



MARINE MAMMAL COMMISSION

26 October 2011

The Honorable Lisa Jackson
U.S. Environmental Protection Agency
EPA Docket Center
Office of Environmental Information Docket
Mail Code 28221T
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: Gulf Coast Ecosystem Restoration Task Force

Dear Ms. Jackson:

The Marine Mammal Protection Act was enacted in 1972 with the primary objective of maintaining the health and stability of marine ecosystems. The Act established the Marine Mammal Commission to oversee and advise federal officials regarding activities that may adversely affect marine mammals and the ecosystems upon which they depend. Twenty-two marine mammal species reside in or regularly visit the Gulf of Mexico. For that reason, the work of the Gulf of Mexico Ecosystem Restoration Task Force is of great interest to the Commission.

The Task Force has recently issued its preliminary strategy for restoration of the Gulf of Mexico regional ecosystem. The strategy is intended to reverse widespread environmental degradation and thereby ensure a healthy marine environment and economic future for the Gulf. The strategy identifies several goals, including restoring and conserving habitat and replenishing and protecting living coastal and marine resources. The Commission supports these goals as they would foster recovery of the Gulf's marine mammals.

The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has prepared the enclosed report, "Assessing the Long-term Effects of the BP Deepwater Horizon Oil Spill on Marine Mammals in the Gulf of Mexico: A Statement of Research Needs." The purpose of this statement is to (1) guide assessment of the long-term effects of the Gulf spill and associated risk factors on marine mammals, (2) guide mitigation and restoration efforts for Gulf marine mammal populations, (3) help track changes in the Gulf ecosystem, including recovery and restoration, and (4) help guide assessment of future spills in the Gulf and elsewhere. The Commission believes that the assessment of long-term effects of the oil spill and other human activities on Gulf marine mammal populations should be included in any ecosystem restoration plan.

Historically, the lack of research infrastructure in the Gulf has been a significant impediment to surveys and other studies needed to assess the status of marine mammal populations and implement measures to ensure their recovery. Most studies conducted to date in the Gulf have focused on specific topics, such as the effects of seismic surveys on sperm whales. Few studies have been directed toward understanding or addressing the cumulative effects of multiple risk factors, despite the fact that the Gulf is relatively industrialized and multiple marine mammal unusual mortality events have occurred there over the past 20 years. The adverse effects of various risk

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factors are manifested in a number of ways, including the occurrence of extensive hypoxic and anoxic zones and harmful algal blooms. Large-scale changes in community structure or prey abundance caused by events such as the Deepwater Horizon oil spill and other human-caused or natural disturbances can affect the carrying capacity or distribution of marine mammal populations. Evaluating the adverse effects of these many factors, managing the activities that cause them, and mitigating their impacts on the Gulf ecosystem, including marine mammals and their prey, will require a major commitment at all levels.

Implementation of a comprehensive restoration plan for the Gulf will require additional resources, as well as improved infrastructure (e.g., research vessels, aircraft, and laboratories), more trained personnel, better sampling methods, and refined analytical tools to detect and assess the effects of exposure to oil and other risk factors. It also will require coordination of research activities and collaboration and partnerships among the involved federal, state, and local agencies, industry, non-governmental organizations, research institutions and organizations, and the public to help maximize the benefits of limited resources.

The Commission gratefully acknowledges the important work of the Gulf Coast Ecosystem Restoration Task Force and hopes you find the enclosed report useful in finalizing a restoration strategy for the Gulf of Mexico marine ecosystem. Please contact me if you have any questions.

Sincerely,



Timothy J. Ragen, Ph. D.
Executive Director

Enclosure