October 26, 2011

MEMORANDUM FOR: John Hankinson,

Gulf Coast Ecosystem Restoration Task Force

FROM:

Heather McCarty Chair Heather D. McCarty Marine Fisheries Advisory Committee (MAFAC)

SUBJECT: Comments on the Gulf Coast Task Force Releases Ecosystem Restoration Strategy

After review of the preliminary Gulf of Mexico Regional Ecosystem Restoration Strategy, the Marine Fisheries Advisory Committee (MAFAC), a federal advisory committee representing a broad range of stakeholders with special knowledge of marine fisheries and resources, offers the following comments. In general, we appreciate the substantial efforts of the Gulf Coast Restoration Task Force (GCRTF) to create the document, which compiles many possible approaches to restoring the Gulf of Mexico. However, MAFAC remains concerned with (A) the extended length of time that will be needed to complete the current process, and (B) the potential for funds to be spread over too many priorities.

In our previous comment letter, MAFAC proposed that the GCRTF focus on two priorities, namely: restoring regional estuaries, and enhancing research, monitoring and data collection for resource management. We are pleased to see both of these concepts repeatedly found within the preliminary Strategy. We believe that MAFAC's two recommended priorities, if implemented, would achieve all four of the GCRTF goals to: (1) restore and conserve habitat; (2) restore water quality; (3) replenish and protect living coastal and marine resources; and (4) enhance community resilience.

The preliminary Strategy, however, does not set out clear priorities. Nor does it propose a clear set of environmental or geographic criteria for identifying funding priorities. Rather, for each of the goals, it provides a menu of options, but otherwise suggests the need, in the future, to develop an inventory, a list of tools, a list of priority watersheds, or some other list of potential projects that could achieve each of the GCRTF goals. In the appendices, the preliminary Strategy further identifies and describes some needs and potential projects for each of the Gulf Coast states, but again, without any effort to set clear priorities and narrow these lists.

MAFAC remains concerned that the current approach, involving a massive inventory of the possible needs and priorities in the Gulf of Mexico, is so far reaching and so broad in scope that it could take far too many years to show progress. Furthermore, with so many different projects being identified, the funding of each project would limit the success of all. Instead, MAFAC encourages focused action. The GCRTF should select priority estuaries and integrate existing plans for estuary restoration to address water quality, water quantity, habitat restoration, and community resilience. By focusing upon the overarching benefits of estuary restoration, and related research, monitoring, and data collection, the GCRTF and its successors can narrow the potential universe of options for consideration, achieve all four of the desired goals, and accelerate the process of funding and actually implementing projects to benefit the environment.

The precedent for the approach MAFAC proposes has already been established. In response to the Exxon Valdez disaster, Alaskans made an essential, threshold decision to focus on habitat acquisition and related research, monitoring, and general restoration. MAFAC encourages the GCRTF and other policy makers to make a similar decision in the Gulf of Mexico, and to immediately identify restoration of the regional estuaries as the top priority.

Thank you for considering our comments.

cc: Dr. Jane Lubchenco Eric Schwaab