

## Response to Comments

Thunder Bay National Marine Sanctuary's 2009 Draft Management Plan (DMP) public comment period took place from 2/24/09 to 4/10/09. Public meetings to obtain comments were held in Rogers City (3/18/09), Harrisville (3/19/09), Lansing (3/20/09), and Alpena (3/24/09) and written comments were also accepted. 24 people provided oral comments and 23 people submitted written comments. These comments are available at [www.thunderbay.noaa.gov](http://www.thunderbay.noaa.gov). This response to comments was jointly developed by NOAA and the State of Michigan Department of History, Arts and Libraries. Comments are summarized according to the content of the statement or question put forward in oral testimonies or written statements. Changes were made to the DMP in response to comments where appropriate. Technical, editing, and layout comments were also taken into consideration and, where appropriate, applied to the DMP, but are not included in the response to comments below.

### **General**

A number of public comments were received in support of the Draft Management Plan and in regard to the quality of the plan. Comments included that the plan was carefully considered and crafted to meet the need of preserving the maritime heritage of the area and to address a variety of issues important not only to the sanctuary, but to the long term preservation and conservation of the Great Lakes. Other comments were that the Draft Management Plan was well thought-out, comprehensive, well-prepared, artistically laid out, lucid, and succinct and the action plans were realistic and do-able.

### **Specific**

There were also a number of more specific comments about the Draft Management Plan or the sanctuary:

1. The outcomes-based approach to the plan helps make sanctuary programs more transparent and accountable to the public.
2. The sanctuary has been a wonderful resource in a time of economic difficulties with the state. It has brought people together at the government level and created unity and local, state, and federal cooperation. The community has seen more than its share of economic struggle and loss of manufacturing at its base, and in the 21<sup>st</sup> century, there will be a shift to tourism and recreational opportunities. The sanctuary will lead that area of the state.
3. The sanctuary has brought opportunities for community and economic development to Northeast Michigan.
4. Thunder Bay National Marine Sanctuary has a lot of credibility in the sanctuary system. The innovative things done at Thunder Bay have gained national attention and the sanctuary is respected around the nation.
5. The sanctuary has raised awareness and appreciation for the Great Lakes generally, and Lake Huron and Thunder Bay more specifically.
6. This plan is of great importance to Alpena County and its surrounding counties.
7. The management plan represents preservation which is highly valued in Rogers City. The community of Rogers City is strongly supportive of the sanctuary and its efforts.

8. The sanctuary has been a positive force for the local community and for maritime heritage resources nationwide.
9. The key programs of the sanctuary (i.e., resource protection, research, education) should be based on the needs of target audiences such as historical / cultural travelers, recreational scuba divers, maritime enthusiasts, and community stakeholders. Sanctuary goals, objectives, and strategies should be consistent with the needs of target audiences (including Michigan stakeholders), vision for the sanctuary, and the respective missions of the management partners.

**Response:** No response to comments 1-9 is necessary.

10. The maritime landscape was mentioned, but should be highlighted to help people understand the broader maritime landscape.

**Response:** More information about the maritime landscape has been added to the introduction for the Final Management Plan.

11. The objectives of the original Thunder Bay National Marine Sanctuary Management Plan have been met or exceeded and are a credit to the professionalism and expertise of staff, strong public support and participation, and adequate funding. This accomplishment should be mentioned in the Draft Management Plan.

**Response:** Information has been added for the Final Management Plan that recognizes the accomplishments of the sanctuary.

12. A particular concern to Michigan stakeholders are the policies and practices to be implemented by NOAA within state public trust waters of Lake Huron. How will the sanctuary incorporate the UNESCO Convention for the Protection of the Underwater Cultural Heritage Annex Rules? The most concern centers on Rule 2 of the Annex Rules, which states that "The commercial exploitation of underwater cultural heritage for trade or speculation or its irretrievable dispersal is fundamentally incompatible with the protection and proper management of underwater cultural heritage." An important problem with the Annex Rules (with respect to Rule 2) is that it does not define commercial exploitation, trade, or speculation. Does this mean that ecotourism and cultural tourism (which are commercial enterprises that can have negative effects upon historic shipwrecks though recreational visitation) are fundamentally incompatible with the protection and proper management of the underwater cultural heritage? Does this give NOAA the policy-based justification for further regulation of tourism enterprises operating within a National Marine Sanctuary?

