February 13, 2012

Dear NRDA Trustees,

On behalf of Ocean Leadership’s 103 member institutions, I would like to submit the following comments on the Draft Phase I Early Restoration Plan and Environmental Assessment. Ocean Leadership thanks you for the opportunity to provide input to this document. We hope our following comments can be included in the final plan in order to enhance and improve the scientific integrity of the restoration planning and assessment.

Gulf of Mexico restoration that is founded on and informed by sound science is a top priority for Ocean Leadership and its member institutions. To this end, the Draft 1 Plan could benefit from more transparency regarding the decision-making process used to evaluate and select the various projects. We recommend that the project selection process be more detailed and provide specific information about the scientific basis for selection and extent of objective weighting for each of the candidate projects. An appendix consisting of such details could answer such potential questions as:

- Were all candidate projects evaluated strictly on a quantitative scale? If so, publish the evaluation matrix for all of the candidate projects (not just the selected projects).
- What, if any, subjective criteria were applied to the overall project selection process? If any, publish the subjective evaluation matrix for all of the candidate projects (not just the selected projects).

Secondly, ecosystem restoration requires a complex understanding of the physical, chemical, geological and biological components of the environment as well as extensive observations and monitoring data to determine the extent of ecosystem recovery. However, a critical element missing from this draft plan is the monitoring efforts required to document the effects (both positive and negative) of the restoration activities. Research, observation, mapping and monitoring are important components of any successful restoration plan and should be the underpinning of the plans and their outcomes. These efforts should be long-term and set in a timeframe of years. Therefore, we recommend a detailed monitoring or observation plan be incorporated into all restoration projects to gauge restoration success (or failure). The monitoring metrics should be able to measure progress in
achieving the identified goals and the projects should utilize adaptive management plans so that activities can be adjusted in response to feedback from monitoring efforts. Furthermore, we recommend an enhancement of the Performance Criteria, Monitoring and Maintenance sections. These sections are repetitive throughout the plan and neither provide specific details nor any indication of how to quantify the environmental or human contributors for success or failure.

While we appreciate the NRDA Trustees’ efforts to identify early restoration projects, the science and monitoring section needs to be a stronger part of this plan. More information is also needed on the selection process. In general, we greatly appreciate your consideration of our recommendations:

- The Draft Plan needs to be more transparent on the project selection evaluation process. The inclusion of the Florida Ramp Project, for example, is sufficiently different from the other projects to raise questions about the selection process.
- Research, observation, mapping and monitoring programs are important components of successful restoration plans and should be incorporated into the projects’ approaches; and
- This Plan needs to enhance, streamline and make more project-specific performance criteria, monitoring and maintenance requirements.

Your work is critical to improving the Gulf Coast ecosystem. We strongly encourage you to utilize the best available science to inform the selection process, to monitor those projects to ensure that they are having their intended effects, and use the feedback from monitoring to adapt project activities as needed.

Sincerely,

Robert B. Gagosian
President and CEO
Consortium for Ocean Leadership