

Dr. Donald L. Newport
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Mr. Jefferson J. Gray
Sanctuary Superintendent
Thunder Bay National Marine Sanctuary
500 West Fletcher St.
Alpena, Mi 49707

March 20, 2009

Dear Superintendent Gray

It is a most sincere pleasure to express my enthusiastic support for the recent Management Plan which has been developed by the combined resources of your staff along with input of citizens from throughout northeast Michigan.

The organization and thoroughness which the Plan represents is extraordinary and charts a course for the Sanctuary that is both well conceived and specific in the utilization of these unique resources in a most positive fashion.

Congratulations on this achievement and I am most optimistic that the Plan will find favor at the next appropriate level of consideration.

Sincerely,

A handwritten signature in black ink that reads 'Donald L. Newport'. The signature is fluid and cursive, with the first name 'Donald' and last name 'Newport' clearly legible.

Donald L. Newport

2097 North Point Road
Alpena, Mi. 49707

March 24, 2009

Thunder Bay National Marine Sanctuary
500 West Fletcher Street
Alpena, Mi. 49707

Re: 2009 Draft Management Plan

I have recently reviewed the 2009 Draft Management Plan for the Thunder Bay National Marine Sanctuary and find the draft plan to be comprehensive and well prepared to meet the management strategies necessary to protect the Marine Sanctuary.

In my opinion, 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.

When approved, the 2009 Draft Management Plan will continue the management goals worthy of a National Maritime treasure.

Sincerely,



Donald G. Beem

From Karen Tetzlaff <tetzlaff@hotmail.com>

Sent Friday, April 3, 2009 12:05 pm

To Jean Prevo <Jean.Prevo@noaa.gov> , Tera Panknin <Tera.Panknin@noaa.gov>

Subject Comments on draft plan

Good Morning,

At the last meeting when you requested comments from the SAC members, I said I would give a written comment. Below is the note that you can add my name to.

As the K-12 representative on the Sanctuary Advisory Council, I am writing in support of the Thunder Bay Marine Sanctuary Draft Management Plan. The K-12 community uses the resources and materials of the Sanctuary to promote our maritime heritage. Staff and students learn valuable lessons in science, history, math and social studies. Many of them are correlated to specific curriculum in our schools. While the Sanctuary is a valuable resource to our local education community, it also reaches far beyond our own geographic area. Through partnerships and distance learning throughout the world, the Sanctuary is a prime example of schools without walls. The plan is a culmination of hours of work and represents the vision and day to day strategies of the Sanctuary.

Karen Tetzlaffk

K-12 SAC Representative

17797 Shubert Hwy, Alpena, Mi

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From Jeff Gray <Jeff.Gray@noaa.gov>

Sent Friday, April 3, 2009 11:08 pm

To 'Tera Panknin' <Tera.Panknin@noaa.gov> , 'Reed Bohne' <Reed.Bohne@noaa.gov> , 'Ellen Brody' <Ellen.Brody@noaa.gov> , 'Russ Green' <Russ.Green@noaa.gov> , 'Edward Lindelof' <Edward.Lindelof@noaa.gov> , 'Helene Scalliet' <Helene.Scalliet@noaa.gov>

Subject FW: Fw: ER-09/0241:Thunder Bay National Marine Sanctuary, Offshore in Lake Huron

From our underwater friends at NPS.

Jefferson Gray
 Superintendent, Thunder Bay National Marine Sanctuary
 500 W. Fletcher St.
 Alpena, MI 49707
 O: 989.356.8805 x12
 F: 989.354.0144
 www.thunderbay.noaa.gov

-----Original Message-----

From: Dave_Conlin@nps.gov [mailto:Dave_Conlin@nps.gov]

Sent: Friday, April 03, 2009 2:55 PM

To: Rebecca_Beavers@nps.gov

Cc: Jeffrey_Cross@nps.gov; Kerry_Moss@nps.gov; Tamara_Whittington@nps.gov; Cliff_McCreedy@nps.gov; John_Wullschleger@nps.gov

Subject: Re: Fw: ER-09/0241:Thunder Bay National Marine Sanctuary, Offshore in Lake Huron

Rebecca-

Over the years we have worked closely with Thunder Bay and had informal input into the development of the activities described in this and the previous management plan. We have continually supported the sanctuary and the activities of its staff which are first rate. We concur with the preferred alternative and note that the sanctuary has been a positive force for the local community and for maritime heritage resources nationwide.

I will not comment from the NRPC side of things as I am not completely familiar with all of the activities of the program.

