

Texas Chapter of the American Shore & Beach Preservation Association

President Jerry Mohn
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June 17, 2013

Honorable Members of the Restore Act Council:

Thank you for the opportunity to submit these comments. First, let me introduce you to the Texas Chapter of the American Shore & Beach Preservation Association, an organization consisting of 12 coastal and 6 inter coastal counties of Texas. Our purpose is to preserve, restore, and protect the shorelines of the Texas Coast for future generations to enjoy by bringing together individuals, coastal professionals and academics, property owners, government entities, and groups in finding solutions.

Second, you are facing a very big and job, but the potential impact to the Gulf coast is tremendous. The RESTORE program is a unique opportunity to cause long term positive change and the decisions you make will have a lasting effect on millions of people.

There has been a great deal of discussion about which projects should or should not be implemented, and many of the proposed projects have been on the shelves of various agencies for many years. But I am asking that you take a step back from the "canned" projects that many groups are proposing; especially the acquisition projects. While acquisitions can be very good projects that are often created with noble intent, they will in effect be taking funds away from areas that are impacted daily by the offshore oil and gas

industry and are also subjected to constant erosional forces. Often these acquisition projects are located away from the gulf shoreline, but the areas to be acquired rely on the protection of a wide beach or healthy dune system to preserve their integrity. Without this protection over time the acquisition properties will become submerged and lost to future generations.

When considering which projects to fund, priority should be given to those projects that have important environmental and species benefits, as well as those projects that restore habitat for endangered species and provide upland protection. Wide beaches provide foraging habitat for many species including the Piping Plover; and healthy dunes provide nesting habitat for the endangered Kemps Ridley sea turtle and both provide protection to upland areas.

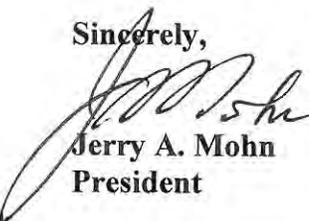
Additionally, when the oil from the Deepwater Horizon tragedy was washing ashore it was not in a vast majority of cases landing on areas that are now being considered for acquisition; instead it washed ashore on the beach. There are many funding mechanisms to acquire properties for preservation, but the funding stream for beach and dune restoration projects is much smaller.

Coastal communities are economic engines that often generate large tax revenues for State and federal governments as supported by Dr. James Houston's work to track the benefits provided by coastal restoration projects.

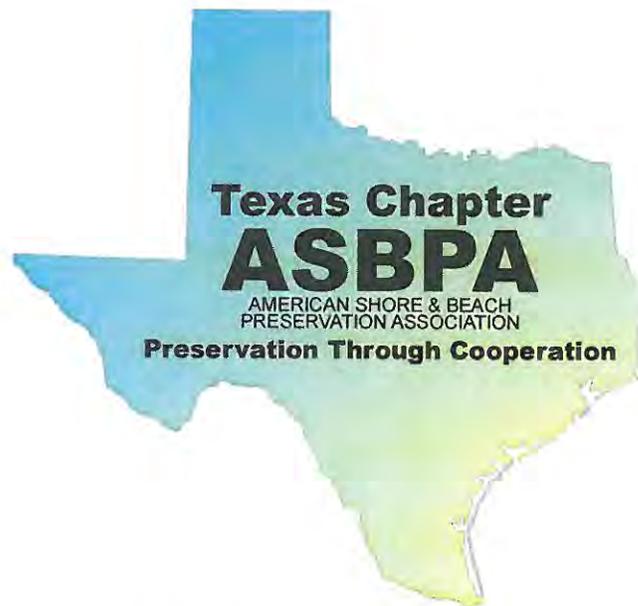
Stated simply- Beach restoration projects and dune restoration projects should be given priority consideration for funding. The upper Texas coast is a critically eroding area and following Hurricane Ike is in dire need of coastal restoration.

Thank you again for this opportunity to provide these comments.

Sincerely,



Jerry A. Mohn
President



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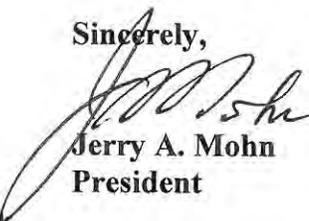
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Sincerely,



Jerry A. Mohn
President

As requested by ACF, I would like to express how I would like to see the Gulf coast to grow and be restored from the 2010 Deepwater Horizon Oil Spill, for example:

1. Ongoing chemical analysis as we attempt to restore the Gulf: Seafood conditions carefully monitored.
2. Study long-term effects; sample was done in 2010: study water, sediment, seafood, the biota and the fauna.
3. Determine how long the dispersed oil's persistence and toxicity remain in the marine environment: sand, soil, sediment, the marinelife.
3. Study other nations' approach to oil dispersants, e.g: Sweden got rid of its supplies of dispersants and its useage (BONN, 2001).
4. Identify the effectiveness of the toxicity of the dispersants vs. other means, such as collection, etc.
5. Develop a proper testing system that is accepted by all countries, specifically not manufacturers of the dispersant.
6. Determine the risks do not far outweigh the pros, or the long-terms effects on acquatic organisms.
7. Read about effects long-term effects on humans. Dr Michael R. Harbut, M.D., M.P.H., clinical professor or Internal Medicine at Wayne State University, Director of the Karmanos Cancer Institute's Environmental Cancer Program; Past chair of the Occupational & Environmental Medicine section of the American College of Chest Physicians. Chief at the Center for Occupational and Environmental Medicine, PC, Dr. Harbut has treated many patients with solvents and petroleum exposure. See details of exposure history:
<http://www.atsdr.cdc.gov/csem/esphistory/ehexposure.form.html>

I trust the above will be helpful to you

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July 2, 2013

Gulf Coast Ecosystem Restoration Council
C/o U.S. Department of Commerce
1401 Constitution Ave., NW, Room 4077
Washington, DC 20230

Re: Comments on “Draft Initial Comprehensive Plan: Restoring the Gulf Coast’s Ecosystem and Economy”

The Baton Rouge Group of the Sierra Club welcomes the opportunity to comment on the “Draft Initial Comprehensive Plan” put forward by the Gulf Ecosystem Restoration Council under the RESTORE Act. The stated purpose of the Draft Plan, to serve as “a framework to implement a coordinated region-wide restoration effort in a way that restores, protects, and revitalizes the Gulf Coast region following the Deepwater Horizon oil spill” is critically important.

While the Draft Plan is clearly incomplete, its Objectives and Goals are similar to those articulated in the Gulf Restoration Strategy released in 2011. The Preliminary List of projects and programs offered in Appendix A gives some idea of what on the ground action might look like under the process laid out in the RESTORE Act.

Several of the projects submitted by the U.S. Army Corps of Engineers are located in our area of focus, East Baton Rouge Parish and surrounding parishes. These are:

“East Baton Rouge Parish... to reduce flood damages from headwater flooding in this watershed. The authorized project calls for improving approximately 66 miles of channels in 5 sub-basins within East Baton Rouge Parish.

“Ascension Parish... Assist in developing and protecting the Parish water and waste water infrastructure.

BRSC Comments on Draft RESTORE Plan - 2

“East Baton Rouge Parish... Assist the Parish in ongoing planning and rehabilitation efforts to design infrastructure improvements and to construct sewer system modifications.

“Livingston Parish... Assist the Parish in ongoing planning and rehabilitation efforts to design infrastructure improvements and to construct sewer system modifications.” (p. 53)

Similar project descriptions are given for a number of other parishes (Iberia, Plaquemines, St. John the Baptist, etc.) The project descriptions are too brief to provide much understanding of what they actually entail. Several are clearly tied to projects authorized in the 2007 Water Resources Development Act (WRDA), which includes flood protection, ecosystem restoration, and wastewater projects.

Their inclusion seems to demonstrate an understanding that actions taken upstream have impacts downstream, and that coastal areas and the Gulf are affected by water pollution and hydrological alterations/degradation that occurs further up the watershed. Each of these three parishes (EBR, Ascension, Livingston) is undergoing rapid and largely uncontrolled growth, with pervasive impacts on their waterbodies, wetlands, natural areas, and farmland.

We have similar concerns about an additional project submitted to the list by the Corps, “Amite River and Tributaries Ecosystem Restoration” (p. 54), which is described as a “Feasibility study of structural and non-structural means for reducing environmental impacts to the Amite River Corridor.” Flooding in the Amite River basin is a direct result of the development of floodplains and the loss of the natural drainage and buffering system. Control of development in wetlands and the floodplain, as well as integrated planning efforts with parishes and local governments to ensure responsible growth policies, are clearly the solution to this problem, even if “structural” measures are necessary in some places.

We believe that it is critical that all of the Corps of Engineers projects listed here include ecosystem restoration and protection and the requirement that integrated planning take place in those watersheds. The “headwater flooding” referred to for the first East Baton Rouge Parish proposed project is not an act of nature but the result of the loss of the natural flood control system (forests, wetlands, etc.) that holds and filters floodwaters, and its replacement with impervious surfaces (roads, roofs, and parking lots.)

It is not clear what precisely “improving... channels in 5 sub-basins within East Baton Rouge Parish” entails, but merely widening channels and expanding drainage systems (culverts, etc.) will not help the

BRSC Comments on Draft RESTORE Plan – 3

water quality and flooding concerns of areas downstream. Ascension Parish in particular has been negatively impacted by the rapid flushing of drainage waters from East Baton Rouge Parish. That “flushing” reflects standard practice of trying to compensate for loss of natural flood holding capacity by draining rainwater/stormwater as rapidly as possible, without consideration of where it goes.

All of the water bodies in East Baton Rouge Parish are biologically impaired because of these trends. Only Bayou Manchac, a historic waterway that forms the boundary between EBR, Ascension, and Iberville Parishes, has a total maximum daily load (TMDL) plan, developed by the Louisiana Department of Environmental Quality under the direction of the Environmental Protection Agency to meet the requirements of the Clean Water Act. Bayou Manchac (for which a State Scenic Stream Management Plan is also being developed) drains into the Amite River, which drains into Lake Maurepas, which is in turn hydrologically connected to the coastal estuary of Lake Pontchartrain.

Ascension and Livingston Parish have similar water quality problems (as do Jefferson, St. Charles, St. Tammany and the other parishes listed in the projects and programs list). The need for the infrastructure and sewer system improvements listed as potential projects is also the direct result of rapid and unplanned development trends, and those projects will help improve water quality both in their particular areas and downstream as the bayous and rivers drain to the coast, especially if they include state of the art nutrient control and monitoring systems. For all of these projects, however, long-lasting effectiveness will require integration with broad planning efforts that include restoration of their watersheds and protection of existing wetlands and natural areas in a coordinated approach.

Sincerely,

Sam Wilcher
Executive Committee
Baton Rouge Group of the Sierra Club
11533 Robin Hood Dr
Baton Rouge, LA 70815-6161

Guadalupe, San Antonio, Mission, and Aransas Rivers and Mission, Copano, Aransas, and San Antonio Bays Basin and Bay Area Stakeholders Committee

Work Plan for Adaptive Management



May 25, 2012

***Guadalupe, San Antonio, Mission, & Aransas Rivers and
Mission, Copano, Aransas, & San Antonio Bays
Basin & Bay Area Stakeholders Committee (GSA BBASC)***

Work Plan for Adaptive Management

**Preliminary Scopes of Work
May 25, 2012**

May 10, 2012

The Honorable Troy Fraser, Co-Presiding Officer
The Honorable Allan Ritter, Co-Presiding Officer
Environmental Flows Advisory Group (EFAG)

Mr. Zak Covar, Executive Director
Texas Commission on Environmental Quality (TCEQ)

Dear Chairman Fraser, Chairman Ritter and Mr. Covar:

Please accept this submittal of the Work Plan for Adaptive Management (Work Plan) from the Guadalupe, San Antonio, Mission, and Aransas Rivers and Mission, Copano, Aransas and San Antonio Bays Basin and Bay Area Stakeholders Committee (BBASC). The BBASC has offered a comprehensive list of study efforts and activities that will provide additional information for future environmental flow rulemaking as well as expand knowledge on the ecosystems of the rivers and bays within our basin.

The BBASC Work Plan is prioritized in three tiers, with the Tier 1 recommendations listed in specific priority order. Study efforts and activities listed in Tier 2 are presented as a higher priority than those items listed in Tier 3; however, within the two tiers the efforts are not prioritized. The BBASC preferred to present prioritization in this manner to highlight the studies and activities it identified as most important in the immediate term without discouraging potential sponsoring or funding entities interested in advancing efforts within the other tiers.

As you review the plan, notice the prioritized Tier 1 efforts recommended by the GSA BBASC address specific information and data gaps that were recognized by both the BBASC and the Basin and Bay Expert Science Team (BBEST) in the previously submitted environmental flow recommendation reports. The BBASC has identified as its top priority in the Work Plan the completion of an Instream Flow study (in accordance with the SB2 Instream Flow guidelines) for the Lower Guadalupe River. The committee identified the lack of site specific biological information linked to historical flow data on the Guadalupe River as a significant limitation in the development of environmental flow recommendations for the Guadalupe River. In addition, the committee recommended two additional flow gages—one on the San Antonio River and one on the Guadalupe. The committee recommended conducting a synoptic flow study before finalizing the location of a new gage below Victoria on the Guadalupe River. The committee also prioritized studies within the bay and estuary system that will advance the level of scientific information on rangia clams; life cycle of key faunal species, particularly some of the mobile species like white shrimp and blue crab; and additional salinity studies to obtain information to better correlate freshwater inflow to salinity throughout the bay and estuary system.

The BBASC chose to devote a section of the Work Plan to addressing the importance of the Potential Strategies to Meet Environmental Flow standards as presented in Section 6 of its Environmental Flow Recommendation Report. Several of the recommended Work Plan elements will provide additional data and information to assess the application and benefit of specific strategies. The BBASC is acutely aware that new ideas and innovative approaches to allocation and management of water resources must be explored to balance diverse water uses and needs within the basin.

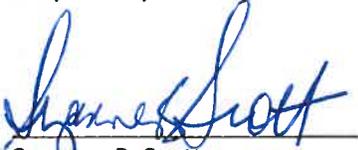
An obstacle that can't be overstated is the lack of funding to advance the body of science on the rivers and bay systems. We encourage the State of Texas to prioritize funding for the scientific studies and

activities presented in this Work Plan. As the state's population continues to grow, we are very aware that all natural resources will be stressed. It is important to have sound scientific data to assess and understand the benefits and detriments of each decision that is made. The State of Texas, river authorities and other natural resource managers are limited as stewards of these resources without access to thorough information and scientific data from which to evaluate decisions. The State of Texas continues to look at funding strategies to meet future water supply needs; we ask that as these discussions progress the State consider funding mechanisms to support the recommendation within this Work Plan. Funding will be critical to ensure that decisions related to the management of limited water supplies have the best available information to sustain the future well-being of the economy and natural resources of the State of Texas.

Lastly, the BBASC recommended a five-year review cycle for the environmental flow standards for this bay and basin area. In Section 2 of the report, we used our experience during this initial process to offer ideas for improving the timeline and effectiveness of the process for the next review cycle.

As the leadership of the BBASC, we make ourselves available to answer questions or provide more information on the recommendations within this Work Plan for Adaptive Management.

Respectfully submitted,



Suzanne B. Scott
GSA BBASC Chair



Dianne Wassenich
GSA BBASC Vice-Chair

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BBASC Tier 1 Work Plan Recommendations

BBASC Tier 1 Work Plan Recommendations			
Priority	Pg #	Study Name	Notes
1	10	Instream Flows - SB2 TIFP Guadalupe Study	
2	13	Instream Flows - Streamflow Gaging and Synoptic Flow Study	
2a	13	USGS Streamflow Gaging and Water Quality Monitoring	The gage location below Victoria is dependent upon the Synoptic Flow Study (2b)
2b	15	Synoptic Flow Measurements to Estimate Freshwater Inflow and Applicability of Lower River Gaging Stations	
3	16	Bays & Estuaries - <i>Rangia</i> Clam Investigations	
4	17	Bays & Estuaries - Life Cycle Habitat & Salinity Studies for Key Faunal Species	
5	19	Bays & Estuaries - Hydrodynamic & Salinity Model Improvements	Hydrodynamic & Salinity Model Improvements Study is dependent upon Synoptic Flow Study (2b)
6	20	Instream Flows - Full Accounting of Surface Water	

BBASC Tier 2 Work Plan Recommendations

***Disclaimer: Studies listed are grouped by type of study, not in any prioritized order**

BBASC Tier 2 Work Plan Recommendations			
Priority	Pg #	Study Name	Notes
	23	Instream Flows - Riparian Assessment and Monitoring	
	25	Instream Flows - Biological Sampling and Monitoring	
	27	Instream Flows - Geomorphic Studies and Monitoring	
	31	Bays & Estuaries - The Distribution and Abundance of Marsh Vegetation in Relation to Salinity and Elevation in the Guadalupe Estuary Delta	
	33	Bays & Estuaries - Habitat Suitability Models for Eastern Oysters, Blue Crabs & White Shrimp	
	34	Bays & Estuaries - Development of an Inundation and Salinity Model of the Guadalupe Estuary Lower Delta and Adjacent Bays	

BBASC Tier 3 Work Plan Recommendations

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BBASC Tier 3 Work Plan Recommendations			
Priority	Pg #	Study Name	Notes
	36	Instream Flows - Groundwater Studies	
	38	Instream Flows - Water Quality Monitoring	
	41	Instream Flows - Invasives	
	42	Bays & Estuaries - Nutrient Load & Concentration Monitoring	
	43	Bays & Estuaries - Role of Cedar Bayou in the Exchange of Water and Meroplankton to the Guadalupe Estuary	
	44	Bays & Estuaries - Evaluation of Sediment Transport Affecting the Guadalupe Estuary Delta	
	46	Bays & Estuaries - Sea Level Rise Associated with Climate Change	

Section 1 Legislative Mandate

Pursuant to SB3 of the 80th Texas Legislature the Guadalupe, San Antonio, Mission, and Aransas Rivers and Mission, Copano, Aransas, and San Antonio Bays Basin and Bay Area Stakeholders Committee (GSA BBASC) was charged with development of a Work Plan to be submitted to the Environmental Flows Advisory Group (EFAG) for approval.

Section 11.02362(p) In recognition of the importance of adaptive management, after submitting its recommendations regarding environmental flow standards and strategies to meet the environmental flow standards to the commission, each basin and bay area stakeholders committee, with the assistance of the pertinent basin and bay expert science team, shall prepare and submit for approval by the advisory group a work plan. The work plan must:

(1) establish a periodic review of the basin and bay environmental flow analyses and environmental flow regime recommendations, environmental flow standards, and strategies, to occur at least once every 10 years;

(2) prescribe specific monitoring, studies, and activities; and

(3) establish a schedule for continuing the validation or refinement of the basin and bay environmental flow analyses and environmental flow regime recommendations, the environmental flow standards adopted by the commission, and the strategies to achieve those standards.

Section 2 GSA BBASC Recommended Timeline for Review of Standards and Standards Update and Review Recommendations

The GSA BBASC recommends a five year periodic review cycle as opposed to the default ten year review identified in SB3 for the review of the basin and bay environmental flow analysis and environmental flow regime recommendations, the environmental flow standards and BBASC recommended strategies. Further, the GSA BBASC recommends maintaining the same five year cycle for addressing the “validation or refinement of the basin and bay environmental flow analyses and environmental flow regime recommendations, the environmental flow standards adopted by the commission, and the strategies to achieve those standards.” The tolling of the five year review clock shall commence upon the date the TCEQ formally adopts the environmental flow standards for this basin. This Work Plan was created and prioritized based upon the assumption TCEQ will adopt the GSA BBASCs recommendation to review the rulemaking process on a five year cycle.

During the GSA BBASC’s deliberations over the Work Plan elements, the committee developed additional recommendations to improve the environmental flows recommendation process as it progresses to the review and update phase. The GSA BBASC recommends clearly defining the continuing technical advisory role of the BBESTs and adequately funding the BBESTs’ continued support of the BBASCs during the required review processes. As future BBASCs are appointed, and as current

committees need to name new members to their BBESTs, the GSA BBASC recommends BBASCs consider the professional expertise of their BBEST teams, taking into consideration whether they have an appropriate balance of water resource engineers and academics. Lastly, the GSA BBASC recommends enhanced integration of the Texas Commission on Environmental Quality (TCEQ) Water Availability Department during the BBASC recommendation deliberations.

As BBASCs enter into the adaptive management phase of the environmental flows process, they will require their associated BBEST's scientific expertise and professional judgment. To our knowledge, BBESTs have not been funded beyond the initial round of recommendations. As the continued involvement of the BBESTs is critical to the success of the environmental flows process, the State should appropriately fund their participation to ensure the stakeholder groups and State agencies continue to receive the best available science as called for in the SB3 legislation. The GSA BBASC respectfully requests the 83rd Legislature address the funding needs of the environmental flows process to ensure the continued support of the appointed Basin and Bay Expert Science Teams.

The GSA BBASC also recommends that TCEQ, as the State's surface water permitting agency, should more actively support and participate in the BBEST and BBASC deliberations. Where the GSA BBASC and BBEST utilized present conditions and gage data to develop their recommendations, the TCEQ exclusively used WAM Run 3 to develop their proposed standards. These differences in methodology have led to confusion and dissatisfaction among stakeholders regarding how the proposed TCEQ standards were developed. To avoid similar situations in the future, the GSA BBASC recommends there be agreement on the models, technical tools, assumptions and data to be used for developing future standards prior to the BBEST, BBASC, and TCEQ staff entering into the first adaptive management and standards review phase. Additionally, the GSA BBASC recommends TCEQ conduct a workshop with the BBEST and BBASC during its technical analysis, thereby allowing all parties that have been intimately engaged in the environmental flows process to foster communication and support clearer understanding of the multiple layers of recommendations. The GSA BBASC believes the above outlined measures will improve communication and technical understanding by the stakeholders, which will benefit the environmental flows program in the future.

Section 3 Strategies to Meet Environmental Flow Standards; Identification, Quantification, Implementation and Measurement

In addition to requiring that each bay and basin area stakeholder committee develop recommendations for environmental flow standards, SB3 also mandates that each committee recommend strategies to meet these standards. In this context, "strategies" refers to the various ways the water needed to fulfill these recommended environmental flow protection standards could be made available for that purpose.

While the flow standards are only applicable to new water rights issued in the basin, “strategies” are distinct in that they have the potential to address environmental flow challenges that may already exist due to existing water use permits. The GSA BBEST report recognized that, based on the available science, with a few noted exceptions, a sound ecological environment exists in these rivers, bays and estuaries today. However, during the GSA BBASC deliberations, GSA BBEST members presented additional analysis regarding the potential impact that full utilization of existing water rights could have on flows. The additional information raised concerns among GSA BBASC members that the “sound ecological environment” found today could change, particularly during lower flow times of the year, as existing water rights are more fully utilized. For this reason, the identification, quantification and implementation of strategies to meet environmental flow standards is of particular interest to the GSA BBASC.

It is recognized that a robust effort to pursue strategies to meet environmental flow protection goals offers those within the watershed a unique opportunity to work collaboratively towards the goal of protecting a sound ecological environment while also meeting human water supply needs. For example, one piece of the stakeholder recommendations includes a dedication of the equivalent of 10 percent of the firm yield of a new water supply permit to the bay and estuary system. Because new permit-holders are able to provide the 10 percent dedication by implementation of strategies, there is significant flexibility in how this requirement can be met and can therefore catalyze creative solutions.

The GSA BBASC included a list of voluntary strategies in their Recommendations Report (see Strategy Options for Achieving Environmental Flow Standards listed below) as well as some initial work to quantify the potential of three of those strategies. Although this is a start, there is much more work that needs to be done in order to better understand which strategies might be most effective in helping to meet the environmental flow standards. For the next phase, a more extensive effort to determine, on a site-specific basis, which strategies can effectively be used to fulfill which parts of the flow regime recommendations is needed.

This next phase needs to include several steps:

- 1) Identifying potential strategies for evaluation to determine their ability to help meet the environmental flow standards,
- 2) Developing detailed plans for evaluating these strategies,
- 3) Performing evaluations to quantify the effects of identified strategies,
- 4) Preparing recommendations of strategies that should be pursued,
- 5) Working to implement recommended strategies, and
- 6) Performing measurements of strategies implementation

Data and Tools Needed for Achieving Environmental Flow Standards

In section 4.4 of the GSA BBASC Environmental Flows Recommendations Report, there are several items identified that will be critical in validating or refining the environmental flows standards and that pertain to the evaluation and implementation of strategies to meet the standards. These include:

- Data review and analysis - It is recommended that all relevant hydrological (surface water and groundwater), biological (instream and riparian), water quality, and geomorphologic data be collected and reviewed to the extent possible during each SB3 review cycle. This supplemental data could prove valuable when determining whether SB3 surface water environmental standards and rules are achievable as implemented. Additionally, this information could serve an important role in guiding any potential modifications to ongoing SB3 studies and monitoring.
- Evaluate additional support and funding for TCEQ South Texas Water Master Program
- Evaluate and advise on web-based technology to facilitate compliance with environmental flow permit conditions.
- **Secure agreement from TCEQ to perform a full accounting of all existing surface water use within the basin to allow for more accurate model projections of current and future water needs**
 - A more accurate accounting of actual surface water use, including an estimation of riparian and domestic and livestock (D&L) use will improve data used for water availability models while providing information to determine if existing water rights could be voluntarily repurposed to assist in meeting flow standards.
- **Improve access to and management of historical TCEQ data on wastewater return flows in order to improve understanding of the role wastewater return flows have in providing flows for environmental purposes**
- **Explore the addition of stream gages in the lower basin to increase data to more accurately measure the contribution of river flows to the bay and estuary system**
- **Update the Guadalupe – San Antonio Water Availability Model (GSA WAM) used by TCEQ for permitting**
 - The current period of record for the GSA WAM is 1934 through 1989 (56 years). The exclusion of the most recent 22 years of data in the model causes credibility issues with the data because many of the recent high flow and drought events are not included in the model. Furthermore, a longer period of record would provide more complete data for the next round of GSA BBASC Recommendations regarding the attainment frequencies associated with the Environmental Flow Standards Recommendations for the Guadalupe and Mission-Aransas Estuaries (Section 4.2).

Strategy Options for Achieving Environmental Flow Standards

- **Explore the donation, sale or lease of new or under-utilized water permits**
 - Willing water permit holders donate, sell or lease all or part of their permit so that water could stay in the stream for environmental flow protection. Permit would be changed to add instream and/or bay and estuary use. To be most effective, these permits would need to be firm water that is fairly senior.

- Use of a water trust can be helpful for keeping track of water dedicated for environmental flow purposes.
- **Dedication of wastewater return flows**
 - Dedication of permitted wastewater return flow toward environmental flow needs. The wastewater could be generated by a new permitted project, an existing project or through agreement or voluntary commitment of wastewater generated by a municipality. Water quality should be considered.
- **Dry Year Option (for Irrigation Permit)**
 - Agricultural water rights holders could be compensated for not diverting water during dry years. Priority should be given to agricultural water rights that have recent historical use. This approach reduces instream water use during critically dry periods in order to increase flows.
- **Increase storage of water for releases for environmental flows**
 - Additional storage could be added to projects to store water during higher flows to allow for releases to support the river/bay system during low flow periods when flow is needed.
 - Develop project to store surface water during higher flows (surface storage or aquifer storage and recovery) to have a solely dedicated source for environmental flows during drier times.
- **Dedication of Conserved Water from Current Permits to Environmental Flows**
 - Permit holders could voluntarily commit water that is saved through conservation methods to environmental flows. Most applicable to Agricultural or Municipal water permit holders.
 - Possible Environmental Quality Incentives Program (EQIP) funding for agricultural conservation practice/s and other available federal funding.
- **Facility Optimization to Enhance Environmental Flows**
 - Modifying a facility's operation and/or schedule of releases can help provide environmental flows. The amount and timing of releases can attempt to better mimic the natural flow patterns of the river system, thereby protecting environmental flows. This can be done to an individual facility or to multiple facilities in a watershed for an additive effect.
- **Water Rights Management**
 - The existing location and timing of diversions of water rights in the basin may inhibit opportunities for better resource management that could help support environmental flows.
 - Combinations of opportunities may exist whereby water right diversion points could be relocated, older rights used in conjunction with new water rights, or new water rights used

in conjunction with currently unused rights to improve delivery efficiencies to both water users and the environment. Contractual agreements will be necessary.

- **Set-asides of Unappropriated Water**
 - Some or all of unappropriated flow within the basins could be left in the river or removed from the amount of water available for future permitting. SB3 contemplates set-asides of unappropriated water by TCEQ.

- **Reduction of Groundwater Pumping**
 - Reducing groundwater pumping can allow springs to provide river baseflows.

- **Land Stewardship Programs**
 - Local, regional, state, and federal incentives for landowners to use good land management practices which will put more water into the water table.

- ***Riparian Zone and Wetland Restoration and Stewardship***
 - Proper stewardship of riparian zones on the basin's creeks and rivers can build up the in-bank water holding capacities which serve to maintain base flows during dry periods and provide a healthy riparian habitat for both aquatic species and other wildlife. Flood attenuation and improved water quality are additional benefits resulting from proper stewardship of riparian zones.
 - Restored and healthy wetlands on the rivers or on the Gulf provide very productive wildlife habitat, filtering and cleansing actions desirable for inflows, and protection for inland communities from hurricanes.

- ***Watershed or Catchment Stewardship***
 - A well-managed, healthy watershed not only provides a desirable livestock and wildlife environment, but increases groundwater penetration and recharge, reduces floods and provides other benefits.
 - Karst limestone watersheds are common across the Hill Country and Edwards Plateau, selective brush management and subsequent improved rangeland management has proven to sometimes increase ground recharge and springflows. Normally, Ashe juniper (cedar, mountain cedar) has been the target brush species, but in other cases mesquite control has produced desirable hydrological benefits.

- **Water Dedication from Existing Permits**
 - Some permit holders may be willing to have conditions placed on their permits, such as a certain percent or set amount of the water being dedicated to provide environmental flows.

- **Municipal, Industrial, Mining and Agricultural Conservation to reduce water use and demand**

- Each city, town and water utility, both large and small, should set goals to lower future surface and/or groundwater use using a conservation program which best fits their situation for both the utility and customers. The goal would be to reduce per capita water use and reduce demand for river diversions.
 - Effective conservation programs/strategies include: stringent leak detection, low water use appliances, inverted pyramid rate structures, customer education program, rainwater harvesting, use of recycled water and gray water, and others.
 - Agricultural irrigation conservation including installation of efficient of water delivery systems (canal, pipelines, etc.), improve center pivot systems, add in-ground moisture monitors, improve crop varieties and other farming methods.
- **Develop conjunctive use water projects**
 - To reduce reliance on surface water, water project developers should be encouraged to develop conjunctive use water projects using both groundwater and surface water. Better data on groundwater availability is now available for defined Groundwater Management Areas and modeled available groundwater reports to the TWDB increasing the certainty of groundwater use planning.
- **Develop alternate water supplies**
 - Alternative water supplies such as desalination of brackish groundwater or seawater desalination offer options to surface water usage and can provide additional water that could be stored and released for environmental flows.
- **Programs addressing logjam removal**
 - A logjam removal program could yield flow benefits to the bay and estuaries and improve stream bed conditions as well as riparian health in associated areas of the basin.

The GSA BBASC recognizes that voluntary implementation of water use and management strategies will improve the effective use of limited surface water within the basin particularly during the driest times when water is in its highest demand and flows are at their lowest. Implementation of strategies is also a vital component toward reaching recommended flow attainment targets while achieving a balance between water supply and environmental needs.

