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Governing the Salish Sea

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Introduction

In 2010, the inland estuarian waters of the Pacific Northwest were officially renamed the Salish Sea.[1] The newly minted waterway encompassed the Puget Sound to the south in Western Washington, and the Strait of Georgia to the north in British Columbia (B.C.), Canada, both connected to the Pacific Ocean by the Strait of Juan de Fuca (see Figure 2). Managing shared, transboundary, marine resources and waterways is essential to environmental protection and has been a key component of international environmental law going back to the Bering Sea Arbitration. There is an extensive history of contentious transboundary water governance issues along the 49th parallel that divides the Salish Sea between Washington State and B.C. regarding the management of key resources, fishing rights, and ensuring water quality as the fluid marine system cannot be confined to the political boundaries of each nation.

Historically, federal and local agreements have focused on the allocation of fishing rights and management of wild salmon stocks.[2] While fisheries management continues to be important, there has been a recent shift towards a systems approach to environmental management. New ways of managing resources across political boundaries, like integrated water management planning, and the multi-scale threat of climate change, have prompted more holistic management plans for resources in the Salish Sea basin.[3] Recognition of the Salish Sea as an interconnected ecological system and acknowledgment of its cultural heritage and importance to indigenous Coast Salish people has invited the opportunity to restructure the governance of resources in the face of increasing vulnerability.

This paper will give an overview of the existing governance structure, its strengths and inherent flaws, and potential for improvement to create a

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1. Brian Tucker & Reuben Rose-Redwood, *Decolonizing the map? Toponymic politics and the rescaling of the Salish Sea*, 59(2) THE CANADIAN GEOGRAPHER / LE GÉOGRAPHE CANADIEN, 194, 194 (2015).

2. *See generally* Boundary Waters Treaty of 1909, U.K.-U.S., Jan. 11, 1909, 36 Stat. 2448, T.S. 548; Convention for the Protection, Preservation and Extension of the Sockeye Salmon Fishery in the Fraser River System, U.S.-Can., May 26, 1930, 8 U.S.T. 1058; Pacific Salmon Treaty, March 18, 1985, U.S.-Can., 99 Stat. 7.

3. G.V. Hildebrand et. al., *Importance of Salmon to Wildlife: Implications for Integrated Management*, 15 URSUS, 1, 1 (2004); *see* Joint Statement of Cooperation on the Georgia Basin and Puget Sound Ecosystem, Jan. 19, 2000, U.S.-Can. (Agreement between the EPA and Environment Canada to address environmental challenges in the Salish Sea).

more adaptive and anticipatory system of resource management. Section One will provide historical context to the modern governance structure and outline the development of international treaties regulating the Salish Sea waters. Section Two will explore the more recent theoretical shifts in ecological management and the development of the current intergovernmental organization governing the Salish Sea. Section Three will examine the emergence of a new structure of cultural identity through the Salish Sea Gatherings of First Nations. Section Four will characterize the existing management structure and identify potential improvements through local participation. Section Five will offer potential governance innovations to provide the region with a more adaptive and anticipatory, rather than reactionary, system.

Traditional Transboundary Governance of the Salish Sea at the 49th Parallel

In 1846, United States and Britain agreed to draw the border between the United States and Canada along the 49th parallel.[4] The border drawn by federal powers gave no consideration to the ecological or cultural systems they bifurcated with international state lines.[5] Indigenous groups that had managed and depended on resources in the Salish Sea with their own borders now split, and management practices that had been used since times immemorial ignored.[6]

As the salmon fisheries and canneries boomed in the late 1800s, it became increasingly difficult to prevent illegal fishing practices across the border.[7] The Canada-U.S. International Joint Commission was formed in 1909 with the Boundary Water Treaty.[8] However, this federal level agreement did little to relieve the increasing tension of policing fishing vessels crossing the Washington State—B.C. border.[9] Advancing technology, which improved catch rates and allowed fishing vessels to move further offshore into the Pacific, coupled with declining fish stocks and the fear of wild salmon population collapse led to the establishment of salmon hatcheries and increasing concern for conservation.[10]

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4.   LISSA K. WADEWITZ, THE NATURE OF BORDERS: SALMON, BOUNDARIES, AND BANDITS ON THE SALISH SEA 7 (2012).

