

PEPC Project ID: 73918, DocumentID: 81472

Correspondence: 1

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Correspondence Text

10 August 2017

Gulf Coast Ecosystem Restoration Council
Attention: Draft FPL Comments
Hale Boggs Federal Building
500 Poydras Street, Suite 1117
New Orleans, LA 70130
frcomments@restorethegulf.gov

RE: Comments on Draft 2017 Commitment and Planning Support Funded Priority List

Dear Council Members:

The Gulf Restoration Network appreciates the opportunity to comment on the Draft 2017 Commitment and Planning Support Funded Priority List (CPS) developed by the Gulf Coast Ecosystem Restoration Council (Council). We commend the Council members for your on-going restoration work that will help restore the coastal environment for our communities and native flora and fauna species across the Gulf Coast.

We support the Council's efforts to provide members with the funds to improve future submissions of project proposals. The draft CPS provides the opportunity for further collaboration amongst the Gulf States, promoting the submission of landscape-style restoration projects. While this effort will assist in maximizing project and program collaborations, as well as promote coordination amongst states,

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agencies, and other restoration programs, it is vital that any monies allocated towards CPS grants should be transparent to the public and undergo rigorous reporting requirements.

The Council's commitment to public engagement is commendable. We appreciate the efforts of staff to engage with the public, both formally and informally, during the various planning stages. We encourage the Council staff to continue their efforts to make their meetings accessible for all Gulf citizens, regardless of geographic or language barriers. Additionally, we ask that the Council prioritize CPS grant applications that seek to use these dollars to further public engagement during pre-submission at the state and agency level. This could include in-person meetings, workshops, and/or webinars that engage public stakeholders during the development of a member's project proposals. Initiating greater involvement and collaboration in project criteria, priorities and types by the public on the front end of RESTORE Act decision making will lead to significantly greater public buy-in, participation and support as funded priority lists are released.

To this end, CPS grant reporting should be transparent and available to the public. Reports should communicate the outcomes of the CPS grant by explaining the progress toward meeting restoration goals and objectives, as well as demonstrating ongoing project evaluation and adaptive management, to the public and other interested entities. This reporting will not only ensure the integrity of this process, but it will also build the public's trust in project selection and the implementation process.

Coastal residents have a strong desire to be part of restoration programs by providing input in planning and implementation, and also by participating in monitoring, data collection and informing adaptive management solutions. It is important to remember that most coastal residents are part of communities that have lived in this region for decades if not centuries, passing traditional ecological knowledge and skills down from one generation to the next. The community's reliance on the Gulf's resources creates an opportunity for co-management in a just, equitable, and scientific way that also contributes to long-term ecological sustainability.

In addition to these comments, the GRN has signed-on to a letter soon to be submitted to the Council by our allies and colleagues Gulfwide. We support and echo the recommendations of the Gulfwide coalition herein.

Thank you for the opportunity to comment. If you have any questions, or if you would like to discuss these comments further, please contact Andrew Whitehurst, Water Program Director for the Gulf Restoration Network, at: andrew@healthygulf.org or (601) 954-7236.

Sincerely,

Cyn Sarthou
Executive Director

PEPC Project ID: 73918, DocumentID: 81472

Correspondence: 2

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We strongly oppose any funding to the Trustees and TIGS as outlined in the in Draft 2017 Funded Priorities List: Comprehensive Support.

The Trustees and TIGS to date have exhibited the lack of experience, competency and commitment to informing and engaging directly impacted disaster communities. The Trustees and TIGS continue to ignore Gulf citizens concerns with the lack of transparency, accountability, equity and inclusion.

As stated in previous comments, we believe that the TIGs are a duplicate of efforts and is a waste of funding that would better serve the resiliency of Gulf of Mexico Communities

We strongly support the 1.44% requested be allocated directly to local Community Based Organizations that were instrumental in identifying the need for the RESTORE Act.

An additional 1% should be allocated for the development and implementation of a Regional Citizen Advisory Council, as proposed.

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Correspondence: 3

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The Trustees and TIGS systematically ignore and dismiss Gulf citizens concerns with the lack of transparency, accountability, community engagement and participation in the decision making process. Therefore, we strongly oppose the approval of the Draft 2017 Funded Priorities List: Comprehensive Support.

