the objective functions of the two systems. Quite simply, the fundamental, long-range objective function of mature biological communities, and the species within them, is survival within a constantly changing environment. A mature biological community is not generally characterized by increasing biomass or throughput of energy or materials. This contrasts with

economic systems that are, most often, for profit growth, sales growth, growth in capital stock, and growth in book value. Does this have any operational implications?

Biological communities tend to display, within environmental constraints, consistency, stability, and relative predictability, because communities with such characteristics tend to survive. Mature communities in particular tend to be characterized by no net growth; they survive, they don't increase in biomass. Here, again, we can see hints that a sustainable business structure might look very different from the one we have now. Profit maximization, growth in capital stock, and rapid rates of technological change would not appear to be sustainable characteristics if they lead the overall economic system to grow uncontrollably. Note this does *not* mean that firms cannot strive to increase profits, both at the expense of competing firms within a sector, or as economic sectors shift in relative importance as sustainability is approached. Nor does it denigrate technological change, which, after all, will be a critical means of approaching sustainability. As noted earlier, maturity is not stasis. It is only where such activity drives continued increase in capital stock, or more rapid cycling of materials out of the economy as waste, that its appropriateness becomes questionable. Thus, for example, continued progress in creating more efficient personal computer and communications devices is desirable and supports dematerialization of economic activity—unless the dominant impact on natural systems is that more and more used electronic devices are simply thrown away.

The critical difference here is between intra-economy competition, which does not result in overall continued growth of capital stock and material consumption, but may lead to changes in relative importance of components of the economic system (economic development), and uncontrolled growth of the economic system as a whole. The former would appear to be acceptable given the mature biological community metaphor; the latter would not—at least, if the biological analogy holds in this particular, which has not been established. We are aware of the bitter arguments concerning the feasibility or desirability of “no-growth” economics generated by books such as the Club of Rome's *The Limits to Growth*. We would pose the arguments, however, not in terms of growth or no growth, but as a question: What types of economic activity and evolution are compatible with an economic system that is sustainable over the long run (e.g., the foreseeable future)? More research is necessary to resolve this question.

Contrasting Systems' Feedback Mechanisms

A more subtle difference is in the feedback systems that characterize mature ecosystems. Control mechanisms by which the communities remain stable even as they evolve in light of changes in the external environment are highly internalized and decentralized, dispersed throughout the community structure. Feedback systems—whereby changes in one component of the community are communicated

throughout the community, thereby facilitating stability and adaptation—are numerous. They all tend to support the long-term stability of the community, including inevitable cycles and variations, as well as allow for further evolution in response to continuous change in the external and internal environment. Also, the selection is for redundant feedback controls—which help ensure stability and survivorship—even at the cost of more growth and/or high net productivity. Moreover, the information content of, and rates of information transfer within, the system is high. In short, mature biological systems tend to be highly organized and integrated, but decentralized with distributed information management mechanisms.

There are obvious parallels and contrasts between an industrial economy and such a system. For example, feedback systems in an economy are indeed complex. However, probably the most important feedback system in a market economy is the price. If this system fails to fully reflect externalities, it will fail to provide accurate information about the relationships between the environment and economic activity. This in turn will result in dysfunctional behavior of the economic system as inappropriate information (that is, signals not reflecting the actual state of the industrial ecology system) leads to incorrect decisions throughout the economy. That this may in fact be the case is at least hinted at by experience; after all, if the economic feedback mechanisms did reflect environmental costs appropriately, humans would not be facing the environmental perturbations they do. If, for political or practical reasons the price structure cannot be adjusted appropriately, alternate feedback systems (educating customers? changing product specifications and standards?) should be explored.

The biological analogy also suggests that society's tendency to approach complex systems perturbations with simplistic, interventionist, prescriptive responses may not result in substantial improvements; that society displays too much hubris in its reliance on micromanaging the complex economic/environment system. Optimizing random identifiable subsystems of a complex system, such as cleaning individual air sheds or river systems, does not ensure optimizing the function of that system as a whole—and there is plenty of evidence that it is not, in fact, being optimized. For example, the United States attempts to control the disposal of hazardous waste through the complex regulatory structures established under the Resource Conservation and Recovery Act, which assume linear material flows. (A material that falls out of a manufacturing process is assumed to be a waste; it is burdened by heavy regulations, thus ironically ensuring that it will, in fact, remain a waste and not be used productively.)⁶ This approach hinders any effort to develop cyclical flows of materials within the economy.

Developing Appropriate Boundary Conditions

What is needed is not more unguided intervention. Rather, what is needed is the development of boundary conditions that encourage the

evolution of environmentally appropriate technologies and behaviors even when it cannot be predicted, *a priori*, what they may be. The need to evolve the system as a whole suggests that changes in the "external environment"—i.e., the legal structures that fundamentally define economic activity—are more appropriate than efforts to impose standards on specific behavior. A potential policy implication, therefore, might be a need to develop very broad, no-prescriptive policy tools that push the industrial system in the desired direction, without trying to define the endpoint, either organizationally or technologically. Properly crafted product takeback requirements might be such a tool. Development of better data, such as those generated by the Community Right-to-Know regulations in the United States, and superior methodologies for better quantifying environmental and economic impacts and costs might be others.

Accordingly, the biological analogy may suggest a regulatory approach where direct intervention in the economic system is limited to establishing basic standards of behavior, such as maximum emission levels and minimal procedures for handling hazardous materials, augmented by broader policies designed to compensate for faulty feedback loops, and to encourage evolution of the economic system as a whole towards a sustainable interrelationship with natural systems. The necessity of some command-and-control structures is obvious, but there is also a need for a much more sophisticated regulatory component that relies on market forces and the control and feedback mechanisms that are internal to, and dispersed throughout, the economy, not imposed directly through regulation.

We offer one more interesting comparison between biological communities and industrial systems. Biological communities of virtually all types display moderation in processing rates and complexity in spatial patterns. Intense clusters of energy and material transformations are generally not found in natural systems. Indeed, above some moderate level of concentration, there are far more diseconomies than economies of scale. All chemicals, including nutrients, are toxic in natural systems if present in high enough concentrations. Similarly, concentrated energy fluxes simply don't happen in biological communities or in biological organisms: enzyme systems substitute sophistication of action for brute force.

The contrast with human industrial activity is apparent. Both the technologies embedded in human economies and the flows and patterns of resource and energy use, consumption, and waste tend to be concentrated. The focus on throughput is apparent: maximum flow, not moderation and maintenance of standing stock, is the order of the day. This would not appear to be sustainable, especially if it appears that sustainability will require the integration of natural and anthropogenic systems in an "engineered world." Natural systems will simply collapse if their internal feedback and control mechanisms are subjected to fluxes that are too large. Biological components will always impose a limitation on the intensity of flows in systems.

This points out another critical difference between biological and industrial organizations. Biological communities are, by and large, localized or relatively closely connected in time and space. Many linkages and links in nutrient cycles, in fact, depend on natural energy fluxes and close proximity. Thus, for example, the nutrients in the rotting log in the forest are carried into the soil by rain water, using energy from sunlight captured as the water initially evaporated. The energy flux is low, the distances proximate.

Global industrial activity is quite a contrast. Even cheap and light goods are produced in pieces all over the world. A complex item like a car or computer contains parts from many nations. The same is true of agriculture: it is an isolated market indeed that does not carry apples or bananas the year round. Such an economy, dependent on global transportation systems, clearly requires substantial energy inputs and is far from the localized spatial scale exhibited by mature biological communities. One possible implication—that a sustainable industrial economy will become more regional or local, more dependent on local resource flows and activities—is interesting because it runs so clearly against the grain of current trends.

Existing Sources of Data

Although we are not aware of any previous organized efforts to bring the insights derived from biological ecology to the field of industrial ecology, there are at least a few past or current activities that might be usefully evaluated in light of the new concept of industrial ecology. Most obviously, of course, a great deal of work has been done over the past few years in theoretical and applied systems ecology, much of which might be fruitfully applied to the developing industrial ecology concept (e.g., Koenig et al. discussing the interrelationships among ecology, engineering, and economics; Odum discussing ecosystems as one example of a “self-organizing system”).⁷ Additionally, the rapidly developing field of ecological economics may be a source of additional insight.⁸

Beyond this, there have also been studies and workshops dedicated to understanding the implications of space colony projects.⁹ A significant issue for the viability of such colonies is inevitably the integration of biological communities into a completely engineered “global” environment in space, a closed system except for energy. This, of course, is similar to applying industrial ecology to understand the implications of billions of people on Spaceship Earth, and how biological and engineered systems may be integrated under such conditions. Accordingly, it may be worth reviewing those studies.

Finally, there are a number of instances of “engineered” environments where biological and engineered components are deliberately combined in one system. Examples might include everything from Disney World to Japan, a heavily industrialized island with few inherent resources. For instance, it is interesting to the Western visitor

that Japanese gardens, so beautiful and "natural" to the eye, have in many cases been intensively gardened—engineered—for hundreds of years. Most of these systems are neither closed nor anywhere near as complex as those considered by industrial ecology but they nevertheless may offer some interesting insights. Accordingly, a research effort to identify such engineered systems and, subsequently, model them and try to understand their characteristics might be useful as well.