Section 4 Work Plan for Adaptive Management Elements

Pursuant to SB3 of the 80th Texas Legislature, as quoted below, the GSA BBASC was charged with development of a Work Plan to be submitted to the Environmental Flows Advisory Group (EFAG) for approval. With the assistance of the Guadalupe, San Antonio, Mission, and Aransas Rivers and Mission, Copano, Aransas, and San Antonio Bays Basin and Bay Expert Science Team (GSA BBEST) the GSA BBASC began to identify subject areas deemed appropriate for monitoring, studies, and activities in their Recommendations Report submitted on September 1, 2011. Although the GSA BBASC

Recommendations Report provided a list of potential Work Plan activities, the list was neither complete nor prioritized. Similarly, Section 7 of the GSA BBEST Recommendations Report identified a developing list of monitoring, studies, and activities deemed appropriate to better inform, support, and adaptively manage environmental flow standards.

To begin addressing identified data gaps the GSA BBASC with the assistance of the GSA BBEST developed “scopes of work” for the monitoring, studies, and activities relevant to the subjects of interest in accordance with guidance from the Science Advisory Committee (SAC). These “scopes of work” focus on the what, why, where, when, who, and cost associated with each subject in order to facilitate these efforts being commenced. The scopes of work and identified strategies constitute the great majority of this Work Plan.

Work Plan subjects identified by the GSA BBASC and/or the GSA BBEST have been categorized based on relevance to instream flows and freshwater inflows to bays and estuaries are listed in Tables 6.0-1 and 6.0-2¹ of the GSA BBASC Recommendations Report. These Work Plan subjects have since been reviewed, revised, edited, and in some instances condensed and combined. The consolidation of some study scopes was accomplished in two workgroups with one focused on instream efforts and the other on bay and estuary issues.

The instream workgroup prioritized their top ten issues while the bay and estuary workgroup did the same for coastal inflow data gaps. The prioritization criteria considered by the instream workgroup included: required time to complete a study; significance of the data gap; connectivity to river/ bay; most influence on inflows; impact on aquatic, estuary, riparian; sequential nature of studies; urgency to address damage areas; and available funding opportunities and costs. The bay and estuary workgroup prioritization criteria considered whether the proposed studies will have a direct influence on the understanding of the current environmental-flow recommendations; promotion of understanding of e-flows and the role of freshwater inflows; availability of funding opportunities; the ability to complete the proposed projects within the planning process; and the potential for funding and resource partnerships. To finalize the Work Plan prioritization, the two workgroups held a joint meeting and agreed that a three-tiered prioritization approach was sufficient to fulfill their legislative mandate and would provide adequate notice to the scientific community which studies were most important to fill data gaps as long as the studies recommended in Tier 1 were numerically prioritized.

The GSA BBASC decided to prioritize the Work Plan elements into three tiers with only those study elements in Tier 1 being numerically prioritized. The GSA BBASC believes the most critical studies and efforts to address known data gaps have been identified and ranked in Tier 1. The studies and efforts in Tiers 2 and 3 were not individually ranked based on the belief that these items are relatively equal in importance. There was much discussion amongst the GSA BBASC regarding the potential for unintentionally diminishing the importance of the Tier 2 and 3 identified studies. Rather than

¹ See Appendix

sequentially ranking these remaining studies, the GSA BBASC chose to group them according to timeline considerations and data gap importance.

TIER 1 Priorities

SENATE BILL 2/TEXAS INSTREAM FLOW PROGRAM (SB2/TIFP) STUDIES ON REMAINING RIVERS IN BASIN

GSA BBASC Priority #1 Instream Flows – SB2/TIFP on Guadalupe

Dependencies/Links: Though not dependent upon, but linked to several recommended studies, the GSA BBASC recommends a Senate Bill 2 (SB2)/Texas Instream Flow Program (TIFP) Study on the Guadalupe River. The GSA BBASC recommends the study first focus on the lower Guadalupe River below Canyon Reservoir followed by a study of the Guadalupe River above Canyon Reservoir. Additionally, several recommended studies in the GSA Work Plan for Adaptive Management will contribute data to these SB2/TIFP studies.

What: In addition to the on-going collaborative efforts in the lower San Antonio sub-basin, the TIFP has the lower Guadalupe River below Canyon Reservoir listed as a primary priority site and the Guadalupe River above Canyon Reservoir listed as a secondary priority site. These rankings suggest the TIFP will be pursuing future studies in these river basins. The GSA BBASC benefited from the interim TIFP study report that provided the committee information connecting biological data to flow levels at specific sites along the Lower San Antonio River and Lower Cibolo Creek. The ability to tie biological data to observable flow levels was critical to the committee's environmental flow recommendations for the Lower San Antonio River and the GSA BBASC believes similar data on the Guadalupe will be equally beneficial for the next round of recommendations. As such, during BBASC Instream work group deliberations, the need for a SB2 study on the lower Guadalupe River was echoed and unanimously supported. To meet these ends, a SB2 study on the lower Guadalupe River below Canyon Reservoir is recommended as a Tier 1 priority. The GSA BBASC recommends the TIFP studies on the Guadalupe be conducted in accordance with the TIFP Technical Overview (TIFP 2008).

As noted above, the TIFP along with SARA recently conducted a TIFP SB2 study on lower San Antonio River and lower Cibolo Creek. A detailed description of that study is presented in the interim progress report prepared by the TIFP (TIFP 2011). Importantly, the results from that study were integral to the GSA BBASC environmental flow recommendations and carried forward into TCEQ rulemaking. Table 1 provides an overview of 1) the SARA/TIFP sponsored SB2 component studies in the lower San Antonio sub-basin that are still in progress; 2) applied

research efforts that have been identified during that study which may improve the ecological understanding of the aquatic and riparian communities and their relationship to flow; and 3) specific long-term monitoring recommended. Individual scopes for SARA/TIFP activities are not presented in this BBASC report, but can be obtained by contacting project sponsors.

Finally, additional rivers for consideration by the GSA BBASC for potential instream flow program type studies include the lower San Marcos River, Blanco River, Medina River, and Mission River. Should future projects appear targeted for these river systems, it may be prudent for the GSA BBASC to consider and support TIFP related studies on these specific rivers, in order to fill data gaps on ecological knowledge and flow-ecology relationships within these systems.

Why: The GSA BBASC recognized the importance of tying site specific biological data to flow levels when they largely adopted the TIFP recommendations for the Lower San Antonio River. A similar level of study effort would be beneficial to the understanding of the Guadalupe River Basin too.

Where: Guadalupe River below Canyon Reservoir is first priority however SB2 type studies are also recommended for the lower San Marcos River, Blanco River, Medina River and Mission River.

When: Begin on the Guadalupe River below Canyon Reservoir as soon as possible.

Who: TCEQ, TPWD, TWDB, GBRA, and stakeholders

Cost: \$1,000,000 – \$2,000,000

**Table 1. Texas Instream Flow Program
Lower San Antonio River and Lower Cibolo Creek Ongoing Activities**

COMPONENT		SUBJECT
BIOLOGY		
Instream	Studies	Life history research on focal species
		Macroinvertebrate community / substrate disturbance evaluation
Seasonal fish sampling		
	Monitoring	Specific flow/temperature driven sampling for fish and mussels
		Long-term annual fisheries sampling
Riparian	Studies	High flow pulse effects on riparian communities
		Development of a mechanistic ecosystem model of ecological interactions of high flow pulses and riparian communities
	Monitoring	Long-term annual monitoring of select riparian transects
		Long-term (every 10 years) limited tree-ring coring analysis to assess riparian productivity relative to total annual volume
WATER QUALITY		
	Studies	Water quality modeling for Cibolo Creek, if warranted
	Monitoring	Specific water temperature and dissolved monitoring at Cibolo Creek during subsistence flow conditions
GEOMORPHOLOGY		
	Studies	2D hydraulic modeling to evaluate channel change with discharge
	Monitoring	Long-term (every five years) select channel cross-sections within study sites to assess potential changes in channel configuration

GSA BBASC Priority #2

Instream Flows - Streamflow Gaging and Synoptic Flow Study

USGS Streamflow Gaging and Water Quality Monitoring

Dependencies: The location of the recommended gage below Victoria will be dependent on the **Synoptic Flow Study**; however, the **Stream Flow Gaging** will utilize existing gages that are in place the entire period of the study. Additionally, efforts might include sediment collection as described in **Tier 3 Bay & Estuary study: Evaluation of Sediment Transport Affecting the Guadalupe Estuary Delta**

What: The San Antonio River Authority and GBRA, U.S. Army Corps of Engineers (USACE), Edwards Aquifer Authority (EAA), CPSE, SAWS, and TWDB annually enter into a cooperative funding agreements with the U.S. Geological Survey (USGS) to support multi-purpose water quality and stream flow monitoring programs. The programs support the annual operation and maintenance of stream flow gages and water quality gages within the San Antonio, Guadalupe, and Mission River watersheds (Table 2). It is recommended that additional funding partners be identified, and cooperative funding agreements and monitoring programs be continued into the future. Additionally, it is recommended that a gage be installed on the Guadalupe River at SH 35 in Refugio County, downstream of the GBRA Salt Water Barrier and Diversion Canal, and a gage be installed on the San Antonio River upstream of the CPSE diversion. Funding partners need to be identified for the new sites. For the downstream Guadalupe River location, the synoptic flow measurements estimating freshwater inflow and applicability of lower river gaging stations is a prerequisite task for completion to this effort to inform the most efficient placement and design for this gage.

Why: Maintaining the existing network of stream flow gages at each monitoring site and establishing new sites as recommended above will provide water resource managers and agencies comprehensive flow records that can be compared with biological, habitat and water quality information into the future.

Where: San Antonio, Guadalupe and Mission River basins.

When: Contract annually over the next 10 years.

Who: USGS with funding support from SARA, GBRA, USACE, EAA, CPSE, SAWS, TWDB, TCEQ, TPWD, TSSWCB, and stakeholder agencies.

Cost: To be determined, for existing sites expected to be about \$340,000 annually. The installation of a new gage site and operation and maintenance (O&M) for the first year is \$25,000; annual O&M costs for subsequent years are \$16,000.

Table 2. USGS gage stations and funding related to BBASC Recommendations

EXISTING Gage Location	Cooperator	Cooperator Funds	USGS Funds/ NSIP Funds	Total EXISTING Cost
Guadalupe River at Comfort	GBRA/USACE-FW	\$1,545 \$2,265	\$13,900	\$17,710
Guadalupe River near Spring Branch	GBRA/USACE-FW	\$9,310 \$2,265	\$4,590	\$16,165
Blanco River at Wimberley	USACE-FW	\$1,545	\$13,905	\$15,450
San Marcos River at Luling	GBRA/USACE-FW	\$1,545 \$720	\$14,730	\$16,995
Plum Creek near Luling	NSIP		\$15,450	\$15,450
Guadalupe River at Gonzales	GBRA/USACE-FW	\$5,925 \$7,725	\$1,800	\$15,450
Sandies Creek near Westhoff	NSIP		\$15,450	\$15,450
Guadalupe River at Cuero	GBRA/USACE-FW	\$9,310 \$2,265	\$4,590	\$16,165
Guadalupe River at Victoria	GBRA/USACE-FW	\$1,545 \$720	\$14,730	\$16,995
Medina River at Bandera	EAA	\$10,350	\$5,100	\$15,450
Medina River at San Antonio	SARA/NSIP	\$41,230	\$300 \$13,600	\$55,130
San Antonio River near Elmendorf	CPS/SAWS	\$9,350 \$49,280	\$6,100 \$0	\$64,730
San Antonio River near Falls City	TWDB	\$8,250	\$7,200	\$15,450
Cibolo Creek near Falls City	NSIP		\$15,450	\$15,450
San Antonio River at Goliad	TWDB/USACE-FW	\$2,060 \$11,590	\$1,800	\$15,450
Mission River at Refugio	TWDB	\$8,250	\$7,200	\$15,450
Total Annual Existing Cost		\$187,045	\$157,115	\$342,940
Proposed NEW Gages	Cooperator	Installation	Annual Maintenance	Total NEW Costs
San Antonio River upstream of the CPSE diversion	To be determined	\$25,000	\$16,000	\$41,000
Downstream of the GBRA Salt Water Barrier and Diversion Canal	To be determined	\$25,000	\$16,000	\$41,000
Total NEW Costs		\$50,000	\$32,000	\$82,000
Total Annual Program Costs (Existing and New)				\$374,940

Synoptic flow measurements to estimate freshwater inflow and applicability of lower river gaging stations

Dependencies: The Synoptic Flow Study could affect other recommended studies such as Riparian, Biological and Geomorphologic Monitoring as well as the Hydrodynamic Salinity Modeling and Marsh Inundation and Salinity Models.

What: Subject to high flow conditions in the Guadalupe River, flows may pass through cuts in the banks of the river and make their way into the Guadalupe Estuary via Schwings, Hog, and/or Goff Bayous passing near or through Green Lake. Hence, the streamflow gaging station on the Guadalupe River near Tivoli (USGS# 08188800) does not measure all Guadalupe River flows passing Victoria and Bloomington that contribute freshwater inflow to the estuary under high flow conditions. Subject to average and low flow conditions, however, this gage does provide a reasonably accurate measure of the combined flows of the Guadalupe and San Antonio Rivers, but diversions into the GBRA Calhoun County Rural Water Supply System (Calhoun Canal System) must be subtracted and discharges (return flows) into the Victoria Barge Canal must be added to calculate measured freshwater inflow to the Guadalupe Estuary. At the present time, diversions into the Calhoun Canal System are measured where the Main Canal passes under State Highway 185. While no water has been diverted for consumption by GBRA or its customers between the Guadalupe River and this measurement point, gravity diversions from the river have passed through gates on the left bank, a diversion canal west of Green Lake, Hog Bayou, a diversion canal south of Green Lake, Goff Bayou, inverted siphons under the Victoria Barge Canal, Dow's Main Pump Station, an above-grade canal and underground conduits on Dow property, and a short segment of the Main Canal. Although any water leaving the river and not measured at SH185 still contributes inflow to the Guadalupe Estuary and/or sustains delta area wetlands and riparian vegetation, improved understanding of the fate of such unaccounted water could lead to improved gaging methods, more accurate modeling of estuarine systems, and/or more efficient management for water supply and/or ecological purposes. Streamflows in the lower San Antonio River below McFaddin are split between the San Antonio River and Elm Bayou before discharging into the Guadalupe River a short distance upstream of the USGS streamflow gaging station identified as the Guadalupe River near Tivoli. Further investigation of this split in terms of variation with streamflow magnitude, floodplain inundation, geomorphology, and ecological effects may provide insights as to whether interventions (e.g., channel forming, bank stabilization, levee construction, etc.) would have associated benefits.

For a range of flows in the Guadalupe and San Antonio Rivers and in the Calhoun Canal System, this work item includes performing synoptic flow measurements at multiple locations in the rivers, bayous, and Calhoun Canal System to ascertain the course(s) of measured flows. Using the results of these synoptic flow measurements, an assessment of

the potential benefits of alternative or supplemental gaging stations and/or interventions will be conducted.

Why: Improve understanding of flow patterns in the lower Guadalupe – San Antonio River Basin and proximate bayous and water courses affecting riparian wetland habitats and freshwater inflows to the Guadalupe Estuary and to determine gage placement and design for GSA BBASC Priority #2, Instream Flows – Streamflow Gaging and Synoptic Flow Study, *USGS Streamflow Gaging and Water Quality Monitoring*.

Where: Guadalupe River below Victoria, San Antonio River below McFaddin, and proximate floodplain and delta areas

When: Two year study which will include at least four synoptic measurements with high and low river flows and high and low Calhoun Canal System flows.

Who: Flow measurements, hydraulic analyses, and gaging location assessments by USGS, River Authorities, State agencies, and/or technical consultants; geomorphological and ecological assessments by technical consultants and/or universities.

Cost: \$25,000 per set of synoptic measurements; \$50,000 for hydraulic analyses and gaging location assessments; and \$25,000 for geomorphological and ecological assessments.

GSA BBASC Priority #3 Bays & Estuaries - *Rangia* Clam Investigations

What: *Rangia* Clam Investigations

Why: In Section 7.1.2.2 of the GSA BBEST Environmental Flows Recommendation Report, the BBEST recognized the need for additional efforts related to *Rangia* clams more specifically as follows:

1. Implement investigation of the location-specific reproductive requirements of *Rangia* clams. These requirements are the very core of the BBEST work with this species and were assumed equal to those found in literature derived from studies in other Gulf and Atlantic Seaboard states.
2. Develop a better assessment of the distribution and abundance patterns of *Rangia* in the Guadalupe and Mission-Aransas Estuaries via appropriate sampling design and field equipment. TPWD data was used by BBEST, but this data essentially reports incidental catch since TPWD and others do not sample specifically for *Rangia*.

Item (1) is partially covered in an ongoing investigation into salinity patterns as a driver of population spatial coverage, but that work assumes the reproductive requirements are consistent with existing literature. More specific information needs to be pursued via laboratory assessments or intensive field test and monitoring.

Additionally, information regarding the salinity suitability curve / habitat modeling approach for oysters referenced as part of GSA BBASC Tier 2 Priority, Bays & Estuaries – Habitat Suitability Models for Eastern Oysters, Blue Crabs, & White Shrimp would support refinements in the *Rangia* habitat modeling refinements

Where: Site specific studies in the upper brackish portions of the Guadalupe and Mission-Aransas Estuaries for *Rangia* items (1) and (2).

When²: 1) reproductive requirements of *Rangia*: 18-24 months from initiation
2) distribution and abundance patterns of *Rangia*: 2-4 months from initiation for each estuary

Who: Mission Aransas National Estuarine Research Reserve (NERR), additional field and/ or laboratory assessments by university private contractor(s) or university(ies)

Cost: 1) lab or field study probably in range of \$80,000 - \$90,000
[basis: 1 grad student full time employee (FTE) for 18 months at \$20/hr. and ¼ FTE supervisory for 18 months at \$35/hr.]

2) distribution and abundance patterns of *Rangia*: approximately \$50-60,000 or \$25,000-30,000 per estuary [basis: similar study performed by contractor on Sabine Lake during Sabine-Neches BBEST work]

GSA BBASC Priority #4 Bays & Estuaries - Life Cycle Habitat & Salinity Studies for Key Faunal Species

What: Life cycle habitat & salinity studies for key faunal species

Why: As described in sections 4.1.5 and 4.3.1 of the GSA BBEST Environmental Flows Recommendation Report, recruitment of post-larval and juvenile life history stages of many species may depend on freshwater inflows producing regions of reduced salinity within estuaries, and some species may derive enhanced benefit from these salinity reductions

² note these are study durations, not billable hour / cost estimates.

occurring during particular seasons. Spring rains may reduce salinities in coastal estuaries for several months due to the long turnover times of most bays on the south Texas coast. This freshwater inflow also provides nutrients that stimulate primary productivity that helps enhance the productivity of the entire food web. Although the BBEST originally planned to use the white shrimp (*Litopenaeus setiferus*) and blue crabs (*Callinectes sapidus*) as key species for characterizing freshwater inflow needs of the Mission-Aransas and Guadalupe estuaries, after review of available data from TPWD, review of the published scientific literature and consultation with local and national scientific experts, it was the consensus of the BBEST that the relationships between freshwater inflow and abundances of these key species were not direct, but included other complex factors that would require additional study.

- How:** An initial approach would include additional review of scientific literature and existing data sets to identify the most likely factors that complicate the relationships between salinity and the abundances of key species such as white shrimp and blue crabs. Once these factors are determined, field and/or laboratory studies can be designed to understand how these additional factors interact with salinity to affect the populations of these key species. Hopefully, these additional scientific studies will guide future efforts to determine environmental flow requirements of Texas estuaries based on the requirements of these valued key species.
- Where:** Entire basin, or initial study within San Antonio Bay, with its higher freshwater inflow and more consistent salinity gradient.
- When:** Six months for dedicated review of literature and available data. The results of the dedicated review of literature and additional data will assist in determining; recommended additional studies
- Who:** Literature review and data review by university investigator, RFP for additional studies issued through Sea Grant or comparable agency and Mission Aransas National Estuarine Research Reserve (NERR)
- Cost:** Literature and data review: \$35,000 [basis 1 FTE for 6 months at \$35 per hour]
Field/laboratory studies TBD. Additional costs could not be determined however costs could likely be significant.

GSA BBASC Priority #5

Bays & Estuaries – Hydrodynamic & Salinity Model Improvements

Dependencies: The Hydrodynamic & Salinity Modeling Improvements study could be dependent on the Synoptic Flow Study

What: Improvements to the TxBLEND Hydrodynamic and Salinity Transport Model (TxBLEND Model)

Why: As described in Section 4 of the GSA BBEST Recommendations Report and in two memos from the TWDB to the BBEST (described therein as TWDB 2010a, 2010b) there are certain inflow conditions and certain geographic areas of the Guadalupe and Mission-Aransas Estuaries that have proven difficult for the TxBLEND Model to predict salinity accurately. There is also new salinity monitoring data from fixed stations in the Mission-Aransas National Estuarine Research Reserve (NERR). Given this information, Section 7.1.2.1 of the GSA BBEST Environmental Flows Recommendation Report recognized the need for additional efforts to calibrate and improve TxBLEND model performance. Possible model improvements include: (1) improving the model grid (*e.g.*, update bathymetry, increase grid resolution, move the freshwater boundary upstream, or improve spatial representation of inflow points); (2) improving estimates of hydrology and freshwater inflows to the bay; (3) improving spatial representation of precipitation falling on the bay (through use of NEXRAD data); (4) improving spatial representation of evaporation from the bay; (5) and improving model coefficients.

During deliberations of the GSA BBASC, concerns were raised about the potential for some error in the technique of estimating inflows to the Guadalupe Estuary in particular. Because TxBLEND requires inflows to the bay as a principal model input, any recommendation or improvement to inflow estimates will be included for model calibration. The GSA BBASC has a proposed study (see the Instream Flows Workplan Synoptic Flow Study) to improve estimates of freshwater inflows. In addition, TWDB maintains estimates of freshwater inflows to the estuary and continually works towards improving datasets on diversions and return flows as well as estimates of rainfall-runoff in ungaged watersheds.

Where: This study proposes a systematic re-examination of the TxBLEND model domain across various inflow levels to identify underperforming spatial areas and inflow conditions. The previous TWDB and BBEST efforts identified problematic TxBLEND performance in the upper portion of the Guadalupe Estuary and in the Copano Bay portion of the Mission-Aransas Estuary. For the upper portion of the Guadalupe Estuary, the TWDB previously identified certain inflow-salinity characteristics that are more challenging for TxBLEND to predict.

When³: 12-20 months from initiation. 6-10 months for model reassessment, including incorporation of any improved inflow estimates, alterations of inflow locations, modification of model grid, evaporation or precipitation techniques and gathering additional inflow and salinity data for a longer period of record. 6-10 months to recalibrate and validate model, including an interactive feedback meeting with outside peer group.

Who: TWDB with potential support / data from other State agencies, Guadalupe-Blanco River Authority, and the Mission Aransas National Estuarine Research Reserve (NERR)

Cost: model refinements: \$50,000 - \$84,000
[basis: 1 FTE for 9-15 months at \$35/hr.]

GSA BBASC Priority #6

Instream Flows - Full Accounting of Surface Water

Dependencies/Links: The Tier 3 Instream Flow – Groundwater Studies: Impacts of Groundwater Withdrawals on Upper Basin Streamflows

Exempt Uses of Surface Water

What: The common law, state statutory law and early Spanish and Mexican law recognize a landowners right to take water from a stream that abuts one's property for domestic and livestock use, and such right is excluded from the appropriation and permitting system. As far back as 1895, it was recognized that a landowner had the right to build a dam, reservoir or lake on his property and impound water for the landowner's drinking purposes and the watering of livestock. The law has continued to evolve and in 1971 the exemption was modified to allow broader uses of the water. The volume and size of the reservoir is governed by the construction date of the reservoir. Those reservoirs constructed after 1953 can impound no more than 200 acre-feet of water. These reservoirs can include vanity ponds, stock tanks and flood control structures. By the nature of their construction, these ponds impound water that would, without their presence, flow into the waters of the state; however, these impoundments are not subject to conservation or curtailment by the South Texas Water Master in times of drought. The impact of these ponds on the surface waters of the Guadalupe, San Antonio and Mission River basins has not been quantified. A study is recommended to quantify the number of exempt use reservoirs. This study would also quantify the amount of water impounded annually based on watershed size, and map the reservoirs using GIS or Google Earth. Additionally, the impact of domestic and livestock use uses on the surface waters of the Guadalupe, San Antonio and Mission River basins has not been quantified. These riparian uses are not presently subject to curtailment by the South

³ note: these are study durations, not billable hour / cost estimates.

Texas Water Master in times of drought. This study would quantify the volume of domestic and livestock uses in each river basin by visibly inspecting the river channels for pumps and pipelines that remove water from the stream and create a map of these riparian diversions using GIS or Google Earth. The overall study including both the exempt reservoirs and domestic and livestock use components would be made available to TCEQ and the South Texas Water Master.

Why: The development of management strategies aimed at ensuring attainment of recommended flow regimes can be informed by understanding the number and location of exempt use reservoirs, the amount of water impounded annually based on watershed size, and the volume and location of domestic and livestock use in each river basin.

Where: Guadalupe, San Antonio and Mission River basins

When: Three year study

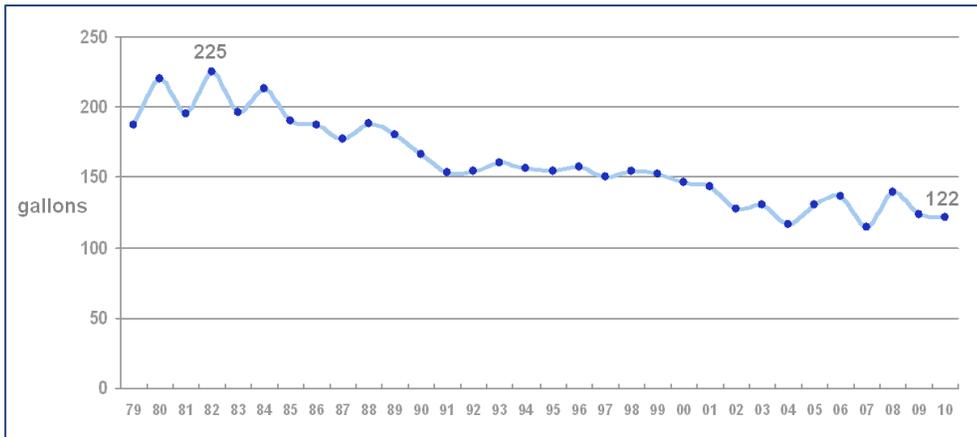
Who: Texas Water Development Board (TWDB), Texas Parks and Wildlife Department (TPWD), Texas State Soil & Water Conservation Board (TSSWCB), Texas Commission on Environmental Quality (TCEQ), Guadalupe-Blanco River Authority (GBRA), San Antonio River Authority (SARA), City Public Service (CPSE)/ San Antonio Water System (SAWS), Natural Resource Conservation Service (NRCS), Groundwater Conservation Districts (GCD) and Groundwater Management Areas (GMA), and other concerned stakeholder agencies.

Cost: To be determined, but expected to be approximately \$200,000 split equally for the reservoirs and domestic and livestock components.

Effects of Conservation, Drought Management, and Reuse

What: In many streams in the Guadalupe/San Antonio basin, subsistence and base flows are dominated by return flows from wastewater treatment plants. As San Antonio has demonstrated, effective Conservation and Drought Management can have profound impacts on expected return flows of treated wastewaters to receiving streams. For example, previous estimates of year 2010 effluent production by San Antonio ranged as high as 380,000 acre-feet, but the actual production in 2010 was less than 150,000 acre-feet, largely owing to reductions in per capita water use resulting from aggressive conservation.

Figure 1
Daily Per Capita Water Use, SAWS Customers, 1979 to 2010



As San Antonio furthers its conservation efforts and as other cities begin to adopt similar conservation and reuse strategies, flows to receiving streams may be impacted. Additionally, as development in the oil and gas industry continues, an increased potential for direct reuse contracts exists. There is a need for a comprehensive evaluation of future return flows that can be expected considering growth in population and concomitant water demands, along with planned and potential conservation and reuse strategies.

Why: The development of management strategies aimed at ensuring attainment of recommended flow regimes can be informed by understanding the realized and potential impacts of Conservation and Drought Management.

Where: Guadalupe, San Antonio and Mission River basins.

When: One to two year study.

Who: River Authorities, Municipal service providers such as SAWS and City of New Braunfels, TWDB, TCEQ and technical consultants

Cost: To be refined, likely not to exceed \$50,000 - \$100,000

TIER 2 Priorities

***Disclaimer: Studies listed are grouped by type of study, not in any prioritized order.**

GSA BBASC Tier 2 Priority

Instream Flows - Riparian Assessment and Monitoring

Dependencies/Links: Riparian, Biological and Geomorphologic Monitoring, if linked would benefit from studies conducted at the same locations for use as input into future SB2 studies.

Riparian Vegetation Mapping and Long-Term Monitoring

What: The objective is to establish a comprehensive riparian vegetation mapping program in the Guadalupe San Antonio Mission Aransas (GSAMA) Basin. The TIFP has already conducted detailed field studies at selected gage locations in portions of the lower San Antonio Basin, and is currently analyzing this data in relation to geomorphologic data. Expansion of the geographic scope of this program should be supported to include Guadalupe and Mission-Aransas basins. Within Section 4.3.1 of the GSA BBASC Environmental Flows Recommendations Report the importance of high flow pulses and overbank flows on riparian vegetation is addressed. These types of flows are necessary in the riparian environment to provide channel and substrate maintenance, limitation of riparian vegetation encroachment, riparian vegetation diversity maintenance, conditions conducive to seedling development, floodplain connectivity, lateral channel movement, floodplain maintenance, recharge of floodplain water tables, flushing of organic material into the channel, nutrient deposition in the floodplain, and restoration of water quality in isolated floodplain water bodies. Flow alteration in magnitude, duration, or frequency, can substantially change riparian vegetation as the flow influences geomorphic features (Naiman et al. 2010), inundation (Auble et al. 1994; Naiman et al, 2010), and, ultimately, riparian vegetation succession (Day et al. 1988). However, the level of alteration that might cause such changes in the GSAMA basins is unknown at this time. That present day distribution of riparian vegetation is reflective of relative inundation duration is known (Auble et al. 1994), but again the basin specifics remain data gaps in our understanding. Data collected on woody vegetation density and basal area provides a dataset that can be assessed to determine current community structure and successional dynamics across the floodplain. Data should be analyzed and correlated to fine-resolution multi-spectral imagery to develop high-detail riparian community maps and datasets.

Additionally, long-term riparian transects will be established following the initial mapping efforts. The objective is to establish long-term riparian transects to track ecological condition of the riparian corridor over time. The TIFP has already established long-term riparian transects for the lower San Antonio River and lower Cibolo Creek basins. The intent is to extend a similar level of effort to the Guadalupe, Mission, and Aransas river basins.

Why: A comprehensive riparian mapping effort will provide the foundation for the selection of representative, long-term riparian monitoring locations. This comprehensive mapping will support future analysis of the effectiveness of high flow pulses (as recommended by TCEQ rules and implementation strategies) to sustain existing riparian communities over time. Long-term riparian transect data collection will be used to specifically track ecological condition of the system over time, and assess (validate) the Environmental Flow Recommendations and Implementation Strategies.