We strongly support the 1.44% requested be allocated directly to local Community Based Organizations that were instrumental in identifying the need for the RESTORE Act. An additional 1% should be allocated for the development and implementation of a Regional Citizen Advisory Council, as proposed.

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Numerous previous comments expressed our concerns that the TIGs duplicate efforts and is a waste of limited funding that would better serve the resiliency of Gulf of Mexico Communities.

The Trustees and TIGS past performance reflects a failure of a sound commitment to informing and engaging directly impacted Gulf of Mexico communities.

Therefore, we strongly oppose the approval of the Draft 2017 Funded Priorities List: Comprehensive Support.

We strongly recommend the 1.44% requested be allocated directly to local Community Based Organizations that were instrumental in identifying the need for the RESTORE Act. An additional 1% should be allocated for the development and implementation of a Regional Citizen Advisory Council.

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Correspondence: 5

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Dear Gulf Coast Ecosystem Restoration Council,

On behalf of the Defenders of Wildlife, please accept our comments concerning the Gulf Coast Ecosystem Restoration Council's 2017 Draft Funded Priorities List: Comprehensive Commitment and Planning Support. Founded in 1947, Defenders is a national non-profit conservation organization focused on wildlife and habitat protection, the protection and recovery of endangered species and the conservation of biodiversity. Defenders has over 80,000 members and supporters in Florida. Defenders is actively monitoring the BP oil spill restoration planning activities of Florida's northern Gulf coast counties.

Defenders of Wildlife support the Council's proposed 2017 priorities to provide limited funding to support the coordination of the projects and activities contemplated in the Council's 2016 Comprehensive Plan. We support the Council using limited Pot 2 funding to: strengthen ecosystem restoration proposals including pre-submission environmental compliance review; to further coordination, collaboration and development of strategic partnerships to enhance project proposals; and to facilitate long-term planning and leveraging efforts across the various funding streams.

Enhanced coordination, collaboration and partnership building are key to selecting and implementing projects in the future that will conserve unprotected wildlife habitat along the Gulf Coast. There are important unprotected areas of wildlife habitat adjacent to the St. Marks National Wildlife Refuge, Apalachicola River and across the Florida panhandle whose acquisition would accomplish your goals and objectives. Such projects would protect and restore wildlife habitat, restore water quality and quantity, replenish and protect living riverine, coastal and marine resources, enhance community resilience, and restore and enhance natural processes, floodplains and shorelines. Additionally, there are

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willing sellers and funding and land stewardship partners to help ensure immediate and long-term success. Please coordinate and collaborate with these willing partners to develop the strategic partnerships necessary to achieve the Council's goals by funding land conservation and habitation restoration projects in Florida and along the Gulf coast.

Thank you very much for considering our comments.

Sincerely,
Kent L. Wimmer, AICP

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Correspondence: 6

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Correspondence Information

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August 14, 2017

Dear Sir or Madam:

The Lone Star Chapter of the Sierra Club wishes to submit some additional comments to augment the letter jointly submitted by the National Wildlife Federation, Sierra Club, et.al., regarding proposed Comprehensive Planning and Support Grants (CPS grants) funded under a draft 2017 Funded Priority List (FPL).

The Lone Star Chapter strongly endorses the comments submitted under the aforesaid letter. However, we would like to emphasize our concerns regarding transparency and public input.

Under the "Reporting Elements" section of the "Draft 2017 Funded Priorities List: Comprehensive Plan Commitment and Planning Support" document, it is noted that the Council member awarded a CPS grant must submit semi-annual reports through the Council's RAAMS. While we agree with this accountability measure, we believe that there should also be an avenue for public access to allow public review of the progress of approved grants.

Furthermore, the Draft 2017 FPL document does not have any provision for making lists and details of CPS grant applications proposed by Council members available for public review and comment before a decision is made to award a grant. Since the purpose of the CPS grants is to enhance the effectiveness of collaborations to restore the Gulf, it is especially useful for the public to be aware of these proposals and to have an opportunity for input at the beginning of the process.