Conclusion

This first attempt to look at industrial ecology through a biological ecology lens is necessarily speculative. Nonetheless, it would appear that a better understanding of the implications of the analogy—and perhaps a sharpening of the analogy to include contrasts between developing versus mature biological communities—could be useful in further developing the industrial ecology concept. Similarly, better definitions of the industrial ecology system, and its subsystems and their linkages, in light of similar efforts regarding biological ecosystems, could be a rewarding exercise and useful in introducing some structure into the concept. If we have been able to suggest some tantalizing implications of the analogy, and encourage further exploration, we have accomplished our goals. ♦

Notes

1. T.E. Graedel and B.R. Allenby, *Industrial Ecology* (Englewood Cliffs: Prentice Hall, forthcoming spring 1994).
2. All systems are, of course, natural by definition. Nonetheless, it is useful when discussing environmental perturbations and industrial ecology generally to differentiate between those that are primarily human in origin (anthropogenic), which are sometimes called "artifactual" systems, and those that are less so, which will be referred to as "natural."
3. See, e.g., R.A. Frosch and N.E. Gallopoulos, "Strategies for Manufacturing," *Scientific American* 261, no. 3 (1989): 144-52; B. R. Allenby, *Design for Environment: Implementing Industrial Ecology* (Ph.D. diss., Pub. No. 9232896, Ann Arbor: University Microfilms); B.R. Allenby, "Industrial Ecology; The Materials Scientists in an Environmental Constrained World," *MRS Bulletin* 17, no. 3: 46-51.
4. W. Stahel, "The Utilization-Focused Service Economy: Resource Efficiency and Product-Life Extension," in *The Greening of Industrial Ecosystems*, B. R. Allenby and D. Richards, eds. (Washington, DC: National Academy Press, forthcoming).
5. H.E. Daly and J.B. Cobb, Jr., *For the Common Good* (Boston: Beacon Press, 1989).
6. See, e.g., M. Weinberg, G. Eyring, J. Raguso, and D. Jensen, "Integrating Environment and Technology: Design for Environment," in *The Greening of Industrial Ecosystems*, B.R. Allenby and D. Richards, eds. (Washington, DC: National Academy Press, forthcoming).
7. See H.E. Koenig, T.C. Edens, and W.E. Cooper, "Ecology, Engineering and Economics," *Proceedings of the Institute of Electrical and Electronics Engineers*, 63, no. 3; and H.T. Odum, "Self-organization, Transformity, and Information," *Science* 242:1132-39.

8. See K.E. Boulding, *Ecodynamics* (Beverly Hills: Sage Publications, 1978); N. Georgescu-Roegen, "Energy and Economic Myths," *Southern Economic Journal*, 41, no. 3:347-381; Daly and Cobb, cited in n. 5.
9. See, e.g., National Aeronautics and Space Administration, *Space Resources and Space Settlements*, NASA SP-428 (1979).

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THE WHITE HOUSE

WASHINGTON

April 22, 1994

Mr. Ron K. Almquist
Manufacturing Manager
AKZO
100 Belmont Drive
Somerset, NJ 08873

Dear Mr. Almquist:

Thank you for your recent letter regarding your thoughts about chlorine study and the Clean Water Act reauthorization. It was good to hear from you.

Rest assured that neither the EPA nor this Administration has made any decision in the reauthorization of the Clean Water Act that would restrict or ban the use of chlorine or chlorinated compounds. Because of the continuing rigorous public debate on this matter, EPA has proposed a thorough and careful review of the issues. I assure you that the proposed EPA study will be conducted in a fair, objective and balanced fashion, using the best available information and with the participation of all interested parties.

Again, thank you for sharing your concerns with me.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/jdm



Coatings

April 6, 1994

Ms. Kathleen McGinty
Deputy Assistant to the President and Director
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Madam:

Akzo supplies coatings to the metal industry. These coatings are based on PVC which is made from chlorine. The recent announcement outlining the U.S. EPA's recommendation for reauthorization of the Clean Water Act included the provision to develop "a national strategy for substituting, reducing or prohibiting the use of chlorine and chlorinated compounds". This type of strategy would seriously affect my company and the businesses we supply. Some products our customers produce using our PVC coatings include residential and industrial siding plus automotive applications.

Thank you for giving this your most serious attention.

Respectfully,

Ron K. Almquist
Manufacturing Manager

RKA:rw

Akzo Coatings Inc.
100 Belmont Drive
Somerset, NJ 08873
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THE WHITE HOUSE
WASHINGTON

April 22, 1994

Mr. Michael J. Aldrich
584 Edgewood Drive
Burlington, WI 53105

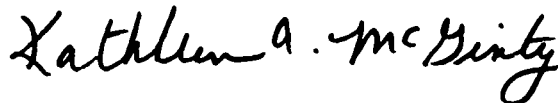
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Again, thank you for sharing your concerns with me.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/jdm

MR. MICHAEL J. ALDRICH
584 Edgewood Drive
Burlington, WI 53105

April 8, 1994

Ms. Kathleen McGinty
Deputy Asstistant to the President and Director
Office Of Environmental Policy
The White House
1600 Pennsylvania Avenue, NW
Washington, D.C. 20500

Dear Ms. McGinty,

I am employed at Ex-Tech Plastics Inc. in Richmond IL. Our company employees about 65 individuals as a Corporation that recycles PVC (Polyvinyl Chloride).

As you know, Greenpeace is trying to place a ban on chlorine, which would cause my company to close its doors. A ban of chlorine would cost hundreds of thousands of jobs nationwide being disastrous to the United States economy.

A ban of chlorine would not only cause the loss of mine and hundreds of thousands of other jobs, the good that chlorine does for people would also be lost. Chlorine is used in over 80% of prescription drugs, and is a vital for safe drinking water.

I do believe that certain chlorine products need to be controlled such as PCB's, DDT and Chlordane, but a completed ban of chlorine and chlorine products would be ludicrous and detrimental to our economy and health. There are numerous other chlorine products that are non-toxic and pose no harm to the earth or humans; why should they be banned along with the bad products?

Please use good common sense before a decision is made and look at the whole picture. I would hate to think the demise of the United States was caused by the ban on the use of a chemical that has so many positive uses for the human life.

Sincerely,



Michael J. Aldrich

THE WHITE HOUSE
WASHINGTON

April 1, 1994

Mr. Chuck Adams
David Brownstead Designs
4260 Park County Hwy 43
Bailey, CO 80421

Dear Mr. Adams:

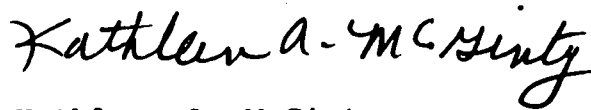
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As you know, President Clinton announced his Forest Plan for a Sustainable Economy and a Sustainable Environment, based on the analytical work of three working groups established at the Forest Conference. This administration believes that the Forest Plan is scientifically-sound and legally responsible and will provide a sustainable harvest. This plan also includes a new economic assistance program that helps local workers, businesses and communities in strengthening the region's economy by creating family-wage jobs, offering new economic opportunities, and ensuring the region's long-term economic health.

After receiving over 100,000 comments on the proposed plan, we are now working to refine it further and expect to submit the final Record of Decision around March 31st. I appreciate learning your views on this very important issue.

Again, thank you for sharing your thoughts with me.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/jdm

david brownstead

DESIGNS

4260 Park County Hwy 43
Bailey, CO 80421
303•838•0963
800•933•3029

March 3, 1994

Ms. Katie McGinty
Director, Office of Environmental Policy
Room #360, the OEOB
Washington, DC 20501

Dear Ms. McGinty:

I am writing to express my opinion of Option 9 as a solution to the dilemma in the forests of the Pacific Northwest.

Option 9 is a poor substitute at best for resolving the forest issues in the northwest. As indicated by the fact that it was not even one of the original options developed by the scientific team, it appears obvious that it is an option of political expediency.

The solution to the current problem is to create a new option (lets call it option minus two). This option should ban logging and provide permanent protection for all remaining native forests nationwide.

One final issue, sufficiency language. It is an affront to the American people, and to the notion of democracy, to even consider the use of sufficiency language. This is nothing more than an attempt to favor special interests by limiting the ability of U.S. citizens' to appeal actions taken by the government and businesses, and to limit judicial review, and finally, to override existing environmental laws.

The American public will absolutely not tolerate this kind of action, and, I would hope that as a democratically elected official, neither will you.

Sincerely,


Chuck Adams

THE WHITE HOUSE
WASHINGTON

April 1, 1994

Mr. Basil Andrews, President
Kalmiopsis Audobon Society
P.O. Box 264
Sixes, OR 97476

Dear Mr. Andrews:

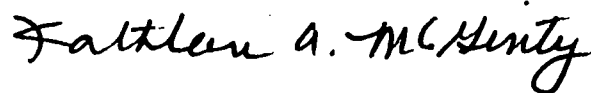
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Again, thank you for sharing your thoughts with me.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/jdm

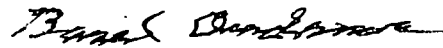
March 23, 1994

Ms. Kathleen McGinty
Office of Environmental Policy
Room 360, Old Executive Office Bldg.
Washington, D.C. 20501

Dear Ms. McGinty,

In the final decision on the Northwest Forest Plan I hope the key watersheds will be protected from all logging. I don't believe that any road building or logging can take place on the steep slopes of the Siskiyou without harm to fish habitat. I have seen the damage that past logging has done and read about the danger of extinction of the important fish of these streams.

Sincerely,


Basil Andrews, President
Kalmiopsis Audubon Society
P.O. Box 264
Sixes, Or. 97476

THE WHITE HOUSE
WASHINGTON

April 1, 1994

Ms. Susan Alexander
68 Central Avenue
San Francisco, CA 94117

Dear Ms. Alexander:

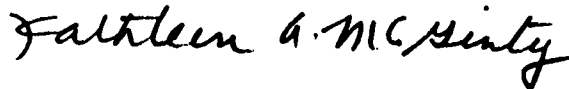
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Again, thank you for sharing your thoughts with me.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/jdm

President Bill Clinton
c/o Katy McGinty/Will Stelle
White House Office of Environmental Policy
Room 360, Old Executive Office Building
Washington, D.C. 20501

RE: PNW Forest Plan
FSEIS-ROD Changes

Dear President Clinton,

Thank you for attempting to address the many problems in forest management that have plagued the Forest Service and BLM in the Pacific Northwest. We place great trust in your administration and these agencies to conserve and protect these forests not only for present and future human generations, but also for hundreds of forest plant and animal species we did not create and cannot replace.

Unfortunately, your Final draft for management of spotted owl forests in Washington, Oregon, and California not only does not protect spotted owls sufficiently, as required by law, but neither does it protect salmon, steelhead, and countless other species the law requires the federal government to protect.