Where: Guadalupe and Mission-Aransas basins

When: Two to three years for sampling, mapping and analyses; annually for long-term transects during the growing season.

Who: TPWD, TWDB, River Authorities, universities and technical consultants

Cost: To be determined, anticipated at \$250,000 followed by \$75,000 annually

Water table monitoring in the Riparian Corridor

What: The objective of groundwater monitoring stations at key USGS gage stations in the GSA Basin is to provide groundwater discharge and recharge data at various flow regimes. The GSA BBEST report highlights that hydrologic connectivity between the channel, floodplain, and terrace features is not well understood. Therefore, a basin-wide groundwater monitoring program would begin to address the data gaps associated with hydrologic connectivity in the basins. Availability of shallow groundwater resources is essential in maintaining a sound ecological environment within the riparian corridor (Stromberg et al. 1996). Availability is dependent on geology, topography, soils, and hydrologic regimes among ecoregions in the GSA basins as well as distance from the river to upland in the riparian corridor. Therefore sites should be located in areas that are representative of ecoregions, as well as where existing and proposed information are generated from the SB2 program, USGS gage locations, and long-term riparian monitoring sites. Shallow water wells should be positioned perpendicular to the stream course and data correlated to riparian vegetation community structure as well as hydrologic regimes in the stream channel. This baseline data can be used to develop depth-to-groundwater ranges for individual woody and herbaceous species and characterize the present groundwater-surface water-riparian community structure. Additional data can be generated in models to determine if proposed alterations to environmental flow regimes would change riparian community structure (Franz and Bazzaz 1977) and affect ecosystem functions the community provides to the stream and downstream estuary.

SARA with the USGS and others has conducted surface / groundwater studies on the Lower San Antonio River and Cibolo Creek.

- Why:** In order to validate the environmental flow regime and investigate implementation strategies, it will be essential to understand the interactions of water table and riparian corridor health. This study is designed to address this data gap, and provide ecological linkage information that will support the assessment of high-flow pulses, and on-going assessment of riparian corridor health and productivity.
- Where:** San Antonio, Guadalupe, Mission and Aransas River basins (Lower San Antonio River and Cibolo Creek have had studies conducted)
- When:** One to two years for identification of sites, data collection and processing, and model development; annual long-term monitoring at select locations.
- Who:** USGS, TPWD, GCDs, River Authorities, universities and technical consultants
- Cost:** To be determined, anticipated to be \$200,000 for one to two year study and \$50,000 per year to monitoring long-term sites (dependent on the number of sites selected for long-term monitoring).

GSA BBASC Tier 2 Priority Instream Flows - Biological Sampling and Monitoring

Dependencies/Links: Riparian, Biological and Geomorphologic Monitoring, if linked would benefit from studies conducted at the same locations for use as input into future SB2 studies.

What: Section 7.1.1.3 of the GSA BBEST Environmental Flows Recommendations Report recognized three biology-related limitations to their recommendations: 1) sound ecological environments were based exclusively on fish communities; 2) fish habitats were used primarily in the assessment of instream flow needs; and 3) flow recommendations are not validated.

The TIFP Technical Overview (TIFP 2008) and Lower San Antonio River Basin Study Design (TIFP 2010) outline four major study components including hydrology and hydraulics, biology, physical processes, and water quality. Adhering to the guidance provided by TIFP (2008 and 2010), a methodology to determine Habitat Suitability Criteria (HSC) was developed and applied for the Lower San Antonio River Instream Flow Study (TIFP / SARA 2011). A suitability criterion for depth, velocity, substrate, and cover was developed for various species and/or guilds of species within the fish community of the lower San Antonio

River and Cibolo Creek. These criteria were used in conjunction with hydrodynamic models to model fish habitat at various flows.

The GSA BBASC Environmental Flows Recommendation Report also recognized limitations in available information regarding fish use of floodplain environments during overbank flows. In general, dependence between floodplain habitats and fluvial specialist fishes is not demonstrated in western gulf slope drainages and interdependency with other taxonomic groups is not known. Studies conducted in a nearby basin (Zeug et al. 2005) demonstrate uniqueness of floodplain environments and their contribution to maintaining fish diversity within the basin. As biological and habitat data collections are being planned, monitoring regimes should be developed to include sampling in floodplains during overbank flows.

Since biological sampling and monitoring data collection efforts are anticipated to involve personnel from State agencies, River Authorities, Universities, Stakeholder organizations, technical consultants and possibly volunteers, it is imperative that very specific quality assurance and quality control protocols for biological sampling, data collection, mapping, data submittal, data processing and data storage be developed and adhered to. Once qualified and verified, all data and information should be posted to a database and made available to the public via the internet. Developing specific protocols, quality assurance and quality control procedures will allow resource managers to consistently track the ecological condition of the system over time, and assess / validate the Environmental Flow Recommendations and Implementation Strategies. It is recommended that a sampling and monitoring regime with approved quality assurance protocols targeted at providing data and information to develop HSC be implemented.

Why: Long-term biological data collection will be used to specifically track ecological condition of the system over time, and assess the Environmental Flow Recommendations and Implementation Strategies. Collecting information on the floodplain usage of fishes in the lower basins will provide valuable information on high-flow pulses and resulting floodplain connectivity effects on the fisheries community. This information will be valuable in assessing the effectiveness of the implemented rules and resulting environmental flow regimes.

Where: San Antonio, Guadalupe and Mission River basins

When: One to two years for assessment of ecological soundness in Guadalupe, Mission, and upper San Antonio river basins. Annual monitoring is recommended in all basins for evaluation of floodplain usage, seasonal differences, and to track ecological condition over time.

Who: TPWD, TCEQ, TWDB, River Authorities, universities, stakeholder organizations, and technical consultants

Cost: Assessment of ecological soundness: \$75,000 to \$175,000 per basin (Guadalupe, Mission, and upper San Antonio). Taxonomic priorities should be established after determination of flow-sensitive taxa and long-term annual monitoring \$150,000 per year for all three basins.

GSA BBASC Tier 2 Priority Instream Flows – Geomorphic Studies and Monitoring

Dependencies/Links: Riparian, Biological and Geomorphologic Monitoring, if linked would benefit from studies conducted at the same locations for use as input into future SB2 studies.

Instream and Riparian Sediment Deposition

What: A geomorphic linkage to ecological health is a major data gap in BBEST analysis to date for both riparian communities and instream aquatic organisms. This study will help define the ecological linkage of sediment deposition in both riparian and instream habitats. Inherent in the geomorphic monitoring approach described above is the collection of channel elevation data at each planar surface corresponding to riparian sediment deposition areas and substrate characteristics. The basic channel topographic survey and analysis will also yield the requisite instream depositional or aggregation characteristics. Within each monitoring site, the distribution of mesohabitat types (i.e., run, pool, riffle, backwater, lateral habitats) will be mapped each year. Within each mesohabitat, the maximum depth, average and maximum width, and length should be noted. Also, within each mesohabitat, a minimum of nine randomly selected points should be selected where depth, velocity, substrate, and cover should be collected. As noted in GSA BBASC Tier 2 Priority, Instream Flows - Riparian Assessment and Monitoring, it is anticipated that along each cross section within the monitoring reach, a riparian line transect methodology will be utilized to characterize the species and age composition for trend analyses each year. It is also anticipated that the fish community will be sampled by mesohabitat unit during the annual monitoring activities of GSA BBASC Tier 2 Priority, Instream Flows – Biological Sampling and Monitoring. The mesohabitat mapping (plan view polygons, width, depth, velocity, substrate and cover should be accomplished by a two person crew in two field days. Analysis of data and comparison of trends should be accomplished by three person weeks of effort.

Why: Understanding the linkage of geomorphic changes to both the riparian and instream communities will be vital in tracking the ecological condition of the system over time, and assessing (validate) the Environmental Flow Recommendations and Implementation Strategies.

Where: Guadalupe, San Antonio and Mission River basins. At locations that have long-term biological monitoring and long-term riparian transects as noted and referenced during studies GSA BBASC Tier 2 Priority, Instream Flows – Riparian Assessment Monitoring and Biological Sampling and Monitoring.

When: Two to three year study

Who: TWDB, TPWD, River authorities, universities and technical consultants

Cost: To be refined, anticipated to be \$250,000 for two to three year study

Geomorphic Studies and Monitoring

What: For this work plan element, a parsimonious approach is proposed that attempts to balance the cost-benefit tradeoffs between the high cost of site-specific studies that are not likely to be transferable between quantification sites and collection of quantitative data within the framework of a monitoring program that can provide inference on the efficacy of adopted environmental flow regimes. The following monitoring program is designed to be applied at each quantification reach on an annual basis and is an integral part of the monitoring program for other resource elements such as the aquatic and riparian resources. Each monitoring site should be at least ~300 mean channel widths and centered on the quantification gage location. Starting at either the upstream or downstream boundary, the channel topography should be measured perpendicular the stream at established locations approximately every 15 mean channel widths. Cross section profiles should be measured from an established bench mark(s) tied to the gage elevation and verticals placed at each break in channel topography (cuts, flat depositional areas, thalweg) and at a minimum of 20 locations or more to adequately define the channel topography. Sampling should be conducted in the early fall to minimize variation in flow regimes and increase sampling efficiency at lower flows for other monitoring activities such as fisheries collections. The right and left headpins that demark each cross section should be located a few feet into the upland vegetation zone. At each vertical across each cross section, the substrate characteristic based on a modified Wentworth scale should be noted in addition to the x-distance and bed elevation. In addition, at each cross section within the active channel, Wolman Pebble counts (a technique for measuring the size of particles on the river bottom) should be collected. These data should be analyzed to generate particle size duration curves for both longitudinal and temporal (year-to-year) changes. Cross section geometry in conjunction with bed material particle size distributions will show if large changes in channel bottom sediment characteristics or channel shape are evident in river channel characteristics. In addition, the slope of planar depositional features throughout the longitudinal profile of the channel should be plotted and compared against each sampling period.

Why: Understanding the linkage between the flow regime, channel change, streambank stability, effects on instream and riparian habitat and resulting affects biological processes is essential to track the ecological condition of the system over time, and fully assess (validate) the Environmental Flow Recommendations and Implementation Strategies.

Where: Guadalupe, San Antonio and Mission River basins. At locations that have long-term biological monitoring and long-term riparian transects as noted and referenced during studies GSA BBASC Tier 2 Priority, Instream Flows – Riparian Assessment Monitoring and Biological Sampling and Monitoring.

When: Annual monitoring to track channel changes over time

Who: TWDB, TPWD, River Authorities, universities and technical consultants

Cost: To be refined, anticipated to be \$150,000 per year

Effects of Logjams on Habitat, Flooding, and Sediment Transport

What: Modern instream flow studies recognize the ecological role of high flow pulses and overbanking events though they are sporadic. In addition, a bulk of the current literature and associated practice works with the definition of an “overbank episode” duration as medium-term on the order of weeks to a month. However, very long-term overbank flows are associated with logjams and the associated reduced hydraulic capacity of the channels on both the lower San Antonio and Guadalupe Rivers. Some observers note increased flooding durations in the lower stretches of the San Antonio and Guadalupe Rivers (Womack, pers. comm.) over the last few decades which may not be fully explained by storm magnitudes. These episodes surpass standard definitions of overbank flows as described by the TIFP. During these events, riparian areas remain flooded for durations ranging from a few weeks to months and even years in select locations. There is little or no data on the riparian and instream effects of these extended durations of inundation caused by logjams on these lower river segments.

Additionally, it is highly probable that these logjams are acting as a substantial “sink” for river-borne sediment. If so, this impediment to sediment movement may have deleterious effects on the downstream river reaches as well as delta and wetland maintenance in the riverine-estuary boundary. Historical evidence from the nearby Colorado River would indicate that lower river logjams can have an enormous effect on sediment delivery to the estuary⁴.

Why: The objective is to examine and understand the effects of logjams on: instream flows, sediment deposition onto riparian lands, sediment transfer to bays, freshwater surges to bays, indicator species guilds (especially riparian species), erosion from extensive channeling cut by water forced overbank.

Where: Lower Guadalupe River below Bloomington and lower San Antonio below Highway 77. Both on-site and comparative studies are likely needed to examine instream biotic and riparian

⁴ as documented in “1.4.3 Historical Changes in Inflows” in LCRA et al. 2006 “Matagorda Bay - Freshwater Inflow Needs Study”

conditions on streams with and without logjams. Thus, this may necessitate examination of a nearby large-channel river (such as the Lavaca or Colorado). Alternatively, a comparative study could be accomplished via limited logjam removal in some portion of the lower San Antonio and/or Guadalupe Rivers.

When⁵: a) 8-12 months for a three-component simultaneous assessment of current conditions with regard to instream biota, riparian composition, and sediment retention.

b1) [after a] 12-18 months for comparative studies to analogous stream reach(s) without logjam and synthesis of results.

b2) [after a] if limited logjam removal is necessary to mount the studies, 24-36 months, with first 12 months for site selection and channel clearance operations; then 12-18 months for comparative studies and synthesis of results.

Who: Assessment and comparative studies and synthesis: River Authorities, TWDB, universities and technical consultants. Logjam removal as necessary: River Authority contracts for removal and maintenance.

Cost: a) current condition assessments: \$113,000
[basis: instream biotic - 2 FTE university or agency investigator, 4 months at \$35 / hr (= \$45,000); riparian - 1 FTE university or agency investigator, 6 months at \$35 / hr (= \$34,000); sediment - 1 FTE university or agency investigator, 6 months at \$35 / hr (= \$34,000)]

b1) comparative studies & synthesis, nearby stream(s): \$168,000
[basis: instream biotic - 2 FTE university or agency investigator, 6 months at \$35 / hr (= \$68,000); riparian - 1 FTE university or agency investigator, 9 months at \$35 / hr (= \$50,000); sediment - 1 FTE university or agency investigator, 9 months at \$35 / hr (= \$50,000)]

b2) additional cost for potential limited removal of logjams. additional \$100,000.
[basis: discussions with GBRA on approximate cost for 1-mile removal.]

Total cost: \$281,000 - 381,000

⁵ note these are study durations, not billable hour / cost estimates.

GSA BBASC Tier 2 Priority

Bays & Estuaries - The Distribution and Abundance of Marsh Vegetation in Relation to Salinity and Elevation in the Guadalupe Estuary Delta

What: The purpose of this study is to determine distribution and abundance of salinity-sensitive wetland plants in the Guadalupe Estuary delta below the southern fork of the Guadalupe River in Refugio County and to monitor the associated salinity regimes. From this data, quantitative status and trends of low-salinity tolerant plants and their salinity tolerance limits would be assessed. This project builds on previous qualitative work by Benton et al. (1984) under TWDB contract, and by the Bureau of Economic Geology, University of Texas at Austin, that reported on wetland plant occurrence/distributions in the Submerged Lands of Texas series for Guadalupe and San Antonio Bay (White et al. 1987). The proposed project would also overlap with the work to be performed in GSA BBASC Tier 2 Priority, Bays & Estuaries – Development of an Inundation and Salinity Model of the Guadalupe Estuary Lower Delta and Adjacent Bays. The objectives of this project are:

1. Determine distribution/ abundance of dominant, wetland vascular plant species along elevation transects in the Guadalupe Delta interior below the south fork of the Guadalupe River, and along the shorelines of Guadalupe and Hynes Bay.
2. Monitor the salinity and inundation (water level) regimes which are associated with these dominant wetland species occurrence and abundance.
3. Develop regression models that correlate dominant wetland plant abundance (production) with inundation and salinity variables so that the plants could be used as focal species to assess freshwater inflow (FWI) needs for the Guadalupe/San Antonio Estuary.

Why: The lower Guadalupe Delta (including Guadalupe Bay) is known to contain a variety of low-salinity sensitive, wetland vegetation (i.e. plant species such as arrowhead, bulrushes, sedges, and aquatic grasses). Because these species are restricted to growth salinities below 2 – 4 psu and represent fixed, stationary habitats, they would comprise good candidates for low-salinity tolerant (so-called oligohaline) focal species in fresh water inflow (FWI) analysis for the Estuary. However, information from Texas on these plants' distribution and productivity, especially in relation to the salinity gradient in the Delta area, is poorly known, making them difficult at this time to analyze as focal species in quantitative freshwater inflow regime assessments (similar to oysters). This Guadalupe Estuary Delta survey to assess the distribution and abundance of marsh vegetation in relation to salinity and elevation is recommended as part of the GSA BBEST Environmental Flows Recommendation Report.

Where: The project area comprises the Guadalupe Delta region below south fork of the Guadalupe River, and also includes Guadalupe and Hynes Bays shorelines. A dynamic salinity gradient in

this region produces the narrow salinity range required by the oligohaline vegetation under certain limited inflow regimes.

How: Project includes three tasks:

1. Surveys of wetland plant distribution on a monthly basis (or bimonthly from November to March), using fixed, defined transects along a tidal elevation gradient. Identify dominant species.
2. Monitoring dominant plant seasonal abundance (biomass) and physico-chemical parameters associated with their occurrence. This project will employ standard plant monitoring methodology at transect sampling sites and should use automated recording instruments for salinity and water levels. Primary locations for bay tide levels and discharge measurements will provide open-bay salinity and water levels during flood periods, as compared to base or low flow periods.
3. Integrating these field-collected data into regression models that relate dominant plant production to freshwater inflow related factors including back-bay salinity and inundation regimes, and corresponding data from the open Guadalupe Bay .

Who: Study to be performed by trained wetlands biologist or botanist (university researcher or consultant/contractor), Mission Aransas National Estuarine Research Reserve (NERR)

When: Two year field study and one year overlapping statistical analysis work (two years total).

Cost: This project could be funded through a joint funding agreement between the TWDB and the Coastal Management Program. The work requires 2-3 trained quantitative ecologists to survey/collect plants, process biomass samples, and maintain water level and salinity meters. Water quality monitoring meters (e.g. datasondes) and water level gages must be maintained, thus this project would best be performed as part of the GSA BBASC Tier 2 Priority, Bays & Estuaries – Development of an Inundation and Salinity Model of the Guadalupe Estuary Lower Delta and Adjacent Bays. Total required funds for the project is \$105,000.

TASK	DESCRIPTION	AMOUNT
1.	Field Surveys and Water Level/Salinity Monitoring (2 yrs)	\$75,000
2.	Regression Analysis of Plant Production/Inundation/ Salinity	\$30,000
3.	Data and Calculations of Plant vs. Salinity Tolerance Limits	
TOTAL COST		\$105,000

GSA BBASC Tier 2 Priority Bays & Estuaries - Habitat Suitability Models for Eastern Oysters, Blue Crabs & White Shrimp

Dependencies: The Habitat Suitability Models is dependent on the Life Cycle Habitat & Salinity Studies for Key Faunal Species

What: Habitat Suitability Models for Oysters, Blue Crabs, & White Shrimp

Why: As identified by the GSA BBEST:

1. Develop basin-wide, multi-parameter Habitat Suitability Models for:
 - a) eastern oysters
 - b) blue crabs
 - c) white shrimp
2. Implement investigation of the location specific requirements of eastern oysters with regard to avoiding the dermo parasite (Dermo).

Part (1a) would be a refinement for the oyster modeling already performed. The salinity suitability curve utilized by BBEST was for whole year average salinity from literature. It may need to be refined for summer and geographic specificity. Other refinements could include additional parameters such as substrate and time-specific curves based on 6-24 months antecedent conditions as indicated by literature addressing cumulative effects of dermo and checks on dermo due to low salinity and low temperature episodes. Parts (1b) and (1c) may be better as a separate undertaking because of still unresolved conceptual issues related to motile species. Studies should involve a principal investigator and expert panel/workshop for conceptual model development.

This Workplan Task would also be heavily informed by results of Tier 1 Priorities: GSA BBASC Priority #3, Bays & Estuaries – *Rangia* Clam Investigations and GSA BBASC Priority #4, Bays & Estuaries – Life Cycle Habitat & Salinity Studies for Key Faunal Species.

Where: Guadalupe and Mission-Aransas Estuaries

When⁶: 1a) Eastern Oysters: 18-24 months to complete
1b) Blue Crabs: 9-12 months to complete; not contingent upon 1a
1c) White Shrimp: 9-12 months to complete, not contingent upon 1a
1d) Oysters - Dermo: 12-18 months from initiation

Who: 1) contractor, or university with agency support

⁶ note these are study durations, not billable hour / cost estimates.

2) dermo data from TPWD and and university researchers synthesized with salinity and salinity-duration
information based on TPWD, TWDB, GBRA, Mission-Aransas NERR and other sonde data.
Synthesis by university or contractor with support from TPWD and Dr. Ray

Cost: 1a) oyster habitat suitability model refinement: \$11,000 - \$22,000
[basis: 1 FTE university investigator / contractor level for 2-4 months, depending upon scope, at \$35 / hr]

1b and c) motile species (blue crab, white shrimp) habitat suitability model development: \$33,000
[basis: 1 FTE university investigator / contractor level for 4 months at \$35 / hr;
1 FTE agency personnel for 1 months at \$35 / hr; \$5,000 travel & stipends]

1d) Dermo synthesis in range of \$67,000 - \$100,000
[basis: contractor or university investigator, 1 FTE for range of 12-18 months at \$35 / hr]

GSA BBASC Tier 2 Priority

Bays & Estuaries - Development of an Inundation and Salinity Model of the Guadalupe Estuary Lower Delta and Adjacent Bays

Dependencies: The Inundation and Salinity Model of the Guadalupe Estuary Lower Delta and Adjacent Bays study could be dependent on Stream Flow Gaging, Hydrodynamic & Salinity Studies for Key Faunal Species and Distribution and Abundance of Marsh Vegetation in Relation to Salinity and Elevation in the Guadalupe Estuary Delta studies recommended.

What: The purpose of this study is to evaluate inundation and salinity dynamics of the lower portion of the Guadalupe Estuary Delta over a range of hydrologic conditions. Based on land surface topography and water monitoring data, an inundation and salinity model would be developed. This project builds on previous work by the TWDB that evaluated salinity exchange and water level changes in Texas Bays. The objectives of this work are:

1. Collect flow and water level data at control points in the lower Delta lakes and interior marshes, and in the open part of Guadalupe and Hynes Bay above San Antonio Bay proper. Obtain and analyze Light Detection and Ranging (LIDAR) elevation data.
2. Evaluate exchange of water using monitored water level and salinity measurements over tidal cycles and inflow pulses.

3. Modify and apply a suitable model (perhaps TxBLEND or SELFE⁷) that correlates inflow from the Guadalupe River, with salinities and water levels between the open Guadalupe Bay and the interior regions of the lower Guadalupe Delta.

Why: The lower Guadalupe Delta consists of the old distributary portions below the South fork of the Guadalupe River. This portion of the Guadalupe Delta has been gradually cut off from the main flow of the Guadalupe River since Traylor Cut was formed in 1935. Freshwater inflows (also containing nutrients and suspended sediment) have been deprived from this lower delta region, and it has been eroding and subsiding since. Although this lower Delta interior contains considerable low salinity wetlands, and is thought to function as nursery habitat for estuarine organisms, hydrologic dynamics remain poorly defined, and the tidal inundation of this backmarsh area has not been characterized. If a shallow marsh inundation model is developed, the need for freshwater inflows in supporting the biological productivity of such wetland areas can be included in BBASC adaptive management of the Guadalupe/San Antonio Bay system, as well as other Texas estuaries. Currently, this important lower Delta area is not included in assessing freshwater inflow needs of estuaries as part of the SB3 process.

Where: The lower Guadalupe Delta consists of the old distributary channels and interior lakes below the South fork of the Guadalupe River. This portion of the Guadalupe Delta has been cut off from the main flow of the Guadalupe River, which now empties inflows and sediments primarily into Mission Lake.

When: 30 months from project initiation; 18 months for model design and development, analysis of LIDAR data, and gathering of sufficient up-to-date water level and salinity data; 12 months to calibrate and validate model.

Who: This project may require multiple entities working in collaboration on various aspects of the project. Based on previous experience modeling coastal wetland areas and estuaries, the Texas Water Development Board (TWDB) is the logical candidate to carry-out the project or, if necessary, coordinate with collaborating subcontractor(s). A few groups (e.g. Harte Research Inst., UT-Bureau of Economic Geology) have considerable expertise in the area of LIDAR data analysis. GCD's or GMAs may also be likely partners.

Cost: This project requires three distinct phases: (1) Acquiring LIDAR data of land surface topography/elevation within the lower Guadalupe Delta; (2) Monitoring of salinity and water levels within the Guadalupe Deltic Marsh and nearby upper Guadalupe and Hynes Bays; and, (3) Development of an inundation and hydrodynamic model which includes the Guadalupe Delta.

⁷ SELFE: A semi-implicit Eulerian-Lagrangian finite-element model for cross-scale ocean circulation

It may be possible to obtain existing LIDAR data for use in development of the model collection effort could be significant. The study will require one- to two-years of field data collection for salinity and water surface elevation in the study area. This effort will require instruments to be purchased (or borrowed) for long-term deployment at strategic locations and to be serviced and maintained by field staff. Data collection also will require processing and quality assurance. An estimated cost for this portion of the project is \$75,000.

Development of a model of wetland inundation will require extending an existing bay hydrodynamic and salinity transport model (*e.g.*, TxBLEND) to include the delta area *or* developing a new bay-delta model using another hydrodynamic model (*e.g.*, SELFE). The estimated cost for this effort is \$125,000.

TASK	DESCRIPTION	AMOUNT
1.	Obtain Lidar Data for Study Area	
2.	Salinity Collection and Water level Measurements	\$75,000
3.	Model Development	\$125,000
TOTAL COST (min)		\$200,000

TIER 3 Priorities

***Disclaimer: Studies listed are grouped by type of study, not in any prioritized order.**

GSA BBASC Tier 3 Priority Instream Flows – Groundwater Studies

Impacts of Groundwater Withdrawals on Upper Basin Streamflows

What: Streamflows in the Guadalupe/San Antonio basin are impacted by complex and poorly understood connections between groundwater systems and surface water, and these groundwater systems are under increasing pressure from expanding uses for commercial, industrial, and domestic activities. The primary groundwater system in the upper basin is the Edwards-Trinity (Plateau) Aquifer, which is projected to be one of the most stressed aquifers in the State over the next 50 years, with large areas seeing steep drops in water levels (TWDB Report 353). Numerous springs and seeps that emerge from the Trinity Aquifer feed Hill Country streams and form a component of base and subsistence flows, or they may contribute to Edwards Aquifer recharge and in turn becomes Edwards Aquifer springflow, one of the most important components of instream flows downstream of the Balcones escarpment. There is also significant recharge to the Edwards Aquifer from the Trinity by interformational flow, with estimates ranging from 59,000 af/yr to over 300,000 af/yr. At the same time, GCDs in the Upper Basin are working to develop management plans for their Modeled Available Groundwater (MAG), which are quantities derived from

consideration of the District's Desired Future Conditions (DFCs) in the TWDB's Groundwater Availability Models.

In the river valleys of the Guadalupe/San Antonio basin, two types of sedimentary deposits influence instream flows by acting as a mechanism for significant flow to and from the river channel. Alluvial deposits are recent or Holocene age deposits associated with floodplains of streams and tributaries, composed of unconsolidated material that is chiefly gravel, sand, and silt, and they yield small to large quantities of fresh to slightly saline groundwater. Terrace deposits are scattered remnants of Pleistocene age that occur at higher elevations than alluvial deposits, usually 20 to 50 feet thick and composed of gravel, sand, silt, and clay, sometimes cemented with calcium carbonate, and yield small to moderate amounts of fresh to moderately saline groundwater.

Given all of these complex factors and uncertainties, it may be difficult to gage the potential effectiveness of BBASC strategies to protect environmental flows and expected attainment frequencies for such flows unless predictions can be made regarding the impacts of groundwater use. This will likely involve hydrologic data collection and a modeling approach, in which a number of scenarios are evaluated to estimate the resulting contribution to upper basin streamflows from groundwater systems when various permutations of the factors described above are taken into account. For the hydrologic data collection, it will be imperative to understand spring discharge from minor springs in the upper basin. As such, it is anticipated that gages at select upper basin locations will be implemented to monitoring spring flow over time. In addition to hydrologic studies, it will be necessary to inventory and/or estimate current and future withdrawal volumes from these formations, evaluate regulatory constraints, and construct a more complete picture of instream flows that will result from the interaction of all factors. Finally, in an attempt to evaluate all water uses, this study would quantify the volume of domestic and livestock groundwater use in each river basin.

Why: In order to devise and implement effective management strategies aimed at ensuring attainment of recommended flow regimes, it will be necessary to gain a better understanding and a predictive capability regarding 1) the interplay and impacts of hydrologic factors; and 2) the impact of alluvial gravels on instream flows, along with current and potential withdrawals of water.

Where: Portions of the Upper Basin where groundwater use may impact streamflows (mostly north of the Edwards Aquifer recharge and artesian zones) and where groundwater drawn from alluvial aquifers may impact streamflows.

When: One year study to evaluate existing data. Two to three year study if new hydrologic studies are commissioned.

- Who:** River Authorities, USGS, Southwest Research Institute, GMA's, GCD's, universities, and technical consultants
- Cost:** To be determined, and will be variable depending on the extent and complexity of the desired analysis. For example, a low-dollar approach might involve using only existing reports and data on connectivity and water transfer between groundwater systems, or if funding is available it might be preferable to conduct a fresh evaluation and narrow down the range of volumes estimated by previous studies.

GSA BBASC Tier 3 Priority Instream Flows – Water Quality Monitoring

TCEQ Clean Rivers Program Water Quality Monitoring

What: Per Senate Bill 818 and under contract with the TCEQ, SARA and GBRA administer and execute the Clean Rivers Program (CRP) Monitoring for their respective basins. The program has been in place since 1991 and is designed to monitor general water quality, compile a long term comprehensive data base, detect trends, identify pollutant sources and aid in water quality planning. The CRP is funded by fees charged to wastewater dischargers by the TCEQ. Due to the long history of the CRP, its excellent quality assurance / quality control protocols, extensive and accessible data base, and consistency across the State, it is recommended that the CRP be continued. However, it is also recommended that the CRP monitoring regime be adjusted as necessary to follow the guidance provided in the TIFP Technical Overview (TIFP 2008). Sampling sites should include all 16 stream locations that were evaluated by the BBEST and adjust biological collection protocols to support the development of Habitat Suitability Criteria (HSC).

In order to augment the CRP monitoring and data base, SARA and GBRA conduct supplemental stream monitoring programs. These programs include long-term monitoring of established sites to identify areas of concern and intensive surveys that focus on identifying potential sources contributing to elevated bacteria levels. In addition to water quality and bacterial monitoring, SARA and GBRA conduct biological monitoring with routine fish and benthic macroinvertebrate collections as well as an annual habitat assessment at each monitoring site. The biological data collected by SARA and GBRA provides fish and benthic macroinvertebrate community composition data that can be analyzed to identify aquatic ecosystem trends and document changes. It is recommended that biological monitoring in the San Antonio and Guadalupe River basins be adjusted to include all 16 sites analyzed by the BBEST, and that similar water quality and biological monitoring be initiated in the Mission River. By building upon an already successful monitoring program, the BBASC will be able to take advantage of existing funding sources, experienced personnel, quality assurance protocols, standard operating procedures, established databases and in kind

services. The resulting effort would be a very comprehensive monitoring program that can be adjusted and implemented without unnecessary delays. The biological sampling component of the CRP will be closely coordinated with the biological monitoring proposed in GSA BBASC Tier 2 Priority, Instream Flows – Biological Sampling and Monitoring. To the degree practicable, CRP fish collections will include a mesohabitat component in order to use this data to supplement HSC development described in GSA BBASC Tier 2 Priority, Instream Flows – Biological Sampling and Monitoring.