**Response:** While the Convention does not define the term commercial exploitation of underwater cultural heritage, Rule 2 does provide guidance as to the meaning of what commercial exploitation of UCH is, i.e., the "trade or speculation [of UCH] or its irretrievable disposal". This is further elaborated in the next sentence. "Underwater cultural heritage shall not be traded, sold, bought or bartered as commercial goods." NOAA views this explanation of what commercial exploitation is as consistent with the underlying purpose of the Convention which is to prevent looting and unwanted salvage. This would not on its face include ecotourism and cultural tourism, provided it does not involve the sale or barter of UCH as commercial goods. To the contrary, it is NOAA's view that ecotourism and cultural tourism is consistent with many of the principles and

objectives of the Convention. For example, under Article 2 (10), “Responsible non-intrusive access to observe or document in situ underwater cultural heritage shall be encouraged to create public awareness, appreciation, and protection of the heritage, except where such access is incompatible with its protection and management.” Under Article 20, “each party shall take all practical measures to raise public awareness regarding the value and significance of underwater cultural heritage and the importance of protecting it ....” Ecotourism and cultural tourism would be activities consistent with these articles, provided there is no sale, barter or destruction of UCH.

13. Sanctuary Advisory Council (SAC) action plans should be included in the Draft Management Plan. These action plans should have been available to the public prior to the public hearings and for review and written comment by interested stakeholders.  
**Response:** The Draft Management Plan was developed from action plans formally recommended by the sanctuary advisory council on February 19, 2008. All advisory council meetings are open to the public with opportunities for public input. Copies of the advisory council’s recommendations are available upon request. A formal public review and comment period of the sanctuary advisory council’s recommendations is beyond the scope of NOAA’s management plan review process.
14. The Final Management Plan should include carefully written summaries and discussions of the organizational missions of all management partners, applicable law and policy, anticipated markets/audiences for programs and services, key stakeholders, important opportunities and challenges in management, and methods used to derive the goals, objectives, strategies, and expected outcomes found within the plan. The goals, objectives, strategies, and expected outcomes of the management plan should be consistent with these managerial contexts.  
**Response:** NOAA believes that where information on partners, applicable laws and other factors is relevant to the implementation of action plans, the information included in the document contains the appropriate level of detail.
15. Prepare strategic plans that guide both project work and program development in the sanctuary. Move from activity-based management to strategic management and from self-promotion to a science-based management approach.  
**Response:** The Final Management Plan provides a science-based approach to sanctuary management and is intended to be the strategic plan that guides the project work and program development of the sanctuary
16. NOAA protects nothing. It is overrun by commercial fish profiteers and does not work for the general welfare of the American public or operate for the good of the environment.  
**Response:** As agreed upon by NOAA and the State of Michigan in 2000, the sanctuary does not regulate fishing activities. The information NOAA currently has regarding commercial fishing activities within the sanctuary does not indicate a conflict between commercial fishing and sanctuary resource protection. In addition, NOAA believes that current sanctuary regulations and current and proposed programs found in the Final Management Plan fully implement the National Marine Sanctuaries Act and works to

preserve Thunder Bay National Marine Sanctuary's nationally significant shipwrecks and maritime landscape through resource protection, education, and research.

17. Before NOAA takes any action it should always be fully advertised to the public.

**Response:** NOAA believes that the Final Management Plan is an important vehicle for informing the public about future proposed activities. NOAA will continue to provide additional notification to the public of upcoming actions through a number of venues including the sanctuary's web site, newspaper announcements and articles, official notices, and Federal Register notices, and direct contact and e-mail with individuals and organizations. This will be done as needed and at a level commensurate with the activity. NOAA has always and will continue to engage the public in a manner which meets or exceeds legal requirements for agency public notice.

18. There is a lack of substantive outreach to and involvement of Michigan stakeholders in research programs and projects at the sanctuary. The revised management plan should state, where appropriate, that the sanctuary will prepare a "Michigan partnership plan" in collaboration with responsible state agencies that include strategies to aggressively promote, facilitate, and recruit the involvement of Michigan universities, colleges, and other institutions in all programs and projects of the sanctuary. Engage Michigan researchers and educational stakeholders before working with institutions outside of Michigan. NOAA should embrace the need for job retention and creation in Michigan by aggressively recruiting Michigan businesses, research and education institutions, and other Michigan organizations to conduct all categories of work within the sanctuary and the management plan should clearly and strongly state such a goal with corresponding outcome statements.

