



MARINE MAMMAL COMMISSION

18 September 2026

Louisiana Trustee Implementation Group
c/o Ms. Elizabeth Fetherston, Marine Mammal Restoration Coordinator
National Marine Fisheries Service
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701

Dear Louisiana Trustee Implementation Group Members:

The Marine Mammal Commission (the Commission) has reviewed the Louisiana Marine Mammal Restoration Strategy (hereafter referred to as the Strategy), posted on 8 July 2026 through the Gulf Spill Restoration portal. Marine mammals in Louisiana, specifically the Barataria Bay stock of bottlenose dolphins, were among the most heavily impacted by the *Deepwater Horizon* (DWH) oil spill. The heavy oiling in Barataria Bay over a prolonged period of time increased mortality and led to chronic disease and impaired reproduction that still persists over a decade since the spill (Schwacke et al. 2023, Pirotta et al. 2026). Primarily based on the extensive injuries documented for the Barataria Bay bottlenose dolphins, \$50 million was allocated to Louisiana for marine mammal restoration. The Commission is pleased to see that the National Marine Fisheries Service (NMFS), through support for the Water Institute and in coordination with the Louisiana Trustee Implementation Group (LA TIG), is moving forward with additional planning for the implementation of a Marine Mammal Restoration Plan for Louisiana and appreciates the opportunity to provide comments on the Strategy.

The Strategy is intended to support development of a future Marine Mammal Restoration Plan and outlines a common framework for restoration actions as part of a programmatic approach. The Strategy identifies a need for partnerships with state and federal agencies, academic institutions, non-governmental organizations, and marine mammal stranding networks. The document specifically describes some of the key partners and meetings that have been held with representatives from those partner organizations to seek input on the Strategy's concepts. Emerging from these meetings were several cross-cutting outcomes, including:

- strong support for the priority alternatives, with particularly high interest in addressing hook and line interactions with dolphins;
- strong support for a collaborative, consortium approach to restore MMs;
- agreement that this approach aligns well with their organizational missions; and
- agreement that the Strategy should focus on state-wide coastal waters, not just Barataria Bay.

The Strategy suggests an approach that includes these partners in building “communities-of-care” for marine mammals, involving engagement with diverse sectors such as fishing communities,

businesses, schools and government agencies, to support a continuous, consistent, and long-term commitment to marine mammal conservation.

The Commission supports the programmatic approach, and particularly the efforts to build partnerships that will promote continued engagement, coordination, and cooperation over the long-term, even after restoration funding has been expended. The Commission strongly supports the communities-of-care approach described in the Strategy document and more extensively in Appendix B. The Strategy mentions the Sarasota Dolphin Research Program as an exemplar for building the credibility, continuity, consistency, and capacity that restoration work depends on. The Sarasota Dolphin Research Program, initiated in 1970, has been immensely successful in building strong community engagement and has supported marine mammal conservation broadly, while providing numerous benefits for the dolphins of Sarasota Bay. Key to the program are regular photographic identification (photo-ID) surveys and periodic catch-and-release health assessments to monitor the dolphin population in Sarasota Bay. The surveys allow ongoing assessment of the health and status of the resident dolphins, early detection of issues such as entanglement or other life-threatening conditions, and interventions to address such life-threatening conditions through disentanglement, veterinary care, and rehabilitation when necessary. Research has demonstrated that early detection and intervention greatly increase a dolphin's chances of survival (Wells et al. 2013). Long-term follow-up monitoring has clearly demonstrated the population-level benefits of individual dolphin rescues (McHugh et al. 2021). Health assessments provide detailed evaluations of individual dolphin health, identifying issues that can't be detected during photo-ID surveys, opportunities to engage in interventions, and additional training opportunities for the stranding response, aquarium, academic, and resource management groups that work together in the region. An intensive program of focused outreach and education increases local awareness of issues facing dolphins, and ways the public can reduce threats to the animals. The Sarasota Dolphin Research Program is an excellent example of what can be accomplished through community engagement, but the key elements of this successful program—regular photographic surveys and health assessments, as well as capacity for interventions that draw on regional support—have been critical to its success. As such, these elements should be included in implementation plans for a community-of-care approach as described in the Strategy for restoration of Louisiana marine mammals.

Given its focus on the strategic approach and use of a structured decision-making process, the Strategy does not specify tangible actions that would necessarily be included in the final restoration plan. Potential actions are described as “examples only” in Appendix A. Although the Commission generally supports the actions presented in Appendix A, the examples do not detail how they would be implemented. Specifically, the Strategy's example action to “Enhance Response and Data Collection from Live and Dead Stranded Marine Mammals” (A.7) could be very beneficial for dolphins, but only if the implementation includes active surveillance, similar to actions integral to the Sarasota Bay Dolphin Research Program. The Commission is concerned that the focus of A.7 is on investigations of stranded (almost always dead) marine mammals. The Commission is supportive of building capacity for reliable and consistent stranding response, but collection of samples and information from dead dolphins cannot be the prompt for health or entanglement interventions and should not be the sole source of information on important stressors faced by the population. It is imperative that active surveillance be an integral part of the Strategy and that this includes surveys and periodic health assessments similar to those undertaken by the Sarasota Dolphin Research Program. Such surveys would improve chances of detection and intervention for dolphin health issues and greatly expand opportunities for engagement of local community members, which is

essential in building communities-of-care. Previous health assessments in Barataria Bay have led to several successful interventions. In one case¹, a dolphin with a life-threatening entanglement was disentangled and later resighted with a calf, showing how individual dolphin rescues could ultimately contribute to population-level benefits, as has been demonstrated in Sarasota Bay with long-term efforts (McHugh et al. 2021). The Commission underscores that enhanced response and data collection must not be limited to stranded dolphins only, but also include photo-ID surveys and catch-and-release health assessments.

