



NATIONAL COALITION FOR MARINE CONSERVATION
4 Royal Street, S.E., Leesburg, VA 20175

June 29, 2010

Ms. Jane Lubchenco
Under Secretary of Commerce
Administrator, National Oceanic & Atmospheric Administration
1401 Constitution Avenue, N.W., Room 5128
Washington, DC 20230

RE: NOAA Leadership on Research and Monitoring of the Gulf Oil Spill

Dear Ms. Lubchenco,

I am writing on behalf of the National Coalition for Marine Conservation, an independent non-profit founded in 1973 and dedicated to changing the way we think and act when it comes to ocean conservation, moving from a single-species focus to a broader, ecosystem-based approach that reflects our increasing knowledge and expanding circle of concern for all marine life while promoting sustainable recreational and commercial fisheries.

I am writing to urge you, as the head of NOAA, to take a strong leadership role in guiding, coordinating and integrating research and monitoring of the ongoing, catastrophic oil spill in the Gulf of Mexico.

It's been well over two months since BP's Deepwater Horizon oil rig exploded, setting off an unremitting torrent of oil into waters of the gulf, millions of gallons and counting. At this writing, there's no end in sight. Some are calling it the worst environmental catastrophe in United States history. One thing is certain. It will be a long time before we realize the full extent of the damage.

We can't appreciate an environmental and economic disaster as monumental as the BP blow-out by examining its effect on any species, human or otherwise. The toll taken by the relentless, months-long gushing of crude into an ever-expanding area of the gulf is appalling: on the people of the region - fishermen, tourism-related businesses, the millions who live and recreate along the shoreline; and on the Atlantic's wild animals that live, breed and feed in the gulf this time of year - endangered sea turtles, shorebirds and myriad species of fish.

(703) 777-0037 - www.savethefish.org

The damage will ultimately be felt, and therefore must be understood, at the ecosystem level, where impacts and changes are harder to comprehend in the short-term and much more difficult to repair in the long-term.

The oil spill in the gulf cries out for a holistic, ecosystems approach to research and monitoring of the widest range of species and habitats. It's an enormous undertaking. We must understand the impact not only on protected or charismatic species or those fish targeted by commercial and recreational fisheries, but on species at all trophic levels, from the bottom of the food chain to the top. And not just the species themselves, but their inter-relationships with associated species (e.g., predators and prey) and with essential habitats, whether pelagic (e.g., floating *sargassum*), benthic, coastal or inter-tidal.

This may seem obvious, and we know it is a tall order, but it is nonetheless vital that we approach the spill in this manner and that this approach be established and implemented early on in order to guide research and monitoring.

We have little experience with a tragedy of this scale, but there are lessons to be learned from the worst previous oil spill, the Exxon Valdez in 1989. After more than 20 years of studies, we are still uncertain about the extent of the impact, the effectiveness of restoration efforts, and whether or not Prince William Sound will ever fully recover. Populations of Pacific herring, sea otters, killer whales and sea ducks have yet to return. A number of backward-looking studies have laid the blame on poor coordination of the research from the beginning, a failure to examine a broader array of impacted species and habitats, and a lack of full and transparent sharing of information among private and public entities involved in the studies, due in part to "ongoing investigations" to establish liability and support litigation, or to defend against the same.

We must make sure this does not happen in the aftermath of the spill in the gulf. Nothing less than the nation's ability to fully understand the depth and breadth of the impact of the spill on a wide range of species and habitats, and to undertake the most effective remedial measures in order to restore the gulf ecosystem and the lives and livelihoods it sustains, will depend on it.

The National Coalition for Marine Conservation urges NOAA, working with your partners in the U.S. Fish & Wildlife Service, to take leadership on studying and monitoring the oil spill's impact on marine life and the gulf ecosystem. We ask that you prepare, publish and implement, within 60 days, a comprehensive plan to oversee and tie together the many commendable but piecemeal efforts of various federal and state agencies, university researchers, BP, fishing associations and environmental NGOs that are testing fish and other wildlife, sampling water quality and gathering data independently. What we need is a forward-looking plan to collect, integrate and analyze all the information on the spill and its impact from an ecosystem-based perspective.

We urge NOAA to appoint an independent panel of scientists to coordinate research and allocate funding to researchers based on meeting stated plan objectives. The results should be peer reviewed and published or presented at open meetings, making the information available to the public.

You have no doubt heard many frustrated and frightened citizens ask: Who in the government is in charge of the response to the BP oil spill? Who's in charge of stopping the flow? Who's in charge of the clean-up? As the primary federal agency with stewardship responsibility for living marine resources, including those now threatened in the Gulf of Mexico, NOAA should be in charge of gathering together all the available information on the spill's impact on fish and other wildlife and integrating it in an ecosystems manner so it can be used to guide future decisions for restoring the gulf environment.

Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in black ink that reads "Ken Hinman". The signature is written in a cursive, slightly slanted style.

Ken Hinman
President

cc: Eric Schwaab, Director, National
Marine Fisheries Service