5.   *Id.*

6.   *Id.* at 6.

7.   *Id.* at 7.

8.   Stacy Clauson & Laurie Trautman, *An Inventory of Policy Actors and Instruments Relevant to the Salish Sea*, 1 BPRI WORKING PAPERS at 44 (2015).

9.   WADEWITZ, *supra* note 4, at 910.

10. *Id.* at 165.

Up until the 1980s, along with the creation of the International Pacific Salmon Fisheries Commission,[11] transnational environmental management efforts in the Salish Sea focused on the conservation of economically valuable sockeye and chinook salmon stocks that spawned upstream in the rivers in Western Washington and B.C.[12] Despite these management efforts, salmon populations have continued to decline in the region.[13] As Salmon are a keystone species in the Salish Sea, their declining numbers have had a cascading impact on the environment and livelihoods of the seven million people living along the coast as ecosystems and industries are disrupted.[14] Out at sea, salmon control the populations of smaller fish while also feeding larger species like seals and orcas and supporting fisheries.[15] As they migrate upstream to spawn, salmon bring nutrients to stream beds and forests as bears, foxes, and birds consume and spread their carcasses, ultimately impacting the productivity of the land and industries beyond fisheries.[16] The hierarchical, bureaucratic environmental governance system that had been built in reactionary pieces over decades was not adequate for addressing the increasing complexity and vulnerability of the region.[17]

Evolution of a Boundary Organization in the Salish Sea and the Global Shift Towards New Socio-Ecological Theories of Governance

In 1992, the local governments of Washington State and B.C. created the Environmental Cooperation Council (ECC) deeming the "shared waters of Georgia Basin and Puget Sound as being of high priority and requiring joint action."[18] In addition to forming a Marine Science Panel to report on resource trends and indicators, the two local governments followed the ECC with a Joint Statement of Cooperation in 2000 to foster collaboration and publish reports on Salish Sea ecosystem health.[19] The ECC is essentially the emergence of a science-policy boundary organization in the Salish Sea. In partnership with researchers at local institutions and non-governmental organizations, the ECC collects and publishes reports on ecological indicators to inform policy decisions on both sides of the border.

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11. Clauson, *supra* note 8, at 2–44.
12. WADEWITZ, *supra* note 4, at 4.
13. *Id.*
14. Cecilia Wong et. al., *Health of the Salish Sea as Measured Using Transboundary Ecosystem Indicators*, 17 AQUATIC ECOSYSTEM HEALTH & MGMT. 463, 466 (2014).
15. Hilderbrand, *supra* note 3, at 9.
16. *Id.* at 2.
17. WADEWITZ, *supra* note 4, at 10.
18. *Id.* at 463.
19. *Id.* at 464.

Because the ECC was established by government agencies with the main purpose of research, it focuses on policy directed scientific inquiry for science-driven policymaking.[20] Though First Nation leaders and representatives of environmental organizations sit on the ECC steering committee, the reports are primarily produced by the U.S. EPA and Environment and Climate Change Canada, which offer financial stability but may hinder flexibility and adaptability.[21]

The bilateral recognition of shared waters in the 1990s, as well as the need for a more integrated transboundary management system, are part of a wider movement in water governance. In the 1970's there was a shift towards participatory processes as a form of decision-making legitimacy.[22] Involving local stakeholders, especially those most likely to be affected by management or new policies, in all stages of the decision-making process, from research to implementation, was seen as an ideal way to ensure successful and sustainable projects.[23] Additionally, the popularity of Integrated Water Resources Management (IWRM) during that time period led to an increased focus on managing water on the basis of watershed boundaries.[24] This allowed regulation to capture human and natural components in one framework.[25] When marine biologist Bert Webber proposed the renaming of the inland waters to the Salish Sea in 1990, it was to recognize it as a complete hydrologic system and watershed or "bioregion."[26] Bioregionalism is a movement for the use of ecological system boundaries as our cultural, social, and political boundaries.[27] This goes beyond the concept of IWRM to suggest that political decision-making boundaries are reconfigured to mimic ecological system boundaries.