Thank you for the opportunity to comment,

Dave

David L. Conlin Ph.D
 Archeologist, Acting Chief

PLEASE NOTE OUR NEW ADDRESS:

National Park Service Submerged Resources Center
 12795 W. Alameda Pkwy.
 Denver, CO 80225

(303) 969-2665
 (505) 310-5502 cell
 (303) 969-2659 fax

www.nps.gov/submerged

The National Park Service cares for special places saved by the American people so that all may experience our heritage.

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|-----+----->
 | | Rebecca Beavers |

From Greg MacMaster <cyclogenesis@charter.net>

Sent Friday, April 10, 2009 8:58 am

To TBMPR@noaa.gov , Jeff.Gray@noaa.gov

Subject TBNMS Public Comments from Greg MacMaster

Attachments This is a public comment by Greg MacMaster for TBNMS.doc

32K

The attached document is also listed below,

This is a public comment by Greg MacMaster, **Governor Appointed Member**, Michigan Underwater Salvage and Preserve Committee for the **Thunder Bay National Marine Sanctuary revised management plan.**

TBNMS needs to put Michigan FIRST!

Why is there no state-wide representation on the TBNMS Sanctuary Advisory Committee (SAC)? Why only local members?

I would like to see some members appointed to the SAC from state-wide organizations that are not directly associated with TBNMS, MDHAL or Michigan History, Arts and Libraries, or the MDEQ.

The statement in a sidebar on page 5 of the draft plan: "Additionally, the ONMS [Office of National Marine Sanctuaries] has incorporated the UNESCO Convention for the Protection of the Underwater Cultural Heritage Annex Rules: How can a federal agency "incorporate" the rules of an international convention in its practice and policies, when that convention has not been authorized by U.S. Congress under its treaty making powers? I am concerned that such an approach could reduce the voice of local U.S. stakeholders to a whisper, while substantive decisions regarding practice and policies in the management of U.S. coastal waters are crafted in the backrooms of national and international bureaucracies. If you feel this concern isn't worth investigating, please list your reasons and describe in detail.

Did the TBNMS contact the chairpersons of academic programs in Michigan with a probable interest in the Sanctuary / Preserve (e.g., archaeology / anthropology, history, social science-based resource management, etc.) to make them aware of potential research and education opportunities at the Sanctuary / Preserve? If not why? If so, please provide documentation to support your answer. It's sad to say, but the TBNMS track record on doing what they say has not always been good in terms of outreach to Michigan stakeholders outside of northeast Michigan.

In a recent FOIA, I found a large amount of **expenditures to 'outside' sources** (outside the State of Michigan). It does not appear, however, that the TBNMS has been widely distributing any competitive bids or request for proposals within Michigan! The result seems to be that expenditures in the amount of over \$100,000 were made to departments/agencies outside Michigan and a meager \$5000 was spent in Alpena at a local scuba store. Much of this money could have been spent **locally in Alpena** – why go out of state to Wisconsin? This begs the following questions:

1. How can a federal agency like TBNMS do business properly without widely distributing competitive bids and request for proposals? If you have records of them, please make them available online (transparency).
2. I would like to see competitive bids and RFPs sent out to Michigan businesses first, BEFORE they are sent to out-of-state organizations. If the TBNMS is capable of bringing in millions of dollars in grants and taxpayer-based funding, I expect to see at least 75% of that money spent in Michigan. Michigan is hurting economically and to see TBNMS spending 75% of their funding on out-of-state institutions instead of locally/state-wide doesn't set well for folks anywhere in Michigan.
3. I would like to see the TBNMS engage Michigan research and educational stakeholders BEFORE working with East Carolina University, University of Rhode Island, or other institutions OUTSIDE Michigan. At least 75% of research and education-related expenditures by the TBNMS should go to Michigan stakeholders! Why is the TBNMS continuously going outside the state for its research and education services? As an example, Michigan has some of the best minds in shipwreck survey work and TBNMS consistently uses institutions in other states. Why is this happening?

TBNMS 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. As of now, it looks to be a "pork barrel" cash cow dependent upon taxpayer funding. TBNMS will need to be as self sufficient as possible as taxpayer-based funding sources decrease in the future. As an example, the TBNMS needs to work with Michigan publishers and book printing businesses as a majority of their educational materials will be for Michigan educational institutions.

It is a MUST that an audit be conducted on TBNMS immediately and bi-annually to ensure transparency and accountability.

I am also very concerned about the apparent practice of the TBNMS to undercut 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. A federal agency should NOT provide a service that a local business or other statewide organization already provides, or is capable of providing. Instead, the TBNMS should be working WITH Michigan organizations to assist in business development and to increase overall economic impact by private sector.