Why: Application of the CRP monitoring augmented with biological collections and habitat assessments provides a comprehensive data base that can support HSC. Data can be evaluated to track the ecological condition of the system over time to document potential ecosystem trends and changes that would support adaptive management.

Where: San Antonio, Guadalupe and Mission River Basins at all 16 stations with BBASC environmental flow recommendations.

When: To begin September 2013 to coincide with the CRP biannual contracting period and continue for six years. It is recommended that water quality sampling occur at all 16 sites bimonthly, and biological collections at all 16 sites be conducted twice per year during the index period (March through October).

Who: SARA, GBRA, TPWD, TCEQ, TWDB, and technical consultants

Cost: FY2012 and 2013 CRP funding from the TCEQ is \$ 418,806 for SARA and \$286,682 for GBRA for the two year contracting period. The CRP is augmented with additional river authority funded monitoring; SARA provides \$139,761 towards additional support monitoring and GBRA provides an additional \$71,360 per two year contracting period. The estimated cost for biological collections and habitat assessment at 16 sites twice per year is \$153,600 over a two year period. The total estimated cost for the water quality and biological monitoring is approximately \$1,070,209 per two year period. The total estimated cost for the recommended six year study period is \$3,210,627.

If the CRP is funded and continues until 2019, it is assumed that CRP monitoring can be adjusted to support the work plan for adaptive management and CRP funding would defray some of the monitoring costs. Traditionally both SARA and GBRA have contributed funds and in kind support towards additional monitoring and studies; however there are no assurances that additional SARA and GBRA funding will be available in the future. In order to accomplish the water quality and biological sampling outlined in this scope, additional funds or in kind support from TCEQ, TPWD, TWDB, TSSWCB, municipalities and stakeholder agencies will need to be identified.

Real-time Monitoring System

What: The San Antonio and Guadalupe River Basin Real Time Monitoring (RTM) Network was developed by the TCEQ in cooperation with SARA, GBRA, CPSE, SAWS, and other local government entities and businesses to provide near-real time monitoring of water quality and enable users to identify, manage and minimize pollutants. This network was established for monitoring water quality concerns due to: point and non-point source pollution carried in storm water runoff, point source discharges, sewer overflows, accidental toxic spills, growth and development of industrial complexes, urbanization and other impacts to the environment. The parameters measured and recorded are dissolved oxygen, temperature, pH, and conductivity, (and turbidity in the Guadalupe River Basin). The main objective is to monitor normal conditions of the receiving streams and collect data to document long term trends in the water quality. The goal is to develop a RTM system that traces the continuity of water quality from ground water through spring emergences, through the Metropolitan areas, and includes tributaries that contribute flow towards San Antonio Bay. Currently there are 14 established surface water RTM sites within the Guadalupe and San Antonio basins, however only three RTM sites (Sandies Creek near Westhoff, Medina River at San Antonio, and San Antonio River near Elmendorf) are located where the BBEST analysis was conducted. It is recommended that the RTM system be expanded to include all 16 sites that were analyzed by the BBEST to develop their Instream flow recommendations.

Why: To provide near-real time water quality data online to water resource agencies, water managers, utility operators and the public in an effort to identify, manage and minimize pollutants. The RTM network serves as an online sentinel that can alert agency scientists of developing water quality problems.

Where: Guadalupe, San Antonio and Mission River basins

When: To begin in October 2013 and continue for 10 years

Who: By cooperative agreements with the USGS and funding support from TWDB, TPWD, TSSWCB, TCEQ, GBRA, SARA, CPSE / SAWS, and other concerned stakeholder agencies

Cost: Installation per RTM site \$35,000 (FY2012), annual per site maintenance cost \$44,000 (FY2012). Therefore, the cost of installing an additional 13 sites would be \$455,000, and annual maintenance costs for all 16 sites would be \$704,000.

GSA BBASC Tier 3 Priority Instream Flows – Invasives

Impacts of Invasive Species

What: Ecohydrological data is limited for riparian communities within the GSA Basin; therefore, evapotranspiration (ET) rates for native and non-native riparian vegetation need to be researched in locations that represent the ecoregional diversity of the basins and where other riparian, hydrologic, and geomorphic data are being collected. The GSA BBEST and SB2 Interim Progress reports address riparian community water needs; however, water use by riparian communities is minimally discussed. Additionally, the influence of non-native vegetation on the regional water budget is difficult to quantify due to limited information on the annual rates of ET in native and non-native riparian communities in the GSA basin. Development of invasive species within riparian corridors has been documented to have ecohydrologic consequences, including a decrease in the water table as well as reduction in water yields (Huddle et al. 2011). The temporal, spatial, and total volume of water used by riparian vegetation varies depending on species composition, ecotype, and age as well as underlying biotic and abiotic factors (Friedman et al. 2005). Non-native woody species alters native riparian composition, which ultimately influences the site water balance and the amount of water available to native riparian vegetation (Huddle et al. 2011).

Evapotranspiration varies by riparian structure and composition, especially with increases or decreases in species density and invasive species. An understanding of both native and invasive species is necessary to quantify benefits of management strategies. Study sites should be located along the riparian corridor and at representative locations within the watershed at a scale that is representative of each ecoregion in the basin. Models should be developed that estimate the ET rates based on plant functional type (obligate wetland, shallow-rooted riparian, deep-rooted riparian, transitional riparian, upland) and water table depth can potentially integrate physiological measurements across larger scales (Baird and Maddock 2005). This effort will be closely coordinated with recommended GSA BBASC Tier 3 Priority, Instream Flows – Groundwater Studies: *Impacts of Groundwater Withdrawals (from Alluvial Gravels and on Upper Basin Streamflows)* and GSA BBASC Tier 3 Priority, Instream Flows – Water Quality Monitoring, to maximize data collected during those riparian focused efforts.

Why: The development of management strategies aimed at ensuring attainment of recommended flow regimes can be informed by understanding the hydrologic budget of riparian communities. Recognized water use by native and non-native riparian communities should be understood as a key component for improving water management options and/or restoration efforts.

Where: San Antonio, Guadalupe, Mission and Aransas River basins

When: Two to four years

Who: TWDB, TPWD, universities and technical consultants

Cost: To be determined

GSA BBASC Tier 3 Priority

Bays & Estuaries – Nutrient Load & Concentration Monitoring

What: Nutrient load and concentration monitoring

Why: As described in Section 4 of the GSA BBEST Environmental Flows Recommendation Report and Section 7.1.2.3 an increased nutrient load that may accompany freshwater inflows can result in serious degradation of the estuarine environment through the increase in the frequency of hypoxic (low oxygen) events and through the stimulation of harmful algal blooms that may result on fish kills. In addition, increased inputs of major nutrients (mainly Nitrogen, but also Phosphorous) may result in increased algal growth which decreases water clarity and reduces the amount of seagrasses in these estuaries.

Where: The Mission-Aransas Estuary is monitored for nutrients on a monthly basis at 5 locations by the Mission-Aransas National Estuarine Research Reserve (NERR), as part of their standard System-Wide Monitoring Program. The reserve staff is also measuring nutrient load from the Mission and Aransas Rivers with funding from the US Environmental Protection Agency. Similar monitoring in San Antonio Bay is needed. An intensive study of freshwater inflows, nutrient concentrations and biological responses in San Antonio Bay was carried out during 1987-88 by the University of Texas Marine Science Institute with funding from the TWDB. The study period included a period with a large pulse of freshwater into the bay. The data from the proposed study would provide a useful comparison to current conditions.

How: Water samples for nutrient analysis should be collected on a monthly basis from the combined flow of the San Antonio and Guadalupe Rivers that enters the head of San Antonio Bay, and from a minimum of an additional three sites along the salinity gradient of San Antonio Bay. When water samples are collected, profiles of water column temperature, salinity, oxygen concentration and chlorophyll concentration should also be collected at each site.

When: Nutrient collection should occur over at least a 12 month period, but if funds allow, a 2 year study would be preferable.

Who: Samples could be collected by TPWD, staff of the Mission-Aransas NERR or GBRA under the CRP. Sample analysis can be performed by the Mission-Aransas NERR, who already performs analysis of nutrient samples from Aransas and Copano Bays.

Cost: If samples can be collected by TPWD or other agency without cost, nutrient analysis for four locations would cost \$180 per month (three replicates per station x 4 stations x \$15 per sample), or \$2,160 per year. If Mission-Aransas NERR collects samples, additional costs of \$250 per month would be needed to cover the cost of boat use fees and fuel, or an additional \$3,000 per year. Personnel costs would be covered by TPWD and/or Mission-Aransas NERR personnel.

GSA BBASC Tier 3 Priority

Bays & Estuaries - Role of Cedar Bayou in the Exchange of Water and Meroplankton to the Guadalupe Estuary

Dependencies: The Role of Cedar Bayou in the Exchange of Water and Meroplankton to the Guadalupe Estuary study could be dependent on the Hydrodynamic & Salinity Modeling Improvements study.

What: Scouring of Passes

Why: The coastline of Texas has a nearly continuous set of barrier islands that separate the coastal bays and estuaries from the open Gulf of Mexico. The number of passes or points of seawater exchange between coastal bays and the open Gulf are limited. These passes are maintained by the natural exchanges of water between the bays and Gulf that result from freshwater inflows and tidal exchange. This water movement removes sediments from the passes to allow for the free exchange of water. Since the construction of several deep water passes that are dredged and maintained to depths needed by large sea-going vessels, the number of natural passes have decreased, since most of the water exchange tends to occur through the path of least resistance in the deeper channels rather than traveling across broad bays and through shallower natural passes. Many estuarine species of finfish, shellfish and other ecologically important species move between the bays and the Gulf of Mexico through these passes, and their life-cycles are dependent on these points of exchange.

Where: The best known example of a natural pass that remains within the Guadalupe-San Antonio Bay and Basin region is Cedar Bayou, a natural pass that has historically separated San Jose and Matagorda Islands. This pass has been closed by natural sedimentation several times, and has been re-opened through manmade and natural processes on several occasions. The pass closed in early 2008 and has remained closed since. The Army Corp of Engineers has

recently issued a permit that would allow for re-opening of Cedar Bayou once a funding source has been found.

How: When Cedar Bayou is re-opened, a study is needed to determine the rates of water exchange through the opening, the ability of this flow to remove sand at the Gulf exchange point to keep the pass open, and to quantify the exchange of early life history stages of fish and shellfish through this pass, to help quantify its value to the regional estuarine ecology.

Who: Studies could be carried out by state agencies (TPWD, TWDB) and/or university/state partnerships such as the Mission-Aransas NERR, or through an RFP through Texas Sea Grant to university investigators.

Cost: \$75,000 [basis: 1 FTE for 12 months over 2 years plus field work expenses]

GSA BBASC Tier 3 Priority

Bays & Estuaries – Evaluation of Sediment Transport Affecting the Guadalupe Estuary Delta

What: This study aims to evaluate sediment transport and loading entering the Guadalupe Estuary, primarily into Mission Lake, over a range of hydrologic conditions. This is particularly important during peak inflow periods, when the largest pulses of sediments are brought in that contribute to accretion of a prograding delta system in Mission Lake. This new sediment accretion should offset the potential sediment that is lost to the lower, older Delta which is undergoing subsidence and decay. This project builds on previous work in Guadalupe Estuary by TWDB and the Bureau of Economic Geology, University of Texas at Austin, and a current joint project by the USGS /TWDB that is evaluating sediment input of the Trinity River into Trinity Bay. The objectives of this work are:

1. Collect flow and sediment transport data in the Guadalupe River above Mission Lake, and calculate loadings to Mission Lake proper with its prograding delta.
2. Evaluate the range in sediment concentrations over major inflow hydrographs to determine inflow vs. sediment loading relationships.
3. Determine from in situ field measurements, the current rate of subsidence occurring in the lower (older) portion of the Guadalupe Delta, and calculate whether current sediment diversion into Mission Lake offsets this subsidence.

Why: Sediment delivery from the Guadalupe River to the estuary is necessary to maintain the shallow-water marshes, especially in the upper estuary, deltaic reaches. Concentrations of riverborne suspended sediment are affected by natural conditions (soil erosion and streambed re-suspension) and can also be affected by upstream human activities (construction, timber harvesting, certain agricultural practices, and hydraulic alteration). The

lower Guadalupe Delta consists of abandoned distributary channels and lakes below the South fork of the Guadalupe River. This portion of the Guadalupe Delta has been gradually cut off from the main flow of the Guadalupe River since Traylor Cut was formed in 1935. Freshwater inflow (also containing nutrients and suspended sediment) has thus been deprived from this lower delta region and emergent marshes have been eroding and subsiding. Sediment input from Traylor Cut now empties into Mission Lake, where a new delta is prograding. Although the lower, old Delta contains considerable low salinity wetlands in the interior area, which are thought to function as important nursery habitat for estuarine organisms, sedimentation dynamics remain poorly defined. This area is steadily being lost as marshlands become submerged, and the amount of sediment deposition required to maintain shallow-water backmarsh areas has not been characterized. Because these loadings are unknown, freshwater inflow estimates to satisfy sediment loading requirements have not been accurately included in the current SB3 inflow regimes.

Where: The lower Guadalupe delta consists of the old distributary channels and interior lakes below the South fork of the Guadalupe River. This portion of the Guadalupe Delta has been cut off from the main flow of the Guadalupe River since inflows and sediments now empty primarily into Mission Lake. Sediment input into Mission Lake via Traylor Cut is contributing to a new prograding delta there.

How: Sediment Collection and Discharge Measurements: USGS stream gage No. 8188800 on the Guadalupe River near Tivoli, TX would be the primary location for suspended sediment sample collection and discharge measurements. This project could employ a methodology similar to that developed for the project completed on the Trinity River titled, *An Evaluation of the Variability of Trinity River Nutrient and Sediment Concentration into Galveston Bay during High Flow*, and would identify changes in sediment concentrations during flood periods, as compared to base or low flow periods. This task should follow USGS procedures for discharge measurements, and sediment (total suspended and size fractionation) collection that exist at the commencement of this study. Emphasis would be placed on high-flow events. The attenuation/backscatter signal of an acoustic Doppler velocity meter (ADVM) could be used to evaluate the relation between backscatter and sediment concentration. An option is that an Optical Backscatter Sensor (OBS) turbidity probe could be installed with the instrumentation at Tivoli. This would include a recording current meter, so the gage is set up for digital measurement and data logging. Blucher Inst/TCOON has had much experience with OBS technology for measuring Total Suspended Solids (TSS) in the Coastal Bend bays. An automatic measurement would greatly relieve the problem of analyzing water-sample determinations, especially sample collection during floods.

Subsidence measurements in the old Delta would be performed according to methods in earlier studies by University of Texas-Bureau of Economic Geology (UT-BEG) or by Harte Research Institute (HRI).

When: This would be a 6 year study, done in 2 phases. The first phase would be 3 years with at least 3 years of actual in situ field sampling of sediment inputs, plus subsidence measurements during 2 of these years. The second phase would be another 2-3 years, including field sampling and development of a numerical sediment transport model.

Who: The sediment transport/loading project would need to be funded through a joint funding agreement between the USGS and the TWDB, as currently performed in Trinity and Matagorda Bays. The sampling and measurement of sediment discharge requires a crew of 2-3 trained Hydrologists (or Hydrographers) to operate machinery, process samples, and measure stream flow. Analytical services for sediment sampling could be provided by the USGS National Water Quality Lab. Blucher Institute should be part of the automated recording measurements.

A Subsidence analysis project in the old Delta could be conducted by an experienced contractor such as University of Texas Bureau of Economic Geology or the Harte Research Institute at Texas A&M University-Corpus Christi.

Cost: Total cost is \$650,000 over 6 years. Required funds for the sediment transport project are estimated at \$500,000 total with USGS contributing Cooperative Water Program funding and the TWDB contributing from its Research and Planning Fund. This funding is divided up into 2 phases. Subsidence study costs are estimated at \$125,000 and a contractor (e.g. HRI, UT-BEG) would need outside funding to support their work.

TASK	DESCRIPTION	AMOUNT
1.	Sediment Transportation	\$500,000
	Phase 1 – Three Years	\$250,000
	Phase 2 – Three Years	\$250,000
2.	Subsidence Study	\$150,000
TOTAL COST		\$650,000

GSA BBASC Tier 3 Priority

Bays & Estuaries – Sea Level Rise Associated with Climate Change

What: Sea Level Rise Associated with Climate Change

Why: Identified by the GSA BBASC. Threats to the estuaries are predominantly in form of:

1. Threats to barrier islands integrity with implications for large changes in circulation and salinity;
2. Potential inundation and loss of wetlands

How: 1a) synthesis of existing information on range of predicted sea level rise;
1b) assessment of vulnerability / development of scenarios of change;
1c) applications of hydrodynamic circulation-salinity models;
2a) assessment of vulnerability via field assessment of vegetation species and communities
GSA BBASC Tier 2 Priority, Bays & Estuaries – Development of an Inundation and Salinity
Model of the Guadalupe Estuary Lower Delta and Adjacent Bays
2b) literature synthesis of salinity/inundation requirements and tolerances of vegetation
species GSA BBASC Tier 2 Priority, Bays & Estuaries – The Distribution and Abundance of
Marsh Vegetation in Relation to Salinity and Elevation in the Guadalupe Estuary Delta
2c) predictions by coupling 2a & b with insights and predictions from 1.

When⁸: 1a) 4-6 months to complete
1b) 2-3 months after 1a;
1c) 6-8 months after 1b
2a) 4-6 months to complete
2b) 4-6 months after 2a;
2c) 6-8 months after 2b

Who: 1a) literature synthesis by university investigator;
1b) workshop with experts, convened by TPWD or TWDB;
1c) TWDB or contractor
2a) field investigations by private contractor(s) or university(ies);
2b) same as 2a);
2c) TWDB or contractor

Cost: 1a) literature synthesis \$17,000
[basis: 1 FTE university investigator for 3 months at \$35 / hr]
1b) vulnerability assessment / scenario workshop- \$11,000
[basis: 1 FTE agency personnel for 1 months at \$35 / hr; \$5,000 travel & stipends]
1c) model applications - \$34,000
[basis: 1 FTE agency or contractor for 6 months at \$35 / hr]
2a) field vegetation assessment \$26,000
[basis: 1 grad student FTE for 3 months at \$20/hr and 1 FTE supervisory level for 3 months at
\$35 / hr]
2b) literature synthesis -\$17,000
[basis: 1 FTE university investigator or contractor for 3 months at \$35 / hr]
2c) wetlands change predictions - \$25,000
[basis: 1 FTE university or contractor for 4 months at \$35 / hr]

⁸ note these are study durations, not billable hour / cost estimates.

Section 5 Appendix

Table 6.0-1. Work Plan Subjects for Adaptive Management – Instream Flows (Rivers, Streams, Tributaries, and Riparian Zones)

ID#	Subject	Primary BBEST Member(s)	Flow Regime Component			Hydrology	Source(s)
			Subsistence	Base	Pulse		
1	Impacts of Groundwater Use on Upper Basin Streamflows	Eckhardt				X	BBASC
2	Exempt Uses of Surface Water	Magin, Gonzales				X	BBASC
3	Riparian Diversions for Domestic & Livestock (D&L) Uses	Magin, Gonzales				X	BBASC
4	Effects of Conservation & Drought Management	Eckhardt				X	BBASC
5	Predictability in Surface Water Permitting	Vaugh				X	BBASC
6	Logjams & Related Flooding, Durations & Effects on Habitat	Vaugh			X		BBASC
7	Impacts of Invasive Species	Smith			X	X	BBASC
8	Impacts of Groundwater Withdrawn from Alluvial Gravels	Eckhardt	X	X		X	BBASC
9	Instream & Riparian Sediment Deposition	Hardy			X	X	BBASC
10	USGS Streamflow Gaging & Water Quality Monitoring	Magin, Gonzales	X	X	X	X	BBEST
11	TCEQ Clean Rivers Program Water Quality Monitoring	Gonzales, Magin	X	X	X		BBEST
12	Real Time Water Quality Monitoring System	Gonzales, Magin	X	X	X		BBEST
13	Biological Sampling & Monitoring	Bonner	X	X	X		BBEST
14	Texas Instream Flows Program	Vaugh	X	X	X	X	BBEST
15	Edwards Aquifer Recovery Implementation Program	Vaugh	X	X		X	BBASC/BBEST
16	Environmental Flow Collaboration Forum	Smith	X	X	X	X	BBEST
17	Geomorphic Studies & Monitoring	Hardy			X	X	BBEST
18	Riparian Vegetation Mapping & Monitoring	Smith			X		BBEST
19	Groundwater Monitoring in the Riparian Corridor	Smith	X	X	X	X	BBEST
20	Fish Community Use of Floodplain Environments	Bonner			X		BBEST
21	Expanded Gauge and Onsite Studies to Improve Understanding of Lowest Stretches of San Antonio and Guadalupe Rivers		X	X	X		BBASC

Table 6.0-2. Work Plan Subjects for Adaptive Management – Bays and Estuaries

ID#	Subject	Primary BBEST Member(s)	Flora/Fauna	Sediment	Nutrients	Inflow	Source(s)
1	Scouring of Passes & Impacts on Estuarine Ecology	Buskey	X				BBASC
2	Marine Wetland Effects on Commercial & Recreational Fishing	Pulich	X				BBASC
3	Impacts of Levees	Vaugh		X		X	BBASC
4	Impacts of Saltwater Barrier	Vaugh		X		X	BBASC
5	Sediment Transport Affecting Guadalupe Delta	Pulich		X		X	BBASC/BBEST
6	Sea Level Rise Associated with Climate Change	Johns				X	BBASC
7	Hydrodynamic & Salinity Modeling Improvements	Johns				X	BBEST
8	Bay & Marsh Salinity & Water Level Data Collection & Monitoring	Johns				X	BBEST
9	Diversion & Return Flow Data for Freshwater Inflow Estimates	Vaugh				X	BBEST
10	Rangia Clam & Eastern Oyster Investigations	Johns, Buskey, Holt	X				BBEST
11	Delta Inundation & Salinity Modeling	Pulich				X	BBEST
12	Life Cycle Habitat & Salinity Studies for Key Faunal Species	Buskey, Pulich, Holt	X				BBEST
13	Salinity Sensitive Plant Monitoring	Pulich	X				BBEST
14	Habitat Suitability Models for Oysters, Blue Crabs, & White Shrimp	Johns	X				BBEST
15	Nutrient Load & Concentration Monitoring	Buskey			X		BBEST

http://www.nytimes.com/2013/06/19/opinion/surviving-the-next-gulf-oil-spill.html?_r=0 I'm a Mobile native and hope to move back as soon as I can. Please be sure this idea is on the table!

A handwritten signature in black ink that reads "Bebe".

Bebe Somerville
Development Communications
WAKE FOREST BAPTIST MEDICAL CENTER
336.716.4805
bsomervi@wakehealth.edu

To the Restore Council,

The overall goals outlined in the Restore Council's draft plan – restoring the Gulf Coast's economy and ecosystem -- are laudable. The Gulf region suffered in multiple ways, and it will take a multi-pronged approach to make our communities and shorelines whole.

But the plan fails in one critical aspect. It does not require that any of the fine money generated by the Restore Act be used to purchase coastal wetlands, marshes, beaches or maritime forests.

Such purchases are referenced in the plan, and cited as possible uses of Restore funds. However, those are simply suggestions. There is no requirement that the states follow through and actually protect a single acre of coastal land.

The undersigned groups propose that the final draft of the Council's plan require that a nickel of every dollar, or five percent, of the Restore money under the council's purview be set aside for buying new coastal lands in every state.

Our marshes and wetlands are the key to the coastal ecosystem, functioning as nurseries for most of the Gulf's signature species. While Louisiana's marshes were devastated by the BP spill, marshes in Alabama, Mississippi, Florida and Texas were largely untouched. Those marshes are the primary reason the Gulf has rebounded from the spill as well as it has. They will be key to ensuring the Gulf rebounds from the next spill.

Today, the Gulf's marshes are in decline, being slowly whittled away by the competing pressures of development and erosion. More than half have already been lost. The Restore funds represent a once in a lifetime opportunity to secure the best remaining pieces and ensure they will be preserved.

There is no more important measure the council can take to ensure the future of the Gulf. We must not let this chance slip away.

Sincerely,

Ben Raines
Executive Director
Weeks Bay Foundation

Dauphin Island Sea Lab
Gulf Restoration Network
Southern Environmental Law Center
Mobile Baykeeper
Atchafalaya Basinkeeper
Weeks Bay Foundation
SouthWings
Gulf Islands Conservancy

Oasis Earth
Mobile Bay Audubon Society
Birmingham Audubon Society
Alabama Coast United
Sierra Club, Mississippi Chapter

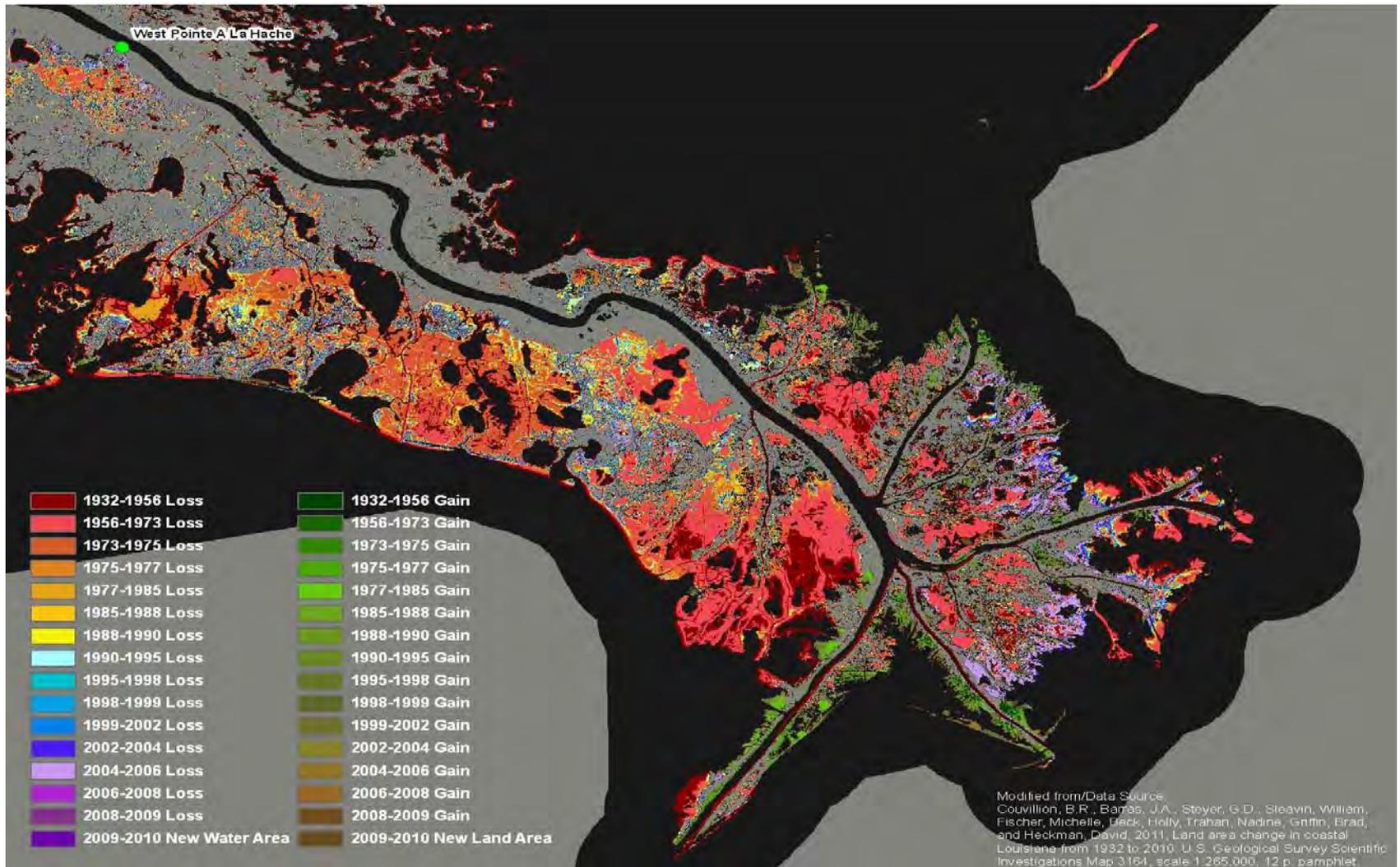
The following scientists endorsed the proposal as well:
John Valentine, Executive Director, Dauphin Island Sea Lab
George Crozier, Dauphin Island Sea Lab, retired Director
Ken Heck, Senior Scientist, Dauphin Island Sea Lab
Just Cebrian, Senior Scientist, Dauphin Island Sea Lab
Monty Graham, Chair, Department of Marine Science, University of Southern Mississippi

Ben Raines
Executive Director
Weeks Bay Foundation, Inc.
11401 U.S. Highway 98
Fairhope, AL 36532
(251) 990-5004
fax (251) 990-9273
www.weeksbay.org