Cohen and Davidson's critique of the watershed approach as a form of governance highlights that use of a watershed as a scale requires symmetry with the "policy-shed" (the units of jurisdictional power) and "problem-shed" (the area affected by an ecological or social problem),

20. Karin M. Gustafsson et al., *Boundary Organizations and Environmental Governance: Performance, Institutional Design, and Conceptual Development*, 19 CLIMATE RISK MGMT. 1, 3 (2018).

21. *Health of the Salish Sea Ecosystem Report Acknowledgments*, U.S. ENVTL. PROT. AGENCY REGION 10 (Feb. 21, 2019); *Health of the Salish Sea Ecosystem Report Acknowledgments*, U.S. ENVTL. PROT. AGENCY REGION 10 (Feb. 21, 2019), https://perma.cc/S7M3-3DY5.

22. Alice Cohen & Seanna Davidson, *The Watershed Approach: Challenges, Antecedents, and the Transition from Technical Tool to Governance Unit*, 4 WATER ALTERNATIVES 1, 3 (2014).

23. *Id.*

24. *Id.* at 6.

25. *Id.*

26. Tucker, *supra* note 1, at 196.

27. *Id.*

otherwise it may only increase complexity and fragmentation, such as policy gaps or overlaps, by trying to work across administrative boundaries.[28] In the case of the Salish Sea, the watershed does align with the "problem-shed" when tackling marine resource issues like salmon and shellfish stock, water quality, and restoring contaminated sites.[29] These issues are economically and culturally relevant to those living on the Salish coast. Despite existing political boundaries, environmental policies should be aimed at addressing the region as a whole. The creation of ECC has attempted to unify the "policy-shed" to the watershed scale by creating a platform through which the different jurisdictions can collaborate.[30]

The dominant discourse on watershed governance frames the watershed as 'natural boundaries' and is associated with local perspectives and empowerment.[31] However, rescaling water governance does not in itself ensure the participation of local residents and civil society in designing policies or carrying out management.[32] Guo emphasizes local stakeholder involvement and participatory processes to encourage local solidarity as a best management practice for watershed management.[33] Therefore, inclusion of local, civil society, stakeholders should be a key component of the governing strategy for the Salish Sea.

Reclaiming Power: The Salish Sea Gatherings

A potential avenue for integrating local solidarity and balancing the top-down authority of the ECC with local knowledge could be through greater tribal involvement. In 2005, the first annual Coast Salish Aboriginal Gathering took place, representing First Nation chiefs, tribal leaders and invited delegates from U.S. and Canada government agencies and environmental organizations.[34] The first Gathering formed the Coast Salish Aboriginal Council (the Council), which represents 70 tribes and bands from the Coast Salish region.[35] While there is a strong interest in addressing

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28. *Id.* at 4-5.
29. Clauson, *supra* note 8, at 3.
30. *Health of the Salish Sea Ecosystem Report Background*, U.S. ENVTL. PROT. AGENCY REGION 10 (Feb. 21, 2019), *Health of the Salish Sea Ecosystem Report Background*, U.S. ENVTL. PROT. AGENCY REGION 10 (Feb. 21, 2019), https://www.epa.gov/salish-sea/about-health-salish-sea-report#background.
31. *Id.* at 2.
32. *Id.*
33. Mingxin Guo, *Effective Watershed Management: Planning, Implementation, and Evaluation*, 5 HYDROL CURRENT 119, 121 (2014).
34. Emma Norman, *Cultural Politics and Transboundary Resource Governance in the Salish Sea*, 5 WATER ALTERNATIVES 138, 146 (2012).
35. *Id.* at 139.

environmental issues, the Council's purpose is to reconnect socially, economically, and politically.[36]

Also, the Council and the annual Gathering are reconceptualizing citizenship beyond the nation-state. At the beginning of the gathering, each representative of the council introduced themselves with their name and the phrase "I am Coast Salish."[37] This performance of collective identity and connection to the ecological system, rather than political system, is an act which Norman identified as "strategic essential[izing]"—representing themselves as unified despite differences, to produce a new post-colonial citizenship.[38] Through this process of unification and centralization, the Council has taken on the role of being a third agency or nation within the Salish Sea coordination with Canada and the U.S. This regional identity and empowerment of First Nations people through the Council is a novel actor in an otherwise federally dominated governance structure.

