



**Comments regarding 9 December 2009 draft of
Interim Framework for Effective Coastal and Marine Spatial Planning (CMSP)
as proposed by the
Interagency Ocean Policy Task Force**

Coordination and cooperative planning between jurisdictions and agencies that have management responsibilities within large marine and fresh water ecosystems is a critical need. Such efforts must proceed as the “integrated, comprehensive, ecosystem-base, flexible and proactive” approaches outlined in the draft Interim CMSP Framework document. To meet the specific needs of the Great Lakes region, the Framework and efforts to implement it within the region must take the following points into consideration:

There are Unique Needs and Circumstances within the Great Lakes Region:

The Great Lakes region is unique (relative to CMSP needs and with respect to historical resource management activities) in several ways:

- The region is a fresh water resource. However it functions in much the same ways as do coastal marine regions in support of recreational, commercial, industrial, transportation, social, and ecological functions. Wise and well coordinated management of these water base activities is essential for the social, economic, and ecological well being of the region. Although the specifics may vary regarding species and to some extent management practices, etc, the region requires the same considerations regarding Federal support as the salt coasts.
- The region is bi-national. Coordination between Canada and the U.S. regarding the use and protection of Great Lakes resources is essential.
- While improvements can always be made, a number of bi-national and multi-jurisdictional coordination vehicles have been in use and have successfully guided Great Lakes regional planning for the past 100 years under the guidance of the Boundary Waters Treaty of 1909. The existing structure can be improved upon in a number of ways. However, the long established Great Lakes collaborative processes and opportunities for joint management between agencies and between jurisdictions and the region’s multiple stakeholders must be preserved.

Implementation of CMSP in the Great Lakes Region Must Address Special Needs:

The report calls for the National Ocean Council (NOC) to serve as the lead for the national CMSP effort. In light of the needs and circumstances of the Great Lakes Region, the NOC should organize implementation of the CMSP Framework such that the following provisions are included:

- Persons with direct Great Lake issues experience – preferably in a leadership role – should serve on the NOC implementation team.
- Coordination of the CMSP effort in the Great Lakes region should be accomplished through the Great Lakes Task Force.

- Opportunities for consultation/observation with/by Canadian resource agency personnel – both Federal and Provincial – must be made available.
- Coordination between U.S. officials working to review and revise the Great Lakes Water Quality Agreement between Canada and the U.S., and those involved in the CMSP effort is essential.

Stakeholder Participation in the CMSP Effort is Essential:

The draft CMSP Interim Framework addresses collaboration between various levels of government jurisdictions but does not appear to include opportunities for active participation of non-governmental stakeholders. It must do so. Stakeholders must have the opportunity to not only comment on CMSP work products, but also participate in the location and review of scientific information and region specific data used in the planning process and other implementation activities. Only through collaboration with knowledgeable regional stakeholders will the CMSP effort result in viable outcomes that reflect the unique needs and circumstances associated with each individual region.

CMSP Processes Should Recognize Existing Environmental Permitting Authorities:

Environmental permitting processes administered by State and Federal agencies have been developed via lengthy and complex legislative and legal processes. The CMSP Interim Framework should recognize that these processes are in place and stipulate that existing permits are to be considered “grandfathered” in accordance with their respective permissions and conditions. In addition, the CMSP Framework should be structured so that new permitting proceedings which go forward under the Framework are not be burdened with new layers of review and/or approval. The Framework must recognize and utilize the environmental permitting authorities that are already in place.

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