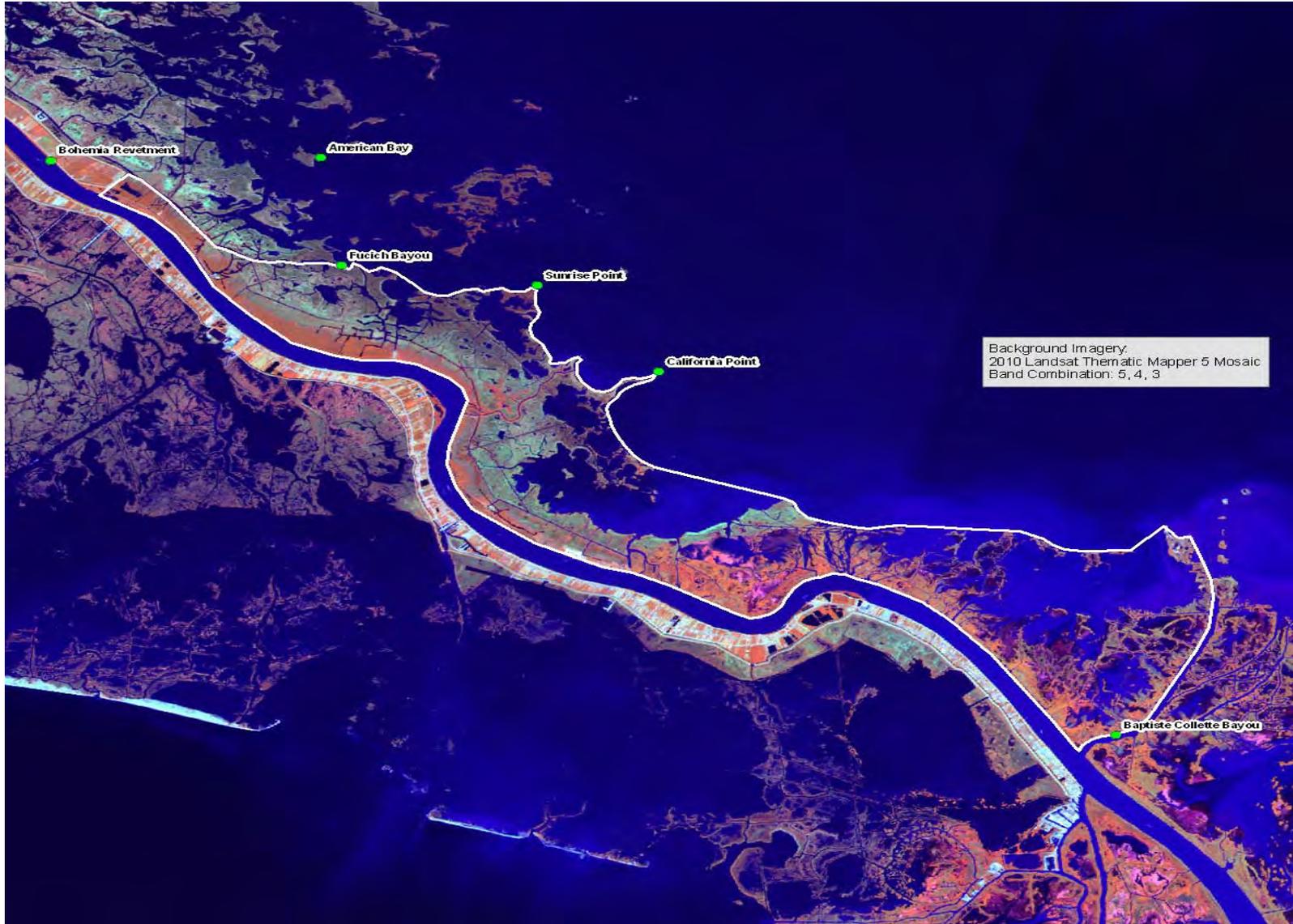
BOHEMIA TO BAPTIST COLLETTE WETLAND EVALUATION 1985 TO 2010

Kenneth Fox
December 2011

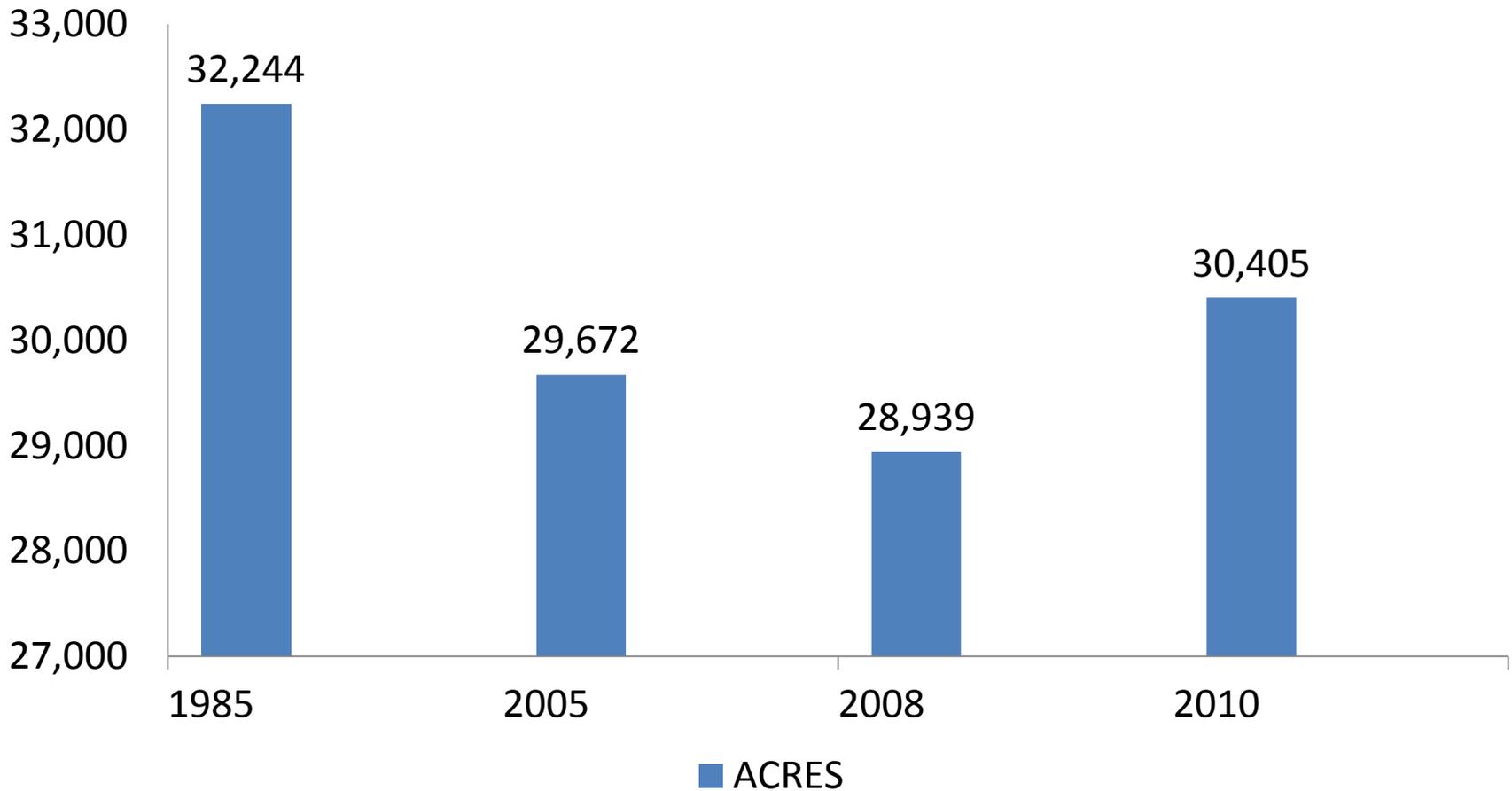
Land Area Change in Coastal Louisiana from 1932 to 2010



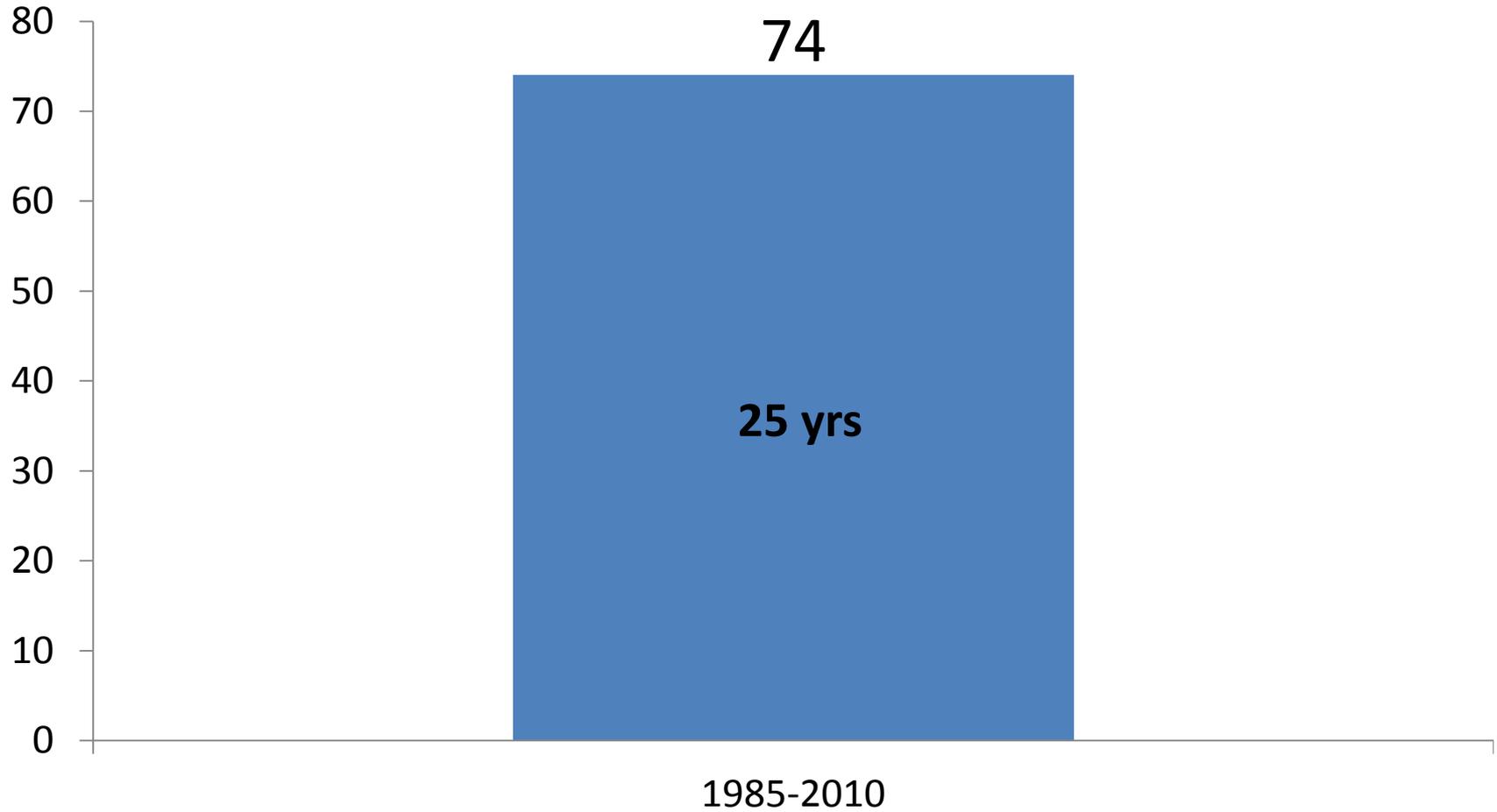
PROJECT AREA (59,028 ACRES) BOHEMIA TO BAPTISTE COLLETTE COLLETTE



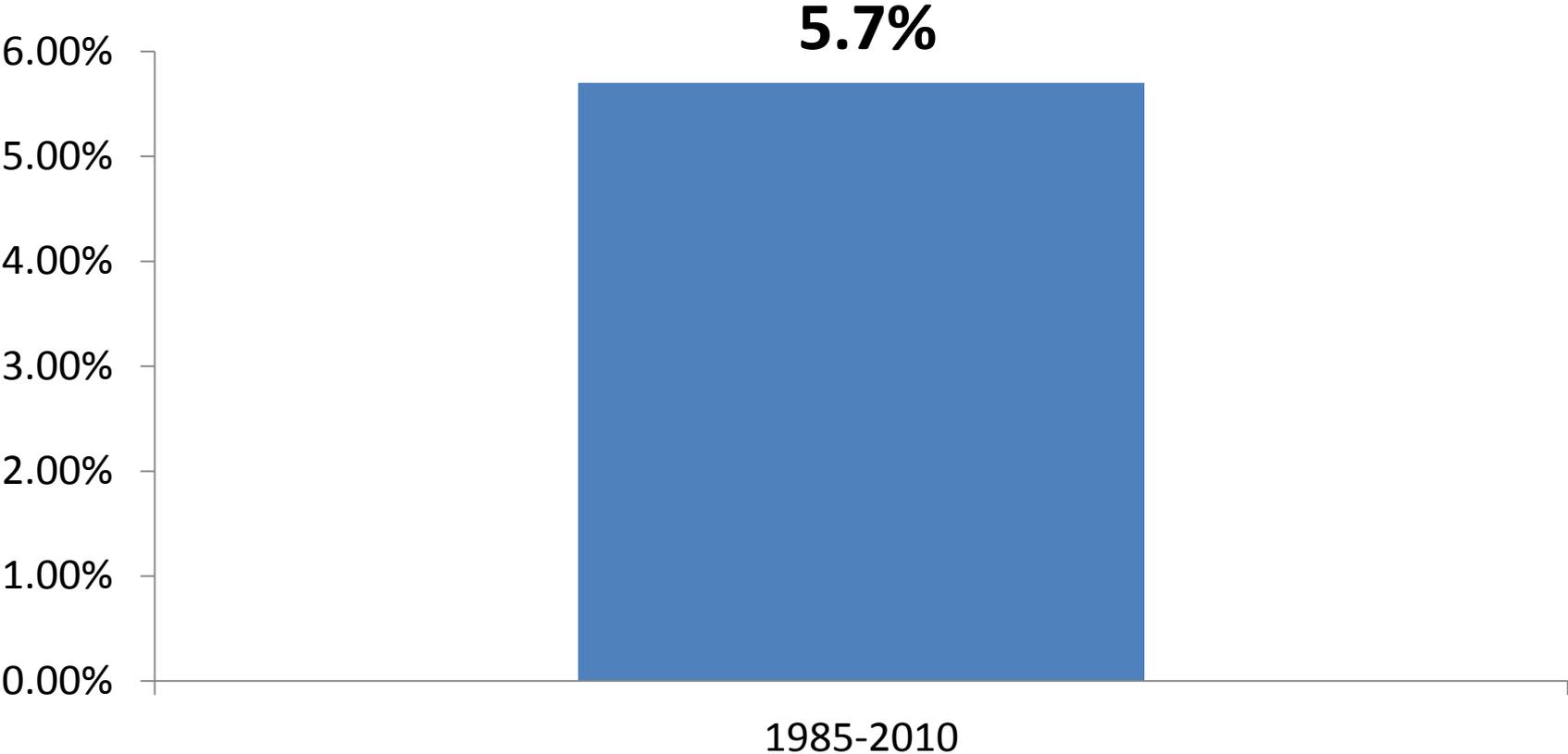
LAND AREA CHANGES FROM BOHEMIA TO BAPTISTE COLLETTE 1985 TO 2010



BOHEMIA TO BAPTISTE COLLETTE AREA LAND LOSS AVERAGE ACRES PER YEAR



BOHEMIA TO BAPTISTE COLLETTE PROJECT 1985-2010 PERCENT OF LAND LOSS



CONCLUSION/RECOMMENDATIONS

- Two large scale diversions, White Ditch Diversion (35,000 cfs) and Myrtle Grove (45,000 cfs), are planned/designed to restore the wetlands similar to what occurred prior to the implementation of the Mississippi River Levees.
- Based on the evaluation results of the Caernarvon Diversion (8000 cfs) and the evaluation results of 25 years of Bohemia to Baptiste Collette area without levees, these large scale diversions will **NOT** be successful and we **DO NOT** want them.
- In addition, the \$787,000,000 estimated cost for these diversions could be better utilized to implement the Plaquemines Parish proposed solutions.

There should be a clause in the conclusion, that if a major storm brings up unforeseen problems caused from the spill, that BP and Deep Water Horizons would be liable for the damage and responsible the problems it may cause. We have not experienced a major storm in the Gulf since the spill, so we really don't know what to expect when we do.

BBASC Tier 1 Work Plan Recommendations

Priority	Pg #	Study Name	Notes	Study Duration	Estimated Cost
1	10	Instream Flows - SB2 TIFP Guadalupe Study		2-4 years	\$2,000,000
2	13	Instream Flows - Streamflow Gaging and Synoptic Flow Study		10 year contracts	\$50,000 (Inst.) + \$32,000 (annual O&M) = \$82,000 (1st year)
2a	13	USGS Streamflow Gaging and Water Quality Monitoring	The gage location below Victoria is dependent upon the Synoptic Flow Study (2b)	10 years	\$370,000 total cost for 1st ten years
2b	15	Synoptic Flow Measurements to Estimate Freshwater Inflow and Applicability of Lower River Gaging Stations		2 years	\$200,000
3	16	Bays & Estuaries - <i>Rangia</i> Clam Investigations		2 years	\$260,000
4	17	Bays & Estuaries - Life Cycle Habitat & Salinity Studies for Key Faunal Species		1 year	\$500,000
5	19	Bays & Estuaries - Hydrodynamic & Salinity Model Improvements	Hydrodynamic & Salinity Model Improvements Study is dependent upon Synoptic Flow Study (2b)	20 months	\$120,000
6	20	Instream Flows - Full Accounting of Surface Water		3-5 years	\$300,000
				TOTAL	\$3,832,000

BBASC Tier 2 Work Plan Recommendations

*Disclaimer: Studies listed are grouped by type of study, not in any prioritized order

Pg #	Study Name	Study Duration	Estimated Cost
23	Instream Flows - Riparian Assessment and Monitoring	2-3 years then annually for long-term transects	\$575,000 (initial study plus 1 year of long-term)
25	Instream Flows - Biological Sampling and Monitoring	2 year study then recommended annually	\$575,000
27	Instream Flows - Geomorphic Studies and Monitoring	2-3 year study	\$781,000
31	Bays & Estuaries - The Distribution and Abundance of Marsh Vegetation in Relation to Salinity and Elevation in the Guadalupe Estuary Delta	2 year study	\$500,000
33	Bays & Estuaries - Habitat Suitability Models for Eastern Oysters, Blue Crabs & White Shrimp	2-3 year study	\$310,000
34	Bays & Estuaries - Development of an Inundation and Salinity Model of the Guadalupe Estuary Lower Delta and Adjacent Bays	2-3 years	\$200,000
			Total
			\$ 2,941,000

BBASC Tier 3 Work Plan Recommendations

*Disclaimer: Studies listed are grouped by type of study, not in any prioritized order

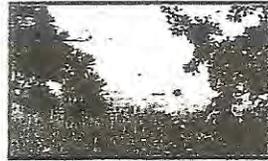
Pg #	Study Name	Study Duration	Estimated Cost
36	Instream Flows - Groundwater Studies	1-3 years	TBD
38	Instream Flows - Water Quality Monitoring	6 and 10 years	\$3,210,627 and \$7,495,000
41	Instream Flows - Invasives	2-4 years	TBD
42	Bays & Estuaries - Nutrient Load & Concentration Monitoring	2 years	\$10,320
43	Bays & Estuaries - Role of Cedar Bayou in the Exchange of Water and Meroplankton to the Guadalupe Estuary	TBD	\$150,000
44	Bays & Estuaries - Evaluation of Sediment Transport Affecting the Guadalupe Estuary Delta	6 year study	\$650,000
46	Bays & Estuaries - Sea Level Rise Associated with Climate Change	2-3 years	\$261,000
			Total
			\$ 11,776,947
			Grand Total
			\$18,549,947

Bay and Estuary Study costs including the Instream synoptic flow measurements are estimated to be: \$2,566,320.00

The total estimated cost for all instream and bay and estuary studies is: \$18,549,947.00



Site Map



- Home
- DMR Information
- CIAP Home
- Coastal Preserves Home
- Coastal Mgt & Planning
- Ecology and the Environment
- Fishing, Oystering, Shrimping
- Fun, Educational
- GIS, Mapping
- Grand Bay National Estuarine Research Reserve
- MSGC Nat'l Heritage xx
- Human Resources
- Information
- Licensing
- Marine Fisheries
- Marine Patrol
- Marketing
- Permitting
- Publications
- Regulations
- Real Time Hydrological
- Sport Fishing

1- Site Information Point of Contact(s)

Mississippi Department of Marine Resources
 Coastal Preserves Program
 1141 Bayview Avenue
 Biloxi, MS 39530
 (228) 374-5000

2- Geographic Information

The land is located between Ocean Springs and Gautier along the Mississippi Gulf Coast.

Narrative Description of the Site:

The wetland boundary of this 2,339-acre preserve is Graveline Bay and Bayou. One exception is the exclusion of one major tributary. Graveline Bay and Bayou represents one of few relatively undisturbed estuarine bays and small tidal creeks in Mississippi. The area supports salt marsh, brackish marsh, and several oyster beds. The bay, marsh, adjoining upland forest, and undeveloped beach front near the mouth of Graveline Bayou are an important landing area for neotropical migrant birds. This coastal bay/marsh estuarine system receives only local freshwater runoff and consists largely of mid-level needle rush (*Juncus roemerianus*) dominated marsh along its entire length. Smooth cordgrass (*Spartina alterniflora*) occurs largely as narrow (1-3 m) bands along the creeks and bayous.

Date When Information Last Updated: March, 1998

Location: Jackson County, N30 E 21'47" W88 E 41'41"

Area of Influence: Watershed

3- Ecological and Cultural Characteristics

Habitat type:

The following ecological communities are expected or known to occur:

Estuarine subtidal 1) muddy sand embayment 2) small tidal creek 3) mollusk reef; Estuarine intertidal 1) sand beach 2) mesohaline marsh 3) oligohaline marsh.

Rare/Endangered Species:

Malaclemys terrapin Diamondback Terrapin
Juniperus silicicola Southern Red Cedar

Geomorphic Features: Pristine Tidal Marsh

4- Current and Potential Use of the Site

Recreational Use: Boaters and anglers use the area on occasional and seasonal basis for waterfowl hunting (sparingly) and fishing.

Commercial Use: Fishing and crabbing

5- Management Status

Land Ownership: Lands adjacent to this Coastal Preserve are either privately, locally, state or federally owned or administered.

Existing Designations: Mississippi Coastal Preserve

Management Status: The State will manage this area to keep it in a natural state.

Existing Monitoring Activities: Monitored by the Department of Marine Resources Coastal Preserves Program.

Acquisition Potential: Active

Management Needs: The State will manage the area as a coastal preserve for conservation purposes to protect ecological integrity of tidal marsh. The DMR will have direct responsibility. Much of the property is considered tidal wetlands and owned by the State.

6- Site Viability

Threats to Ecological Integrity:

To the south are two fairly large failed residential subdivisions. Roads are cut, utilities are in place, but very few houses are built. Oyster beds have been closed by the DMR due to septic tank contamination and limited flushing action of bay.

Increase of residential home construction without tie in to city sewer system could have adverse impact on bay. Could also result in increased sediment loading.

7- Comments and/or Additional Information on Graveline Bay Preserve:

Email Coastal Preserves Manager

[Next Site](#) [Return to GEMS Main Page](#)

© Mississippi Department of Marine Resources
For questions or comments,
see our [contacts page](#).

MISSISSIPPI DEPARTMENT
OF MARINE RESOURCES
DISCLAIMER

Statement by Dr. E.W. “Ed” Cake, Jr., Ph.D., regarding the

**Draft Initial Comprehensive Plan:
Restoring the Gulf Coast’s Ecosystem and Economy**

Thank you for this opportunity to comment on the **Gulf Coast Ecosystem Restoration Council’s** Draft Initial Comprehensive plan.

I am very concerned that no rubric is in place for determining the validity and appropriateness of projects proposed for funding under the Mississippi’s Restoration Components (projects).

The draft initial plan lists five broad and nebulous **Goals** (section III), but fails to prioritize those goals or assign values thereto for validating proposed restoration projects. If we consider their simple listing in the draft initial plan, one could assume that they are listed in descending order of importance. Please help the public to understanding the importance of each goal by giving some weighted importance factor to each **Goal**.

The seven **Objectives** listed in the section IV of the draft initial plan should be used in a rubric to objectively assess the validity, importance, appropriateness, and potential for success of all projects proposed by the public, the agencies, and other entities including the **Council**. Only by assigning a numerical value to the various components of the proposed restoration projects can the public understand and support the restoration projects chosen by the **Council** in each state.

The four **Evaluation Criteria** (section IV) are not prioritized, per se. Again, these proposed criteria should be include in a decision-making rubric and applied to all proposed restoration projects evaluated by the **Council**. It is imperative that the **Council’s** decisions as well as those of each state **Trustee** regarding the final selection of restoration projects be transparent and immune from undue political influence. I am very concerned about the evaluation process for the proposed restoration projects in Mississippi and who will make the final decision on which projects to fund.

As **Trustee Fisher** is very aware I submitted a proposal to restore oyster reef habitats in Point aux Chenes Bay in the **Grand Bay National Estuarine Research Reserve** in eastern Jackson County, Mississippi, early on in the process. (See accompanying proposal.) That proposal meets all of five of the **Goals** (section III) and six of the seven **Objectives** (section IV). However, there has been no feedback from Ms. Fisher or the **Council** regarding that proposed project. That multi-million dollar project will help restore and preserve the estuarine habitats of **GBNERR** and provide oysters and other estuarine-dependent fishery resources to the residents of Jackson County and adjacent Mobile County.

Personally and professionally, it does not matter to me who or what agency prepares the final proposal or conducts the project so long as the project moves forward through the selection process to the implementation phase and on to completion. But until and unless **Trustee Fisher** or the **Council** applies the evaluation criteria and rubric, no addition action is warranted at this time. If the **Council** does not have staff scientists with comprehensive knowledge of oyster restoration projects, who will make the final determination of the validity of this proposal to restore the oyster habitats in Point aux Chenes Bay?

The **Proposal Evaluation and Selection** statement in the Draft Initial Comprehensive Plan provides a three-step process including (a) **Eligibility Verification**, (b) **Coordination Review**, and (c) **Evaluation**. Has a *minimum set of requirements under applicable law* (state or federal) been published or sent to the entities that submitted restoration proposals as stated in subsection a? If not, why not?

I would like the record to reflect that I favor both the **Citizens and Scientific Advisory** groups to assist the **Council** with its deliberations. I suggest that each of the five of the Gulf States constitute their own advisory groups so that the advisory process does not become too burdensome and complex. I urge the **Council** to adopt **the Advisory Group** concept and invite citizens and scientists from the public to serve on those groups ASAP.

This statement, along with the following proposal constitute by formal response to **the Draft Initial Plan for Restoring the Gulf Coast's Ecosystems and Economy**.

Respectfully submitted,

Ed Cake

E.W. "Ed" Cake, Jr., Ph.D.
Chief Science Officer &
Certified Oyster Biologist
Gulf Environmental Associates
2510 Ridgewood Road
Ocean Springs, MS 39564
Email: ed.cake@yahoo.com
Mobile phone: (228) 324-9292
June 19, 2013; 1:19 p.m.

A Proposal to Restore the Oyster Habitats in Point aux Chenes Bay, in Eastern Jackson County, Mississippi, Using RESTORE Act Funds

**Prepared by:
Gulf Environmental Associates
Ocean Springs, Mississippi**

INTRODUCTION: The Gulf Coast Ecosystem Restoration Task Force is completing its review of restoration projects to be considered in Mississippi and elsewhere along the oil-impacted coastline of the Gulf of Mexico. The following preliminary proposal to restore the oyster habitats in Point aux Chenes Bay in eastern Jackson County, Mississippi, is herewith submitted to the Task Force and other state and federal agencies for further consideration.

The known impacts of the BP oil spill in April 2010 and its aftermath in 2011 in the state waters of Mississippi include, but are not limited to (1) the loss of all sizes of the American oyster, *Crassostrea virginica*, from state oyster reefs in western Mississippi Sound; (2) a state-wide reduction of or absence of successful post-oil-spill oyster spatsets; (3) the demise of the Mississippi oyster fishery; and (4) the loss of oyster habitats that support other important commercial and recreational fisheries. The loss of productive oyster reefs in western Mississippi Sound will necessitate not only the restoration of those damaged reefs but other oyster habitats elsewhere in Mississippi that could support the struggling oyster fishing industry. Oyster resources and habitats elsewhere including those in Jackson County furnish the planktonic oyster larvae that become the oyster spat on the now-dead reefs in the western Sound. Those reefs in Biloxi Bay, Graveline Bayou, and Pascagoula Bay could also supply relaying stocks for repopulating reefs in the western Sound should that become necessary.

In the 1900s productive natural oyster reefs existed in the bayous inshore of Point aux Chenes Bay east of Pascagoula and west of the Mississippi-Alabama state line and in the bay itself. [See attached topographic map.] In the early 1900s a 3-mile segment of the Grande Batture Islands, formed the southern boundary of the approximate 4,000-acre Point aux Chenes Bay, protecting it from storm waves and the intrusion of high-salinity, Gulf waters. Those islands also helped to hold the lower-salinity waters from the bayous that brought freshwater into the bay and created the estuarine conditions necessary for oyster settlement and growth and protected them from voracious high-salinity predators such as the southern oyster drill or “conch,” *Thais* [*Stramonita*] *haemastoma*. Although the State of Mississippi, Department of Marine Resources has attempted to restore oyster habitats in the bay, those attempts failed because of several factors discussed below.

A series of natural and artificial events that began in the recent geological past ended oyster production in Point aux Chenes Bay. Those events included (1) the prehistoric “pirating” of the Escatawpa River by the Pascagoula River that severely reduced the inflow of freshwater, nutrients, and sediments into the waterways that emptied into Point aux Chenes Bay. The

freshwater was required to maintain estuarine conditions; the nutrients were necessary to foster growth of all estuarine organisms including fish, oysters, shrimp, etc.; and the sediments were absolutely necessary to maintain the Grande Batture Islands at the mouth of the bay. Those islands were constantly be eroded by storm waves and tidal currents. (2) The natural westerly migration of the adjacent offshore barrier island of Petit Bois widened Petit Bois Pass and long-period waves entering eastern Mississippi Sound from the Gulf of Mexico helped to erode the sediment-starved Grande Batture Islands.

The reduction of freshwater resources to the bay was exacerbated by (3) the construction of three artificial, east-west “levees” north of the bay during the early to mid-1900s. Those “levees” include the current CSX Railroad bed and the “old” and “new” US Highway 90 road beds. Those man-made “levees” which are breached by inadequate openings prevent sufficient flows of freshwater, nutrients, and sediments from the Escatawpa River Basin into Point aux Chenes Bay. (4) Fresh water use by the now-closed International Paper Company facility in Moss Point further reduced the availability of inflows to the basin. (5) Human population growth along in the area drained by Bayou Heron and Bayou Cumbest eventually led to the closure of shellfish beds in those waterways from the inflow of improperly treated human sewage.

And finally, (6) the spill of highly-acidic effluents from Mississippi Phosphate Company’s waste gypsum pile that broke containment in 2005 just before Hurricane Katrina ended oyster production in Bangs Lake, a small embayment, and Bangs Bayou at the northwestern side of Point aux Chenes Bay. In the past Bangs Lake has served as a relaying area for oysters from Pascagoula Bay and elsewhere with assistance from and benefit accruing to local oyster fishermen.

The restoration of oyster habitats in Point aux Chenes Bay is appropriate and justified because of the loss of oysters and oyster habitats in western Mississippi Sound. It will require many years to re-establish productive oyster reefs and commercial oyster harvesting in the western Sound at least in part because of BP’s dispersed oil and Nalco’s Corexit dispersants and the “blackwater” events that killed virtually all oysters and other benthic organisms in the aftermath of the *Deepwater Horizon* disaster. Thirty-one years after the Ixtoc-1 oil spill in the Bay of Campeche in Mexico in 1979 the oysters in the oil-polluted Laguna de Terminos have still not recovered in their former habitats and to their pre-spill abundance levels. Until and unless full oyster production and restored oyster habitats exist in western Mississippi Sound, additional oyster habitats should be created to aid the oyster fishery and to restore the benefits that oyster reefs provide to Mississippi’s coastal ecosystem ... habitats for myriads of associated organisms in the Sound’s food webs, substrate for attached organisms, water filtration and sediment-cleansing features, stabilization of benthic habitats, fish habitats and sportsfishing reefs ... to mention a few.

RESTORATION PLAN: The term “restoration” begins with the prefix “re-.” The restoration of oyster habitats and oyster production in the Point aux Chenes Bay and adjacent waterway will require the use of many other concepts and activities that also begin with the prefix “re-.” This restoration plan may seem simple, but it is very complex and costly and will require the cooperation of several state and federal agencies to “make it happen. The advent of the BP oil

spill and the restoration funds that will be provided to Mississippi and the federal government as a result of that disaster will provide an exceptional opportunity to restore oyster habitats in eastern Jackson County. The restoration plan outlined below will require considerable pre-impact studies and post-impact evaluation. It may also require an Environmental Assessment or “EA” by one or more state or federal agencies. Its limited scope and beneficial outcomes will hopefully preclude a formal Environmental Impact Statement (“EIS”) process, given the fact that no federal funds need to be expended since BP should fund the entire project.