One of the best ways to protect threatened species at the least cost to the timber industry is to protect all roadless areas remaining on federal forest land. These are precious refuges of biodiversity. They have still not been cut because their timber value per acre is lowest and access to them is most difficult.

Specifically -- please protect key land bridges between bioregions. A glaring error in your Final document is in the Siskiyou Pass corridor east of Interstate 5 in Oregon north of the California border. The Soda Mountain-Pilot Rock ridge needs inviolate "Reserve" status. Every spotted owl study or recovery plan to date regarded this area as critical connectivity habitat between the Klamath/Siskiyou and Southern Cascades. Every option but the politicized "Option 9" put this area in "Reserve." It needs to be an inviolat "Reserve" when the Record of Decision on this very significant plan is signed.

Please don't gamble with the forests of the present or future -- or the species which depend on them. At least protect all forest roadless areas. And certainly PUT THE SODA MOUNTAIN-PILOT ROCK-SISKIYOU PASS CORRIDOR IN INVIOLE RESERVE.

Sincerely,

Susan Alexander

Date: 3/8/94

Name:

SUSAN ALEXANDER

Address:

68 CENTRAL AVE

City/State/Zip:

SAN FRANCISCO, CA

94117

THE WHITE HOUSE
WASHINGTON

April 1, 1994

Mr. Brian K. Anderson
P.O. Box 227
Geismar, LA 70734

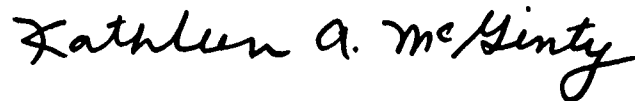
Dear Mr. Anderson:

Thank you for your recent letter regarding your thoughts about chlorine study and the Clean Water Act reauthorization. It was good to hear from you.

Rest assured that neither the EPA nor this Administration has made any decision in the reauthorization of the Clean Water Act that would restrict or ban the use of chlorine or chlorinated compounds. Because of the continuing rigorous public debate on this matter, EPA has proposed a thorough and careful review of the issues. I assure you that the proposed EPA study will be conducted in a fair, objective and balanced fashion, using the best available information and with the participation of all interested parties.

Again, thank you for sharing your concerns with me.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/jdm

P.O. Box 227
Geismar, LA 70734
February 25, 1994

Office of Environmental Policy
Deputy Asst to the Pres. and Director, Kathleen McGinty
Old Executive Office Bldg, Room 360
17th St. & Pennsylvania Ave., NW
Washington, DC 20501

Dear Ms. McGinty:

I am writing to you to express my concern about the recent recommendation from EPA's Carol Browner that Congress develop a "national strategy for substituting, reducing or prohibiting the use of chlorine and chlorinated compounds" over the next three years.

This unscientific approach would be very costly to the economy of the United States and the health of its people. I have noticed over the years that ignorance and fear prevail over science in the environmental arena. Please do everything in your power to prevent Carol Browner's recommendation from being acted on. The EPA's poor decision on this issue could lead to widespread public ignorance and fear and legislation which could cripple a significant part of the U.S. economy.

Furthermore, the process that arrived at this recommendation is very unbalanced. EPA included activists like Greenpeace and the U.S. Public Interest Research Group (PIRG), but excluded representatives from industry and organizations which promote the responsible operation of production and distribution facilities.

Please consider the following key points:

- More than a dozen federal laws and hundreds of individual regulations already are in place to properly manage risks from chemical, including chlorine, and to ensure environmental protection. Industry supports this process and encourages EPA to enforce environmental regulations.
- The chlorine initiative does not belong in the Clean Water Act and should not be part of the Administration's program on that Act because the Act is designed to prevent pollution, not "prohibit" the use of any family of chemicals.
- Chlorine is used to treat 98% of all drinking water. Chlorine chemistry accounts for \$100 billion of the U.S. economy and is used in 85% of all pharmaceuticals, nearly all crop protection materials, hospital disinfection, and many plastics.

Sincerely,
Brian K. Anderson

THE WHITE HOUSE
WASHINGTON

April 1, 1994

Mr. Jerry E. Arrowood
Vice president, Operations Manager
Plastic Oddities, Inc.
P.O. Box 2307 Rt 2, Burke Road
Shelby, NC 28150

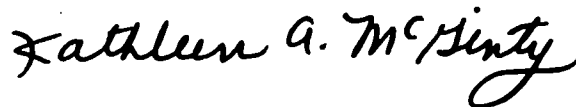
Dear Mr. Arrowood:

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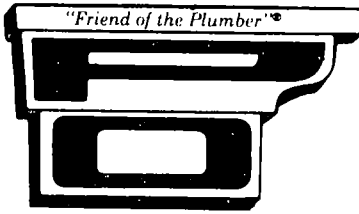
Again, thank you for sharing your concerns with me.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/jdm



Plastic Oddities, Inc.
PO Box 2307 Rt. 2, Burke Rd.
Shelby, North Carolina 28150
(704) 482-8776
Nationwide Watts 800-438-5327

*Buzy Izzy™
Packaged
Products*

March 9, 1994

Ms. Kathleen McGinty
Deputy Assistant to the President and Director
Office of Environmental Policy
The White House
1600 Pennsylvania Avenue, NW
Washington DC 20500

Dear Ms. McGinty:

We the one hundred plus employees of Plastic Oddities, Inc., a specialty plumbing supply manufacturer located in Shelby, North Carolina are compelled to express our concerns regarding the current EPA Anti-Chlorine Strategy Campaign.

Obviously, as a supplier of PVC products to the plumbing industry, we are just one of many manufacturers who have realized the benefits of these products in today's market. Not only do we have approximately one hundred families depending on the income generated from the sale and use of PVC products, but we are not inconvenienced that all fairness has been used in adequately presenting our side. Such questions as (1) Has a due process approach been used based on sound scientific research to determine the actual ill effects of chlorine? (2) Can we really expect to remain competitive on the global market without chlorine and chlorine related products? (3) Lastly, have all social economic factors been weighted out?

Please, as our elected officials, we beg you to proceed slowly and work jointly with our representatives in determining a long-term solution to this issue that will not dramatically impact our livelihoods in an adverse manner.

Sincerely,

PLASTIC ODDITIES, INC.

Jerry E. Arrowood
Vice President/Operations Manager

JEA:hbb

The Original Plastic Offset Flange

THE WHITE HOUSE
WASHINGTON

March 11, 1994

Ms. Melanie Allardale
230 East 300 South
Moab, UT 84532

Dear Ms. Allardale:

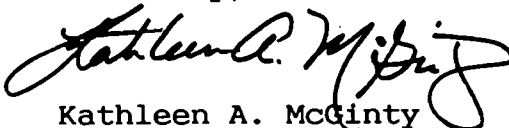
Thank you for contacting me regarding your thoughts about President Clinton's Forest Management Plan. It was good to hear from you.

As you know, President Clinton announced his Forest Plan for a Sustainable Economy and a Sustainable Environment, based on the analytical work of three working groups established at the Forest Conference. This Administration believes that the Forest Plan is scientifically-sound and legally responsible and will provide a sustainable harvest. This plan also includes a new economic assistance program that helps local workers, businesses and communities in strengthening the region's economy by creating family-wage jobs, offering new economic opportunities, and ensuring the region's long-term economic health.

After receiving over 100,000 comments on the proposed plan, we are now working to refine it further and expect to submit it to the court by the end of March. I appreciate learning your views on this very important issue.

Again, thank you for sharing your thoughts with me.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/avl

Ms. Katie McGinty
Director, Office of Env. Policy
Room 360, the OEOP
Washington, DC 20501

Re: Option 9

February 22, 1994

Dear Katie McGinty,

I am deeply disappointed in the course of ancient forest plan events. Threatening conservationists with sufficiency riders to persuade them to release 83 million acres of old growth to the ceaselessly hungry saws was "dirty pool." This political manipulation makes the legality of Option 9 quite suspect.

Have you heard about Champion Lumber Company selling off its holdings in Montana and closing mills? Where is their sympathy for these suffering timber workers who bent your ear at the Forest Summit?

We need an option that BANS ALL LOGGING ON PUBLIC LANDS IMMEDIATELY and PROVIDES PERMANENT PROTECTION FOR ALL REMAINING NATIVE FORESTS NATIONWIDE. Sufficiency language which would limit citizen's appeals, judicial review and override existing environmental law is tremendously inconsistent with the founding principles of our country.

I hope you would promote environmental policy that seeks to make amends for the tremendous damage that has been inflicted upon our forests through greed and ignorance. So little of our original forests are left after four decades of rape and run that sustainability of forest ecosystems calls for a complete stop to all logging on public lands immediately. We need every remaining bit for future generations' material and spiritual well being. Why not stop the rape and run scenario while there is still some forest left?

The Forest Summit seemed a good start, but by banning Zero Cut proponents and giving so much voice to the same old song about job loss the deck was stacked.

I worked for compromise in a consensus group for six years. Now I feel four decades of compromise is too much. Please support an option to end all logging, and log exports NOW and don't employ sufficiency riders to coerce.

Thank you for your attention.

Sincerely,

Melanie Allardale
Melanie Allardale
230 East 300 South
Moab, UT 84532

THE WHITE HOUSE
WASHINGTON

March 10, 1994

Dr. Martin Albert
Charlottesville Wellness Center
901 Preston Avenue
Charlottesville, VA 22903

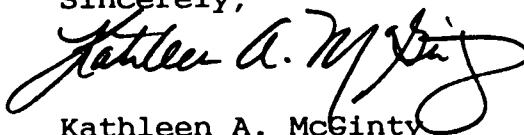
Dear Dr. Albert:

Thank you for contacting me regarding your thoughts about the management of the Tongass National Forest in southeast Alaska. It was good to hear from you.

President Clinton and I are committed to the protection of our valuable natural resources in a way that leads to strong and sustainable economic growth. The U.S. Forest Service has notified the Alaska Lumber and Paper (ALP) that they are in breach of their contract. The Administration is currently reviewing ALP's proposed recommendations for future operations, and a final decision will be forthcoming before April 15.