**Response:** NOAA believes that in managing the sanctuary it has reached out to and involved Michigan universities, colleges, and other institutions in sanctuary programs and projects. Furthermore, the sanctuary is committed to continue to work with Michigan universities, colleges, and institutions whose interests are consistent with the sanctuary's mission. Please see Thunder Bay National Marine Sanctuary's State of the Sanctuary Report (2006) for more specific information about sanctuary partnerships with Michigan universities, colleges, and other institutions. The sanctuary is part of a national program and, as such, will work with universities, colleges, and institutions inside and outside of Michigan to accomplish the goals of the Final Management Plan. In terms of funded work and spending, the sanctuary follows federal procurement procedures.

19. Thunder Bay National Marine Sanctuary undercuts Michigan businesses by offering similar services at low or no cost (such as educational boat trips, scientific/commercial diving, avocational archaeology training) thereby unfairly competing with local businesses or other statewide organizations. It should be working with Michigan organizations to assist in business development and to increase overall economic impact by private sector. The sanctuary should not compete with those in private sector that provide services and products in historical interpretation, archaeological research, heritage education, recreation and tourism, technology development, and other professional fields of endeavor.

**Response:** NOAA believes that the sanctuary has played a supportive role in helping to sustain and build the Michigan economy. The Final Management Plan contains a number of strategies and activities that will aid local business efforts. NOAA has received a number of comments from organizations representing business interests on the management plan, most of which have been strongly supportive of the sanctuary's proposed activities. In addition, NOAA works with a variety of Michigan organizations to foster local and statewide economic development. These organizations include area chambers of commerce, the Alpena Downtown Development Authority, area Convention and Visitors Bureaus, Travel Michigan, Target Alpena Development Corporation, Michigan's U.S. 23 Sunrise Side Coastal Heritage Route, and the Michigan and Thunder Bay Underwater Preserve Committees.

A number of comments were received about providing financial information for Thunder Bay National Marine Sanctuary:

20. In terms of internal versus external funding, it would be useful to have an addendum to the Draft Management Plan that contains criteria and financial breakdowns.
21. It would be very beneficial to those assessing the revised management plan for NOAA to prepare and distribute a breakdown of federal programs to various grantees and contractors since 2000.
22. Thunder Bay National Marine Sanctuary needs to show a true justification for upcoming funding requests with factual numbers of revenues and expenditures related to taxpayer-based funding and other types of funding.
23. An audit on Thunder Bay National Marine Sanctuary should be conducted immediately and bi-annually to ensure transparency and accountability.

**Response:** The funding requirements presented for each action plan are the estimated costs to conduct strategies, regardless of funding sources, either internal or external. Full implementation of these strategies is dependent on support from various sources including state and federal funding, grants, donations, and contributions from partners. Presentation of funding requirements in the Final Management Plan is consistent with other national marine sanctuaries' management plans. It is beyond the scope of the Final Management Plan to provide other types of financial information. While NOAA does not conduct formal financial audits of national marine sanctuaries, stringent external evaluations of the ONMS have been, and will most likely continue to be, conducted periodically. More information on external evaluation of the ONMS can be found online at <http://sanctuaries.noaa.gov/management/effective.html>. In addition, all acquisitions, grants, agreements, and small purchases are made in compliance with Federal Acquisitions Regulations, the Commerce Acquisitions Manual, and NOAA and NOS guidelines and procedures.

### **Resource Protection**

24. Expand the sanctuary northward.
25. The proposed expansion of the sanctuary will complement tourism and help local businesses in Rogers City.
26. People in the Alcona County community are very supportive of the sanctuary and would be very fortunate to have the boundary extend to include Alcona County.

27. Alcona County may benefit from the sanctuary expansion through tours.
28. The sanctuary's proposed expansion will enhance the sanctuary's role in Lake Huron's management and given the sanctuary's success to date, seems an appropriate scale for future operations.

**Response:** As outlined in Strategy RP-1, NOAA will evaluate and assess the Thunder Bay Sanctuary Advisory Council's recommendation to expand the sanctuary to a 3,662-square-mile-area from Alcona County to Presque County, east to the international border with Canada. Any proposed expansion of the sanctuary by NOAA would undergo a separate public review process.

