Science Evaluation

Bucket 2 – Council Selected Restoration Component

PROPOSAL TITLE

Gulf of Mexico Estuary Program

LOCATION

Gulf Coast Estuaries

SPONSOR(S)

EPA

TYPE OF FUNDING REQUESTED (Planning, Technical Assistance, Implementation)

Planning/Technical assistance/Implementation

REVIEWED BY:

DATE:

12/30/14

Best Available Science:

These 6 factors/elements help frame the reviewers answers to A, B and C found in next section:

1. Have the proposal objectives, including methods used, been justified using peer reviewed and/or publicly available information?

- ○ YES
- ◉ NO
- ○ NEED MORE INFORMATION

Comments

There is no peer reviewed and/or publicly available information to support the need for additional estuary programs. There is no discussion of existing water quality/resource impairments within the proposed estuaries that supports the stated objectives.

2. If information supporting the proposal does not directly pertain to the Gulf Coast region, are applicant's methods reasonably supported and adaptable to that geographic area?

- (●) YES
- ( ) NO
- ( ) NEED MORE INFORMATION

Comments

3. Are the literature sources used to support the proposal accurately and completely cited?

- (●) YES
- ( ) NO
- ( ) NEED MORE INFORMATION

Comments

4. Are the literature sources represented in a fair and unbiased manner?

- (●) YES
- ( ) NO
- ( ) NEED MORE INFORMATION

Comments

5. Does the proposal evaluate uncertainties and risks in the scientific basis for the proposal, including any identified by the public and Council members?

- ( ) YES
- (●) NO
- ( ) NEED MORE INFORMATION

Comments

The proposal does not evaluate any uncertainties or risks in the scientific basis for the proposal, particularly for the need at the individual sites.

6. Does the proposal evaluate uncertainties and risks in achieving its objectives over time? (e.g., is there an uncertainty or risk that in 5-10 years the project/program will be obsolete or not function as planned given projections of sea level rise?)

- ○ YES
- ◉ NO
- ○ NEED MORE INFORMATION

Comments

Many existing NEP's have faced long and difficult struggles to meet CCMP goals. Having a plethora of new programs in itself posses a level of uncertainty and risk of meeting the proposal goals, and is a risk to existing Gulf NEP's by imposing additional time commitments of state and federal agency representatives and scientists to participate in more NEP's.

Based on the answers to the previous 6 questions, and giving deference to the sponsor to provide within reason the use of best available science the following three questions can be answered:

A. Has the applicant made a reasonable determination that the proposal is based on science that uses peer-reviewed and publicly available data?

- ○ YES
- ◉ NO
- ○ NEED MORE INFORMATION

Information Needed:

The proposal lacks any science-based justification (peer-reviewed or publicly available) of existing water quality/resource impairments within the proposed estuaries that supports a science-based need for additional NEP's.

B. Has the applicant made a reasonable determination that the proposal is based on science that maximizes the quality, objectivity, and integrity of information (including, as applicable, statistical information)?

- ○ YES
- ◉ NO
- ○ NEED MORE INFORMATION

Information Needed:

The proposal lacks any science-based justification (peer-reviewed or publicly available) of existing water quality/resource impairments within the proposed estuaries that supports a science-based need for additional NEP's.

C. Has the applicant made a reasonable determination that the proposal is based on science that clearly documents and communicates risks and uncertainties in the scientific basis for such projects?

- ○ YES
- ○ NO
- ○ NEED MORE INFORMATION

Information Needed:

The proposal does not document risks and/or uncertainties in the scientific basis of the proposal.

Science Context Evaluation

A. Have other methods been discussed and reasons provided to why the method is being selected (e.g., scientifically sound; cost-effectiveness)?

Yes. The proposal provides examples of success in specific program areas of existing Gulf NEP's.

B. Has your agency/vendor/project manager conducted a project/program like the one proposed?

Yes.

C. Is there a risk mitigation plan in place for project objectives? (captures risk measures as defined under best available science by the Comprehensive Plan and Act)

No risk mitigation plan is provide.

D. Does the project/program consider consequences with implementation? (captures risk measures as defined under best available science by the Comprehensive Plan and Act)

No.

E. Does the project/program have clearly defined goals?

Yes, goals are clearly defined.

F. Does the project/program have clearly defined objectives?

Yes, objectives are clearly defined.

G. Does the project/program have measures of success? (captures statistical information requirement as defined by the Comprehensive Plan and Act)

Yes.

H. Is a monitoring program in place to determine project goals, success and help adaptive management (if applicable)? (captures statistical information requirement as defined by the Comprehensive Plan and Act)

No. The proposal does not include a monitoring plan, but indicates each new NEP will develop such a plan. There should also be an overarching Gulf-wide monitoring plan for the aggregate of NEP's.

I. Does the project/program consider recent and/or relevant information? (captures statistical information requirement as defined by the Comprehensive Plan and Act)

Yes. The proposal discusses several recent program advances and information generated at other Gulf NEP's.

J. Has the project/program evaluated past successes and failures of similar efforts? (captures the communication of risks and uncertainties in the scientific basis for such projects as defined by the Comprehensive Plan and Act)

The proposal only presents success of other Gulf NEP's and makes no mention of failures (or lessons learned) from NEP's.

Please summarize any additional information needed below:

There is no science-based justification for starting up new NEP's in the Gulf region. The proposal relies heavily on the concept that if existing NEP's are having successes, then more will be even better. This is dangerous logic that could negatively impact even existing NEP's. First, the proposal only discusses program successes at the existing NEP's...are there no examples of failures..no examples where an NEP did not meet CCMP goals? Second, new NEP's require participation from state and federal representatives, as well as scientists. Many of these individuals are already over committed and requiring more of their time could jeopardize the quality of the science and future success of all the Gulf NEP's.