While the Salish Sea Gatherings represent a step forward in water resource management, there seems to be a missing link between participation in monitoring and evaluating ecosystem health and the power to regulate. The attendance of federal and local environmental agencies at the Salish Sea Gatherings as well as explicit inclusion of Coast Salish "traditional ecological knowledge" as a perspective on each indicator in the Health of the Salish Sea Report, suggests that policy-makers recognize the importance of indigenous people's participation.[39] However, this participation does not translate into regulatory power in the current structure.[40] Regulations have been primarily reliant on scientific knowledge through partnerships with academia which is, in some cases, at odds with traditional knowledge.[41]

An example of inherent differences in management strategies is First Nation opposition to Canada's new Marine Protected Area (MPA) plans. Canada is in the process of setting up a network of MPAs which have been proven a successful ecosystem restoration tool in academic literature.[42]

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36. *Id.*

37. *Id.* at 152.

38. *Id.* at 145.

39. *Health of the Salish Sea Ecosystem Report Acknowledgments*, U.S. ENVTL. PROT. AGENCY REGION 10 (Feb. 21, 2019), *Health of the Salish Sea Ecosystem Report Acknowledgments*, U.S. ENVTL. PROT. AGENCY REGION 10 (Feb. 21, 2019), https://perma.cc/S7M3-3DY5.

40. E. Norman & K. Bakker, *Transgressing Scales: Water Governance Across the Canada-U.S. Borderland*, 99 ANNALS OF THE ASSOCIATION OF AMERICAN GEOGRAPHERS, 99, 109 (2009).

41. C. A. Ayers et al., *An Exploration of Hul'qumi'num Coast Salish People's Attitudes Towards the Establishment of No-Take Zones Within Marine Protected Areas in the Salish Sea, Canada*, 56(2) THE CANADIAN GEOGRAPHER / LE GEOGRAPHIE CANADIEN 271 (2012).

42. *Id.* at 261.

Environment and Climate Change Canada wants each national marine park area to have at least one permanent No-Take Zone (NTZ), including one in the Salish Sea.[43] When surveyed and interviewed, Hul'qumi'num First Nations people from the Strait of Georgia recognized the scientific validity and necessity of managing marine species and agreed that NTZ would prevent overfishing but were opposed to permanent NTZs.[44] According to Ayers et. al., there is support for seasonal or temporary closures for management but "many believe that ecosystems are healthier and more productive with traditional management practices than without them."[45] Traditional knowledge proves that a clam bed is more productive when actively harvested rather than left without any human interaction.[46] This suggests the need for an adaptive resource management plan that will be more reactive to localized change rather than a broad nationally determined MPA.

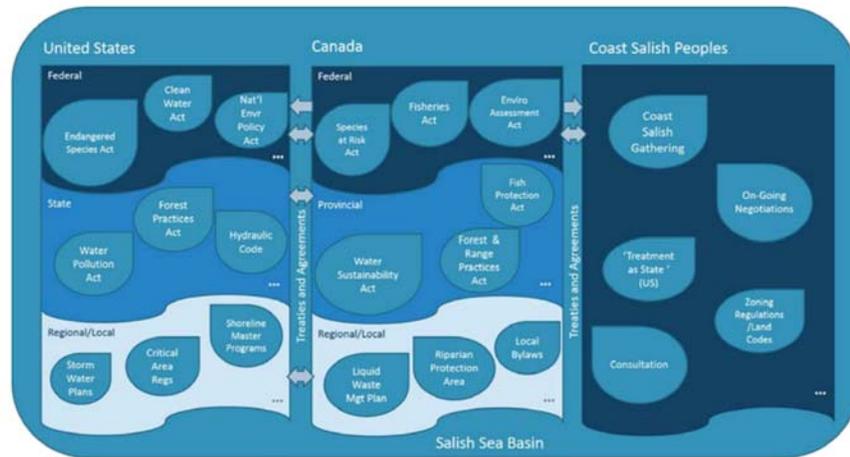**Analysis of the current Salish Sea governance structure**