29. Would expansion of the sanctuary increase the bounds of the Thunder Bay Underwater Preserve and would that impact the percentage of maximum allowable bottomlands?

**Response:** Under Michigan law, if the sanctuary expands, the Thunder Bay Underwater Preserve would not automatically expand. Legislative action by the State of Michigan would be needed to expand the Thunder Bay Underwater Preserve. Thunder Bay National Marine Sanctuary is exempt from the 10% maximum allowed bottomlands for Michigan Underwater Preserves.

30. In terms of enforcement, how is it being done? With resources being stretched, what will that mean for expansion and how will enforcement be achieved?

**Response:** As stated in the Draft Management Plan, the sanctuary works with its enforcement partners, including the NOAA's Office of Law Enforcement, U.S. Coast Guard, Michigan Department of Natural Resources, Alpena County Sheriff, and Michigan State Police to enforce sanctuary regulations, including the use of interpretive enforcement. Part of the process of evaluating and assessing the advisory council's boundary expansion recommendation (Strategy RP-1) will be determining what resources will be needed in an expanded sanctuary.

31. Include partnering with the Lake Carriers Association in Strategy RP-3, Activity 3.3 (D): *Provide U.S. Coast Guard Auxiliary members, marina employees, and other appropriate individuals and organization with information about recognizing and reporting violations of sanctuary regulation, and solicit from them "Reports of vessels anchored in shipping channels" to provide Thunder Bay National Marine Sanctuary valuable information on those diving un-buoyed wrecks.*

**Response:** Due to the number of sanctuary partners, action plan strategies often do not cite specific partners, though this comment will be considered when implementing Strategy RP-3, Activity 3.3 (D).

32. In Strategy RP-4, Activity 4.1 (B): *Explore the use of cell phones and podcasting as a means of allowing recreational users to access interactive interpretive materials at shipwreck sites, include a buoy monitoring system (game cameras mounted inside buoys) and in Strategy RP-4, Activity 4.2: Maintain existing and install additional mooring buoys at shipwreck sites to protect shipwrecks from anchor damage and to facilitate shipwreck access, include an "Adopt a Wreck" program.*

**Response:** The suggestion to include a buoy monitoring system will be considered when implementing Strategy RP-3, Activity 3.2: *Evaluate the use of technology to enhance*

*enforcement efforts.* An “Adopt a Wreck” program will be considered when implementing Strategy RP-4, Activity 4.2.

33. Include in the Draft Management Plan that local communities affected by expansion approve of it, as evidenced by resolutions being passed.

**Response:** The background section of the Resource Protection Action Plan has been revised to note that a number of resolutions and letters of support for sanctuary expansion have been received. Several local government and non-governmental organizations including the City of Alpena, Alpena County, Alpena Township, Sanborn Township, Presque Isle Township, Rogers City, Alcona County, Michigan Sunrise Side Travel Association, and the Sunrise Side Coastal Highway Management Council passed resolutions or submitted written letters of support for expansion.

34. Is there an artifact accessions policy?

**Response:** The Michigan Department of History, Arts and Library’s accessions policy is used by Thunder Bay National Marine Sanctuary to acquire artifacts.

### **Education and Outreach**

35. The sanctuary has provided educational opportunities and has exposed kids to things they wouldn’t otherwise have been able to experience. This is critical and educational pieces have to stay strong.

36. The sanctuary is a benefit to Rogers City schools.

37. The sanctuary is important for destination tourism and regional cooperation and has helped strengthen intergovernmental relations.

38. Rogers City is strongly supportive of the Great Lakes Maritime Heritage Trail.

39. The Sanctuary Superintendent has done a good job of letting people know about the sanctuary.

40. The sanctuary has had an impact on children in the community as an educational resource and for children nationwide with telepresence. It has created awareness for parents and children and the children will help carry that stewardship forward.

41. While the sanctuary is a valuable resource to the local education community, it also reaches far beyond its geographic area. Through partnerships and distance learning throughout the world, the sanctuary is a prime example of schools without walls.

42. The sanctuary’s on-going and planned public outreach activities are critical to the success of the sanctuary, the protection of the lakes, and for creating opportunities for residents of all ages to appreciate, understand, and become involved in the preservation of their lakes.

