

Ocean Conservancy's Rapid Assessment of the Gulf Coast Ecosystem Restoration Council's Draft Initial Comprehensive Plan

Released May 23, 2013, the Draft Initial Comprehensive Plan is intended to serve as a framework to implement a coordinated, region-wide restoration effort. Ocean Conservancy reviewed the draft initial plan for the components we believe are integral to the success of restoration of the Gulf of Mexico's natural resources. This review constitutes a rapid assessment intended to help shape comments at one of the many public meetings for this plan and to inform a full comment letter, including an analysis of the environmental assessment and appendix project list. We evaluated the Plan based on the Council's approach to several critical components; we indicate whether their approach is **on track**, **needs improvement**, or **requires significant work**.

Ocean Conservancy's initial assessment of the Plan indicates that the Council is on the right track, but there is still much work to be done to flesh out the specific milestones and objectives that must be contained in the Draft Initial Comprehensive Plan in order to fully restore the Gulf of Mexico. The task at hand is monumental, but the Council cannot afford to put off the tough decisions needed to develop an implementation plan that serves the citizens of the Gulf of Mexico and protects and restores the resources we rely on for food, recreation and livelihood.

Comprehensive Approach to Restoration

From the Plan: Page 6: "The Council recognizes that upland, estuarine, and marine habitats are intrinsically connected, and will provide ecosystem-based and landscape-scale restoration without regard to geographic location within the Gulf Coast region."

Our View: The interlinked nature of the Gulf's coastal and marine resources, combined with the fact that environmental stressors are associated with both land- and ocean-based activities, make an ecologically and geographically balanced restoration approach essential.

From the Plan: Page 9: "The Council will coordinate, as appropriate, with states, federal agencies, tribes, and other entities working in the Gulf Coast region to achieve common goals, create regulatory efficiencies, and collectively work towards an integrated vision for comprehensive restoration."

We Recommend: The final plan must demonstrate an integrated, regional approach and include specific objectives and detailed information on how progress will be monitored to ensure that projects are contributing to an overall approach that addresses restoration of both coastal and marine environments as well as coastal communities.

The Council should enter into a formal agreement with the BP Deepwater Horizon NRDA Trustee Council, the National Fish and Wildlife Foundation and the National Academy of Sciences to link and coordinate restoration efforts in response to the oil disaster as well as to the decades of degradation in the Gulf.

Science-based Approach to Restoration

From the Plan: Page 6: “The decisions made pursuant to the Plan will be based on the best available science and this Plan will evolve over time to incorporate new science, information, and changing conditions. The Council will coordinate with the scientific community to improve decision-making.”

Page 13: The council recognizes that science must be the foundation for project selection and for ensuring that projects are contributing to the overall goals of the Council.

Our View: We commend the Council’s commitment to fund projects that “implement or improve: science-based adaptive management and project-level and regional ecosystem monitoring; including the coordination and interoperability of ecosystem monitoring programs...” However, the specific process and objectives needed to achieve this goal are missing in the plan. As science and adaptive management are the core underpinnings of a successful restoration program, the Council must articulate in the final plan how science will inform restoration decision-making and measure project success over time.

We Recommend: Toward this goal, the Council should devote the resources necessary to provide or obtain the science needed to support effective restoration, as well as to promote long-term sustainable use of the Gulf ecosystem. This program should be cooperative in nature, taking advantage of existing and new efforts, including but not limited to the Gulf Coast Ecosystem Restoration Science, Observation, Monitoring and Technology Program and the Centers of Excellence, both established under the RESTORE Act, as well as any ongoing science program related to the Deepwater Horizon NRDA process. Use of the best available science is paramount; this should include traditional, environmental science, social science and the incorporation of local and tribal knowledge, regardless of official federal or state recognition.

The professional staff of the Council should include a senior-level chief scientist who advises the executive director and Council and who manages and works with independent peer reviewers and a scientific advisory committee to provide guidance and feedback at programmatic and project levels.

The Council should establish at least two advisory committees: a scientific advisory committee to provide advice on “the best available science” and on restoration at a programmatic level, and a public advisory committee with regional and stakeholder representation to ensure public participation and transparency in decision-making. The Gulf of Mexico Fishery Management Council, which has established science and public advisory bodies and robust public participation procedures, is a useful model for the Council.

Ecosystem Focus

From the Plan: The Council has adopted five goals to provide the overarching framework for a coordinated approach to restoration. Four of these goals are ecosystem-focused, and a fifth goal to restore and revitalize the Gulf economy is also included in the Plan. The Council asserts that “To achieve all five goals, the Council will support ecosystem restoration that can enhance local communities by giving people desirable places to live, work and play, while creating opportunities for new and existing businesses of all sizes, especially those dependent on natural resources.”

Page 18: Projects implemented under the state impact allocation of the RESTORE Act “will be implemented in a manner that does not have a negative impact on the Gulf Coast Ecosystem restoration projects and programs selected for implementation by the Council.”

Our View: We believe the four ecosystem goals outlined are the correct goals. The task before the Council is to develop a plan, a set of criteria for project selection, and a science-supported decision making process to achieve all of these goals in a way that is comprehensive and based on the best available science. This requires the commitment of all of the Council members to think beyond political boundaries to ensure that restoration projects are coordinated to create an outcome that is larger than the sum of the individual projects.

Clear Criteria for Decision-making

From the Plan: The Plan reiterates the four priority criteria contained in the RESTORE Act to inform project decision-making. However, these criteria alone are not sufficient to ensure that projects will achieve the vision of full restoration of the Gulf ecosystem.

Our View: As restoration moves from planning to implementation, there will be myriad project proposals on which to spend restoration funds. The ultimate success of these projects—which must be measured by the health and resilience of the ecosystem—rests on selection, implementation and evaluation of a series of integrated projects, consistent with a Gulf-wide plan and rigorous application of criteria, to ensure that only the best and most appropriate projects are funded. The restoration program that emerges should take a comprehensive, integrated ecosystem approach and strive for results that are greater than the sum of the individual projects.

We Recommend: Adopt and adhere to additional criteria that will ensure a successful restoration outcome. See attachment for Ocean Conservancy’s recommended criteria.

Public Engagement

From the Plan: Page 1: “...Gulf Coast restoration will not be successful without genuine and meaningful input from the people in the region.”

The Council will accept comments on the plan as well as project ideas via a series of public meetings as well as on their website at www.restorethegulf.gov.

We Recommend: Meaningful public participation includes the following: meetings open to the public (except for occasional executive sessions when necessary), advance public notice of meetings, opportunities for public comment at meetings, and opportunities for comment on draft strategies, plans and projects. Council meetings should be rotated across the Gulf states to afford opportunities for the public to attend meetings in person.

Adequate notice of meetings dates and locations must be provided to ensure meaningful public participation and input. Adequate notice means a minimum of 15 business days.