Figure 1. Policy instruments affecting governance in the Salish Sea.[47]

Given its transboundary and complex nature, many actors must work towards the common goal of protecting the Salish Sea, which can hinder progress. As an update to a report published in 1992, Clauson and Trautman released a comprehensive report on the actors involved in

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43.   *Id.* at 269.
44.   *Id.* at 271.
45.   *Id.*
46.   *Id.*
47.   Clauson, *supra* note 8, at 1-2.

governing the Salish Sea. The report describes the situation as "a complicated and, at times, fragmented approach to governance."[48] Figure 1 outlines the multi-scale policy instruments at work. Though no remedies are proposed in the 2015 policy baseline, Nasser recommended improved communication not only between the regulators but also citizen groups across jurisdictions, a joint scientific monitoring program, and harmonization of environmental policies.[49] For the most part, the ECC has achieved these recommendations and some health indicators, like the levels of toxics, are improving, but marine species continue to decline.[50]

Salish Sea governance has primarily taken the form of trans-governmental networks,[51] dominated by governmental actors rather than private actors and NGOs, to design collective action.[52] Though the Council has some legal rights to manage resources in the Salish Sea, they are on unequal grounds in comparison to the federal and local U.S. and Canadian governmental actors when it comes to policy-making power. From an adaptive governance perspective, local knowledge and the reconciliation of bottom up and top down forms of management are necessary to build social capacity and resilience.[53] There is clear intention to increase indigenous perspectives and include local knowledge in ECC, but it is offered as a side-bar in text rather than taking center stage in the indicator reports.[54] The earlier example of Canada's MPA program conflicting with traditional knowledge proves that there is a lack of sincere co-production of knowledge between civil society, science and policy to feed into the decision-making process (see Figure 1).[55]

Also, the fragmented and overlapping system may be impeding civic engagement. While U.S. Environmental regulation is highly decentralized and allows for public comment, Environment and Climate Change Canada takes a more centralized approach to policymaking with less opportunity for public review.[56] These fundamental structural differences between governments may complicate collaboration when it

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48. Clauson, *supra* note 8, at 2.

49. Christine Nasser, *Beyond the Border, Environmental Management in British Columbia and Washington*, ENVIRONMENTAL PROTECTION AGENCY (1992).

50. *Health of the Salish Sea Ecosystem Report Acknowledgments*, U.S. ENVTL. PROT. AGENCY REGION 10 (Feb. 21, 2019).

51. *Id.* at 44.

52. R. G. Healy et al., *Environmental Policy in North America,* U. OF TORONTO PRESS, 2014.

53. C. Folke et al., *Adaptive Governance of Social-Ecological Systems*, 30 ANN. REV. OF ENV'T AND RESOURCES 441 (2005).

54. U.S. Environmental Protection Agency, Region 10, Health of the Salish Sea Ecosystem Report: Collections and Lists (last visited Feb. 21, 2019), https://perma.cc/LM9S-YYJG.

55. Ayers, *supra* note 41, at 271.

56. Clauson, *supra* note 8, at § 2, p. 42.

comes to engaging the public and local stakeholders. ECC can jointly assess the health of the Salish Sea and make policy recommendations, but there are still two separate systems of policy instruments, that of U.S. EPA and of Environment and Climate Change Canada, when it comes to action.[57]

Potential Innovations in Salish Sea Governance Towards Adaptive and Anticipatory Management

The combined human and climate stresses on the economic and ecological vitality of the Salish Sea call for resilience planning to increase both the social and ecological capacity to respond to change.[58] Climate change impacts are already being felt in the ecological system and urban development is expected to continue increasing in the Salish coastal region.[59] Though the current governance structure may be functional, it is not ideal to respond to growing problems. Governance for resilience will require an increase in co-produced management, co-learning, and polycentricity.[60] The following section identifies several opportunities to develop a governance system for the Salish Sea that can be locally informed, flexible and adaptable over time in response to cultural and climatic change, and can anticipate and plan for future challenges.