I certainly appreciate learning your views about the Tongass National Forest and Sitka and the surrounding region's economy. Again, thank you for sharing your views with me.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/avl

CHARLOTTESVILLE WELLNESS CENTER

Family practice

PREVENTIVE MEDICINE

Samuel D. Caughron, M.D.
Martin P. Albert, M.D.

Gregory S. Gelburd, D.O.
Mark Oberman, P.A., M.A.

February 16, 1994

Vice President Al Gore
Office of Environmental Policy
Old Executive Office Building, Room 274
Washington, DC 20501
ATTN: Katie McGinty

Dear Ms. McGinty:

I'm writing to support the Clinton Administration's intention to terminate the Alaska Pulp Corporation's contract.

I encourage you to use this opportunity to reverse the unfortunate misguided policy of logging in the Tongass National Forest.

The unsustainable logging that has been taking place has been harmful to wildlife, water quality, fishing, tourism and has been destroying the eco system of the forest.

Sincerely,



Martin Albert, M.D.

MA/dct

Name	Date
Peter Rundlet	3/16/00

Counsel

THE WHITE HOUSE

WASHINGTON

March 11, 1994

Ms. Raja Adams
4701 222nd Street, SW
Mountlake Terrace, WA 98043

Dear Ms. Adams:

Thank you for your thoughtful letter on the efforts of some other countries to resume commercial whaling.

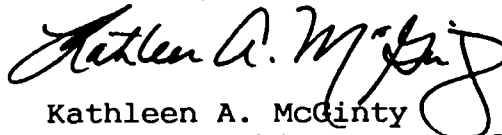
Let me reassure you that the United States is deeply opposed to commercial whaling. The U.S. does not engage in commercial whaling, and we allow no imports of whale products. The United States also firmly supports creation of a whale sanctuary in the oceans surrounding Antarctica.

We have to recognize, however, that not every country agrees with us. Some countries believe that certain stocks of whales are numerous enough to withstand the resumption of commercial whaling without the danger of extinction. We think it is important to make sure that this question is addressed with sound science, and by giving the whales, not whalers, the benefit of the doubt when there are serious scientific uncertainties. That is why we are working within the International Whaling Commission to assure that the methodology known as the "revised management procedure" embodies these principles.

Some people fear that our work on this scientific methodology signals that we are changing our position and are preparing to support commercial whaling. Let me reassure you that this is not true. The United States has no intention to support commercial whaling.

I share your concern for whales and the environment. With your support, we will accomplish a great deal to protect the environment here in this country and around the world.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/avl

Kathleen McGinty
Deputy Ass't to the President
for Environmental Policy
17th St. & Pennsylvania Ave. N.W.
Washington, D.C. 20500

3-2-94

Dear Ms. McGinty,

I am stating my opposition to resumption of commercial whaling on any basis, particularly for any short-term political maneuverings. The support of the Clinton administration through the National Marine Fisheries Service for implementation of "science-based" commercial whaling is unconscionable. The terrible irresponsibility of whalers in the past has left large whale populations at such low levels that there are no compromise positions on this issue - I withdraw personal support for the Clinton administration unless a change on this issue is clearly stated and acted upon.

Sincerely,

Raja Adams
4701-222nd St. S.W.
Mountlake Terrace, WA
98043

THE WHITE HOUSE

WASHINGTON

March 11, 1994

Ms. Andrea Ayala
HHC 3rd Coscom (Mat)
CMR 467 Box 4347
Apo Ae 09096
GERMANY

Dear Ms. Ayala:

Thank you for your thoughtful letter on the efforts of some other countries to resume commercial whaling.

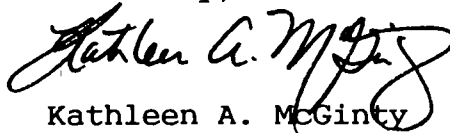
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I share your concern for whales and the environment. With your support, we will accomplish a great deal to protect the environment here in this country and around the world.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/avl

February 24, 1994

Andrea Ayala
HHC 3rd Coscom (Mat)
CMR 467 Box 4347
Apo Ae 09096

Ms. Kathleen Mc Clint

Hello my name is Andrea Ayala I am 16 years old and am a sophomore in high school. I live in Wiesbaden, Germany. My father is in the Army and we have been stationed here for about 2 years.

In my Biology class, we have had the opportunity to adopt a whale and are aware of the problems this animal has of becoming endangered, an issue that has come to my attention is that of the "science based" commercial whaling. I am very much against this because I feel it will lead to resumption of commercial whaling. I really feel this should be looked at and hopefully considered to be changed. Thank you for your time.

A Concerned Student,

Andrea Ayala

Andrea Ayala

THE WHITE HOUSE

WASHINGTON

March 11, 1994

Ms. Betsy Adams
1715 Everglades
Tyler, TX 75703

Dear Ms. Adams:

Thank you for your thoughtful letter on the efforts of some other countries to resume commercial whaling.

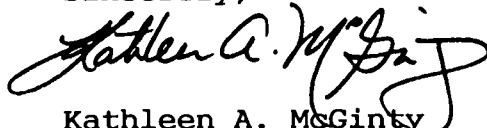
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I share your concern for whales and the environment. With your support, we will accomplish a great deal to protect the environment here in this country and around the world.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/avl

February 23, 1994

Kathleen McGinty
Deputy Assistant to the President for Environmental Policy
17th St. & Pennsylvania Ave. N.W.
Washington, D.C. 20500

Ms. McGinty:

As a whale lover, I find it dreadful that the Clinton Administration is moving towards a pro-whaling position. These are exceptional animals and need to be protected, not killed. Please reconsider this position.

Sincerely,


Betsy Adams

THE WHITE HOUSE

WASHINGTON

March 11, 1994

Ms. Barbara Arber
314 Lake Front Street
Mount Ephraim, NJ 08059

Dear Ms. Arber:

Thank you for your thoughtful letter on the efforts of some other countries to resume commercial whaling.

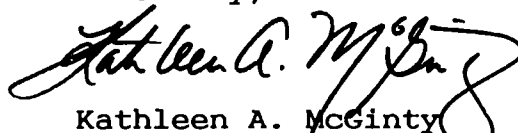
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Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/avl

314 Lake Street St

McC. Ephraim, N.J 08059

Feb. 28, 1994

Dear Mrs. Mc Henty,

I am writing to protest President Clinton's position for the resumption of commercial whaling. I do not understand what science based commercial whaling is. I can think of no reason on earth why the United States would have any reason to kill whales.

Please go on a whale watching boat and see up close these beautiful family orientated animals. It will be an experience you will never forget. Then picture killing these beautiful creatures.

Please do something to help!
Thank you for your time

Sincerely,

Barbara Cullen

THE WHITE HOUSE

WASHINGTON

March 11, 1994

Ms. Rita Abrams
57 Park Avenue
Albany, N.Y. 12202

Dear Ms. Abrams:

Thank you for your thoughtful letter on the efforts of some other countries to resume commercial whaling.

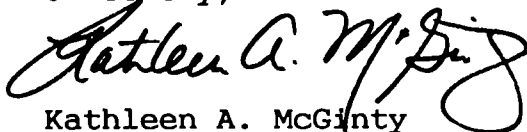
Let me reassure you that the United States is deeply opposed to commercial whaling. The U.S. does not engage in commercial whaling, and we allow no imports of whale products. The United States also firmly supports creation of a whale sanctuary in the oceans surrounding Antarctica.

We have to recognize, however, that not every country agrees with us. Some countries believe that certain stocks of whales are numerous enough to withstand the resumption of commercial whaling without the danger of extinction. We think it is important to make sure that this question is addressed with sound science, and by giving the whales, not whalers, the benefit of the doubt when there are serious scientific uncertainties. That is why we are working within the International Whaling Commission to assure that the methodology known as the "revised management procedure" embodies these principles.

Some people fear that our work on this scientific methodology signals that we are changing our position and are preparing to support commercial whaling. Let me reassure you that this is not true. The United States has no intention to support commercial whaling.

I share your concern for whales and the environment. With your support, we will accomplish a great deal to protect the environment here in this country and around the world.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/avl

R ABRAMS
57 PARK AVE 2
ALBANY NY 12202

February 28, 1994

Ms. K. McGinty
Environmental Policy
17th St & Penn. Ave NW
Washington, DC 20500

Dear Ms. McGinty -

I don't understand The administration's decision to agree to resumption of whaling. Perhaps this is due to Norway's decision to start whaling again.

This is a great mistake; whaling is not necessary as there are substitutes for the products and using the term "science-based" whaling is a complete phony.

Please do your utmost to continue the whale and marine protection.

Rita Abrams

THE WHITE HOUSE

WASHINGTON

March 11, 1994

Ms. Margaret Adams
409 East 85th Street
Apartment 4C
New York, NY 10028

Dear Ms. Adams:

Thank you for your thoughtful letter on the efforts of some other countries to resume commercial whaling.

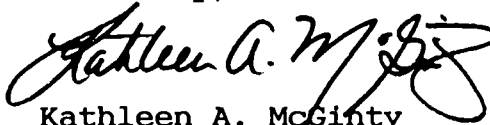
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Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/avl

409 East 85th Street
Apt. 4C
New York, NY 10028

Ms. Kathleen McGinty
Deputy Assistant to the President
for Environmental Policy
17th St. & Pennsylvania Avenue, NW
Washington, DC 20500

Dear Ms. McGinty,

I am absolutely SHOCKED and DISAPPOINTED to learn that the Clinton Administration, rather than impose economic sanctions against Norway over their recent resumption of commercial whaling, now supports the implementation of science-based commercial whaling!

This is OUTRAGEOUS and I protest strongly this disgraceful and unwarranted move of President Clinton and please tell him so. The whales - and ALL wildlife - have suffered at the hands of the human race for far too long. We do NOT need science-based commercial whaling, even to "support" an ally like Norway. Let that country find other jobs for their whalers!!