The Lone Star Chapter appreciates the opportunity to submit additional comments.

Sincerely,

Evelyn L. Merz

Conservation Chair

Lone Star Chapter Sierra Club

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Gulf Coast Regional Collaborative
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www.stepscoalition.org
Ya-Sin Shabazz / Project Director & Evaluator Gulf Coast Regional Collaborative /
yshabazz@stepscoalition.org
August 13th, 2017

Dear RESTORE Council, The member organizations of the Gulf Coast Regional Collaborative (GCRC) would like to thank you for your continued work on Gulf Restoration and for the opportunity to comment on your draft, 2017 Funded Priorities List's Comprehensive Plan Commitment and Planning Support (CPS). We specifically thank you for listing "translators" as an example of 'public engagement activities,' a subset of one of the eight, enumerated allowable activities in the CPS. We would like you to consider our brief comments as recommendations for making the CPS an even more effective guiding document for inclusive planning. All GCRC member organizations hold strongly that inclusive planning is an essential key to effective Restoration. The CPS can best bring about inclusive planning by expressly requiring such. We are thus asking for more specific delineation and more robust reporting requirements as it relates to Council Members' existing planning policies and practices, and as it specifically relates to Council Members' projected planning activities going forward under the CPS. We recommend the express inclusion of: · A language access goal and reporting data requirement for Vietnamese and Vietnamese-American fishermen, · Required member procedures, compliance, and data reporting specific to Executive Orders 13160, 12948, and 12898, pertaining to Environmental Justice, and · Required local and environmental justice driven approaches to strategic planning partnerships and collaboration in the governed restoration planning. Further, as GCRC member organizations - and the groups supporting our member organizations and constituencies - are relatively small, the GCRC encourages the fair use of contracted consultants to ensure meaningful engagement

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and fair treatment of environmental justice communities, to solicit and collect language accessibility in planning data, and to solicit and measure stakeholder (including in-State, local, small business contractors) planning awareness, inclusion, and participation. As such, we recommend clear language in the CPS that both encourages and enables Council members to seek specialized and culturally competent consultants as a component of their agency/department staffing. Thank you again for the opportunity to offer the above comments. We look forward to working with you further to inclusively plan Gulf Restoration and effectively restore the Gulf.

Gulf Coast Regional Collaborative

Boat People SOS

Hijra House

Mary Queen of Vietnam

CDC Mississippi Center for Justice Steps Coalition

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Correspondence Text

August 14, 2017
Gulf Coast Ecosystem Restoration Council
500 Poydras Street Suite 1117 New Orleans, LA 70130
RE: 2017 Draft Funded Priorities List: Comprehensive Commitment and Planning Support

Dear RESTORE Council Members:

On behalf of our organizations across the Gulf Coast, we thank you once again for your on-going work for restoration - particularly in the form of the 2016 Comprehensive Plan Update. The updated Comprehensive Plan made critical commitments to improve the development of future Funded Priority Lists, including through updated submission guidelines and enhanced science review; to accommodate and advance large scale projects; to identify and maximize project and program synergies; and to coordinate across agencies and restoration programs.

We appreciate that these activities require resources, and we support the expenditure of a limited amount of Bucket 2 dollars to achieve the Council's Comprehensive Plan commitments. However, we want to emphasize upfront that any expenditure of Bucket 2 dollars on Commitment and Planning Support (CPS) grants should be subject to robust and transparent reporting requirements.

The 2017 CPS FPL includes a wide range of activities that could still lead to disjointed and uncoordinated planning efforts if each Council member's grant application focuses on different aspects of allowable activities. To ensure coordination of planning efforts and maximize the benefits of planning dollars, we recommend that CPS grant investments from each Council member focus on the following:

- Collaborative development of large-scale project submissions for future FPLs. We encourage the Council to pursue a holistic, science-based approach to restoration planning that seeks to identify and

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address ecosystem stressors at the watershed/estuary or regional scale. For resources that cross jurisdictions, the Council should coordinate activities among relevant agencies and with other funding streams. In places where gaps in planning efforts may impede identification of projects to advance large-scale, comprehensive restoration under Bucket 2, we encourage Council members to utilize these funds to support development of project/program options. For example, if a watershed/estuary straddles more than one state, there might be a need for two or more Council members to jointly study, prioritize and address stressors in developing a large-scale project.