The actions to “Decrease Interactions with Hook and Line Fisheries” (A.4), “Decrease Feeding Associated with Fish Cleaning Stations” (A.5), and “Decrease Incidence of Intentional Harm to Dolphins Associated with Commercial and Recreational Fishing” (A.6) would be particularly applicable for Barataria Bay bottlenose dolphins. Zolman et al. (2026) report a high prevalence of entanglement and vessel strike scars for this population. The Strategy reports that an informal analysis of Barataria Bay health assessment data found that 13% of dolphins sampled had wounds consistent with intentional human harm. The Commission notes that assessment surveys of live dolphins as recommended above would provide not only an opportunity for disentanglement and other veterinary interventions, but would also provide information on dolphin behavior, and in some cases, adverse human interactions with dolphins (e.g., provisioning), critical to designing effective mitigation plans for reducing fishery and vessel interactions and incidents of intentional harm.

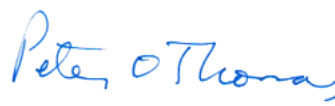
The Commission is concerned about the Strategy’s shift away from a focus on the Barataria Bay stock of bottlenose dolphins, for which substantial, chronic injuries from the DWH spill have been documented (Schwacke et al. 2023). This is demonstrated by the cross-cutting outcome from meetings with partners agreeing that the Strategy should focus on state-wide coastal waters, not just Barataria Bay. The concentration of commercial and recreational vessel and fishing activity overlapping with the high density of bottlenose dolphins around Grand Isle increases other anthropogenic sources of mortality risk in Barataria Bay—as noted herein, and a recent study has suggested that some risks, such as vessel strikes, may be exacerbated for Barataria Bay dolphins because of their prior exposure to DWH oil (Pirotta et al. 2026). Barataria Bay dolphins were central to the DWH injury assessment for which the restoration funds were awarded, and there is ample opportunity and substantial need for primary restoration in Barataria Bay. The Commission questions why the Trustees would pivot their focus to alternate areas of the coast, where injuries to marine mammals were not as extreme, or where injuries were not documented. Furthermore, the human development of Grand Isle and the Louisiana Department of Wildlife and Fisheries laboratory facility that is housed there could provide infrastructure and greater opportunity for community engagement, as compared to more remote locations in the western portion of the state. Arguably, Barataria Bay a cost-effective region for initial implementation of restoration approaches, and an obvious choice to establish a community-of-care. Success of an initial study in Barataria Bay could then be expanded to other areas as appropriate. The Commission emphasizes that the Barataria Bay stock of bottlenose dolphins should be a central component of the Louisiana Marine Mammal Restoration Plan moving forward.

¹ See <https://nmmf.org/rescued-bottlenose-dolphin-gives-new-life/>.

The Commission previously provided comments and recommendations² for marine mammal restoration plans described in the Trustee's Programmatic Damage Assessment and Restoration Plan and Final Programmatic Environmental Impact Statement (PDARP/PEIS). The Commission also submitted four potential restoration projects for Louisiana through the Gulf Spill Restoration portal, which included improved marine mammal stranding response capabilities, bottlenose dolphin health assessments, bottlenose dolphin photo-ID surveys, and reducing bycatch of bottlenose dolphins in commercial and recreational fisheries. Two of these proposed projects were reflected in LA TIG's range of alternatives presented in the Draft Restoration Plan/Environmental Assessment #5: Living Coastal and Marine Resources – Marine Mammals and Oysters, for which the Commission also provided comments and recommendations³. Since that time, little has been accomplished toward initiating the critically-needed restoration actions for marine mammals in Louisiana. It has been more than 16 years since the catastrophic DWH oil spill and 11 years since the PDARP/PEIS was finalized. Part of this delay was due to the LA TIG's focus on the mid-Barataria Sediment Diversion (MBSD) project, which was itself a threat to the viability of the Barataria Bay bottlenose dolphin population (Thomas et al. 2022). The Commission provided comments and recommendations related to the MBSD project⁴ and engaged with NOAA to investigate potential monitoring and potential mitigation strategies. As the MBSD project has since been terminated, the Commission underscores the need to initiate the long overdue restoration actions for bottlenose dolphins in Barataria Bay. Recent research has highlighted that greater benefits are attained when restoration efforts are implemented in a timely manner (Pirrotta et al. 2026), but it also demonstrated that even when those efforts are delayed, restoration can still provide substantial benefits and improve the population recovery trajectory for long-lived species such as bottlenose dolphins.

The Commission looks forward to seeing additional details on the implementation of a Louisiana Marine Mammal Restoration Plan.

Sincerely,



Peter O. Thomas, Ph.D.,
Executive Director

² See the Commission's [4 December 2015](#) letter.

³ See the Commission's [20 April 2020](#) letter.

⁴ See the Commission's [2 June 2021](#) and [18 October 2022](#) letters.

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