I am sick and tired of hearing about MEN's jobs. Are whalers and/or loggers too stupid to do anything else?? When were women ever able to stick to just one job??

PLEASE - NO COMMERCIAL WHALING UNDER ANY CIRCUMSTANCES. If President Clinton pursues this kind of environmental policy, he will NOT get my vote in '96.

Yours sincerely,

A handwritten signature in black ink, appearing to read "M. Adams". The signature is stylized with a large, looped initial "M" and a trailing flourish.

Margaret Adams

THE WHITE HOUSE
WASHINGTON

March 11, 1994

Ms. Mildred Arntz
20 Burgess Avenue
Westwood, MA 02090

Dear Ms. Arntz:

Thank you for your thoughtful letter on the efforts of some other countries to resume commercial whaling.

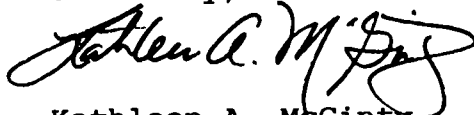
Let me reassure you that the United States is deeply opposed to commercial whaling. The U.S. does not engage in commercial whaling, and we allow no imports of whale products. The United States also firmly supports creation of a whale sanctuary in the oceans surrounding Antarctica.

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Some people fear that our work on this scientific methodology signals that we are changing our position and are preparing to support commercial whaling. Let me reassure you that this is not true. The United States has no intention to support commercial whaling.

I share your concern for whales and the environment. With your support, we will accomplish a great deal to protect the environment here in this country and around the world.

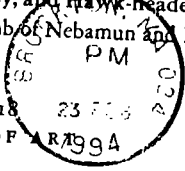
Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/avl

The God Osiris, with Three Guardian Gods of Burial:
 Human-headed Imsety, Ape-headed Hapy, and Hawk-headed Kebehsenuef
 Detail of facsimile wall painting from Tomb of Nebamun and Ipuky
 made by the Museum's Graphic Expedition
 Tempera on paper
 Egyptian (Thebes), ca. 1380 B.C., Dynasty 18
 THE METROPOLITAN MUSEUM OF ART
 Rogers Fund 30.4.157



Feb. 23, 1994

Dear Ms. McGinty,

I wish to strongly
 protest the Clinton
 Administration's position
 on the resumption of commercial
 whaling = calling it "science
 based" commercial whaling.
 As individuals, we can still
 say "not now" in their resumption
 of whaling.

Kathleen McGinty,
 Deputy Assistant for
 Environmental Policy
 17th St. & Pennsylvania
 Ave., NW
 Washington, DC
 20500

Mrs. Mildred Aratz
 20 Buxton Ave
 Westford, MA 02090

A4696-0

THE WHITE HOUSE
WASHINGTON

March 10, 1994

Mr. Larry Anderson
5723 Trenton Avenue
Baton Rouge, LA 70808

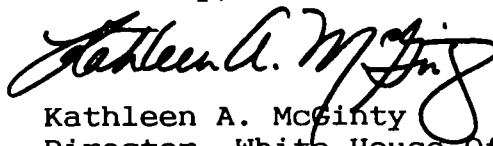
Dear Mr. Anderson:

Thank you for your recent letter regarding your thoughts about chlorine study and the Clean Water Act reauthorization. It was good to hear from you.

Rest assured that neither EPA nor this Administration has made any decision in the reauthorization of the Clean Water Act that would restrict or ban the use of chlorine or chlorinated compounds. Because of the continuing rigorous public debate on this matter, EPA has proposed a thorough and careful review of the issues. I assure you that the proposed EPA study will be conducted in a fair, objective and balanced fashion, using the best available information and with the participation of all interested parties.

Again, thank you for sharing your concerns with me.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen A. McInty". The signature is fluid and cursive, with a large, stylized "M" and "I".

Kathleen A. McInty
Director, White House Office on
Environmental Policy

KAM/avl

THE WHITE HOUSE
WASHINGTON

March 10, 1994

Mr. Dominick J. Agnello
Technical Sales Representative
Elf Atochem North America, Inc.
2000 Market Street
Philadelphia, PA 19103

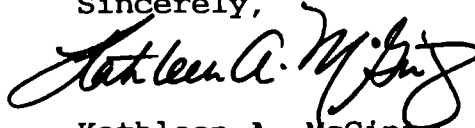
Dear Mr. Agnello:

Thank you for your recent letter regarding your thoughts about chlorine study and the Clean Water Act reauthorization. It was good to hear from you.

Rest assured that neither EPA nor this Administration has made any decision in the reauthorization of the Clean Water Act that would restrict or ban the use of chlorine or chlorinated compounds. Because of the continuing rigorous public debate on this matter, EPA has proposed a thorough and careful review of the issues. I assure you that the proposed EPA study will be conducted in a fair, objective and balanced fashion, using the best available information and with the participation of all interested parties.

Again, thank you for sharing your concerns with me.

Sincerely,

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Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/avl

elf atochem



Elf Atochem North America, Inc.

2000 Market Street
Philadelphia, PA 19103-3222
Tel.: 215.419.7000

February 16, 1994

Office Environmental Policy
Deputy Assistant to the President
Kathleen McGinty
Old Executive Office Building, Room 360
17th & Pennsylvania Avenue, NW
Washington, D.C. 20501

SUBJECT: U.S. EPA Proposal to Phaseout Chlorine

Dear Deputy Assistant McGinty:

As Technical Sales Representative of Elf Atochem of North America's Performance Products Group, I am writing to express to you my opposition to U.S. Environmental Protection Agency (EPA) Administrator Browner's recent proposal for development of a plan to "prohibit, reduce or substitute (for) the use of chlorine" over the next 3 years.

What is especially disturbing about the announcement from Administrator Browner is that it reflects a continuing pattern that has excluded industry's input into the Agency public policy-making process. In the case of chlorine, the Administrator has sought to prejudice the public policy debate in advance of sound scientific assessment and in the absence of input by all stakeholders.

By way of background, Elf Atochem North America is a diversified process chemical manufacturer employing more than 5,200 people nationwide with 33 manufacturing facilities in 17 U.S. states. The company is headquartered in Philadelphia, PA and reports annual sales of just under \$2 billion. Major product/market segments include: commodity organic and inorganic chemicals and chemical intermediates; specialty chemicals, agricultural chemicals and polymers.

Chlorine and chlorinated compounds are essential to society

The EPA proposal makes no sense. The proposed ban represents an unscientific approach to regulating the chemicals because it proposes prohibiting or reducing the use of chlorine and chlorinated compounds without regard to whether such a significant burden on society is warranted.

Chlorine and chlorinated compounds are used to meet some of the most essential and vital needs of modern society, including: protecting our public water supply, and in 85% of all medicines, 96% of all crop protection chemicals, all vinyl plastics and thousands of other products (manufactured in the U.S. and marketed globally) that are the basis of modern life.

Approximately 1.3 million U.S. jobs depend on the chlorine industry. Wages and salaries total more than \$30 billion a year. Further, almost 40% of all U.S. jobs and income depend in some way on chlorine and products of the chlorine industry. Two hundred and twelve industries use chlorine and related compounds, generating 45 million jobs and \$1.6 trillion in economic activity -- including a \$3 billion net trade surplus.

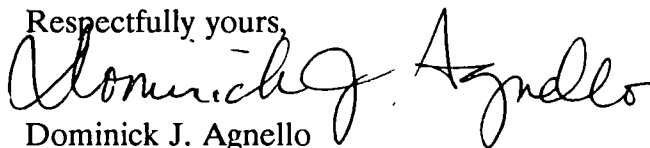
Process for Evaluating and Minimizing Risk is Already Underway

Scientific experts have concluded that chlorinated compounds span a wide range and should not be considered as a single group for purposes of risk assessment. The EPA proposal would short-circuit such initiatives based on scientific risk assessment, including current projects relating to a reassessment of dioxin and chlorine's use in the pulp and paper industry.

With the exception of a few persistent, biocumulative chlorinated organic chemicals (e.g. DDT) in localized areas resulting from historical uses, current concentrations of chlorine and chlorinated compounds have not been shown to cause adverse effects on humans or the environment. Continuing technological improvements are expected to lower the already low risks of adverse effects related to chlorine in the environment.

Thank you for your consideration of the points raised in this letter. I hope that, upon a careful review of the implications of the EPA proposal, that this administration will adopt a policy based on (1) credible science that weighs all the evidence in an even-handed manner, including an evaluation of potential alternatives; (2) a fair and balanced process that involves all stakeholders; and (3) weighs social and economic factors.

Respectfully yours,



Dominick J. Agnello
Technical Sales Representative

DJA/jrd

cc: Mr. Charles A. Kitchen
Director Government & Community Relations
ELF ATOCHEM NORTH AMERICA, INC.
1200 N. Nash Street
Arlington, VA 22209
(703) 527-2099, telephone
(703) 527-2092, fax

THE WHITE HOUSE
WASHINGTON

March 10, 1994

Mr. James Adsett
Director
Site Remediation
Elf Atochem North America, Inc.
201 West Dodge Street
P.O. Box 3608
Bryan, TX 77805

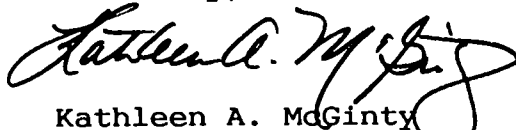
Dear Mr. Adsett:

Thank you for your recent letter regarding your thoughts about chlorine study and the Clean Water Act reauthorization. It was good to hear from you.

Rest assured that neither EPA nor this Administration has made any decision in the reauthorization of the Clean Water Act that would restrict or ban the use of chlorine or chlorinated compounds. Because of the continuing rigorous public debate on this matter, EPA has proposed a thorough and careful review of the issues. I assure you that the proposed EPA study will be conducted in a fair, objective and balanced fashion, using the best available information and with the participation of all interested parties.