In approaching this opportunity, we also strongly encourage the federal agencies on the Council to develop priorities and processes shared across agencies and with the Gulf Coast States. Different federal agencies have different roles and jurisdictions in Gulf

restoration, and the CPS grants sought by the agencies should be coordinated and reflective of their varying restoration interests and responsibilities.

- Long-term planning and leveraging across funding streams. We urge the Council to develop a 10-year funding strategy that will outline anticipated future expenditures from Bucket 2 with as much specificity as possible. As noted in the 2017 CPS FPL, these grants will assist Council members in considering the coordinated use of all DWH funding sources, and identifying their restoration priorities for Bucket 2 funds. We recognize the challenges for financing presented by the 15-year payout schedule, and also support Council efforts to identify creative conservation financing mechanisms.

- Gulfwide investments in science review, project evaluation and tracking, and adaptive management. It is also important that the RESTORE Council develop plans for project evaluation and adaptive management, as well as protocols for project tracking that are consistent across Council members and compatible with those of other restoration programs. The Council Monitoring and Assessment Program is structured to ensure this consistency, and should be adequately resourced. We also encourage the Council to develop and share protocols for project tracking and reporting out, to help keep the public updated on project progress and share restoration success stories. We recommend that the Council set aside some portion of CPS FPL funds for these purposes, which are for the benefit of the entire RESTORE program.

We are also supportive of the expenditure of CPS funds to fulfill the Comprehensive Plan commitment to update the science review process, as well as for decision-support structures and tools. For example, there may be value in funding a Gulfwide stressors analysis to inform project selection in priority watersheds.

- Coordinating regulatory efforts across Council membership. We strongly support the use of these dollars to coordinate pre-submission environmental compliance review, particularly in the case of complex projects involving multiple agencies and permitting requirements. In addition, funding could be used to evaluate regulatory barriers to implementation across projects types and watersheds, and develop collective solutions that will help advance all Gulf restoration projects. We believe such proactive coordination between federal agencies and states will result in more efficient implementation of restoration projects, and encourage the Council to identify approaches for facilitating expedient review of Bucket 2 projects.

- Promoting public engagement and strategic partnerships with stakeholders and technical experts. We encourage expenditure of CPS funds on efforts to engage the public via multiple avenues (webinar, in-person meetings, workshops) at multiple stages in the process, including during proposal development. We appreciate the Council's efforts to make meetings accessible, across geographic and language barriers. We also applaud the Council's interest in leveraging expertise through interactions and focus groups, including with the academic and non-profit communities.

We understand that many of the state and federal agencies engaged in Gulf restoration are under-resourced for the critical task at hand, and as noted above we support the use of a small percentage of Bucket 2 funds to increase agency capacity to pursue thoughtful, strategic restoration. However, we are deeply concerned that, as outlined, the reporting requirements for the CPS grants are insufficient. To that end, we suggest the following:

- The Council members will begin submitting grant applications for CPS funding in the fall. These grant applications should be made public and should be detailed enough to transparently track the commitments by each Council member and the expenditure of funds over time.
- The Semi-Annual Financial and Expenditure reports on the CPS grants should also be made public on the Council's webpage, and not only submitted through the RAAMS site.
- We strongly support the report summaries including specific details on collaboration activities, FPL-related planning, and potential project/program concepts, but we are concerned that this list of reporting items is not comprehensive of all allowable activities under the grant. Full disclosure of the detailed usage of all funds disbursed pursuant to this opportunity is essential to ensure that the Council's investments in planning and collaboration are being made to meet the commitments of the 2016 Updated Comprehensive Plan. A standardized template for reporting would be helpful in this regard.
- We also request that the Council hold a public meeting at the end of the grant period (if not more frequently) to report out on the outcomes of CPS grant activities.