PROJECT GOALS:

1. **REBUILD** the Mississippi segment of the Grande Batture Islands with sediments dredged from nearby channels (e.g., Bayou Casotte) or from Mississippi Sound.
2. **REMOVE** or open sections of the Highway 90 and CSX Railroad “levees” so as to,
3. **RESTORE** freshwater inflow to Point aux Chenes Bay and its tributaries (Bayou Cumbest & Bayou Heron).
4. **RE-ESTABLISH** proper water-bottom conditions by planting cultch materials.
5. **RELAY** oysters from Graveline Bayou and/or Pascagoula Bay to **REPOPULATE** the **REPLACEMENT** oyster habitats.
6. **REMOVE** the sources of human and industrial pollution so as to permit,
7. **RECLASSIFICATION** of the Point aux Chenes Bay area as “approved” or “conditional approved” shellfish-growing waters.
8. **REQUIRE** Mississippi Phosphate Company to **RESTORE** Bangs Lake to its pre-acid-spill conditions, including, but not limited to, the **REPLANTING** of oysters in that lake.
9. **REIMBURSE** the oyster fishermen of east Jackson County for assisting with the **RELAYING** and **REPLANTING** oysters in Point aux Chenes Bay and Bangs Lake.
10. **REMIND** the oyster fishermen of east Jackson County of their **RESPONSIBILITY** to care for and enhance the oyster populations of the Point aux Chenes Bay area.

E.W. “Ed” Cake, Jr., Ph.D.
Chief Science Officer &
Certified Oyster Biologist
Gulf Environmental Associates
2510 Ridgewood Road
Ocean Springs, MS 39564
E-mail: ed.cake@yahoo.com
Mobile Phone: (228) 324-9292



June 19, 2013

Ms. Rebecca Blank, Chair
Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Avenue, N. W., Room 4077
Washington, DC 20230

RE: Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy

Dear Ms. Blank:

Ducks Unlimited was founded in 1937 by concerned and farsighted sportsmen conservationists. Our mission is to conserve, restore, and manage wetlands and associated habitats for North America's waterfowl, and for the benefits these resources provide other wildlife and the people who enjoy and value them. DU has over one million supporters who now make up the largest wetlands and waterfowl conservation organization in the world. With our many private and public partners we have conserved over 13 million acres of habitat for waterfowl and associated wildlife in the U.S., Canada, and Mexico. Ducks Unlimited is a science-based conservation organization. Every aspect of our habitat conservation work is rooted in the fundamental principles of scientific disciplines such as wetland ecology, waterfowl biology, hydrology, and landscape ecology.

The wetlands of the Gulf of Mexico coast comprise one of Ducks Unlimited's five highest conservation priority regions in North America because they are the most important and most threatened waterfowl wintering habitat on the continent. Indeed, the North American Waterfowl Management Plan (NAWMP) Gulf Coast Joint Venture (GCJV) has a goal to winter and return at least 13.71 million ducks and 1.32 million geese to the breeding population when continental populations are at NAWMP goals (<http://www.gcjv.org/documents.php>). No other wintering region in North America provides winter and migration habitat to such numbers of waterfowl. Importantly, the five Gulf Coast states provide habitat for over 95% of the world's population of the mottled duck – a resident breeding species in coastal wetlands and inland prairies whose population trajectory is estimated to be declining by the U. S. Fish and Wildlife Service. Given their critical importance to North American waterfowl, Ducks Unlimited has conserved nearly 310,000 acres of coastal wetland and prairie habitats in the counties and parishes of Florida, Alabama, Mississippi, Louisiana, and Texas. Across the entire geography of these five Gulf states DU has conserved over 902,000 acres of important wetlands and waterfowl habitat.

Gulf Coast wetlands are also continentally important habitat for millions of wading birds, shorebirds, secretive marsh birds such as king and clapper rails, and a host of other wetland dependent wildlife

species (<http://www.gcjv.org/documents.php>). Alarming, however, the Gulf's coastal wetlands remain at high risk of loss. Coastal wetland losses in some Gulf Coast states exceed 30%, particularly in Louisiana where an estimated 1.2 million of the ~3.1 million acres that existed in recent decades have been lost through conversion to open water (<http://dnr.louisiana.gov/index.cfm?md=pagebuilder&tmp=home&pid=99&pnid=0&nid=51>). If rates of loss are not reduced via management and restoration activities, it is estimated that by 2050 Louisiana alone will have lost more than 40% of its coastal wetlands (<http://www.coastal.la.gov/index.cfm?md=pagebuilder&tmp=home&nid=152&pnid=0&pid=112&catid=0&elid=0>).

Such losses are unacceptable and will have far reaching consequences for the entire Gulf of Mexico, and because of the associated loss of ecological goods and services, the large scale loss of wetlands ultimately will affect economies and people all across the United States. For example, waterfowl hunting and related activities (travel, lodging, etc.) contributed an estimated \$284,230,000 to the regional economies of Texas, Louisiana, and Mississippi in a single year (data unavailable for Alabama and Florida; http://library.fws.gov/pubs/nat_survey2006_waterfowlhunting.pdf). As previously noted in the Council's Gulf of Mexico Regional Ecosystem Strategy, much of the culture of the region is inherently linked to its bountiful natural resources. Waterfowl hunting is a very important part of the region's history and cultural tradition, and as part of the larger goal to restore coastal ecosystems and build resilience in coastal communities, maintaining this unique aspect of the regional culture should be an important consideration.

Hence, given the priority DU places on conservation of Gulf Coast wetlands and our investments toward that end, we are pleased to provide comments on the *Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy*. We congratulate the Council on your initial draft and we are generally pleased to see the emphasis on ecological restoration, the acknowledgement that ecological restoration fosters economic restoration, and the intention to base restoration decisions on the best available science. Given that some key aspects of information regarding the RESTORE Act remain undetermined, we encourage the Council to continue to offer opportunities for comments from all stakeholders as this plan is refined as more information becomes available. In particular, incomplete Plan elements including the Ten-Year Funding Strategy, project priority list(s), state master restoration plans, State Expenditure Plans, and other features related to this Comprehensive Plan all offer additional opportunities for the Council to solicit input from stakeholders. We encourage the Council to seize those opportunities to ensure a continued transparent process that results in the best possible plan based on the best available science to successfully restore the Gulf's complex ecosystem.

Specific Comments on the Draft Initial Comprehensive Plan

Page 6, Commitment to Science-Based Decision Making

DU applauds the Council for its commitment to pursuing and using the best available science to inform its decisions. Following principles of science-based adaptive management in the face of inevitable uncertainty should ensure the best possible outcomes based on resources invested through the RESTORE Act. We further encourage the Council to commit to evaluation of restoration investments and projects to ensure information is gathered that can inform future decisions and investments. Evaluation is a critical step in execution of adaptive management that sometimes is overlooked or neglected.

Page 6, Commitment to a Regional Ecosystem-based Approach to Restoration

We are pleased the Council recognizes the linkages from uplands to deepwater marine habitats that shape the Gulf's complex ecosystem. The Plan refers to this as a regional approach, and we encourage the Council to more explicitly consider and define that terminology. For land-based (including coastal wetlands) coastal restoration efforts, watersheds may provide a spatially explicit means by which the broader regional ecosystem may be divided, and may offer a means by which restoration planning may be stepped down to project level implementation. We note here that some watersheds will extend beyond the RESTORE Act limitation of working within the coastal zone and/or a 25 mile buffer zone. Council may wish to contemplate the need to consider work outside of that defined area in some instances, particularly as it pertains to proposals to restore or enhance water quality and quantity. Also, at the watershed scale, assumptions about project outcomes should be stated, followed by project completion, and then evaluation of assumptions based on project results. New information will be obtained through that process that can inform future project and funding decisions. Ultimately, we suggest Council consider ways to make this plan, its related assumptions, projects and project outcomes, as spatially explicit as possible, which should lead to development of information that informs future iterations of this Plan at various scales up to and including the regional ecosystem scale.

Page 7, Commitment to Engagement, Inclusion, and Transparency

We are very pleased with the participation process to date and applaud the Council's efforts to invite participation and comments from the diverse stakeholders with interest in Gulf restoration. In particular, we are delighted to note the Council's intention to facilitate strategic partnerships and collaboration on innovative elements of restoration. Ducks Unlimited has a long history of working in conservation partnerships, and we stand ready, within the context of our mission, to partner with the Council and other stakeholders to complete projects, programs, and other efforts that will achieve our collective goals for Gulf restoration.

Page 8, Goals

Again, we are pleased the Council continues to acknowledge that ecological restoration of the Gulf ecosystem is foundational to restoring and sustaining a strong regional economy. The five goals advanced by the Council are appropriate and should serve as excellent guidance for the collective restoration actions performed under all aspects and elements of the RESTORE Act.

Page 11, Objectives

Ducks Unlimited believes the broad, high level objectives as stated in the Draft Plan are appropriate and inclusive of the types of restoration that will be required to meet some of the habitat needs of waterfowl and other wetland dependent migratory birds. Further, the stated objectives should also provide appropriate high level direction for use of RESTORE and related funding. It is difficult to envision a method to prioritize these objectives – they are inter-related, and ultimately all founded upon restoration of elements of the Gulf's complex regional ecosystem. Given the Council's recognition that restoration of the Gulf regional ecosystem is foundational to restoration of the regional economy, we believe these high level objectives do not require prioritization.

We offer the following specific comments regarding each of the objectives:

- 1) Restore, Enhance and Protect Habitats: Habitat and the ecological processes that shape it are the foundational building blocks of the Gulf's ecosystem and economy. We are

pleased to note that Council acknowledges that control of invasive species may be required to successfully restore some aspects of the Gulf's regional ecosystem and sub-regional ecosystem components. We also recommend that Council consider conservation easements as a practical tool to protect privately-owned habitats in the Gulf region. Many land trusts and other organizations exist that could facilitate use of conservation easements to protect privately owned lands that are an important part of the Gulf ecosystem. Finally, Council may wish to consider that land protection via direct acquisition from willing sellers is usually a first step to achieve protection goals. We urge Council to consider ways to assist public and private landowners with long term management that will ensure continuing returns from invested RESTORE funds

- 2) Restore, Improve and Protect Water Quality *and Quantity*: While *water quantity* is referenced under this objective, we suggest Council explicitly include the words “*and Quantity*” as part of the objective. Water quantity issues arise throughout the Gulf region. Examples include water shortages in coastal Texas (e.g., current efforts to resolve water allocations in the Lower Colorado River basin), Mobile Bay (e.g., timing and amount of freshwater inflows from the Alabama River affect the Bay's ecology), and Apalachicola Bay (e.g., freshwater inflows from the Chattahoochee and Apalachicola Rivers affect the Bay's ecology). Council should consider projects that provide innovative solutions to water quality and quantity issues. For example, perhaps relatively small off river channel storage reservoirs could be used to supplement water quantity by storing water for release to maintain minimal inflows to bays and estuaries, or provide water to manage habitat for wetland wildlife. Regardless, water quantity should be an issue for the Council on par with water quality in regard to Gulf restoration.
- 3) Protect and Restore Living Coastal and Marine Resources: The objective is appropriate, and we are pleased to see the acknowledgement that some projects and outcomes may benefit recreationally important activities including waterfowl hunting.
- 4) Restore and Enhance Natural Processes and Shorelines: This objective is appropriate, but likely should acknowledge the need to *protect* any natural processes that remain generally unaltered. Additionally, it may not be possible in some instances to fully restore natural processes. Hence, this objective might also need to be refined to include efforts that seek to minimize negative ecological forces or effects caused by past perturbations. Perhaps a good example of this would be that Council should consider salinity barrier projects proposed for the Calcasieu and Sabine Navigation Channels. Neither project explicitly restores or enhances a natural process, but both are essential to protecting sensitive coastal wetlands from high salinities associated with Gulf water moving unnaturally and rapidly into low salinity habitats. Hence, some re-wording may be needed to acknowledge that some processes in some areas of the Gulf may be so disrupted that there is need to aggressively fund and complete projects that, while not part of the “natural processes” that shaped the system, are necessary to ensure that important habitats are not further degraded or lost. While the focus on restoration of natural processes is appropriate, regrettably, there appear to be some areas of the Gulf that will require more intensive management features such as the two salinity control projects mentioned (both of which are part of the State of Louisiana's Master Plan).
- 5) Promote Community Resilience: This objective is very appropriate, particularly references to restoration of features that provide nonstructural, natural buffers against storms and flooding. One such nonstructural natural buffer is the Gulf's extensive coastal wetlands – restoration of which would contribute toward nearly every objective listed in the Draft Plan.
- 6) Promote Natural Resource Stewardship and Environmental Education: This is an appropriate objective. Many residents of the Gulf region already understand the

importance of a healthy Gulf ecosystem, but continued outreach and education not only to Gulf region residents, but across the United States is appropriate. We believe successful restoration of the Gulf ultimately will require commitment of people outside of the Gulf region that enjoy the Gulf's natural resources in some form. This may include people coming into the region for its outstanding recreational hunting and fishing opportunities, people who enjoy eating Gulf shrimp, oysters and other seafood, or even people that rely on energy sources whose production is tied to Gulf resources or infrastructure. A healthy Gulf ecosystem is the basis for many resources enjoyed by people across the United States, so thoughtful and strategic outreach across the country seems warranted.

- 7) **Improve Science-Based Decision-Making Processes:** This objective is very appropriate, and we are pleased the Council has formally recognized the need to monitor and evaluate projects and programs funded through RESTORE. As noted, such evaluation is a critical component of science-based adaptive management. The examples provided in the Draft Plan suggest the Council is considering an appropriate array of options. We suggest Council consider, within the proposal process, guiding the applicants to consider and state assumptions and/or uncertainties about projects and project outcomes. Such statement of assumptions and uncertainties on the "front end" of the proposal process can help both the Council and those implementing projects better design appropriate performance measures to ensure the best science-based evaluation possible.

Evaluation Criteria

As previously mentioned, as part of the proposal review and evaluation process, Council may wish to consider requesting proposal developers to explicitly consider and state desired project outcomes and effects and uncertainties and assumptions about the proposed project. Such statements of uncertainties and assumptions invariably lead to discussion and consideration of the best ways to gather pertinent information to evaluate projects. Such a process generally ensures that applicants have thoroughly contemplated their proposed work and outcomes prior to submission for consideration of funding by the Council. In addition, such planning and evaluation is paramount to science based adaptive management, and ultimately to ensuring the Councils funding awards achieve desired goals and objectives, or at least result in learning to inform future restoration efforts.

We respectfully suggest that the Council should further define the Priority Criteria by requesting applicants to explicitly address "*How, and at what spatial scale (e.g., Gulf ecosystem, watershed, local or some other division) does the proposed work explicitly contribute to restoration and protection of ecosystem functions, marine, fish, or wildlife species habitats or populations, identify how and which functions, how and which species directly benefit, etc.?*". Applicants could also be requested to provide appropriate science-based references in support of their statement when possible, and they could also be asked to identify uncertainties in project outcomes where and when they exist.

An initial emphasis on projects that affect larger scales over longer time periods seems warranted, but to evaluate those two elements, some means to classify proposals by geographical and temporal scale of impact would be required. Applicants should be able to convey in fairly explicit terms how projects benefit ecosystem functions, habitats, and species over space and for what duration. Obviously, not all projects are likely to benefit all elements of the Gulf's complex ecosystem. Requiring applicants to explicitly predict project outcomes and benefits, with appropriate documentation and/or identification of uncertainties, should serve Council well in the project selection process and allow Council to select an array of projects that provide the most substantial benefits at largest scales.

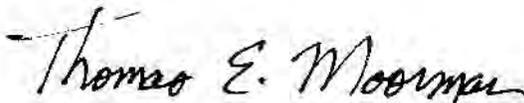
Ducks Unlimited also supports the concept and use of advisory committees to support and enhance Council decisions on project selection and funding. In particular, a Science Advisory Committee seems very appropriate given the complex and diverse nature of the Gulf ecosystem, the various restoration approaches that will ultimately be necessary, and the complex nature of evaluating project and program effects on Gulf natural resources. Council may also wish to consider subcommittees structured under an overarching Science Advisory Committee to focus explicitly on specific issues. For example, subcommittees composed of experts on migratory birds, fisheries, marine mammals, wetlands, deepwater habitats, water quality and quantity, etc., may be necessary to ensure the best science is reviewed and applied in support of restoration efforts. A Science Advisory Committee also would be a logical group to provide oversight and guidance to Council in regard to ensuring that principles of science-based adaptive management are followed throughout this long term restoration effort.

Preliminary list of authorized but not yet commenced projects and programs

We appreciate the opportunity to peruse the preliminary list of authorized but not yet commenced projects. We trust the Council will carefully review each project for consistency with the Plan objectives using the Plan Evaluation Criteria. We also trust the Council will provide opportunities for stakeholders to review and comment on each project before final decisions are made regarding project selection and funding. Consideration of these projects by a Science Advisory Committee may also be warranted (if Council establishes such a committee). A Science Advisory Committee, at a minimum, could help Council ensure appropriate planning and evaluation are part of each project, and in so doing help ensure the broader restoration effort guided by this Plan follows principles of science-based adaptive management and/or structured decision making in the face of inevitable uncertainty, and ultimately achieves the goals and objectives of this plan..

Thank you for the opportunity to provide comments on the Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy.

Sincerely,

A handwritten signature in black ink that reads "Thomas E. Moorman". The signature is written in a cursive, slightly slanted style.

Thomas E. Moorman, Ph.D.
Director of Science and Public Policy
Ducks Unlimited, Southern Region



Galveston County Beach Erosion Task Force

June 17, 2013

Hon. Members of the Restore Council-

Thank you for the opportunity to submit these comments. You are facing a very big and job, but the potential impact to the Gulf coast is tremendous. The RESTORE program is a unique opportunity to cause long term positive change and the decisions you make will have a lasting effect on millions of people.

There has been a great deal of discussion about which projects should or should not be implemented, and many of the proposed projects have been on the shelves of various agencies for many years. But I am asking that you take a step back from the "canned" projects that many groups are proposing; especially the acquisition projects. While acquisitions can be very good projects that are often created with noble intent, they will in effect be taking funds away from areas that are impacted daily by the offshore oil and gas industry and are also subjected to constant erosional forces. Often these acquisition projects are located away from the gulf shoreline, but the areas to be acquired rely on the protection of a wide beach or healthy dune system to preserve their integrity. Without this protection over time the acquisition properties will become submerged and lost to future generations.

When considering which projects to fund, priority should be given to those projects that have important environmental and species benefits, as well as those projects that restore habitat for endangered species and provide upland protection. Wide beaches provide foraging habitat for many species including the Piping Plover; and healthy dunes provide nesting habitat for the endangered Kemp's Ridley sea turtle and both provide protection to upland areas.

Additionally, when the oil from the Deepwater Horizon tragedy was washing ashore it was not in a vast majority of cases landing on areas that are now being considered for acquisition; instead it washed ashore on the beach. There are many funding mechanisms to acquire properties for preservation, but the funding stream for beach and dune restoration projects is much smaller.

Coastal communities are economic engines that often generate large tax revenues for State and federal governments as supported by Dr. James Houston's work to track the benefits provided by coastal restoration projects.

Stated simply- Beach restoration projects and dune restoration projects should be given priority consideration for funding. The upper Texas coast is a critically eroding area and following Hurricane Ike is in dire need of coastal restoration.

Thank you again for this opportunity to provide these comments.

Sincerely,

Jerry Mohn, Chairman
Galveston County Beach Erosion Task Force

Officers

Chairman

Jerry Mohn

Vice-Chairman

Peggy Zahler

Secretary

John Lee Jr.

Members

County of Galveston

City of Galveston

City of Jamaica Beach

City of Galveston

Park Board of Trustees

West Galveston Island

Property Owners Association

Pirates Property Owners Association

Gilchrist Community Association

Bolivar Peninsula Chamber of Commerce

Administrative Office Address

Galveston County
Courthouse
722 Moody
3rd Floor
Galveston, Texas
77550

Mission:

To promote the common good and general welfare of the residents, property owners, visitors and community of Galveston County by coordinating and furthering their common interest in an effective response to erosion of the beaches of Galveston County

3 June 2013

Gulf Coast Ecosystem Restoration Council
Draft Initial Comprehensive Plan

Dear Council Members:

Thank you for your service on this council, and the willingness to engage the public in this process. This document contains my comments/opinions on the Draft Comprehensive Plan for your consideration.

Refine Objectives and Evaluation Criteria: I would suggest not to be more specific on the Objectives. Keep the descriptions broad, so that any and all ideas may be considered. Making the Objectives too specific runs the risk of excluding ideas and projects and constraining innovation. Evaluation criteria should be very specific and measurable, as objective as possible. I do not think the current evaluation list is specific enough, and are somewhat redundant.

Establish Advisory Committees: Both citizens advisory and scientific advisory groups are indeed needed, but should have different foci. Citizen advisory groups should be as local as possible- County level. Science advisory groups should be related to broad differences in the offshore and coastal ecosystems of the Gulf Coast, but otherwise expertise-based, not necessarily geography-based. Science advisory groups may be fluid, calling on expertise from the scientific community as needed.

One of the difficulties in establishing these boards will be conflicts of interest. Those persons best qualified to sit on these boards will also hopefully be engaged in some of the projects. Clearly having persons with a vested interest in the region will be more thoroughly engaged, but there also needs to be some objective element involved so that projects are supported by science and real needs instead of political popularity from both within and outside of government agencies. I would recommend external scientific review.

I would also suggest that that Council avail themselves of academics in the scientific community in regionally located Universities for local expertise, and those already organized in the 8 GOMRI research consortia around the Gulf Coast, in addition to seeking expertise from the international science community.. It is part of our mandate to (try to) be objective and of service to society.

Pre-and Post Project funding. The nature of ecosystem restoration funding in the past has largely excluded planning, design, engineering, and permitting phases critical to success, and has not allowed sufficient post-project monitoring to provide adequate assessment of success. The first is a roadblock to the development of large scale and worthwhile projects, the latter is needed to determine investment strategies for future proposals. I would encourage the Council to consider including these in project awards.

Respectfully,

Richard A. Snyder
Professor and Director



June 11, 2013

Submitted Online and Sent via U.S. Mail

Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Avenue N.W., Room 4077
Washington, DC 20230

Re: Support for Acquisition and Restoration of Essential Habitat for the Endangered Dusky Gopher Frog

To Whom It May Concern:

On behalf of the Center for Biological Diversity and Gulf Restoration Network, we are writing to offer our support for use of *Deepwater Horizon* oil spill settlement funds for acquisition and restoration of essential endangered species habitat that is currently owned by a development company called Columbus Communities, LLC or "Tradition." As explained below, survival of the highly endangered dusky gopher frog requires restoration of the longleaf pine ecosystem on this 250-acre parcel. Because the parcel straddles Tiger Creek, its restoration would contribute to improved health of watersheds that border the Gulf Coast, as needed for a Gulf-wide ecosystem approach to restoration.

The Center for Biological Diversity is a national, nonprofit conservation organization with more than 500,000 members and online activists dedicated to the protection of endangered species and wild places. Gulf Restoration Network is a network of environmental, social justice, and citizens' groups and individuals committed to restoring the Gulf of Mexico to an ecologically and biologically sustainable condition.

Dusky Gopher Frog

The U.S. Fish and Wildlife Service ("FWS") listed the dusky gopher frog (*Rana sevosa*) under the Endangered Species Act in December of 2001 and designated critical habitat in June of 2012. The frog is primarily threatened by habitat loss. Due to its small numbers, it is also highly susceptible to genetic isolation, inbreeding, and random demographic or human related events. FWS has estimated that less than 100 adult Mississippi gopher frogs remain.

The dusky gopher frog is currently known from just a handful of sites in Harrison and Jackson counties in southern Mississippi, with only one of these sites – Glen's Pond – regularly showing reproduction by the frog.

The Tradition Development

A 4,600-acre master-planned community called the “Town of Tradition” is being developed on property next to Glen’s Pond. The development plan calls for 2,260 acres of single and multi-family units; 200 acres of commercial, office, retail, and light industry; 40 acres of schools, churches, and other civic related developments; and 300 acres for two golf courses.

The Tradition property boundary is approximately 200 meters from Glen’s Pond. In collaboration with Tradition, we have identified a 250-acre parcel of Tradition land located immediately adjacent to Glen’s Pond, which is essential for the frog’s survival. The FWS has recognized the importance of this parcel by including it in the frog’s designated critical habitat.

Proposal for Acquisition and Restoration

Tradition has asked state and federal agencies to support (a) acquisition of the 250-acre parcel by an appropriate agency, (b) placement of this acquisition/preservation project on the priority lists of projects to be funded in Mississippi with settlement funds from the *Deepwater Horizon* oil spill, and (c) funding of the restoration of longleaf pine on the parcel through an endowment from the National Fish and Wildlife Foundation funds, Gulf Coast Ecosystem Restoration Council funds, or other sources.

We are writing to offer our support for Tradition’s recommendation because preservation of this habitat is absolutely essential for the frog’s survival. The dusky gopher frog is one of the most highly endangered amphibians in the country with likely less than 100 adult frogs remaining. The 250-acre parcel surrounds Glen’s Pond, which is the frog’s last viable breeding pond.

Acquisition of this parcel by an appropriate agency would ensure that the frog’s longleaf pine habitat is preserved and appropriately managed through controlled burns to ensure that it continues to meet the frog’s highly specialized habitat requirements. In addition, preservation of the longleaf pine on this parcel could also provide habitat for the endangered gopher tortoise and red-cockaded woodpecker.

The gopher frog parcel straddles Tiger Creek, a natural stream that flows into the Biloxi River, which flows into the Bay of Biloxi and thence to the Mississippi Sound and Gulf of Mexico. If an agency were to acquire and restore the parcel, this land would provide natural filtering of storm water runoff and would enhance water quality contributing to restoration of the estuarine ecosystem of the Biloxi River, Biloxi Bay and Mississippi Sound, which was harmed by the oil spill.

Preserving this parcel and others bordering watersheds of the Gulf Coast is essential to a Gulf-wide ecosystem approach to restoration. Impaired water quality and ecosystem functioning due to widespread destruction of the virgin longleaf pine forest likely has contributed to the decline of marine life in our rivers, bays, and the Gulf itself, in addition to wildlife dependent on longleaf pine, such as the dusky gopher frog, gopher tortoise, and red-cockaded woodpecker.

For all these reasons, we believe that settlement funds should be used to acquire and preserve the 250-acre gopher frog parcel. If you have any questions or would like to discuss further, please do not hesitate to contact any of us.

Sincerely,



Collette Adkins Giese
Amphibian and Reptile Attorney
Center for Biological Diversity
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cadkinsgiese@biologicaldiversity.org

D. Noah Greenwald
Endangered Species Program Director
Center for Biological Diversity
(503) 484-7495
ngreenwald@biologicaldiversity.org

Cynthia Sarthou
Executive Director
Gulf Restoration Network
(504) 525-1528 ext 202
cyn@healthygulf.org



Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Avenue, N.W., Room 4077
Washington, DC 20230

June 24, 2013

Dear Secretary Blank:

The Steering Committees of the Peninsular Florida, South Atlantic, Gulf Coastal Plains & Ozarks, and Gulf Coast Prairie Landscape Conservation Cooperatives (Gulf LCCs) commend the Gulf Coast Ecosystem Restoration Council for the development of the *Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy*. Through this plan, the Council provides a strong framework for restoring, protecting, and revitalizing the Gulf Coast region following the Deepwater Horizon oil spill.

Landscape Conservation Cooperatives (LCCs) are a national network of non-regulatory, public-private partnerships. The Gulf LCCs have established a geographically-broad partnership across the Southeast with a shared mission to define, design and deliver landscapes capable of sustaining natural and cultural resources at desired levels now and into the future (see Attachment 1). Through this partnership, we implement many activities to achieve this mission that are strongly aligned with the goals and objectives outlined in the Draft Comprehensive Plan (see Attachment 2).

The Draft Comprehensive Plan highlights the fact that Gulf Coast ecosystem restoration will require a long-term vision and multidisciplinary approach. It will involve not only identifying opportunities to restore ecosystems that provide critical ecological services, but strategies to ensure that those ecological services will persist given changing conditions. Climate change, sea level rise and other landscape scale challenges require innovative conservation strategies that reflect our best understanding of ecological vulnerabilities to changing conditions. The Gulf LCCs invested in the Gulf Coast Vulnerability Assessment and other ecological modeling efforts to identify resources that would be “at risk” under projected changes anticipated along the Gulf Coast. This is a vital first step towards a coordinated, science-based, proactive approach to effective conservation through adaptation. Therefore, we are encouraged by the inclusion of sustainability within the objectives of the Draft Comprehensive Plan as a critical element to restore the ecosystem and economy of the Gulf Coast region.

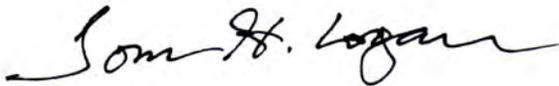
The Gulf LCCs work closely together to ensure their conservation plans will result in an ecologically-connected landscape conservation network. This requires considering both the coastal environment and the critical inland lands and waters that sustain them for a “white water to blue water” landscape approach. For example, the Gulf LCCs represent conservation partnerships that span large landscapes and major river systems important to the Gulf Coast, such as the Rio Grande, Mississippi River, the Mobile-Tensaw Delta, and Apalachicola-Chattahoochee-Flint River Basin. Therefore, we are encouraged by the Council’s commitment to ecosystem-based and landscape-scale restoration and your recognition that upland, estuarine, and marine habitats are intrinsically connected.

We are also encouraged by the Council’s commitment to both science-based decision-making and measuring outcomes, which are the cornerstones of the LCC approach. Together, the Gulf LCCs work to develop and apply conservation science that incorporates the best available understanding of future change. As multidisciplinary, self-directed partnerships we provide a forum for leveraging resources and expertise to not only provide the best available conservation science, but also address critical science gaps

for conservation planning. Additionally, LCCs use an adaptive, science-based approach to regularly evaluate the effectiveness of scientific information and conservation to improve decision-making. For example, each of the Gulf LCCs is working with partners to select indicators and set conservation targets to define shared, measurable goals for sustainable fish, wildlife, and cultural resources.

Thank you for this opportunity to provide input to the Draft Interim Comprehensive Restoration Plan. The Gulf LCCs are committed to a partnership approach to conservation in the Gulf Coast region and look forward to working with the Council.