Again, thank you for sharing your concerns with me.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/avl



Elf Atochem North America, Inc.
201 West Dodge Street, P.O. Box 3608
Bryan, TX 77805
Tel: (409) 779-0060, Fax: (409) 823-1544

February 23, 1994

Office Environmental Policy
Deputy Assistant to the President, Kathleen McGinty
Old Executive Office Building, Room 360
17th Street & Pennsylvania, NW
Washington, DC 20501

Subject: U.S. EPA Proposal to Phaseout Chlorine

Dear Ms. McGinty,

As Director, Site Remediation of Elf Atochem North America's Bryan, Texas facility, I am writing to express to you my opposition to U.S. Environmental Protection Agency (EPA) Administrator Browner's recent proposal for development of a plan to "prohibit, reduce or substitute (for) use of chlorine" over the next 3 years.

What is especially disturbing about Administrator Browner's announcement is that it reflects a continuing pattern that has excluded industry's input into the Agency's public policy-making process. In the case of chlorine, the Administrator has sought to prejudice the public policy debate in advance of sound scientific assessment and in the absence of input by all stakeholders.

By way of background, Elf Atochem North America is a diversified process chemical manufacturer employing more than 5,200 people nationwide with 33 manufacturing facilities in 17 U.S. states. The Company is headquartered in Philadelphia, PA and reports annual sales of just under \$2 billion. Major product/market segments include: commodity organic and inorganic chemicals and chemical intermediates; specialty chemicals; agricultural chemicals, and polymers.

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Process of Evaluating and Minimizing Risk is Already Underway

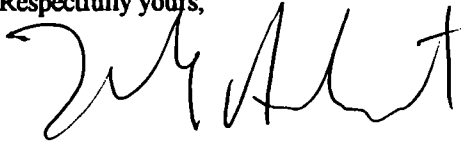
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compounds have not been shown to causes adverse effects on humans or the environment. Continuing technological improvements are expected to lower the already low risks of adverse effects related to chlorine in the environment.

Thank you for your consideration the points raised in this letter. I hope that, upon a careful review of the implications of the EPA proposal, that this administration will adopt a policy based on (1) credible science that weighs all of the evidence in an even-handed manner, including an evaluation of potential alternatives; (2) a fair and balanced process that involves all stakeholders; and (3) weighs social and economic factors.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'JMA', written over a horizontal line.

James M. Adsett
Director, Site Remediation

JMA/jfs

cc: Mr. Charles Kitchen
Director Government & Community Relations
ELF ATOCHEM NORTH AMERICA, INC.
1200 N. Nash Street
Arlington, VA 22209
Tel. (703) 527-2099 FAX (703) 527-2092

THE WHITE HOUSE
WASHINGTON

March 10, 1994

Dr. Naras Alle
4823 Millwood Drive
Baton Rouge, LA 70817

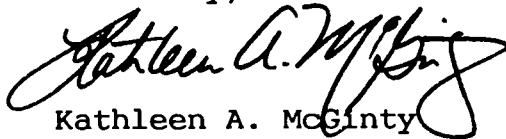
Dear Dr. Alle:

Thank you for your recent letter regarding your thoughts about chlorine study and the Clean Water Act reauthorization. It was good to hear from you.

Rest assured that neither EPA nor this Administration has made any decision in the reauthorization of the Clean Water Act that would restrict or ban the use of chlorine or chlorinated compounds. Because of the continuing rigorous public debate on this matter, EPA has proposed a thorough and careful review of the issues. I assure you that the proposed EPA study will be conducted in a fair, objective and balanced fashion, using the best available information and with the participation of all interested parties.

Again, thank you for sharing your concerns with me.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen A. McGinty", with a stylized flourish at the end.

Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/avl

February 17, 1994

Ms. Kathleen McGinty
Environmental Policy Office
17th St. & Pennsylvania Ave.
Washington, DC 20501

Dear Ms. McGinty:

I write to express serious alarm regarding the recent announcement outlining the U.S. Environmental Protection Agency's recommendation for reauthorization of the Clean Water Act that included the provision to develop a strategy to "prohibit, reduce or substitute the use of chlorine and chlorinated compounds".

From water purification to plastics, from crop-protection chemicals to pharmaceutical, chlorine chemistry plays an important role in many of the processes and products that enable us to enjoy healthy and productive lives.

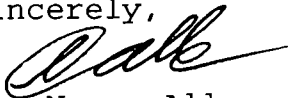
As an employee and scientist in the chlorine related industry, I find EPA recommendation to ban chlorine and chlorinated compounds is unfair and not based on sound science. The chlorine industry employs approximately 1.3 million people in the U.S. with \$57 billion in capital investments. A ban on chlorine and chlorine compounds without justification will cause irreparable damage to the U.S. economy and chemical industry.

Furthermore, this action by EPA is unnecessary as the chlorine and chlorine containing products are already fully regulated by many federal, state, and local laws.

I strongly urge you to consider the very serious implications of a strategy formulated by EPA and activists like Greenpeace in banning chlorine and chlorinated compounds. I hope you will adhere to the importance of sound science and risk assessment when considering any recommendation made regarding the use of chlorine.

Thank you for your attention in this matter.

Sincerely,



Dr. Naras Alle
4823 Millwood Dr.
Baton Rouge, LA 70817

THE WHITE HOUSE
WASHINGTON

March 10, 1994

Mr. Mike Akin
13258 Landry Road
Gonzales, LA 70737

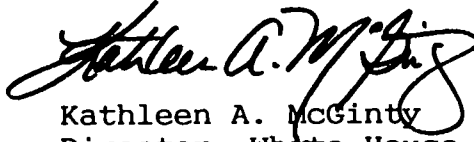
Dear Mr. Akin:

Thank you for your recent letter regarding your thoughts about chlorine study and the Clean Water Act reauthorization. It was good to hear from you.

Rest assured that neither EPA nor this Administration has made any decision in the reauthorization of the Clean Water Act that would restrict or ban the use of chlorine or chlorinated compounds. Because of the continuing rigorous public debate on this matter, EPA has proposed a thorough and careful review of the issues. I assure you that the proposed EPA study will be conducted in a fair, objective and balanced fashion, using the best available information and with the participation of all interested parties.

Again, thank you for sharing your concerns with me.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen A. McGinty", written over a horizontal line.

Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/avl

February 14, 1994

Deputy Asst. to the Pres. and Dir.
Kathleen McGinty
Office of Environmental Policy
Old Executive Office Building
Room 360
17th St. & Pennsylvania Ave., NW
Washington, DC 20501

Dear Ms. McGinty:

I am a chlorine plant operator in St. Gabriel, Louisiana and the recent recommendation by the U.S. Environmental Protection Agency on chlorine is scientifically unfounded.

Prohibiting the use of chlorine and chlorinated compounds without justification would cause irreparable damage to the U.S. economy. This act would place our industry in grave consequences, including the loss of many jobs, mine included.

You are reminded that chlorine and chlorine compounds are used to meet the most vital needs of modern life, such as:

1. Protecting the public water supply
2. Use in 85 percent of all medicines
3. Use in 96 percent of crop-protection chemicals
4. Hospitals and food-handling cleanliness
5. Keeping swimming pools safe
6. Food fresh and free of contamination

We are opposed to the process that EPA added this section on chlorine to the Clean Water Act, as it is definitely unbalanced.

I am requesting that you consider the many benefits of chlorine and chlorinated compounds and look at the various issues before making any decisions. The chlorine proposal does not belong in the Clean Water Act.

Sincerely,

Mike Albin
13258 L. Landry Rd
Gonzales La. 70737

THE WHITE HOUSE
WASHINGTON

March 10, 1994

Mr. Leon B. Anziano
President, Chlor-Alkali Products
Olin Corporation
120 Long Ridge Road
P.O. Box 1355
Stamford, CT 06904-1355

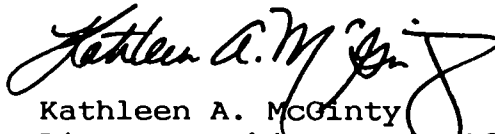
Dear Mr. Anziano:

Thank you for your recent letter regarding your thoughts about chlorine study and the Clean Water Act reauthorization. It was good to hear from you.

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Again, thank you for sharing your concerns with me.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen A. McGinty", with a stylized flourish at the end.

Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/avl



120 LONG RIDGE ROAD, P.O. BOX 1355, STAMFORD, CT 06904-1355

February 11, 1994

Kathleen A. McGinty
Deputy Assistant to the President -
Director Office on Environmental Policy
Old Executive Office Building
17th and Pennsylvania Ave., N.W.
Washington 20500

Dear Ms. McGinty:

On behalf of all 14,000 employees in Olin Corporation, I am writing today to urge you to remove from any Clean Water Act reauthorization provisions that call for a study aimed at prohibiting or restricting the use of chlorine and chlorine compounds. This proposal by the EPA, with its foregone conclusion that chlorine chemistry poses serious risks to human health and the environment, is bad science, bad public policy and bad politics.

It is clearly bad science to call for a study targeted exclusively at chlorine and chlorine derivatives. Yes, there are a handful of chlorine-containing compounds, such as DDT and PCBs, that scientists agree do have the specific chemical structure that makes them persistent and bioaccumulative and therefore of serious concern to wildlife and human health. These substances have long been banned. However, chlorine itself and the vast majority of chemicals produced by chlorine chemistry do not share this structure, and should not be guilty by association. And while we in industry do support focused efforts to address the health and environmental issues regarding highly toxic, persistent and bioaccumulative substances, this would not require any new legislation. The EPA already has the authority and the legislative vehicles (e.g. TOSCA) to study the effects of chemicals and to ban or restrict their use when warranted.