Additionally, we appreciate and support the Council's intent in trying to incentivize cost-savings in the CPS effort. However, we are unclear regarding how the language in the "Ensuring Fiscal Responsibility" section will be operationalized to "take such savings into account when considering that member's proposals for future restoration funding opportunities." We request that this be clarified in the final FPL. Further, we strongly discourage consideration of CPS grant savings as a variable in project selection on future FPLs. Future projects should be evaluated based on the RESTORE Act's priority criteria, and their contributions to the goals and objectives of the Updated Comprehensive Plan - not predicated on how much a Council member "saved" or did not claim from the planning support offered. Finally, we note that the Council will evaluate in 4 years whether to extend this grant opportunity into the future. It is important to the undersigned organizations that the Council members treat these grants as a limited and one-time opportunity to do long-term planning and visioning for Bucket 2, and do not become reliant on annual grants through the RESTORE Council process. We believe that such an attitude and approach will result in more meaningful proposal submissions, and bigger-picture thinking.

Thank you for the opportunity to provide comment. We stand ready as willing partners in the restoration process.

Sincerely,

Alabama Coastal Foundation
America's WETLAND Foundation
Audubon Florida
Audubon Louisiana
Audubon Mississippi
Audubon Texas
Birmingham Audubon
Coalition to Restore Coastal Louisiana
Coastal Conservation Association - Mississippi
Conservation Alabama Foundation
Environmental Defense Fund
Florida Wildlife Federation

Galveston Bay Foundation
Galveston Baykeeper
Greater New Orleans, Inc.
Gulf Coast Regional Collaborative
Gulf Islands Conservancy, Inc.
Gulf Restoration Network
Houston Audubon
Houston Wilderness
Lake Pontchartrain Basin Foundation
Land Trust for the Mississippi Coastal Plain
Louisiana Wildlife Federation
Mississippi Urban Forest Council
Mississippi Wildlife Federation
Mobile Baykeeper
National Audubon Society
National Wildlife Federation
Ocean Conservancy
Restore or Retreat
Sierra Club - Lone Star Chapter
Steps Coalition
Student Conservation Association
Texas Conservation Alliance
The Corps Network
The Nature Conservancy
Turtle Island Restoration Network
Wildlife Mississippi

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SENT BY ELECTRONIC TRANSMISSION AND U.S. POSTAL DELIVERY

August 14, 2017

Gulf Coast Ecosystem Restoration Council
Attention: Draft FPL Comments
Hale Boggs Federal Building
500 Poydras Street, Suite 1117
New Orleans, LA 70130
Email: frcomments@restorethegulf.gov

RE: 2017 Draft Funded Priorities List: Comprehensive Commitment and Planning Support

The Mississippi Commercial Fisheries United, Inc. ("MSCFU") hereby respectfully submits recommendations to the Gulf Coast Ecosystem Restoration Council in response to solicitation for public comments on the 2017 Draft Funded Priorities List: Comprehensive Commitment and Planning Support plan. MSCFU is a non-profit business alliance registered with the Mississippi Secretary of State and tax-exempt 501(C) 6 entity with the Internal Revenue Service. MSCFU represents the common interests of Mississippi's commercial fishing industry including fishermen (and women), seafood businesses, and seafood consumers across the Gulf Coast whom relies on the natural resources of the Gulf of Mexico and surrounding state territorial waters. MSCFU members were directly impacted by the worst environmental disaster in United States history; the BP Deepwater Horizon Oil Spill of 2010, and continue to be impacted. MSCFU was originally formed as the Mississippi Gulf Coast Fishermen's Organization, Inc. in 1974 to promote and encourage improvement of the fishing

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industry in the State of Mississippi and the United States; to awaken within the public and political sectors, the status of the fishing industry and its needs; to encourage the application of educational and scientific knowledge to the fishing industry; and to promote the preservation of the natural resources of the seafood industry. Please duly consider the following recommendations regarding proposed planning and restoration activities contained herein.