I strongly believe that better working relationships among Michigan organizations and the TBNMS is crucial in developing a TRUE state-federal partnership for the best interests of the State of Michigan.

Greg MacMaster

Mr. Jeff Gray, Superintendent
RE: Management Plan Review
Thunder Bay National Marine Sanctuary
500 W. Fletcher Street
Alpena, MI 49707

16 March 2009

Dear Jeff and Sanctuary Staff:

Thank you for the opportunity to provide written comments on the recently completed *Thunder Bay National Marine Sanctuary Draft Management Plan - 2009*.

The Nature Conservancy is an international non-profit organization, and our mission is to preserve the plants, animals, and natural communities that represent the diversity of life on Earth by protecting the lands and waters they need to survive. The Nature Conservancy has identified the Presque Isle Shoreline, a coastal area that largely encompasses the landward boundary of the proposed Sanctuary expansion and some of the adjacent nearshore waters, as an important biodiversity conservation area. The Nature Conservancy has also been integrally engaged in the development of a Lake Huron Biodiversity Conservation Strategy as part of our increased focus on Great Lakes conservation. The Sanctuary is a key partner in Lake Huron management and has been an asset in these discussions. We value our collaboration to date with the Sanctuary, and hope to expand it in the future.

We applaud the Sanctuary's efforts in raising awareness and appreciation for the Great Lakes generally, and Lake Huron and Thunder Bay more specifically. The Sanctuary's proposed expansion will only enhance the Sanctuary's role in Lake Huron management and, given its success to date, seems an appropriate scale for future operations. The Draft Management Plan is a well-written road map that lays out an ambitious body of work for the Sanctuary.

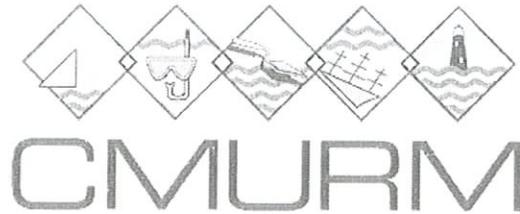
The portion of the Sanctuary's activities that most closely aligns with The Nature Conservancy's efforts to conserve biological diversity is reflected in the "Research Action Plan" section of the Draft Management Plan. Despite having distinct missions, the Sanctuary's research efforts not only improve the understanding and conservation of maritime resources, but can also help us better understand Lake Huron's ecology. Improving bathymetric data, investigating the unique sinkhole features, and monitoring invasive zebra mussels are examples of important scientific inquiries necessary for both cultural and natural resource protection. 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. We look forward to being not only consumers of this information, but also to seeking opportunities to collaborate on research questions in the future.

Again, we commend the Thunder Bay National Marine Sanctuary's updated Draft Management Plan and look forward to further strengthening our relationship.

Sincerely,



Rachael Franks Taylor
Director of Coastal Conservation



Center for Maritime & Underwater Resource Management
P.O. Box 158; Laingsburg, MI 48848
989-834-0007

April 10, 2009

Dear Management Plan Review Team:

Thank you for the opportunity to provide written comments on the draft management plan for the Thunder Bay National Marine Sanctuary and Underwater Preserve (Sanctuary / Preserve). There have been some impressive accomplishments by NOAA and its organizational partners since establishment of the Sanctuary / Preserve in 2000. These accomplishments are summarized in the *State of the Sanctuary* report prepared by NOAA prior to scoping meetings for revision of the management plan in 2006. Such accomplishments were envisioned by Michigan stakeholders involved in the long process to establish the Sanctuary / Preserve, which formally began with a site evaluation proposal to NOAA in the early 1980s.

The following comments should be viewed, therefore, in the spirit of furthering the vision for the Sanctuary / Preserve as well as the unique management partnership of the State of Michigan and NOAA. They are broken down into "specific comments," and into more "general comments" regarding professional development of management capabilities by NOAA and its organizational partners.

Specific Comments

1. "Buy Michigan First"

The current, dramatic downturn in Michigan's economic environment has rightly spurred pleas by Michigan businesses, nonprofits, and government agencies to "buy Michigan first." As a federal agency involved in the management of state public trust resources, **NOAA should embrace this need for job retention and creation by aggressively recruiting Michigan businesses, research and education institutions, and other Michigan organizations to conduct ALL categories of work within the Sanctuary / Preserve.** The Sanctuary / Preserve management plan should clearly and strongly state such a goal with corresponding outcome statements. A suggested tool in helping to accomplish outcomes in job retention and creation is a "Michigan partnership plan," prepared in collaboration with relevant state agencies and other Michigan stakeholders throughout the State of Michigan. Such a partnership plan would also demonstrate commitment by NOAA to work collaboratively with Michigan stakeholders to create real, verifiable "returns on investment" from federal and state taxpayer-based funds devoted to the Sanctuary / Preserve (as opposed to vague, rhetorical statements regarding the benefits of the Sanctuary / Preserve).