Given the enormous and negative economic consequences that would result, it is also bad public policy to proclaim a strategy of banning or restricting the use of chlorine and chlorine compounds before any sound scientific examination has occurred. As one of the basic building blocks of modern society, chlorine is used to produce 85% of all pharmaceutical products, including leukemia-fighting medicines, as well as everything from fire extinguishers and shoes to furniture cushioning, computer parts and electronic components. The chlorine industry directly supports 370,000 jobs, and indirectly another 950,000, with total wages and salaries of more than \$31 billion a year. If other products or processes could be found to substitute for chlorine, the net cost to U.S. consumers would exceed \$90 billion a year, which would be reflected in higher prices for food, housing, furniture, and residential electricity rates as major power consuming industries are shut

Finally, in light of your pledge to run an open, inclusive Administration, it was bad politics for the EPA to exclude the chemical industry and other vital constituencies from the discussion and decision-making process on the need for this proposed study. Our industry has proven its willingness to work with government and others to find effective ways to improve health and environmental quality, including the quality of our nation's waters. We cannot do so, however, if we are excluded from the table. The Administration set an excellent example of inclusive outreach through its approach to Superfund reauthorization. The same approach is warranted with chlorine.

Let me make it clear that we in the chemical industry are already actively engaged with the EPA and other agencies in 24 constructive activities regarding chlorine, its derivatives and byproducts. Among others, these include the dioxin reassessment, pulp and paper cluster rules, and the development of regulations regarding disinfection alternatives. We also are eager to contribute to any studies that truly seek an objective clarification of scientific issues as a basis for sound decision-making. Such studies should include all affected parties and achieve their consensus, employ sound scientific principles and joint fact-finding, and weigh both environmental and economic impacts through a process of risk/benefit analysis. Indeed, we applauded the signing of Executive Order 122866 on Regulatory Planning and Review because of its strong endorsement of the use of risk assessment processes in making public policy and developing regulatory proposals.

Our commitment to proactively address the health and environmental impacts of the products we make is a vital part of the chemical industry's Responsible Care® initiative. True to this initiative, the Chlorine Chemistry Council (CCC), chaired by Olin executive Leon Anziano, is willing to contribute data from research that CCC has sponsored. This includes the CanTox study that reviews all major existing research relating to chlorine's health and environmental impacts, and the Charles River Associates study of the enormous economic impacts that would result from banning or restricting the use of chlorine. Clearly, one key area that needs further research involves estrogen mimicking compounds. We fully endorse the proposed study of zeno-estrogens by the National Academy of Sciences, which would include industry participation.

I am eager to discuss these issues with you. As a regular participant in the debate over Superfund reauthorization, I have seen first hand the benefits of an ongoing dialogue on even the most controversial issues with the Clinton Administration. I hope we can open the lines of communication on the vital issue of chlorine's role in society as well.

Very truly yours,

A handwritten signature in cursive script, reading "L B Anziano".

Leon B. Anziano
President, Chlor-Alkali Products

THE WHITE HOUSE

WASHINGTON

May 11, 1994

Señor Carlos Agnesi
President
Costa Virgen de Jalisco, A.C.
Guadalajara, Jalisco
Mexico

Dear Señor Agnesi:

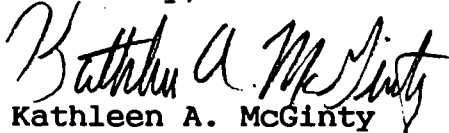
Thank you for contacting my office regarding your work at Costa Virgen de Jalisco. It was good to hear from you. I am sorry for the delay in responding.

I appreciate learning about your organization's efforts to promote sustainable development. The Clinton Administration is working hard to integrate sustainable development concepts into our policies, both foreign and domestic. I share your enthusiasm for future progress in this arena.

You may be aware that the United States will be hosting the Summit of the Americas this December in Miami, Florida. A portion of this summit will be dedicated to sustainable development issues in the Americas. I suggest you contact the Mexican delegation to this summit.

Again, thank you for sharing your work with me.

Sincerely,



Kathleen A. McGinty
Director, White House Office on
Environmental Policy

KAM/avl

Costa Virgen de Jalisco, A. C.

AV. CHAPULTEPEC SUR # 470
GUADALAJARA, JALISCO, MEXICO
TELS. (013) 615-6784 Y 630-08-95
FAX. 615-85-05

March 14, 1994

Mr. Scott Paul
Assistant to the V.P.
on Ecology Matters.
The White House
Washington, D.C.

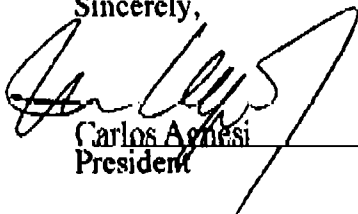
Dear Mr. Paul:

It was a pleasure to discuss the interesting programs your office is involved in. As I mentioned to you, our association is involved in the planning and development of 150 miles of the state of Jalisco's coast line (Costa Virgen), and we are working with the Federal and State governments to instill an ecological awareness in order not to spoil its beauty.

Costa Virgen de Jalisco, A.C. is committed to prevent any future damage to the sea and land while creating an eco-tourism development. Therefore, after reading Mr. Gore's book, *Earth in The Balance*, it occurred to me your department might have some useful and proven ways of accomplishing our goal.

I would like to thank you in advance for any assistance provided in this matter and look forward to your visit on your next trip to México.

Sincerely,



Carlos Agnesi
President

THE WHITE HOUSE

WASHINGTON

May 12, 1994

The Honorable Cecil Andrus
Governor
State of Idaho
Boise, ID 83720-1000

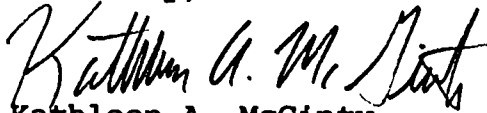
Dear Governor Andrus:

Thank you for your recent letter regarding your recommendation of Dr. Marshall Drummond for a position on the Nuclear Regulatory Commission. It was good to hear from you.

I have taken the liberty of sharing a copy of your letter and the information you enclosed with other White House staff involved in this matter.

Again, thank you for sharing your thoughts with me.

Sincerely,



Kathleen A. McGinty
Director, White House Office
On Environmental Policy

KAM/avl

March 16, 1994

The Honorable Cecil Andrus
Governor
State of Idaho
Boise, ID 83720-1000

*OK, if not
O.B.S.*

Dear Governor Andrus:

Thank you for your recent letter regarding your recommendation of Dr. Marshall Drummond for a position on the Nuclear Regulatory Commission. It was good to hear from you.

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Again, thank you for sharing your thoughts with me.

Sincerely,

Kathleen A. McGinty
Director, White House Office
on Environmental Policy

KAM/avl

*have already
given a copy
to Wes.*

;0#x



OFFICE OF THE GOVERNOR

STATE CAPITOL

BOISE 83720-1000

CECIL D. ANDRUS
GOVERNOR

(208) 334-2100

February 16, 1994

Kathleen McGinty
Deputy Assistant to the President and Director
Office of Environmental Policy
Old Executive Office Building
17th Street & Pennsylvania Avenue, NW
Washington, DC 20500

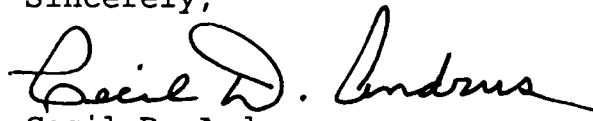
Dear Ms. McGinty:

I am sending you a copy of a letter I sent recently to President Clinton concerning Dr. Marshall "Mark" Drummond, who I believe would be a fine candidate for a position on the Nuclear Regulatory Commission (NRC).

I would appreciate your review of his qualifications.

With best regards,

Sincerely,


Cecil D. Andrus
Governor

CDA:mjl

Enclosure



OFFICE OF THE GOVERNOR

STATE CAPITOL

BOISE 83720-1000

CECIL D. ANDRUS
GOVERNOR

February 15, 1994

(208) 334-2100

William J. Clinton
President
The White House
Washington, D.C. 20500

Dear Mr. President:

As the Administration continues to look for qualified candidates for positions on the Nuclear Regulatory Commission (NRC), I would like to express my support for Dr. Marshall "Mark" Drummond, President of Eastern Washington University.

Dr. Drummond has been recommended to you by Speaker of the House Tom Foley, Senator Patty Murray and Congressman Norm Dicks. I am pleased to join these esteemed members of Congress in an enthusiastic endorsement.

You know of my long-time concern for developing a permanent national solution to the enormous problems of nuclear waste storage and disposal, and it is clear to me that members of the NRC will play an ever-increasing role in guiding and determining that solution. Dr. Drummond's extensive background in dealing with these complex issues equips him well to serve.

Dr. Drummond believes, as I do, that we must focus again on the need to develop a realistic national energy policy that anticipates future needs, encourages necessary research and development, addresses waste management concerns, and enhances national security. I believe he will be an effective voice on the commission in encouraging this much-needed policy development.

Finally, Mr. President, although the commission must have a national vision, I also believe the Pacific Northwest has a unique claim to representation on the NRC. This region has a long history of being on the forward edge of nuclear energy development and we have experienced both the good and the bad that has come with a leadership position. Dr. Drummond understands the challenges our region faces and, just as important, he can apply the knowledge we have accumulated in this part of the world to the critical national work of the NRC.

President William J. Clinton
February 15, 1994
Page 2

I join the Speaker, Senator Murray and Congressman Dicks in a strong endorsement of Dr. Marshall Drummond for membership on the Nuclear Regulatory Commission.

With best regards,

Sincerely,

COPY ORIGINAL
SIGNED BY
CECIL D. ANDRUS
Cecil D. Andrus
Governor

CDA:mjl



OFFICE OF THE VICE PRESIDENT
WASHINGTON

June 21, 1994

John H. Adams
Natural Resources Defense Council
40 West 20th Street
New York, New York 10011

Dear Mr. Adams:

Thank you for writing to us about the proposals submitted to the Administration concerning the future of the domestic oil and gas industry. The Administration is currently reviewing issues related to these proposals.

The Administration supports ensuring that oil and gas production is fully compatible with the protection of the environment. I can assure you that we will keep this objective and your views in mind as review of these issues proceeds.

Thank you again for writing to me. Please feel free to contact me in the future concerning this issue or any other matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Al Gore", written over the word "Sincerely,".