As restoration projects across the Gulf Coast take shape and are implemented, the need for stakeholder engagement becomes increasingly apparent. Communities directly impacted by proposed restoration projects are becoming more aware of the need to speak up and seek inclusion in the restoration process post BP. The commercial fishing community; as represented by MSCFU feels that the quality of stakeholder inclusion, collaboration, and transparency has been largely inadequate throughout the restoration process thus far. Several restoration projects that have already been implemented have drawn harsh criticisms because certain projects are perceived by the fishing community as possibly having negative direct impacts on historic fishing grounds that the commercial fishing industry relies upon. The need to collaborate and consult with the commercial fishing community on the front end of restoration projects cannot be stressed enough. Long-time fishing industry participants are regarded as local maritime experts that possess the unique capability to assess the unintended consequences that proposed restoration projects may have on a wide variety of historically important commercial fishing grounds and marine resources. These local experts have derived invaluable traditional ecologically important knowledge from decades of at sea observations and interactions with marine resources while conducting commercial fishing activities in the areas most heavily impacted by the BP oil spill. This local knowledge of the marine habitat and resources should not go underutilized. The Council must fully understand the unintended consequences any and all proposed projects may have on commercial fisheries and commercial fishing dependent communities by ensuring restoration efforts do not run counter to the objectives of the RESTORE Act before any funding decision is considered. Relying on state conservation agencies for robust, knowledgeable input on proposed projects that promotes and protects the interests of the commercial fishing industry is something that the industry realizes it cannot be dependent upon.

To address these concerns; funds accessed from the CPS by each Council member should come with stipulations that require compensated consultation with commercial fishing industry stakeholders and/or their authorized representatives in the planning and collaboration of any related restoration activities. Just as it is costly for Council members and staff to travel around and keep up with restoration business; the same holds true for members of the commercial fishing industry. The majority of the time the industry has is spent in the field, on the water, or maintaining business operations in an unforgiving post BP era. Not only does it cost seafood industry members' significant time and resources to study and travel for restoration activities; lost incomes from time away from commercial fishing related activities are often accrued as industry stakeholders struggle to stay informed throughout the entire restoration process. Therefore, the commercial fishing community is often left out of the discussion on the front end of the restoration process and is widely underserved or misrepresented. Real, meaningful restoration projects that fully understand and assess perceived ecosystem benefits as well as potential unintended consequences cannot be fully realized until the restoration process ensures that bona fide commercial fishing industry stakeholders are thoroughly engaged, consulted, and valued throughout the entire process.

Please duly consider the recommendations contained herein in regards to the Gulf Coast Ecosystem Restoration Council's solicitation for public comments on the 2017 Draft Funded Priority List: Comprehensive Commitment and Planning Support plan. Please feel free to contact MSCFU's

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Executive Director for additional information or questions regarding the subject matter contained in this letter or in reference to concerns over other restoration projects in the implementation phase or under consideration.

Sincerely,
Ryan Bradley - Executive Director
Mississippi Commercial Fisheries United, Inc.

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Correspondence: 10

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Will questions be answered? Or can only comments be submitted?
Would establishing a new estuary program be eligible for these funds (since support of such a program would ensure programs and projects within a watershed are coordinated to ensure a common goal)?

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Will you be able to provide the slides in this presentation on your website?

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Correspondence: 12

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Given the intent for Council members to use CPS funds for collaborative planning - will multiple individual Council members be able to JOINTLY REQUEST CPS funds for large scale planning efforts? (i.e. combine CPS funds)
Thanks for the opportunity to listen and make an immediate question. Will provide more comments before the public comment ends.

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Correspondence Text

In Mississippi, does the MDEQ on behalf of the Governor apply for these planning funds or does the Governor's office apply?

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Correspondence: 14

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Correspondence Text

Why can't the Council agencies form a workgroup and develop the overall Plan and save the \$23 Million?
Will all future grant cycles be delayed until all Council partners have their plans?

PEPC Project ID: 73918, DocumentID: 81472
Correspondence: 15

Author Information

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Status: New Park Correspondence Log:
Date Sent: Jul 13, 2017 Date Received: Jul 13, 2017
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Other
Notes: Comments submitted during webinar

Correspondence Text

Will the presentation scheduled for July 25th be a repeat of this presentation or will it cover new content?

PEPC Project ID: 73918, DocumentID: 81472
Correspondence: 16

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Status: New Park Correspondence Log:
Date Sent: Jul 13, 2017 Date Received: Jul 13, 2017
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Other
Notes: Comments submitted during webinar

Correspondence Text

How will Council members be sourcing their project ideas?