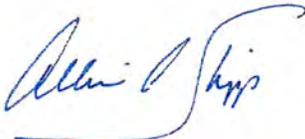
Sincerely,



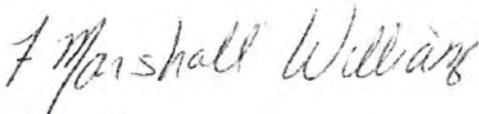
Thomas H. Logan
~~Vice President~~ *Retired*
~~Breedlove, Dennis & Associates, Inc.~~
Chair, Peninsular Florida Landscape Conservation Cooperative



Kenny Ribbeck
Chief, Wildlife Division
Louisiana Department of Wildlife and Fisheries
Chair, Gulf Coastal Plains & Ozarks Landscape Conservation Cooperative



Allison A. Shipp
Associate Regional Director
Southwest Region
U.S. Geological Survey
Chair, Gulf Coast Prairie Landscape Conservation Cooperative



Marshall Williams, PE
Regional Environmental Coordinator/Engineer
Army Regional Environmental and Energy Office- Southern (REEO-S)
Chair, South Atlantic Landscape Conservation Cooperative

Attachment 1: List of Gulf LCCs Steering Committee Organizations

Gulf Coastal Plains and Ozarks LCC

<http://gcpolcc.org/>

- Alabama Department of Conservation and Natural Resources
- American Bird Conservancy
- Arkansas Game and Fish Commission
- Auburn University
- Ducks Unlimited
- Florida Fish and Wildlife Conservation Commission
- Kentucky Department of Fish and Wildlife Resources
- Louisiana Department of Wildlife and Fisheries
- Mississippi Department of Wildlife, Fisheries, and Parks
- Mississippi State University
- Missouri Department of Conservation
- Oklahoma Department of Wildlife Conservation
- Tennessee Wildlife Resources Agency
- Texas Parks & Wildlife Department
- National Bobwhite Conservation Initiative
- National Oceanic and Atmospheric Administration
- National Park Service
- U.S. Army Corps of Engineers
- U.S. Fish and Wildlife Service
- U.S. Forest Service
- U.S. Geological Survey
- The Conservation Fund
- The Nature Conservancy

Gulf Coast Prairie LCC

<http://gulfcoastprairielcc.org/>

- Ducks Unlimited
- Gulf Coast Joint Venture
- Louisiana Department of Wildlife and Fisheries
- National Park Service
- National Oceanic and Atmospheric Administration
- Natural Resource Conservation Service
- Oaks and Prairies Joint Venture
- Oklahoma Department of Wildlife Conservation
- Reservoir Fisheries Habitat Partnership
- Rio Grande Joint Venture
- Southeast Aquatic Resources Partnership
- Texas Parks and Wildlife Department
- The Conservation Fund
- The Nature Conservancy
- U.S. Fish and Wildlife Service
- U.S. Geological Survey
- U.S. Natural Resources Conservation Service

Peninsular Florida LCC

<http://peninsularfloridalcc.org/>

- Florida Department of Agriculture and Consumer Services
- Florida Department of Environmental Protection
- Florida Farm Bureau
- Florida Fish and Wildlife Conservation Commission
- Florida Forestry Association
- Florida Land Council
- Florida Natural Areas Inventory
- Florida Forest Service
- Florida Regional Planning Councils
- Florida Wildlife Federation
- Miccosukee Tribe
- National Park Service
- National Oceanic and Atmospheric Administration
- Natural Resource Conservation Service
- Private Sector Members At Large
- Seminole Tribe
- St John's River Water Management District
- South Florida Water Management District
- Southwest Florida Water Management District
- The Nature Conservancy
- U.S. Department of Defense
- U.S. Environmental Protection Agency
- U.S. Fish and Wildlife Service
- U.S. Forest Service
- U.S. Geological Survey

South Atlantic LCC

<http://www.southatlanticlcc.org/>

- Florida Fish & Wildlife Conservation Commission
- Georgia Department of Natural Resources
- National Park Service
- National Oceanic and Atmospheric Administration
- North Carolina Wildlife Resources Commission
- South Atlantic Fishery Management Council
- South Carolina Department of Natural Resources
- The Nature Conservancy
- U.S. Department of Defense
- U.S. Environmental Protection Agency
- U.S. Fish and Wildlife Service
- U.S. Forest Service
- U.S. Geological Survey
- Virginia Department of Game and Inland Fisheries

Attachment 2:**Example Gulf Coast LCC-led Efforts Supporting Gulf Coast Restoration and Conservation**

Project Title	Description	Key Project Partners with the Gulf LCCs
Gulf Coast Vulnerability Assessment	The GCVA will enhance conservation, restoration planning, and implementation by providing a better understanding of the potential range of effects of climate change, sea level rise, and land use change on Gulf of Mexico coastal ecosystems and their species.	U.S. Fish and Wildlife Service, Gulf of Mexico Alliance, The Nature Conservancy, NOAA, and USGS.
Evaluation of Regional SLAMM Results to Establish a Consistent Framework of Data and Models and to Identify Critical Gaps for Evaluating Sea Level Rise Impacts to Coastal Marshes across the Gulf Coast.	The Sea Level Affecting Marshes Model (SLAMM) has been used in several projects along the Gulf Coast to model impacts to coastal marshes resulting from sea level rise (SLR). This project will synthesize, assess, and map the results from multiple modeling efforts for the Gulf Coast that can be used to characterize the impacts of SLR on coastal marshes.	Gulf of Mexico Alliance
Geospatial Vulnerability Analysis Tool: Gulf of Mexico Barrier Island System	This project will provide regionally comparable datasets that will be used to perform geospatial analysis to evaluate vulnerability of the Gulf of Mexico barrier island system. Available geospatial change analysis tools will be used with integrated physical and biological data sets to identify data gaps, characterize and map vulnerability variables, and develop an integrated set of data that can be used in decision support and visualization tools.	U.S. Fish and Wildlife Service, Gulf of Mexico Alliance, The Nature Conservancy, NOAA, and USGS.
Southeast Urban Growth Modeling	This project will develop long term urbanization scenarios by expanding existing SLEUTH urban growth models. By understanding where urban growth is likely to occur under existing conditions, conservation and urban planners can develop better, more targeted strategies for land conservation.	DOI Southeast Climate Science Center
Conservation Planning Atlas	The Conservation Planning Atlas (CPA) is a science-based mapping platform where conservation managers can go to view, retrieve, and perform analyses on spatial information with specific conservation goals in mind. The CPA also allows its users to create groups of members from several organizations who may have the same conservation goals. Within a group, you can perform analyses, upload data, and share information for other group members to use.	Conservation Biology Institute, Data Basin
Southern Instream Flow Research Agenda	Flow alteration is identified by experts as one of the major threats facing aquatic habitats across the region. The importance of natural flow regimes to the ecological integrity of rivers has been established for decades, but more specific information is needed to develop and implement scientifically credible instream flow standards to protect our rivers.	Southeastern Aquatic Research Partnership

Example Gulf Coast LCC-led Efforts Supporting Gulf Coast Restoration and Conservation

Project Title	Description	Key Project Partners with the Gulf LCCs
Factors influencing autumn-winter distribution of dabbling ducks in the Atlantic, Mississippi, and Central Flyways of North America	Changes in climate can influence availability of habitat and cause shifts in wildlife populations. A Weather Severity Index (WSI) to help explain weather-related duck migration will be used to estimate future distributions of duck populations given climate change scenarios.	Longpoint Waterfowl, University of Western Ontario
Climate change effects on fish and mussels in the ACF	Multi-scale modeling capabilities for forecasting climate change effects on stream fishes and mussels.	University of Georgia
Ecological implications of mangrove forest migration in the southeastern United States	Winter climate change has the potential to have a large impact on coastal wetlands in the southeastern U.S. Warmer winter temperatures and reductions in the intensity of freeze events would likely lead to mangrove forest range expansion and salt marsh displacement in parts of the U.S. Gulf of Mexico and Atlantic coast. The objective of the proposed research is to better evaluate the ecological implications of mangrove forest migration and salt marsh displacement.	USGS National Wetlands Research Center



June 18, 2013

VIA ELECTRONIC & US MAIL

Chair of the Gulf Coast Ecosystem Restoration Council
United States Department of Commerce
Attn: Teresa Christopher
Senior Advisor for Gulf Restoration
1401 Constitution Ave
Washington, D.C. 20230

Dear Ms. Christopher:

Recognizing the importance of working together, not as silos of government but as partners for full restoration, Florida has taken a unique and collaborative approach in its implementation of the RESTORE Act. Last year, Florida's 23 Gulf Coast counties formally executed a partnership to establish the Gulf Consortium and develop the State Expenditure Plan (Impact Allocation Component). Through a Memorandum of Understanding, the Gulf Consortium will also be working with the State of Florida and its many agencies to ensure that as projects and programs are reviewed for the State Expenditure Plan, they meet not only local needs but also regional, state and federal objectives and requirements.

According to the Draft Initial Comprehensive Plan, the Gulf Consortium's State Expenditure Plan must be consistent with the plan's goals and objectives. To further consistency and collaboration, the Gulf Consortium is requesting an extension from the Department of Commerce to the deadline for comments to the Draft Initial Comprehensive Plan. An extension will allow the Gulf Consortium to coordinate with its 23 coastal member counties at its next public meeting scheduled for June 28, 2013, and provide its collective comments to the Gulf Ecosystem Restoration Council. July 12, 2013 is the requested extension date.

The Gulf Consortium is fully supportive of the Council and is ready to participate in the planning at all levels. Favorable consideration of this request for extension will ensure public participation and is greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Grover Robinson", with a long horizontal flourish extending to the right.

Grover Robinson, Chairman
Gulf Consortium

cc: Gulf Consortium Members
Mr. Chris Holley, Executive Director, Florida Association of Counties
Mr. Douglas Darling, Interim Manager, Gulf Consortium
Ms. Sarah Bleakley, Interim General Counsel, Gulf Consortium

Florida Gulf of Mexico Restoration
Project Submittal Form

Project Name:

Southwest Florida Regional Ambient Monitoring Plan

Contact Information

Holly Greening, Director
Tampa Bay Estuary Program
hgreening@tbep.org
727-893-2765

Mark Alderson, Director
Sarasota Bay Estuary Program
mark@sbep.org
941-955-8085

Lisa Beever, Director
Charlotte Harbor National Estuary Program
lbeever@swfrpc.org
239-338-2556 ext 235

Project Location (include map, if possible, and the city, county, long/lat, and watershed)

The *Southwest Florida Regional Ambient Monitoring Plan* includes 14 water quality monitoring programs to enhance understanding and tracking of water quality conditions in coastal waterbodies, located in 11 counties stretching from Levy County south to Collier County on Florida's west coast. Project locations are shown on the attached map (Attachment 1) and are included in the Southwest Florida Regional Ecosystem Restoration Plan (SWFRERP). Information on the location of individual projects included in the *Southwest Florida Regional Ambient Monitoring Plan* (with city/county, latitude and longitude) is included in the individual project descriptions from the SWFRERP in the FDEP database.

Project Description (describe all aspects of the project)

The *Southwest Florida Regional Ambient Monitoring Plan* directly supports tracking of the impacts from implementation of the State's Priority Area 1 (Stormwater/Wastewater Infrastructure projects); Priority Area 3 (Water quality projects); and Priority Area 4 (Implementation of agricultural best management practices).

The *Southwest Florida Regional Ambient Monitoring Plan* includes 14 priority projects (listed in Attachment 2), combined into one Regional Ambient Monitoring Program (RAMP). This Plan

proposes the establishment of a Regional Trust Fund for Biological and Water Resource Monitoring to support the following critical monitoring elements:

- Hydrologic (stream gage) monitoring
- Ambient water quality monitoring
- Atmospheric deposition monitoring
- Tidal creeks monitoring to support nutrient criteria development

Estimated Project Costs (describe the estimated costs of the project, including any assumptions for contingency and ongoing operations/maintenance. Identify other secured funding sources such as matching funds, in-kind contributions or state/federal dollars. In addition, if possible, complete and submit the Cost Appendix Sheet associated with this form):

Estimated needed total cost of the establishment of the Regional Trust Fund for Biological and Water Resource Monitoring Program is **\$20,000,000**. Needed funds to support all projects included in the *Southwest Florida Regional Ambient Monitoring Plan* is **\$33,376,828** (see page 31 of the SWFRERP). Individual project descriptions include estimates of matching funds and other contributions.

Other funding (indicate if the project is submitted for any potential funding or if it may be used to leverage additional funding, of so please describe the funding source (e.g. State/Federal Grants):

Additional funding from grants, municipalities and other funding sources is shown in the individual project descriptions included in the FDEP database from the SWFRERP.

Technical feasibility (describe the technologies involved and any relevant past experience or proven success with similar projects):

Individual project descriptions include technical approach (see database descriptions). Monitoring programs have been refined and continually adjusted over many years in Southwest Florida by the counties and cities implementing them.

Environmental Benefits (Describe the nature, magnitude, and timing of any environmental benefits attributable to the project. If possible, describe potential environmental performance measures [e.g. pollutant reduction]. Please address any potential environmental impacts associated with implementing or maintaining the project [e.g., loss of a habitat or conversion of habitat from one type to another during implementation]).

Environmental benefits resulting from the *Southwest Florida Regional Ambient Monitoring Plan* will enhance understanding and tracking of water quality conditions in coastal waterbodies, located in 11 counties stretching from Levy County south to Collier County on Florida's west coast. Individual project descriptions include additional information on each (see FDEP database for individual project descriptions).

Economic and Social Benefits (describe the economic and social benefits including those related to the project's improved ecosystem services and any estimates on jobs created or preserved).

Jobs created or preserved by the *Southwest Florida Regional Ambient Monitoring Plan* are estimated as **28 direct jobs**.

Community Resilience (describe if the project assists Florida's ability to anticipate, withstand, or recover from hazards or threats [e.g. hurricane preparedness, establishing living shorelines]).

The ability to track and assess water quality response to hurricanes and other hazards or threats is critical to understanding and improving community resilience (see Attachment 2 and more detailed accounts in the FDEP database).

Conflicts or Complements to Existing Efforts (describe any ongoing activities in the project implementation area, if the project is part of another plan, and why the project does or does not interfere with that work. Please consider how the project may complement existing local, regional, and state efforts/plans/objectives).

Monitoring projects in the *Southwest Florida Regional Ambient Monitoring Plan* which occur within one or more of the National Estuary Program boundaries (see Map 5 of the SWFRERP, page 34) can assist in implementing the NEPs federally-approved Comprehensive Conservation and Management Plans. The two Water Management Districts develop Surface Water Improvement and Management (SWIM) Plans, of which many of the projects would assist in implementing. In addition, all of these projects are elements of the Southwest Florida Regional Ecosystem Restoration Plan, adopted on March 8, 2013.

Complies with Federal, State, Local and Tribal Laws/Regulations (describe any concerns or potential conflicts).

No concerns have been noted.

Readiness for Implementation (describe if the project has had any design or permitting work started or completed [attach permits or design work]. Please address any issues that may delay start or finish of the project).

All projects in the *Southwest Florida Regional Ambient Monitoring Plan* can be implemented immediately. After rules are provided by the Treasury Department regarding RESTORE Act funding, more will be understood regarding definitions of 'previously authorized projects'. At that point, the southwest Florida NEPs can assist the State in identifying such projects within the *Southwest Florida Regional Ambient Monitoring Plan*.

Public Acceptance (describe any known or potential public approval or opposition to the project).

All projects contained in the Southwest Florida Regional Ecosystem Restoration Plan, including the 14 included in this *Southwest Florida Regional Ambient Monitoring Plan*, were reviewed and ranked through publicly-noticed meetings of a Work Group (January 28-29 and February 11, 2013), followed by a Joint NEP Management Board on Feb 20, 2013. The Joint NEP Policy Board, consisting of 39 elected officials, Water Management Governing Board members, and agency leads (listed on page 8 of the SWFRERP) approved the process and resulting plan on March 8, 2013. All meetings were noticed (1) in the Florida Administrative Register; (2) through direct notice to the three National Estuary Program Board members and all applicants; and (3) on the websites of the three NEPs.

Additional Information you may wish to provide (Please include any maps, designs, drawings, photos, or background resources that may assist in completely and accurately understanding the project):

Two documents are attached:

- Attachment 1- Map showing locations of the 14 projects included in the *Southwest Florida Regional Ambient Monitoring Plan*.
- Attachment 2- A listing of the 14 projects included in the *Southwest Florida Regional Ambient Monitoring Plan*.

The Southwest Florida Regional Ecosystem Restoration Plan (SWFRERP), approved by the Joint NEP Policy Board members on March 8, 2013 has been previously provided to FDEP.

To Whom It May Concern:

On behalf of Charlotte County, Florida, a community of roughly 160,000 on Florida's Gulf Coast halfway between Tampa and Naples, we appreciate the opportunity to comment on the Gulf Ecosystem Restoration Council's (Council) Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy (Plan). Charlotte County is home to the Charlotte Harbor Estuary, the second largest in Florida which directly flows into the Gulf of Mexico. The Charlotte Harbor watershed encompasses all or parts of ten Florida counties and 4,500 square miles, so its health is intrinsically linked to the health of the Gulf.

In general, we are pleased with the Plan and understand that it is in many ways a living document, one that will be updated as events warrant. We approve of the Council's effort to help implement the RESTORE Act and look forward working with you to improve the health of the Gulf. Additionally, Charlotte County is an active member of the Florida Gulf Consortium and we support their comments to the Plan as well.

More specifically, in addition to the excellent Priority Criteria laid out in the Plan, we believe projects should be judged based on their regionalism and efforts to involve many participating entities. For example, if Charlotte County were to seek funding from the Council for septic to central sewer system conversions, stormwater improvements, and the development of best management practices, we anticipate working with a number of our neighbor communities such as Sarasota, Lee, and Collier counties to develop a comprehensive approach that will deliver significant water quality benefits to our shared water resources in and around the Gulf.

Further, one of the Plan's Goals is to "Restore and Revitalize the Gulf Economy" by enhancing "the sustainability and resiliency of the Gulf economy." However, this goal is not fully realized later in the Plan's Objectives. While we understand that the health of many Florida coastal economies is intrinsically tied to our collective water quality, we believe economic restoration could be more clearly stated as a Plan Objective.

Finally, we are intrigued by the Plan Objective to "Promote Community Resilience." Much of the discussion in this section revolves around non-structural solutions to responding to increased flood risks. However, in Florida, much of our coastlines that will be developed already are, thereby limiting most non-structural options. With much of Charlotte County in flood prone areas, we welcome the opportunity to develop "incentive-based mitigation programs" that could help our community avoid damage from future storms. In order to be effective, we urge the Council not to limit our options in developing a project or planning proposal that could mitigate risk to our community, even one that may be structural.

Thank you again for the opportunity to comment on the Plan. We look forward to working with the Council over the next several years as you begin to implement the Plan.

Sincerely,

Jason Stoltzfus
Program Liaison
Administration

Charlotte County, Florida

Office: (941) 743-1582

Cell: (717) 577-9278

www.CharlotteCountyFL.com

"To Exceed Expectations in the Delivery of Public Services"

Dear Council Members

First, please allow me to introduce myself. I am the Maurice Ewing Professor of Oceanography in the Department of Earth Sciences and Director of the Center for Sustainability at Rice University. Over the past three decades my graduate students and I have conducted research from the Florida Keys to the Rio Grande River, focusing mainly on the evolution of the coast and coastal response to the current acceleration of sea-level rise (a five-fold increase since most of the modern coastal estuaries and barriers formed). I have advocated strongly in public lectures, the peer-reviewed literature and my book "Formation and Future of the Upper Texas Coast" that changes that are occurring today are unprecedented and related largely to accelerated sea-level rise, human-induced subsidence and changes in sediment supply that are due to both natural and anthropogenic causes. Thus, I was strongly encouraged last evening at the Galveston meeting of the Gulf Coast Ecosystem Restoration Program to hear numerous references to the need to integrate science in the program. I also strongly support the argument that the dramatic changes occurring today along the coast are due to multiple factors, not just the BP spill. Indeed, in the final analysis that event may weigh in as having played a relatively minor role in the overall degradation of coastal ecosystems.

Last evening several people commented on the need to integrate science into this program, including the appointment of a science advisory committee. I strongly concur, but I would take this one step further to say that this committee should be composed of scientists who have strong research track records and demonstrated interests in conveying science to the public and policy makers. You will find that the number of experts in coastal science will increase by at least two orders of magnitude when there is the smell of money in the air. It is essential to check the scientific credentials of candidates using Google Scholar or other means. Most reputable scientists would argue that the peer-reviewed literature weighs more heavily than white papers and reports that generally do not undergo review by experts outside the authors own agency or institution. All too often I have seen so-called advisory groups filled by political appointment and/or lack the multidisciplinary breadth of knowledge to truly understand the various factors that influence coastal ecosystems and how these factors will vary in response to Global Climate Change (e.g. accelerated sea-level rise and changing precipitation patterns). As a result, the credibility of the program with the science community is derailed from the onset.

With this in mind, I am writing to call your attention to the Gulf Coastal Science Consortium, which is an organization composed of widely published and cited (peer-reviewed literature) coastal scientists focused on Gulf coastal issues, including but not limited to impacts of accelerated sea-level rise, natural and human induced subsidence, natural and anthropogenic alterations in sediment supply to coasts, and severe storm impacts, as well as other factors that

have and will control coastal ecosystem evolution. The members of this group have conducted research in all Gulf coastal states and all have extensive public outreach experience. We represent many universities, not just Gulf Coast universities, because the best scientists don't always reside at Gulf Coast universities. The original organizing members and their brief resumes can be viewed on our web cite; just Google Gulf Coastal Science Consortium.

Our first workshop was held at Rice University in June of 2012 and resulted in a set of consensus statements on several issues related to impacts of climate change and sea-level rise. These are listed on our web site. Our second gathering was associated with an international meeting held in Galveston, Texas in April of 2013 "Coastal Processes and Environments Under Sea-Level Rise and Changing Climate: Science to Inform Management". This conference was sponsored by the American Geophysical Union (AGU), Geological Society of America (GSA), Geological Society of London, Society for Sedimentary Research and the Shell Center for Sustainability of Rice University. These combined societies include many of the coastal science community in the physical sciences. The Galveston meeting was a five-day conference attended by 84 scientists, including social scientists, from 12 countries and resulted in a number of bullet statements outlining the outcome of the meeting. Meeting results, including the list of bullet statements, will be published by both AGU (EOS) and in GSA Today in the next several weeks. I attach a draft of the GSA Today article. In addition, AGU will issue a statement for members and policy makers after their Science and Policy Conference in Washington D.C. later this month.

I hope that you will consider members of our organizing committee when appointing a science advisory group to insure representation from the physical sciences who are knowledgeable about factors that will influence the sustainability of proposed ecosystem restoration projects. If I can answer any questions, please do not hesitate to contact me directly.

Sincerely

John B. Anderson

Maurice Ewing Professor of Oceanography and Director of the Shell Center for Sustainability

Rice University

I support a greater allocation for ecosystem restoration, including acquisition and restoration of coastal marshes for the range of critical ecosystem services they provide and their role in controlling flooding and supporting recovery.

Nancy Hornor

Sent from my iPad

As a kayak fisherman, I have spent much time in the estuaries of the Gulf Coast. In the kayak, we are close to the water and up close with the waters that give the Gulf of Mexico life. Using the restore funds to purchase, protect and restore estuaries should be the primary activities of your Council. This activity would satisfy many of the bullet points I see in the law. The estuaries of the Gulf Coast are teeming with life from game fish to birds, sea turtles and even larger mammals like dolphins and manatees that share these waters to nurture life. As my recreational activity involves riding the tide up into the estuaries I see the power of these areas to cleanse the Gulf. In many places in Florida where I live, the tide is going in or going out into the flat estuary from the sands of South Florida to the limestone of North Florida so the estuaries are constantly cleaning the Gulf waters.

As a President of a tourism company I see the economic benefits to estuary purchase first-hand. My customers come from across the world to visit this area because of the natural beauty of the Gulf ecosystem and to eat the bounty that comes from the Gulf. The life that comes out of these estuaries moves to the open gulf to reproduce when we carefully protect these areas is easy to see when you see the story of the glorious redfish fishery that was almost destroyed in the eighties. Through careful management it is now vibrant in most parts of the gulf coast. As an example, that fishery provides recreational activities for residents, food for families, income for guides, bait shops and local hotels plus a draw to the Gulf Coast for many tourists who pay taxes to fund state activities. Tampa Bay has been saved by careful purchases of ELAPP (county) sales taxes, so we have restored much of the wetlands in Southern Hillsborough County and Northern Manatee County. Through mitigation, we are also protecting uplands from the estuaries. In some areas, rivers and springs will need to be protected to maintain the proper balance between salt and fresh waters coming into the estuaries. I have paddled the restored areas we have re-created in lower Tampa Bay like Terra Ceia and Bishop's Harbor. They do function and begin to mimic the natural areas around them to clean the gulf almost immediately upon restoration. I regularly fish the Nature Coast, Charlotte Harbor, Big Bend and down to the Everglades. I have seen the Eagles at St. Vincent National Seashore and enjoy redfish, shrimp, crabs and oysters from the Gulf waters. We spend money in pursuit of our recreational activity every time we take an overnight trip to see a new area. As a citizen, I have voted to improve Tampa Bay by taxing myself and I get immense satisfaction of floating the clean waters of Tampa Bay over sea grasses that were not there ten or fifteen years ago or seeing a roseate spoonbill take flight. When I read that we have replaced sea grasses to a 1950s level in Tampa Bay, I am very proud. I would like to say the same about Gulf restoration twenty years from now if we do this right. I would like to be able to tell people that the BP disaster was terrible but we used most of the funds to actually fix the estuaries which went on to make the Gulf of Mexico better for generations to come. Careful stewardship of this once in a lifetime funding is required to make sure we invest in essential Gulf estuary management/cleaning, redevelopment and replacement with the majority of the available funds.

The purpose of my public comment today is to urge the Council to use the best science to allocate funds to estuary restoration and expansion over all other activities requested by Governments and interested stakeholders. I know there will be a push by many to use the funds for pet projects on the general wish list but the Gulf seems sometimes to be hanging by a thread under the pressure we put on it in this millennium. This decision is critical as these funds will provide a once in a lifetime chance to make or break the Gulf of Mexico for our generation.

John Rice, GM

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Dear Sir or Madam:

I read an article in the New York Times this afternoon which called for setting aside as much natural coastal habitat to protect the gulf coast as possible. I hope the Council takes this recommendation to heart and uses as much of the proceeds as possible to purchase and restore the coastal ecosystems that sustain the Gulf of Mexico.

Not only do the plants and animals of the Gulf have intrinsic and touristic value, but they also support so many people economically. With that in mind, it would be sound economic, environmental and social health policy to purchase and protect as much of the coastal lands as possible so that if a tragedy of this scale ever happens again, the Gulf can bounce back just as well next time.

Please, pay heed to our fragile ecosystems which sustain us and protect the Gulf.

Thank you,

John Tillo

John A. Tillo
2212 Knapp St.
Ames, IA 50014
515-450-4243

As a homeowner and resident of coastal Florida, living only 1000 feet from the Gulf of Mexico, I strongly urge the council to require that five cents of every dollar you control be used to buy and protect coastal marshes and wetlands. This is the single most important thing you can do to help the Gulf survive the next inevitable oil spill.

Sincerely,

Johnny Vanderlip
Tarpon Springs, FL

June 19, 2013

Comments on Draft Initial Comprehensive Plan

Breakout of funds p. 5: Always wondered about the 35% to states directly—will that be equally divided or proportional? If proportional, hard to make sense of it even using tidal shorelines (see PEA p. 30), considering the minimal impact of the BP disaster on TX and FL.

Although you consider ports essential and part of restoration (p. 17--how were they damaged?), Gulfport is not listed in the PEA as a major port (p. 38-39). Yet most of the MS money will have to go to this port as it needs about a billion in dredging for it to live up to the promises it has made to HUD (for the free \$570 million). Somehow making a shallow sound into a deepwater port does not seem like “restoration” but rather destruction. [For the “free” grant money of \$250 million, MS Power has spent \$4 billion on a coal plant—watch out about basing business strategy on government grants.]

“Acquiring the equivalent” (p. 9), and “protection through acquisition” (p. 12), will be, I hope, a **major** expenditure for all the states and the Council as a whole. Since it seems impossible to get the near shore waters protected (Marine Protection Areas—was surprised to see so many on p. 17), even though we are experiencing extremely low catches of menhaden, shrimp & oysters, as much land along the tidal shoreline marshes and estuaries as possible should be acquired. This is an essential protection for the mainland as well as a nursery for the fisheries. It would also prevent development. There is no point in destroying the marshes to build structures that are destined to wash away in storms or be buried by sea level rise. Please see Ben Raines’ op-ed in the New York Times June 19: http://www.nytimes.com/2013/06/19/opinion/surviving-the-next-gulf-oil-spill.html?_r=0 I very much respect the controls you have laid out in this “draft plan,” but I think it would not have been going too far to require that a certain percentage of each state’s money be spent on acquiring wetlands and land along shorelines.

It makes sense that the highest priority for the first three years would be restoration (p. 14). I hope you can hold MS’s feet to the fire on that one, but forgive if I am skeptical. I would expect MS “Oil Spill Impact Plan” to be full of Infinity Science Centers and Biloxi Baseball Park enhancements. Also the “financial controls” mentioned on p. 18 are going to be essential in MS.

As a draft plan, I do not object to a lack of specifics—laying out the pre-requisites in some states that rarely follow “the rules” is a good idea. It would have been nice to pay some obeisance to the public and appoint a citizens advisory council to oversee the compliance with some of the requirements.

Also, it would have made sense to require each state to set aside a certain portion of its “Direct” component as an endowment for ongoing maintenance of some of the projects.

Comments on Draft Programmatic Environmental Assessment

You all are going to be in trouble with the southern governors for mentioning sea level rise (p. 42, p. 66) without citing the exact Bible passage which predicts it. We have been told by these governors that they don't "believe in" climate change and the fact that it is happening is going to be an insult to their intelligence.

It is depressing to see an EIS with only "proposed" and "no action." Sometimes there is a "Plan B" that spends less money and does less damage—perhaps when the final EA is published there will be some alternatives besides the recommended and nothing.

I wondered whether the "acres in conservation" on p. 18 included national forests...the description does not include them.

Comments on Appendix A

Was pleased to see the MsCIP projects on here. I don't remember their appearance in the NRDA list, although perhaps they were submitted by the MDMR. Somehow doesn't jibe with the GoCoast projects, which were mostly non-restoration, brick and mortar (especially the 'transportation hub' for freight only, and adding to the utility pipelines to nowhere). I was surprised not to see the GoCoast projects on the list. Going to be hard to stretch that money (when and if it materializes) for MsCIP and GoCoast.

As usual, I don't expect any of these comments to make any difference. Certainly the GoCoast document was not changed at all by numerous public comments. But I just keep doing it, like Sisyphus.

And I wish the public could see some plans from BOEM for improving oil spill response, such as increasing the requirements for deep-water drillers—an ROV with a transponder to regulate the blowout preventer (BOP), as is required in other countries, or a spare BOP. But apparently BOEM has no responsibility to the public and whatever they do or don't do is confidential. And the dispersant problem needs to be addressed by the EPA.

The States and the council should require that a nickel of every dollar they control be used to buy and protect coastal marshes and wetlands. Any estuary, marsh or maritime forest remaining on the Gulf of Mexico should be preserved. This is most likely our greatest and last opportunity as a people to preserve what's left of the Gulf shoreline.

I was born and raised in Tampa, Florida. As a child, I rode my bike from home to fish and crab on pristine or near-pristine beaches and backwaters. None of these places exist any more due to unfettered development, overpopulation and greed. I'm not exaggerating.

Julian Fernandez
Dallas, Texas

Congress specifically designed the RESTORE Act to require robust public involvement in all stages of the process of determining which projects and activities should get funded by the Deepwater Horizon oil spill civil penalties. The RESTORE Act established the Gulf Coast Ecosystem Restoration Council, which is comprised of state and federal officials tasked with allocating Restore Act funds to restoration projects along the Gulf Coast. These funds could be upwards of \$20 billion dollars.

Outgoing EPA Administrator, Lisa Jackson, called on the Gulf Coast Ecosystem Restoration Council to establish a Citizen Advisory Committee that would give a forum for participation by non-governmental organizations including environmental, conservation, fishing and community stakeholder groups in the development and implementation of a Gulf-wide restoration plan.