**Response:** No response is necessary.

43. Development of a youth advisory committee should go forward.

**Response:** A volunteer youth group called the Sanctuary Stewards is planned for Strategy ED-5, Activity 5.2: *Seek ongoing input from junior high, high school, and college students to provide advice on sanctuary education and outreach programs for similar-aged audiences, to foster youth leadership, and to encourage youth participation in sanctuary education and outreach programs.*

44. For the Strategy ED-2, Activity 2.1 (D): *Seek opportunities to integrate sanctuary content in undergraduate and graduate level college courses in archaeology and maritime history, as well as museum, aquarium, and science center programs*, in addition to providing content to others, receive work from others and allow for more integration on the design side and with archaeology.

**Response:** The sanctuary welcomes the opportunity to receive content from outside researchers, and in the past, has integrated content from outside researchers in education and outreach programming.

45. Make available the results of a professional economic impact assessment conducted by an independent firm to ascertain the current and prospective monetary benefits of the sanctuary.

**Response:** An economic impact assessment has not been conducted by the sanctuary, though initial steps have been taken by NOAA and the State of Michigan to assess sanctuary impacts. The Final Management Plan will include an activity on conducting an economic impact assessment, Strategy ED-4, Activity 4.3: *Conduct an assessment of the economic impact of the sanctuary*. Like all activities in the Final Management Plan, conducting an economic impact assessment will be dependent on available funding.

## **Research**

46. The sanctuary's research efforts not only improve the understanding and conservation of maritime resources, but can also help gain better understanding of Lake Huron's ecology. Similarly, the sanctuary's efforts to become designated as a sentinel site to focus on impacts and implications of global climate change will be highly beneficial.

**Response:** No response is necessary.

47. The Thunder Bay Underwater Preserve Committee or the Michigan Underwater Preserve Committee should be mentioned in Strategies R-5, Activity 5.1: *Work with the sanctuary's volunteer coordinator to recruit, train, and retain volunteers to assist sanctuary staff on various research projects and with the Thunder Bay Sanctuary Research Collection* or Activity 5.2: *Establish partnerships with universities, colleges, and other institutions to establish a robust program for student research internships and fellowships*, and in Strategy ED-3, Activity 3.1 (E): *Increase marketing efforts in partnership with local and state travel organizations, including area convention and visitors bureaus, chambers of commerce, and Travel Michigan*.

**Response:** The Michigan and Thunder Bay Underwater Preserve Committees were added to Strategy ED-3, Activity 3.1 (E) for the Final Management Plan, and will be considered when implementing Strategy R-5, Activity 5.1 and 5.2.

48. Include in Research Strategy R-4: *Develop partnerships with local, national, and international researchers and organizations to enhance sanctuary research programs*, that NOAA will develop partnerships with "state researchers and organizations."

**Response:** Research Strategy R-4 has been revised to: *Develop partnerships with local, state, national, and international researchers and organizations to enhance sanctuary research programs*.

49. Strategy R-5, Activity 5.2 (A) states that the sanctuary will “Work with ONMS headquarters and the NOAA Maritime Heritage Program to establish memorandums of agreement with appropriate institutions.” How will “appropriate” be defined?

**Response:** Appropriate institutions are those whose work would contribute to completion of Final Management Plan strategies.

50. Develop substantive working relationships with professional researchers in human dimensions and the applied social sciences to better assess and develop programs, and to prepare effective strategic plans for those programs, including integrated approaches to marketing and community engagement. Integrate expertise in anthropology, archaeology, and other social sciences (i.e., human dimensions) to provide a more “balanced” approach to program development. Such academic programs provide the social science-based theory and method needed for more rigorous archeological research including site assessment, testing, and excavation.

**Response:** NOAA believes the Research Action Plan adequately addresses the scope and goals for sanctuary research.

51. The United States and nearly all major maritime nations are not signatories to the UNESCO Convention on the Protection of the Underwater Cultural Heritage, but to be effective, everyone (including NOAA and state agencies) should abide by the Annex Rules regarding the preparation of professional, strategic research plans and projects research designs. Research should be guided by a priori scientific research designs.

**Response:** NOAA agrees that it should abide by the Annex Rules in preparation of professional research plans, project research designs and otherwise abide by them under the Final Management Plan.

52. Develop scientific means for measuring and evaluating the impacts of the sanctuary. The most important dimensions are the physical effects of human activities and natural processes on archaeological sites, economic impacts, and social and cultural effects.