General Comments

These comments are general in nature and are intended to provide some “guiding principles” to consider in finalizing the Sanctuary / Preserve management plan. CMURM is willing to provide additional details, however, if any of these topically organized comments are of further interest to the Sanctuary / Preserve.

1. Develop programs based on the needs of target audiences, including Michigan stakeholders

The key programs of the Sanctuary / Preserve (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. These programs should also be based on the needs of other Michigan stakeholders because (a) the State of Michigan is a partner in co-management of the Sanctuary / Preserve, (b) citizens of Michigan retain ownership of all public trust resources within the boundaries of the Sanctuary / Preserve, and (c) the historic shipwrecks and other archaeological sites therein are part of our state’s maritime heritage.

2. Move from activity-based management to strategic management

A strategic management approach requires that explicit goals, objectives, strategies, and expected outcomes are identified for the key programs of the Sanctuary / Preserve. These goals, objectives, and strategies should be consistent with the needs of target audiences (including Michigan stakeholders), vision for the Sanctuary / Preserve, and the respective missions of the management partners. A strategic management approach can enhance the effectiveness and efficiency of organizational management as well as provide much better accountability for the actions of management partners.

3. Move from self-promotion to a science-based approach to management

An early focus on promotion of the Sanctuary / Preserve through the celebrity status of Dr. Robert Ballard, special events, documentaries targeting popular audiences, and news stories is understandable in today’s competitive environment for both public (tax payer-based) funds and private fund-raising. Self-promotion and demonstrations of “cool” technologies, however, should *not* be primary determinants of management decision-making. To be more consistent with Congressional intent for the National Marine Sanctuary Program, the Sanctuary / Preserve should champion the application of social sciences, and where appropriate, environmental sciences in development of its programs in resource protection, research, and education. This means preparation of strategic plans that guide both project work and program development in the Sanctuary / Preserve. In addition, all research conducted within the Sanctuary / Preserve should be guided by *a priori* scientific research designs.

4. Move from historical interpretation of resources to scientific interpretations based in anthropology, archaeology, and other social sciences (i.e. human dimensions)

The academic background of current Sanctuary / Preserve staff appears to be primarily maritime history. Such a disciplinary focus may have merit in early stages of program development where basic reconnaissance level documentation and interpretation of historic shipwrecks are a priority, but can lead to serious biases in further program development. The integration of expertise in anthropology, archaeology, and other social sciences (i.e. human dimensions) would provide a more “balanced” approach to program development. (The “academic standard” for archaeological research in North America is graduate-level education within an accredited program in the behavioral / social sciences.) Such academic programs provide the social science-based theory and method needed for more rigorous archeological research including site assessment, testing, and excavation.

adjustment of programs. An important purpose of “community engagement” is to empower citizen action, entrepreneurship, and stewardship instead of dependence upon government services. The Sanctuary / Preserve management team is encouraged to become more familiar and consistent with professional practices in community engagement and development.

9. Acknowledge and celebrate the accomplishments of Michigan stakeholders in establishment of the Sanctuary / Preserve

Since the mid-1970s, Michigan stakeholders have been substantively involved in the establishment of the Thunder Bay Underwater Preserve, and later, the Thunder Bay National Marine Sanctuary and Underwater Preserve. It is doubtful that the Sanctuary / Preserve would have been established without the capacity-building and expertise of these stakeholders. Unfortunately, the Great Lakes Maritime Heritage Center does not currently have an exhibit that acknowledges and celebrates the continuing accomplishments of these Michigan stakeholders.

10. Develop scientific means for measuring and evaluating the impacts of the Sanctuary / Preserve

The impacts and more specific effects of the Sanctuary / Preserve can be measured and evaluated according to different dimensions. The dimensions of most importance in public resource management are generally (1) *physical effects* of human activities and natural processes on archaeological sites, (2) *economic impacts* of agency programs on regional expenditures, jobs, income, and taxes, and (3) *social and cultural effects* on local communities and other stakeholders. The Sanctuary / Preserve is encouraged to develop scientific means for measuring these impacts / effects in order to monitor and improve their management plans and operations, enhance transparency and accountability for management actions, and to provide reliable information to the public about the benefits *and* costs of the Sanctuary / Preserve.

Sincerely,

Kenneth J. Vrana
President
vrnaken@earthlink.net

Cc CMURM Board of Directors