The organization of the Council and annual Gatherings is an opportunity to integrate local knowledge into the management system, identify new opportunities and challenges for ecological management by including new perspectives, and to build a more adaptive and reflexive governance system. Despite the involvement of the Council, they are not a represented signatory on the joint agreement between U.S. and Canada.[61] Recognizing the Council as a separate governmental body within the ECC could help foster greater integration in the coproduction of knowledge. For example, the Gatherings can serve as a venue for envisioning an ideal future and constructing the mode of governance necessary to achieve an ecologically thriving Salish Sea. The cultural significance of marine species like salmon, mussels, and orcas and the rights of indigenous groups to these cultural resources can act as the upper limit to risk because complete resource collapse is the socially defined intolerable risk.[62] The current governance model is tracking changes in resources and responding to changes as they arise through tactics like remediation rather than taking an

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57. *Id. at* § 1, p. 2.
58. J. P. Evans, *Environmental Governance*, ROUTLEDGE (1st ed 2012), https://perma.cc/3BT2-Z3A7.
59. Wong, *supra* note 14, at 470.
60. Evans, *supra* note 57, at 178-184.
61. Joint Statement of Cooperation on the Georgia Basin and Puget Sound Ecosystem, U.S.-Can, January 19, 2000 https://perma.cc/AW2W-5NWU.
62. *Id.*

anticipatory governance approach by modeling future ecosystem scenarios and proactively building climate resilient socio-ecological systems.[63] This is partly due to a lack of regional models of climate change. Academic institutions like Western Washington University's Salish Sea Institute could partner with ECC to prioritize translating the global level IPCC climate change projections to the expected impacts on resources and people in the Salish Sea region. Combining localized models of climate change with participatory visions of a sustainable socio-ecological system is one potential method of creating a more adaptive and anticipatory governance model.

Also, visualizations and representations of the Salish Sea, both spoken and printed, can be harnessed to promote adaptive governance. For instance, renaming and mapping of the Salish Sea (see Figure 2) has played a significant role in reshaping social, political and scientific discourse.[64] First, it is interesting to note that, although the renaming of the inland waters as the Salish Sea has been seen as an act of 'decolonizing the map,' the name was proposed and brought into use by the scientific community rather than indigenous Coast Salish people and was not traditionally used in pre-colonial times.[65] Before colloquial use of "Salish Sea" began in the 1990s, tribes throughout the region had different names and boundaries for the ecological system.[66] Though tribes had always been socially and economically connected, the naming of the Salish Sea has formalized a previously informal social network into a unified decision-making body directed by the Council.[67] The power of unification and identity through the name has encouraged widespread acceptance and participation.[68] Wider use of the term 'Salish Sea' in civil society and scientific literature can be used to expand the Coast Salish identity beyond the Council.

63. Wong, *supra* note 14, at 470.
64. Tucker, *supra* note 1, at 197-98.
65. *Id.* at 200.
66. *Id.*
67. Norman, *supra* note 34, at 143–45.
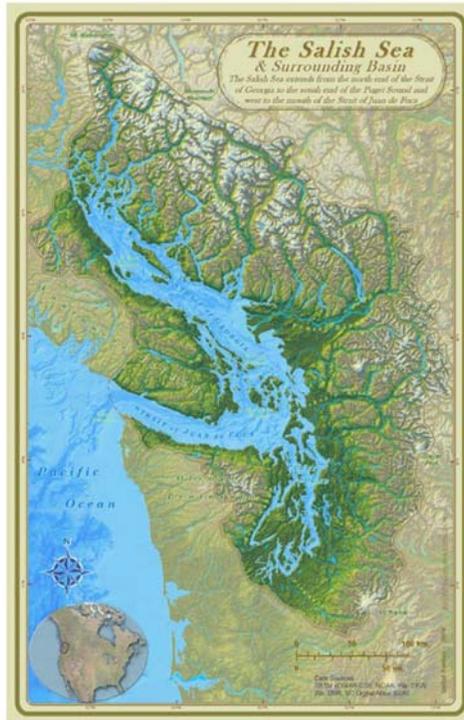68. Norman, *supra* note 34, at 152.