**Response:** Each action plan in the Final Management Plan has performance measures to evaluate the performance of sanctuary program activities and there are several activities in the Final Management Plan that address these dimensions: Strategy RP-2: *Assess and evaluate recreational use of sanctuary resources*, Strategy R-2: *Develop a monitoring program for sanctuary maritime heritage sites*, Strategy ED-4, Activity 4.3: *Conduct an assessment of the economic impact of the sanctuary*, and Strategy ED-5, Activity 5.3: *Develop and implement an ongoing system to evaluate and improve education and outreach programs*.

### **Sanctuary Operations**

53. The area where the heritage center is located would not be redeveloped if the sanctuary offices were not there. The sanctuary is the “Anchorstore” of Alpena’s waterfront redevelopment.

**Response:** No response is necessary.

54. The joint management committee should include two individuals representing Michigan and one individual representing NOAA. As for the Michigan representatives, one individual should be familiar with state resource management policies, and another familiar with research and educational policies in Michigan.

**Response:** NOAA disagrees with this comment. The Joint Management Committee currently consists of the director of the Office of National Marine Sanctuaries and a state representative appointed by the director of the Michigan Department of History, Arts and Libraries. Both members represent all aspects of their agencies, including resource management, research, and educational policies, among others.

55. In terms of the heritage center, has there been any thought on becoming accredited with the American Association of Museums?

**Response:** The sanctuary will evaluate the need for American Association of Museums accreditation for the Great Lakes Maritime Heritage Center.

56. When will a boat building facility be established?

**Response:** The sanctuary is currently evaluating options for a permanent boat building facility, but an exact date cannot be specified.

57. Why is there no state-wide representation on the TBNMS Sanctuary Advisory Council, only local members? There should be members appointed to the SAC from state-wide organizations that are not directly associated with TBNMS, MDHAL, or the MDEQ.

**Response:** According to the Office of National Marine Sanctuaries' Sanctuary Advisory Council (SAC) Implementation Handbook, sanctuary superintendents recruit and select council members, with final approval given by the ONMS Director. The Handbook and council application state that council members should reside in the area affected by the sanctuary. The National Marine Sanctuaries Act limits the number of council seats on the TBNMS council to 15 members. It is the policy of Thunder Bay National Marine Sanctuary that the Thunder Bay Sanctuary Advisory Council consists of local members because they are most affected by the sanctuary. The sanctuary welcomes and provides a variety of mechanisms for public input including: contacting the sanctuary directly, contacting SAC members whose constituency an individual belongs to, and providing public comments at SAC meetings.

58. The Great Lakes Maritime Heritage Center should have an exhibit that acknowledges and celebrates the continuing accomplishments of Michigan stakeholders substantively involved in the establishment of the Thunder Bay Underwater Preserve, and later, the Thunder Bay National Marine Sanctuary and Underwater Preserve.

**Response:** NOAA has completed Phase I exhibits at the Great Lakes Maritime Heritage Center and is planning Phase II. This comment will be considered.

59. Science on a Sphere should be included in either the Sanctuary Operations or Education and Outreach Action Plan.

**Response:** Science on a Sphere is a planned component of Phase II programming at the Great Lakes Maritime Heritage Center and would fall under Strategy SO-1: *Develop infrastructure to enhance and maintain the Great Lakes Maritime Heritage Center.*

60. As soon as possible, the sanctuary should add staff with academic qualifications and experience in community development, and recreation and tourism management to improve its capacities in these important professional fields, and to better develop collaborative relationships with Michigan user groups and other stakeholders.

**Response:** NOAA believes staff requirements in the Sanctuary Operations Action Plan are adequate to meet the needs of the sanctuary. As with current positions, position descriptions are written to ensure proper qualifications.

61. Move from development of community support to true community engagement.

**Response:** Community engagement is a major focus for the sanctuary. This is best illustrated by the Thunder Bay Sanctuary Advisory Council. The council advises the sanctuary and members represent the community's different interests, including government, education, maritime history and interpretation, fishing, diving, tourism, economic development, and the community-at-large. Advisory council members serve as liaisons between their constituents and the sanctuary, keeping sanctuary staff informed of issues and concerns and performing outreach to their respective constituents on the sanctuary's behalf. The advisory council played a large role in the development of this Final Management Plan by making recommendations for action plan strategies and activities based on public comments.