Al Gore

KAM/mmg

Katy- —

We thought it a good
idea to respond to this
letter. Attached is a
draft response for your
comments. Thanks,

Linda
—

June 21, 1994

John H. Adams
Natural Resources Defense Council
40 West 20th Street
New York, New York 10011

Dear Mr. Adams:

Thank you for writing to us about the proposals submitted to the Administration concerning the future of the domestic oil and gas industry. The Administration is currently reviewing issues related to these proposals.

The Administration supports ensuring that oil and gas production is fully compatible with protection of the environment. I can assure you that we will keep this objective and your views in mind as review of these issues proceeds.

Thank you again for writing to me. Please feel free to contact me in the future concerning this issue or any other matter.

Sincerely,

Al Gore

Lee Ann, —
Could you please
grace these letters
with the VP's signature.
Thanks.
M.J. OEP
6-6531 — 360



Natural Resources
Defense Council

PLEASE
DELIVER
FAX TO:

Vice President Gore

ORGANIZATION:

The White House

THIS TRANSMISSION IS

6

PAGES, INCLUDING COVER SHEET.

FAX IS
FROM:

John H. Adams, NRDC

Natural Resources Defense Council, Inc.
40 West 20th Street
New York, New York 10011

IF THERE ARE PROBLEMS WITH THIS TRANSMISSION

PLEASE CONTACT:

Pam Weiant

AT (212) 727-

4424

NRDC'S NEW YORK OFFICE FAX NUMBER: (212) 727-1773

Wes, must we respond,
your thoughts!

MF

w.m.

* NATURAL RESOURCES DEFENSE COUNCIL *
* SIERRA CLUB * THE WILDERNESS SOCIETY *
* THE NATIONAL AUDUBON SOCIETY * AMERICAN OCEANS CAMPAIGN *
* FRIENDS OF THE EARTH * CENTER FOR MARINE CONSERVATION *
* TAXPAYER ASSETS PROJECT *

Vice President Albert Gore
The White House
Washington, D.C.

June 14, 1994

Dear Vice President Gore:

We are writing to express our concerns about a number of "incentives" to help the domestic oil and gas industry that we understand are being considered by the Administration.

We understand that items under consideration include proposals to relax existing or proposed environmental regulations and policies, including those governing underground injection of oil industry waste, natural resource damage assessment, financial responsibility for oil spills, and ecosystem management on federal lands. In addition, we understand the Administration is considering subsidies for this industry that may encourage oil and gas activity on sensitive offshore public lands.

1. Relaxation of environmental regulations and policies

The oil industry already enjoys preferential treatment with respect to environmental controls. For example, most oil and gas exploration and development wastes are currently exempt from classification as "hazardous waste" under the Resource Conservation and Recovery Act, regardless of whether such wastes meet the criteria for hazardous waste. Similar exemptions and exclusions for the oil and gas industry exist in other federal environmental statutes, including the Clean Water Act, the Clean Air Act, the Safe Drinking Water Act, the Hazardous Liquid Pipeline Safety Act, and the Emergency Planning and Community Right-To-Know Act.

We would vigorously oppose further relaxation of environmental requirements for this industry. We understand the following proposals are under consideration by the interagency working group.

A. Natural resource damage assessment

Under both the Oil Pollution Act (OPA) and Superfund, polluters are liable for damages to natural resources. Holding polluters fully liable for these damages creates an important incentive for pollution prevention. A key component of assessing damages is calculating the value of resources that do not currently have a commercial or recreational value. These values are termed passive use or non-use values. Most of the damages suffered as a result of the Exxon-Valdez were to such values; if Exxon had not been held liable for these damages it would have ended up paying for only a small portion of the harm suffered.

Currently, "contingent valuation" is the only method available for measuring passive use values. Its use was upheld by the U.S. Court of Appeals for the D.C. Circuit in the State of Ohio case and was approved in 1993 by a panel convened by NOAA and chaired by two Nobel Laureate economists.

We believe the present exemptions are unwarranted and will understand that there is an effort on the part of the oil industry and some federal agencies to severely limit the use of contingent valuation in natural resource damage assessment. If these efforts are successful, those responsible for major oil spills in the future would escape responsibility for the majority of the damages that result.

Apparently at OMB's request, NOAA and DOI's proposed natural resource damage assessment rules place unreasonable and arbitrary limits on the use of contingent valuation. One of the most objectionable provisions that the agencies were required to include is a requirement that the results of a contingent valuation survey be cut in half. This is termed a "calibration" of the results. This and other totally arbitrary limitations placed on contingent valuation make its use much more difficult, costly and less valuable. In effect, the changes make it harder to hold polluters fully liable for the damages they cause and substantially weaken the incentive for pollution prevention.

We strongly object to these and other attempts to weaken or eliminate the use of contingent valuation in natural resource damage assessment, and urge that the arbitrary restrictions on it be removed in the final rules that emerge from DOI and NOAA.

B. Financial responsibility for oil spills

We understand that the oil industry is urging the Administration not to proceed with a final Coast Guard rulemaking regarding financial responsibility requirements for oil tankers and other vessels under OPA. We also understand that there is pressure to weaken OPA's financial responsibility requirements that apply to offshore facilities either through legislation or administrative rulemaking.

The principle that the "polluter pays" is at the heart of OPA and rests on both the statutory liability limits and the requirement that owners and operators demonstrate that they have the financial wherewithal to pay for a spill up to those limits. By ensuring that a potential spiller can pay for cleanup and damages up to the liability limits, financial responsibility requirements provide strong financial incentives to prevent spills and help to discourage "fly by night" operators.

For offshore facilities, we recognize that if interpreted in an overly broad fashion, OPA's financial responsibility requirements may pose some difficulties for some classes of offshore facilities. We believe however that the Interior Department has sufficient discretion to address these difficulties administratively without undermining OPA's fundamental principles and without recommending that OPA be amended.

For vessels, we strongly support the Coast Guard's approach articulated in its proposed rule and accompanying Preliminary Regulatory Impact Analysis, which would require vessel owners and operators to demonstrate full financial responsibility as required by OPA. The oil industry opposes the Coast Guard's approach, claiming that mechanisms for satisfying financial responsibility are not available. We note, however, that a number of companies have indicated to the Coast Guard that they are ready and willing to provide coverage that will fully meet the financial responsibility requirements.

Prompt implementation of the vessel financial responsibility rule is important because certain pre-existing financial responsibility regulations will remain in effect until the Coast Guard promulgates final regulations. Since existing regulations ensure financial responsibility at levels generally far lower than those required by OPA, claimants could fail to obtain OPA levels of compensation from a spiller. Thus, delays in the rulemaking increase the likelihood that consumers, not the spiller, would pay for cleanup and damages and reduces the financial incentives to minimize spill risks.

C. Underground injection

We understand that there is pressure from some segments of the oil industry to terminate an EPA rulemaking that would strengthen underground injection control (UIC) regulations governing injection of oil industry waste. Serious deficiencies in the current regulations have resulted in documented cases of groundwater contamination from oil and gas injection wells. Improvements are necessary to prevent contamination of underground sources of drinking water with carcinogenic and other contaminants such as benzene and radium from injection wells.

It is our understanding that EPA's proposed rulemaking reflects the report of an advisory committee convened by EPA consisting of environmental groups, oil companies, trade groups, states and federal agencies. The report, which was conditionally approved by all participants (including the American Petroleum Institute), concluded that injection wells should have improved construction standards, increased monitoring, and a system for identifying improperly plugged abandoned wells in the area around existing injection wells. Friends of the Earth and the National Audubon Society participated in the advisory committee and believe its report represents the absolute minimum necessary to protect drinking water and the public. If the Administration now backs away from the approach outlined in the report based on pressure from some segments of the oil industry, it will cast serious doubt on the Administration's commitment to consensus-based attempts to resolve environmental disputes, as well as on its commitment to protect public health.

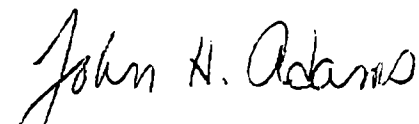
D. Multiple use vs. ecosystem management

We understand that the oil industry has expressed the desire to

extract from offshore public land on the Outer Continental Shelf. We are concerned that such royalty relief will likely encourage environmentally inappropriate new leasing, exploration and development on sensitive offshore federal lands, particularly on the OCS off Alaska.

In conclusion, we are very concerned about various proposals apparently under consideration to aid the oil and gas industry. We request the opportunity to discuss these issues with you before any decisions are made.

Sincerely,



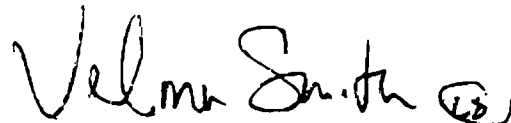
John H. Adams, Executive Director
Natural Resources Defense Council



Carl Pope, Executive Director
Sierra Club



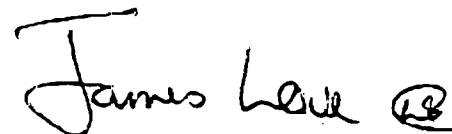
Liz Raisbeck, Senior Vice
President, Regional and
Government Affairs
National Audubon Society



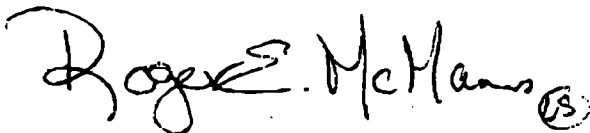
Velma Smith, Director of
Domestic Policy
Friends of the Earth



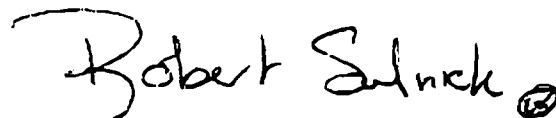
G. Jon Roush, President
The Wilderness Society



James Love, Director
Taxpayer Assets Project



Roger E. McManus, President
Center for Marine Conservation



Robert Sulnick, Executive
Director
American Oceans Campaign