Figure 2. Map of the Salish Sea and surrounding basin.[69]

The map itself has the power to create a new status quo.[70] Illustrations of the region as a whole ecosystem can be used in the existing education system to help develop a sense of ecological citizenship. In some educational material, the name Salish Sea is already in use, like the coloring book Baker created for an National Oceanic and Atmospheric Association outreach program.[71] Using maps and understanding the importance of watersheds is already part of the 6th grade science curriculum in the Puget Sound region of Washington State.[72] Classes participating in Stormfest, a water education fieldtrip organized by the City of Burien, use maps of local watersheds overlaid on jurisdictional maps to identify the watershed they live in and show that neighborhood watersheds are nested in the greater

69.   Stefan Freelan, *Map of The Salish Sea and Surrounding Basin*, STEFAN FREELAN MAPS HUXLEY, (Feb. 21 2019) https://perma.cc/3E7V-SEM2.

70.   J. B. Harley *Deconstructing the Map*, CARTOGRAPHICA VOL. 26, No. 2, Summer 1989, 1-20 (Feb. 16 2019), https://perma.cc/DB7M-BTUU.

71.   Tucker, *supra* note 1, at.202.

72.   Gilda Wheeler, *Washington State Learning Standards. Integrated Environmental and Sustainability*, at 15 (2014), https://perma.cc/Z7RX-BG6P.

Puget Sound watershed.[73] Using the Salish Sea map (Figure 2), this connection to the wider ecosystem could easily be taken a step beyond the urban political boundaries and the Puget Sound. Ecosystem education is an opportunity to develop ecological citizenship and cultivate an embeddedness in place.[74] Though using a watershed as the scale of governance may be too complex with existing jurisdictional scales, developing a watershed identity and dual citizenship to ecological system and nation-state political system is certainly feasible. Just as tribal leaders identify themselves as "Coast Salish" at a Gathering,[75] urban and rural residents from Tacoma to Vancouver, B.C. should feel that they are Coast Salish first, and American or Canadian second. Cultural identification, a sense of belonging and responsibility to the ecosystem is a first step towards increasing social capacity and local participation in environmental decision-making.

Conclusion

The Salish Sea is a complex socio-ecological system rich in culture and nature. While the management of its transboundary resources has significantly evolved from international fisheries treaties to a trans-governmental boundary organization, the ECC, the mounting threats of climate change and urban development necessitate a more adaptive and anticipatory approach. Through greater integration and participation from civil society, the ECC can localize their strategies and protect both human and environmental interests in the future. The emergence of First Nations Gatherings and the Council can be an opportunity to expand participation in management, incorporate traditional ecological knowledge, and reconceptualize regional identity. Here, several strategies have been identified to encourage wider participation in governing the Salish Sea towards a more adaptable and resilient management plan. This includes, representation of the Council as signatory to the ECC, community visioning workshops, local climate change modelling, and greater use of the term and visual representation of "Salish Sea," particularly in early education, to promote a new sense of ecological citizenship. Future research should focus on the potential development of social and cultural resilience indicators to supplement the ecological health indictors currently guiding the ECC. Additionally, research on local community engagement in the Salish Sea region through exercises like counter-mapping and visioning could help

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73. This is based on the author's firsthand experience as a volunteer educator during Stormfest in the spring of 2018. For more information about Stormfest, visit the City of Burien website, https://perma.cc/ECX5-SPXG.
74. Evans, *supra* note 57, at 63.
75. Norman, *supra* note 34, at.152.

develop concrete steps forward for government agencies to incorporate local participation.

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