



Council of Great Lakes Industries(CGLI) Comments on Development of Strategic Action Plans for the National Policy for the Stewardship of the Ocean, Our Coasts, and the Great Lakes

29 April 2011

The Council of Great Lakes Industries (CGLI), representing the common interests of more than two dozen U.S. and Canadian industrial organizations and associations that have investments in the Great Lakes Basin, is pleased to submit the following comments on selected priority objectives.

General comments

We continue to support cooperative planning between jurisdictions and agencies that have management responsibilities within marine and fresh water ecosystems. The action plans being developed need to consider the multi-roles the oceans and marine ecosystems fulfill including the Great Lakes in supporting the health, security, economy and culture of the regions.

The unique needs of the Great Lakes as a bi-national fresh water system should be paramount in developing any action plans that apply to the region. Regional efforts, currently in place, must be integrated in any plans. The Great Lakes Region has a long tradition of multi-stakeholder involvement in policy action and well-developed structures for intergovernmental coordination to protect and restore the waters. Plans for the Region should incorporate stakeholder involvement that is extensively promoted to make stakeholders aware of actions and opportunities to participate. Stakeholders both within the Region and those in other coastal areas are unaware of this extensive ocean policy planning. Strong scientific information is used to inform Great Lakes decision-making in the Region and needs to be used in all planning. If the needed scientific information is not available, comprehensive scientific studies should be performed before action is taken. In addition, there is growing concern that the real economic and societal impact has not been sufficiently studied to understand the potential outcomes.

The development of the action plans should not create additional permitting burdens in the Great Lakes. Environmental permitting in the Region has been developed through complex legislative and legal processes and should not be superseded by additional or otherwise more burdensome permitting processes. Existing permits should be “grandfathered” in accordance with their respective permissions and conditions.

Specific priority issues:

- **Ecosystem-based management** - the Great Lakes Region has developed extensive ecosystem-based management models with strong stakeholder involvement for the Great Lakes Region. Reinforcing the implementation of the existing management plans is needed rather than creating a new management system.
- **Coastal and Marine Spatial planning** – Regional stakeholders should lead planning efforts, not only by providing comments but also reviewing scientific information.
- **Coordinate and Support** – All efforts in the bi-national area of the Lakes will require coordination with Canada.
- **Resiliency and Adaptation to Climate Change and Ocean Acidification** – Current stakeholder efforts in the Great Lakes Region are developing climate adaptation agendas.
- **Regional Ecosystem Protection and Restoration** – The Great Lakes Restoration Strategy developed by stakeholders in the Great Lakes Collaboration Strategy is the result of years of work, adaptive modification and improvement. The existing programs should be utilized in the planning process.
- **Water Quality and Sustainable Practices on Land:** States in the Basin have been particularly diligent in aggressively pursuing innovative land practices for water quality. These activities are ongoing, often advanced and tracked by multi-stakeholder and bi-national Lakewide Management Plans (LaMPs). These are spatial planning style programs.
- **Ocean, Coastal, and Great Lakes Observations, Mapping, and Infrastructure** – Continued support for the Great Lakes Observing System will enhance data collection and data management in the Lakes.

It should be evident from the above that there is extensive, ongoing activity in the Basin that relevant U.S. Federal agencies are already be aware of. Spatial planning is already underway in the Basin. Assembling the objectives, “obstacles and metrics of progress relevant to each” is a huge task currently being undertaken by the State of the Lakes Eco-system Conference (SOLEC). Duplication and/or making any of these existing activities redundant would not speed up the achievement of existing eco-system preservation/restoration goals.

We appreciate this opportunity to provide comments. For more information contact:
George H. Kuper, President
Council of Great Lakes Industries
Email: ghk@cgli.org
Phone: 734-663-1944