However, the Gulf Coast Ecosystem Restoration Council has not yet established a Citizen Advisory Committee and continues to move forward in restoration planning without allowing for meaningful community input. A Citizens Advisory Committee is an essential piece of the process, without which the council will lack the important resources and knowledge base of coastal residents and the citizen engagement needed for effective participation in implementing Gulf-wide ecosystem restoration plan.

A Citizen Advisory Committee must be established as soon as possible in order to inform the Council's restoration plan. The Citizen's Committee should provide formal citizen involvement in development of the restoration plan and remain involved as the projects are implemented to ensure the plan is carried out as intended.

The Gulf Coast is a culturally rich region made up of numerous stakeholders, including: fishermen, oil rig workers, landowners, conservation groups, recreationalists, small business owners and residents. The Deepwater Horizon caused severe damage to the region; the Gulf Coast Ecosystem Restoration Council provides us with an opportunity to heal the Gulf Coast. Let's use this opportunity to make things right and keep the citizens at the table so that they can help shape the future of the Gulf Coast!

Kenneth Ragas
34329 Hwy. 11
Buras, LA 70041



*Dedicated to preserving and protecting valuable natural areas
and agricultural lands in Southeast Louisiana for current and*

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Re: Draft Initial Comprehensive Plan
Land Trust for Southeast Louisiana Public Comments

Dear Dr. Blank:

My name is Marisa Escudero and I am writing on behalf of the Land Trust for Southeast Louisiana to submit public comments in regards to the Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy. The Land Trust for Southeast Louisiana is a 501(c)(3), nonprofit corporation that works with community partners to create a healthy and sustainable natural environment through land donations, conservation easements, or land purchases that conserve and protect valuable natural areas and agricultural lands of Southeast Louisiana for current and future generations. We wish to extend our help and expertise to the Gulf Coast Ecosystem Restoration Council as you continue to develop the Initial Comprehensive Plan.

We generally support the Council's plan and goals as they echo the beliefs of the Land Trust for Southeast Louisiana with regards to water quality, coastal restoration, changing climate conditions, and protecting coastal ecosystems and habitats. However, we have six primary concerns related to the execution of these goals that we would like to bring to the Council's attention:

1. Permanent Land Protection
2. Funding
3. Competitive Application Process for Centers of Excellence Grants
4. Citizens Advisory Committee and Scientific Advisory Committee
5. Criteria for Selecting Projects
6. General Comments

Permanent Land Protection

As the Trustees move forward, we urge you to make a commitment to the permanent protection of natural habitats, ecosystems, and watersheds in the region. Permanent land protection is readily attained through land acquisition from willing sellers to government and non-profit organizations, or alternatively through

conservation management agreements with private landowners. Either option can be layered over any remedial restoration activity. Over time, permanent land protection has proven its efficacy for restoring natural resources and services, whereby providing natural resource benefits to the public in perpetuity. Presently, thousands of eligible property owners in the Gulf region are willing to either sell their land or enter into conservation agreements. More importantly, permanent land protection satisfies various objectives by restoring and protecting habitats, restoring and protecting water quality, restoring and enhancing natural processes and shorelines, and promoting community resilience. We encourage the Council to consider a watershed approach to future restoration and land use planning activities. This approach could factor in the future impacts associated with climate change, land use change, and non-point source stormwater runoff. The acquisition of riparian watershed corridors could play an important role in sustaining healthy populations of living resources.

Funding

We advocate the Council to adopt a policy that would allow RESTORE funds to be used for land acquisition, long-term monitoring, and land protection in Louisiana, similar to the Forever Florida and Forever Wild funding mechanisms in Florida and Alabama. This policy could also allow for match and cost-share for other federal programs or endowments, revolving funds, and similar funding mechanism so that protection, restoration, and management can be conducted in perpetuity. We additionally encourage the Council to set aside funds in each affected state that would allow for the acquisition of fee simple real estate properties and conservation easements from willing sellers and donors of these properties that contain important conservation values that align with the framework and objectives of the approved comprehensive plan.

We encourage the Council to explore blue carbon funding opportunities through wetland carbon sequestration. Blue carbon is when wetlands store captured atmospheric CO₂ through photosynthesis, which is retained in root mats and other material after the plants die and decay, thus permanently storing carbon dioxide. Approximately 4 million acres of fresh-to-saline wetlands in the Mississippi River Delta are ready and eligible for restoration under the new wetland carbon credit methodology. Presently, blue carbon credits are traded in American voluntary markets and will soon trade in California's regulatory market. This is an innovative, forward-thinking approach to rebuilding coastal Louisiana, Mississippi, and parts of Texas by giving a dollar value to restoring, conserving, and permanently protecting wetland ecosystems. We encourage the Council to support projects and plans that will facilitate and encourage blue carbon financing.

Competitive Application Process for Centers of Excellence Grants

We urge the Council to draft and present application guidelines for the Centers of Excellence Grants. Two and a half percent (2.5%) of the total funds made available each year from the Trust Fund and 25% of the interest earned by the Trust Fund are to be made available to Gulf Coast States in equal amounts to award *competitive grants to nongovernmental entities and consortia in the GCR*

(including public and private universities) to conduct research on the GCR.¹ Entities or consortia in each state may submit grant applications to their respective state *"at such time, in such manner, and containing such information as determined by the state."* We urge the Council to move forward with the application guidelines. There is no need to wait for regulations from the Department of Treasury to proceed with drafting application guidelines.

We appreciate your efforts to ensure these grants are awarded to the broadest cross-section of participants in keeping with the disciplines in the RESTORE Act:

1. Coastal and deltaic sustainability, restoration and protection, including solutions and technology that allow citizens to live in a safe and sustainable manner in a coastal delta in the GCR;
2. Coastal fisheries & wildlife ecosystem research and monitoring;
3. Offshore energy development, including research and technology to improve sustainable and safe development of energy resources in the Gulf of Mexico;
4. Sustainable and resilient growth, economic and commercial development in the GCR;
5. Comprehensive observation, monitoring, and mapping.²

The states will have to report information regarding all grants to the Council annually.³ Those reports will include the amount, discipline or disciplines supporting the grant, and recipients of the grants. If a grant is awarded to a consortium, the membership of that consortium must be reported, as well.⁴

Advisory Committees (3)

We advise the Council to establish a citizens advisory committee, a scientific advisory committee, and a lands committee. These committees could provide critical input to the coastal decision making process and should be in addition to public outreach and public input activities. We further recommend that representatives from nonprofit land protection organizations be named to the citizens advisory and lands committees. The lands committee would be charged with reviewing and making recommendations on land acquisition and conservation strategies. The committees could consist of local residents, environmental nonprofits, civic groups, church groups and the academic sector. The nonprofit input could include the land trust community; specifically the Partnership for Gulf Coast Land Conservation could provide critical input on this matter. We encourage the Council to engage the five Gulf of Mexico National Estuarine Research Reserve System (NERRS) sites to assist in coastal decision-making education, science-based decision making, and land acquisition of important ecologically sensitive properties within the boundaries of each Gulf of Mexico NERRS site.

¹ RESTORE Act, Sec. 1605(a), Sec. 1604(h), Sec. 1605(c)(1).

² RESTORE Act, Sec. 1605(c)(3), Sec. 1605(d).

³ RESTORE Act, Sec. 1605(c)(4).

⁴ RESTORE Act, Sec. 1605(c)(4)(A).

Criteria for Selecting Projects

We generally agree with the Council's four criteria for selecting projects. However, we respectfully advise the Council to include language highlighting the need for permanent protection of natural resources and to consider the health of a watershed in its criteria. Moreover, we request the Council give highest priority to ecosystem projects and programs that meet the Priority Criteria *annually*, and not limit this to only the first three years. With regard to other state comprehensive plans, we advocate for a transparent and open process in each state to ensure the spirit of the RESTORE Act is carried out. We recommend each state include meaningful public input in the development of goals, objectives, criteria, and projects.

Thus far, Louisiana is the only state that has enacted a comprehensive plan. Although the state has adopted the plan, there are elements such as levees and other permanent structures that do not necessarily match the environmental restoration criteria. Specifically, more emphasis is needed for projects and plans that emphasize permanent land protection including both conservation easements and land acquisition by organizations that can provide for preservation in perpetuity. The funding for these projects should provide for not only the initial investment but also ample funding for ongoing land management, annual monitoring, and carbon sequestration. Land protection organizations like Land Trust for Southeast Louisiana would like additional opportunities to address these items and advocate for projects with the highest environmental value. Examples would include projects that restore long-term resiliency of the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands. We additionally recommend the Council develop a ranking system so that proposers and the public can know how the projects will be prioritized.

General Comments

We recommend the final version of the Comprehensive Plan be delayed for several months until the Department of Treasury issues regulations and the Council provides the required Ten-Year Funding Strategy and finalized project priority list. We recommend the Trustees provide another iteration of the plan for public comment. NGO's, community members, and the general public need to be able to review a more detailed plan in order to provide meaningful public input. Land Trust for Southeast Louisiana recommends the Council adopt a transparent process by which non-Trustees can propose projects. We urge the Council to establish policies and procedures that would ensure public transparency of projects and allow uniform consistency with each of the five Gulf States implementation development and compliance with their designated RESTORE state funds.

We look forward to working with the Trustees of the Gulf Coast Ecosystem Restoration Council on further developing the Comprehensive Plan and the restoration of our region. Thank you for your time and your dedication to restoring the Gulf Coast Region.

A handwritten signature in black ink that reads "Marisa C. Escudero". The signature is written in a cursive style with a prominent flourish at the end.

Marisa C. Escudero, Esq.
Lead Development Coordinator
Land Trust for Southeast Louisiana

Dear Reader,

Hi, my name is Laurel Cohen. I'm a rising sophomore at Yale University and I was born and raised in Orlando, Florida. I know how devastating the BP spill was for the ecosystems, economies, and livelihoods that depend on a thriving coastal environment and I have a vested interest in seeing that the Gulf is restored with care and forethought. I read a wonderful Op-Ed in the New York Times that gave me the inspiration to email you; I encourage you to read it at this [link](#). The point in the article that I would like to reiterate is that as much money as possible from the fund of the Restore Act be used to buy and protect coastal marshes and wetlands. The Everglades is one of my favorite places on Earth and my whole life I've known that the aquifers, marine life, and flora of Florida all eventually connect back to the health of wetlands in my state. I'm sure the situation is similar in the other states affected by the spill, and I can think of no more responsible way to defend ourselves from the next spill than to place our trust in protected, flourishing wetlands. I hope you take my comments to heart, and I very much appreciate your time.

Yours truly,

~Laurel C.

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P.O. Box #205425

New Haven, CT 06520



LEAGUE OF WOMEN VOTERS[®] OF LOUISIANA

Where Hands on Work Leads to Civic Improvement

June 27, 2013

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Comments from the LEAGUE OF WOMEN VOTERS[®] OF LOUISIANA on the Gulf Coast Ecosystem Restoration Council's Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy

We write on behalf of the League of Women Voters of Louisiana (LWVLA) to provide our comments and concerns with regard to the Gulf Coast Ecosystem Restoration Council's (Council) Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy (Draft Plan). LWVLA is a nonpartisan political organization encouraging informed and active participation in government. The League supports the preservation of areas of unique ecological systems, particularly the coastal wetlands and policies and programs which promote comprehensive long-range planning for conservation and development of land and water resources.

LWVLA is pleased to see that the Plan states the Council's commitment to science based decision making and adaptive management of plans and projects. We believe that all projects funded under the RESTORE Act must be required to have a plan for evaluation and a system for measuring outcomes which would allow true adaptive management to occur.

We support the Council's commitment to (1) focusing on funding for ecosystem restoration (as defined by the five plan goals), which is necessary to ensuring that we benefit the natural resources, our economy, and our communities; and (2) taking a regional, ecosystem-based, and landscape-scale restoration approach to restoration that addresses the entire Gulf as one interconnected ecosystem.

We also support the Council's stated intent to use an integrated and coordinated approach and work closely to ensure that efforts funded through NRDA and NFWF are complimentary. Since funding for comprehensive restoration will be limited in relation to the restoration need, leveraging multiple funding sources will be critical to getting the most "bang for our buck" on environmental restoration. It is essential that efforts to integrate restoration with the increasing need for community protection.

Our coastal communities are some of the most vulnerable in the nation to the impacts of storms. The efforts of the Council represent our best opportunity to make our Gulf coast, our communities and our coastal-dependent economies more resilient in the face of rising seas and stronger storms. Every dollar the Council approves, either through state or Council-led plans, should increase our resilience, providing non-structural storm protection and facilitating climate change adaptation (strengthening barrier islands, restoring coastal marshes and forest, etc.). We must use available restoration dollars to protect critical infrastructure that ensures the economic, and cultural, survival of coastal communities. For coastal communities dependent for their livelihoods on the natural resources of the Gulf, environmental restoration is essential to economic recovery.

We are pleased that the Council is considering the formation of a Citizen Advisory Committee and Science Advisory Committee. As the Council has experienced during this comment period, communities are eager to provide input to the Council on the considerations that should guide the Council in choosing RESTORE projects. Greater transparency and community participation in RESTORE Council decision-making in a meaningful way is something that the public has asked for repeatedly. We urge the Council to continue to engage the public in the process of planning, implementing and monitoring restoration.

We appreciate this opportunity to comment on the Draft Plan and look forward to working with the Council as it moves forward.

Respectfully submitted,

Sandra S. Slifer

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*County Hearing
Examiner*

June 25, 2013

Via email: RestoreCouncil@doc.gov

Cameron F. Kerry, Acting Secretary of Commerce, Chair
Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Avenue, N.W., Room 4077
Washington, DC 20230

Re: Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy - Lee County, Florida Comment Letter

Dear Chair Kerry:

On behalf of Lee County, Florida we thank you for the opportunity to comment on the Gulf Ecosystem Restoration Council's ("Council") Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy ("Plan.") We applaud the Council for developing this draft Plan and appreciate that the Council will continue to build more detail into the Plan and its associated processes as existing uncertainties are resolved. From Lee County's perspective as a member of the Florida Gulf Consortium and an active participant at both the State and Federal levels of government in efforts to protect and restore our natural resources, we appreciate the challenge of developing a Plan of this magnitude. Additionally, the level of uncertainty surrounding the timing and amount of penalty dollars that will ultimately be available to expend on ecosystem recovery in the Gulf Coast Region has made this even more challenging. Below you will find our general comments on the current schedule for reviewing and adopting the Plan and more specific comments on certain elements of the draft Plan.

General Comments

Given the phased approach to the legal proceedings in the BP Gulf Oil Spill Case, this uncertainty is likely to remain for several more months, possibly years. The aggressive statutory deadline of July 6, 2013 for approving the Plan appears to have assumed the availability of significantly more Trust Fund dollars at this time. With the likelihood of any type of resolution of the BP Oil Spill Case at least several months away, the urgency to adopt and publish the Plan is no longer necessary. We appreciate the Council taking a step back to allow for more public input and additional time to refine the draft Plan. The Council must take advantage of this time to develop a Plan that properly evaluates and selects priority projects and integrates all of the funding sources in a manner that efficiently and effectively carries out the intent of the RESTORE Act.

Duties of the Council Under the RESTORE Act

The RESTORE Act sets forth several duties that the Council shall complete and carry out in furtherance of the intent to restore the Gulf Coast Region. However, these duties are not delineated within the Plan document. These duties serve as the basis of the Plan and will frame its content and provisions. These duties must be clearly articulated within and reflected throughout the Plan.

Duty of Council to Identify Authorized Projects that Can Be Implemented Quickly

Chief among the Council's duties referenced above is to identify and list, as soon as practicable, projects that have been authorized prior to the adoption of the RESTORE Act but that have not yet commenced, that can be implemented quickly to fulfill the purposes and goals of the Plan – to restore and protect the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, barrier islands, dunes, and coastal wetlands of the Gulf Coast Region. This list of "preauthorized" projects is not subject to the "best available science" standard when prioritizing the projects to be funded during the first three years of the Plan. Essentially, preauthorized projects that are "shovel ready" will receive preference over those projects that need further design or regulatory approvals and are not in a position to be immediately implemented. Under the RESTORE Act, this preference must be considered prior to evaluating the projects under the Plan's criteria in order to effectuate one of the Council's primary duties to quickly implement restoration projects.

The draft Plan, Appendix "A," contains a list of these "authorized but not yet commenced projects and programs" (collectively "projects"). The background information preceding this list describes such projects as those that "have been either federally authorized by Congress or approved under a State program, plan or action." However, the actual project list gives no indication whether the named project is actually authorized or approved by either Congress or a Gulf Coast Region State. Given the preference described above that these types of projects will receive, it is important that each project on this list be fully vetted to verify that it has been appropriately authorized or approved and is shovel ready. This vetting process may filter out several projects that are neither authorized by Congress nor authorized by a valid state program, plan or action. We suggest that the preauthorized list include, at minimum, the following: a specific indication whether such projects are authorized or approved, citation of the specific federal or state authorization or approval, and the status of the projects in terms of their readiness for construction.

For instance, in Florida, there are several types of statutory programs or plans that develop, implement and fund restoration projects. In Lee County, these include the Comprehensive Everglades Restoration Plan ("CERP"), Caloosahatchee River Watershed Protection Plan, Caloosahatchee River Minimum Flows and Levels Recovery Strategy and the Caloosahatchee Estuary Basin Management Action Plan. These State of Florida plans or programs contain several projects that have been approved by the State of Florida and would further the purpose and goals of the Plan. They include, among others, the Caloosahatchee River (C-43) West Basin Storage Reservoir Project (the "C-43 Project"), Spanish Creek/Four Corners Initiative, C-43 Water Quality Treatment and Testing Facility Project (BOMA Property) and the Caloosahatchee Area Lakes Restoration (Lake Hicpochee) Project.

While certain components of the Plan, like the 10 Year Funding Strategy, will remain incomplete until there is more certainty regarding the dollars available to the Trust Fund, the Funded Priorities list can and should be developed using the criteria set forth in the RESTORE Act. Given that one of the Council's primary duties is to implement projects quickly upon adoption of the Plan, the Council should immediately rank at the top of its list those projects that are shovel ready. Additionally, using the best available science, the Council should also begin evaluating and ranking other projects that can be implemented within the initial three year time period of the Funded Priorities List. This approach will put

the Council in position to quickly implement projects, if and when, the BP Oil Spill Case is resolved. Furthermore, the Council may then reevaluate and adjust the rankings and sequencing of the projects once the penalty dollars are allocated to the Trust Fund. In light of the Council's duty to quickly implement projects and requirements to update the Funded Priorities List on an annual basis, this approach fits with the intent of the RESTORE Act.

Priority Criteria

The Council seeks public comment on all aspects of the Plan, but is particularly interested in the Priority Criteria that are proposed to be used to evaluate ecosystem projects for at least the first three years of the Plan. Notwithstanding the comments above regarding the preference to quickly implementing preauthorized projects, we believe the Priority Criteria as laid out in the Plan are effective principles to help guide the project selection process and should not be refined so much as to limit the ability of the Council to fund worthwhile projects. In particular, we approve of several specifics with regard to the Priority Criteria. They include:

- 1) The first Priority Criteria describes projects that "are projected to make the greatest contribution to restoring and protecting... the Gulf, without regard to geographic location within the... region." We wholeheartedly agree. Not all worthwhile Gulf restoration projects can or should be located in areas perceived to have received the most damaging impacts from the Deepwater Horizon spill. Furthermore, the RESTORE Act clearly emphasizes the importance of lands, water and watersheds adjacent to the Gulf of Mexico and the value of restoring these. In fact, the Council has incorporated this emphasis into the Plan as its primary commitment. This commitment is aimed at focusing the Council's efforts on a "Regional Ecosystem-based Approach to Restoration." As stated in the Plan,

"upland, estuarine, and marine habitats are intrinsically connected, and will promote ecosystem-based and landscape-scale restoration without regard to geographic location within the Gulf Coast region. A regional approach to restoration more effectively leverages the resources of the Gulf Coast and promotes holistic Gulf Coast recovery. The Council recognizes that regional ecosystem restoration activities can also have multiple human and environmental benefits, such as restoring habitats that sustainably support diverse fish and wildlife populations, while also providing an array of commercial, recreational, and other human uses of the ecosystem."

Here, in the Southwest Florida Gulf Coast Region, there is not a better positioned or more uniquely situated project to carry out this type of restoration approach than the C-43 Project mentioned above. The C-43 Project is located within the Caloosahatchee River watershed. The Caloosahatchee River and Estuary ("CRE") is at the head of a vast estuarine and marine ecosystem that includes aquatic preserves along with numerous other federal, state, and local parks and recreation areas.

The C-43 Project contributes to the restoration of ecosystem function in the CRE by reducing the number and severity of events where harmful amounts of freshwater from basin runoff and Lake Okeechobee releases are discharged into the CRE system. Also, the C-43 Project helps to maintain a desirable minimum flow of fresh water to the CRE during dry periods. These two primary functions help to moderate unnatural changes in salinity that are detrimental to the CRE's estuarine communities. In particular, the C-43 Project will optimize the health of the oyster

communities and vegetative communities that serve as valuable habitat (nursery, escape cover, feeding grounds) for a variety of freshwater, marine and estuarine-dependent fish and wildlife, including several endangered species. Most economically important saltwater fishes and crustaceans spawn offshore in the Gulf and then use estuarine areas, like the CRE, for nursery habitat. In particular, the mangrove shoreline, large expanses of sea grass meadows, oyster bars, and sand bars of the CRE serve as a nursery ground for many commercial and recreational fish species in the Gulf, including drum, grouper, sea trout, snook, tarpon, flounder, blue and stone crab, pompano, mullet and shrimp. In sum, the C-43 Project will directly contribute to the Gulf Coast Region recovery by assisting in restoring this valuable habitat and supports sustainable and diverse fish and wildlife populations, while also providing an array of commercial, recreational, and other human uses of the ecosystem.

- 2) The second Priority Criteria discusses the value of “large-scale projects.” Again, we agree with the Council’s approach. We believe the Council should focus its resources on large-scale, immediately implementable projects that will deliver vast improvements to the Gulf ecosystem. Relying solely on thinly spread funding on hundreds of small-scale restoration projects throughout the Gulf Coast Region will not allow for the transformative restoration that the RESTORE Act intends to make possible. These smaller-scale restoration projects are more appropriate for the Direct Component funding. The C-43 Project, given its size and scope, may provide more benefit to the Gulf Coast Region than any other project in Florida by improving the timing, quantity and quality of freshwater flows to the CRE and reducing the negative impacts to the Gulf from the unfortunately polluted Lake Okeechobee. The area of benefit is expansive and recognized as significant at a local, regional, state and national level. The benefited area includes several of Florida’s aquatic preserves (Matlacha Pass Aquatic Preserve, Pine Island Sound Aquatic Preserve and Estero Bay Aquatic Preserve) and the Charlotte Harbor National Estuary. San Carlos Bay and the Caloosahatchee River are both designated as Federal Manatee Refuges. In addition, there are five national wildlife refuges in the benefited area, including: J.N. Ding Darling National Wildlife Refuge, Caloosahatchee National Wildlife Refuge, Matlacha Pass National Wildlife Refuge, Pine Island National Wildlife Refuge and Island Bay National Wildlife Refuge. There has also been significant public recognition of the importance of this area through continued support of this project by the local public and all levels of government. Simply stated, the potential scale of positive impact from the C-43 Project to federal and state natural and cultural resources is enormous.
- 3) The third Priority Criteria mentions that projects should be “contained in existing Gulf Coast State comprehensive plans.” As mentioned above, the C-43 Project is included in CERP: Florida’s *comprehensive plan* for Everglades restoration. CERP is a multi-decade, monumental Federal-State partnership between the Army Corps of Engineers (“Corps”) and the South Florida Water Management District (“SFWMD”). Everglades restoration is predicated on the ability to store more water. Ultimately, more water must be made available to impaired ecosystems at the right times and in the right quantities. The C-43 Project is a foundational project of CERP. It will not only contribute to the improvement of the health of the CRE and the Gulf Coast Region, but it will also provide additional storage for the Everglades ecosystem. As all projects considered in CERP, the C-43 Project has gone through and completed rigorous scientific analysis and planning, including an Integrated Project Implementation Report and Environmental Impacts Statement. The C-43 Project has support from all agencies involved in its review including the Corps, the SFWMD, the Florida Department of Environmental Protection, the Department of Interior and the Environmental Protection Agency. Additionally, as mentioned above, the C-43 Project is the keystone project within several other State of Florida approved restoration plans. In sum, the multiple reviews and approvals of the C-43 Project by these federal and state plans, clearly underscore the fact that it needs no further analysis. Without

question, the science is there and it is accepted. It is designed and ready for construction and can be implemented quickly.

- 4) Finally, as indicated above, there is a large omission of the statutory preference for preauthorized and shovel ready projects within the Plan's Proposal and Selection Process. Again, one of the primary duties of the Council is to identify and quickly implement those projects that have been previously approved at the federal or state level. These preauthorized and shovel ready projects, like the C-43 Project, have already completed intensive planning efforts, rigorous engineering and design and lengthy environmental permitting reviews. The Council's Plan must specifically include within its Proposal and Selection process adequate provisions that ensure preauthorized projects will receive preference based upon the project's ability to be quickly implemented. While we understand the Plan may fund projects for many years, potentially even up to a decade or more, we feel strongly that the Council must clearly delineate and carry out in the Plan the mandated duty of the RESTORE Act - to implement a number of significantly impactful projects in the short-term in order to help improve the health of the ecosystem in the Gulf Coast Region as quickly as possible.

Conclusion

Again, we appreciate the Council allowing for more public input and additional time to ensure that the adopted Plan clearly reflects the duties of the Council as well as a proper project evaluation and selection process as required under the RESTORE Act. A Plan that properly reflects these requirements will prioritize, integrate and expend all of the RESTORE Act money sources in a manner that efficiently and effectively carries out the intent of the RESTORE Act. We look forward to working with the Council over the next several years as you begin to implement the Plan.

Sincerely,



Tammara "Tammy" Hall
Lee County Commissioner
District 4

I strongly support the plan's broad goals of restoring and conserving habitat. I also encourage you to include provisions for purchasing and protecting undeveloped shoreline and wetlands to better mitigate against further wetland loss.

Sincerely,
Lew Stringer
425 Buena Vista Ave East
San Francisco, CA
94117

Louisiana Audubon Council Delta Chapter of the Sierra Club

1522 Lowerline St.
New Orleans LA, 70118
June 25, 2013

Chairman
Gulf Coast Ecosystem Restoration Council
U.S. Fish and Wildlife Service
P.O. Box 2099
Fairhope, AL 36533

Re: Draft Programmatic Environmental Assessment (DPEA) for Draft Initial
Comprehensive Plan (DICP)

Dear Sirs,

We thank you for the opportunity to address the Council at the June 12 meeting in Belle Chase, Louisiana. Public involvement is a very important facet of the process. These comments are on behalf of the Louisiana Audubon Council and the Delta Chapter of the Sierra Club.

We have reviewed the Draft Initial Comprehensive Plan and the Draft Preliminary Program list and note a project suggested by NOAA, "to restore fish habitats affected by hurricanes in Mississippi and Louisiana". The following project fits within NOAA's proposed guidance.

Pearl River Basin Project, Louisiana and Mississippi:

The watersheds that connect the rivers to the estuaries are as important as the estuaries themselves. Without the connecting freshwater systems, the productivity of the estuaries will diminish significantly. We, therefore, suggest a project which has strong backing from the states of Louisiana and Mississippi, federal and state agencies, and NGOs.

The project idea was submitted for NRDA review by federal agencies and NGOs and posted on NOAA's Gulf Spill Restoration website. It is entitled, "**Restore Historic Gulf Sturgeon Spawning Grounds**". (NOAA, 2013)

The project, as envisioned, would either remove the outdated sills or provide a fish bypass (rock ramp) at two locations: one on the Bogue Chitto River, the other at Poole's Bluff on the Pearl River. Although this project was submitted because of the Bogalusa paper mill fish kill, it is still pertinent to the BP oil spill funding guidelines.

The sills are part of the Corps' Pearl River Navigation Project, built in 1954, which is no longer in use. Because of the sills, anadromous fish have not been able to spawn in the upper watershed for almost 60 years. The Gulf Sturgeon overwinters in Mississippi Sound which was impacted by the BP oil spill. The impact to this critical habitat is another reason that there should be support for assisting the recovery of the sturgeon.

Reconnecting these rivers to the Gulf of Mexico would allow the migration of the threatened Gulf Sturgeon and 17 additional species which can not now navigate the river because of the low-head dams. The other fish species include, in part: striped bass, American eel, American shad, Alabama shad. See attachment for complete list (Kohl, 2003).

The Bogue Chitto and Pearl Rivers are part of the critical habitat for the Gulf Sturgeon, as is Mississippi Sound. By court order, NOAA and FWS are to assist in the recovery of the sturgeon.

This project, if implemented, will benefit Louisiana and Mississippi by reconnecting 85% of the watershed of the rivers to the Gulf of Mexico. Impacts from Hurricane Katrina, and the Bogalusa paper mill toxic releases into the Pearl River, reduced the population of sturgeon from 400 individuals, pre-Katrina, to approximately 100 individuals today. We must act soon to assist the recovery.

Essential Fish Habitat (EFH):

"The 1996 amendments to the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) set forth a new mandate to identify and protect important marine and anadromous fisheries habitat." (DPEA, p.35). The Pearl and Bogue Chitto Rivers are part of the EFH, since anadromous fish need the rivers to spawn. The low-head dams prevent that.

The removal of the sills would have positive social consequences by increasing recreational and commercial catches on the rivers and by eliminating the dangerous rollovers which have killed at least four people at the sills.

Providing RESTORE money to remove these sills will be a major contribution to re-establishing historic fisheries in the Pearl River Basin. Since this project has broad state and federal agency support, we hope that the Council will seriously consider this project and elevate its priority.

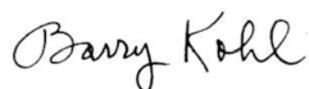
We believe this plan will meet many of the objectives of the Comprehensive Plan: 1) Restore, Enhance and Protect Habitats, 2) Restore, Improve, and Protect Water Quality, and 3) Protect and Restore Living Coastal and Marine Resources.

Science Advisory Committee:

We urge the Council to create a Science Advisory Committee to support the efforts to develop, implement, and monitor the Plan. This will improve the Plan's science-based, decision-making commitment. Such a committee is vital to ensure that the best available science guides the Plan and the Priority Projects.

In conclusion, we stress the importance of using the BP funds for environmental restoration projects along the Coast. The majority of the money should be used to mitigate the **environmental** impacts of the BP spill as this will increase the economic benefits to both states. We do not support structural projects which could have an adverse impact on the environment.

Sincerely,



Barry Kohl, Ph.D.

enclosures:

cc:

Haywood Martin, Chair, Delta Chpt Sierra Club

LAC, Board of Directors

Matt Rota, GRN

Hugh Penn, Sierra Club

Rebecca Triche, Director, La Wildlife Fed.

USF&WS, Lafayette

NMFS, Baton Rouge

CPRA,

La DWF

References:

NOAA 2013. URL: <http://www.gulfspillrestoration.noaa.gov/restoration/give-us-your-ideas/view-submitted-projects/>

Kohl, B. 2003. Fig. 6, Migratory Fish in the Pearl River System. *In* Technical Report on the proposed Fish Bypass at Poole's Bluff Sill, Pearl River, Louisiana -Mississippi. Prepared for the Gulf of Mexico Foundation, Project 1003, 15 pp, 24 figs, 5 tables, Appendix.



GULF SPILL RESTORATION

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View Submitted Projects

You can use the map below to view projects that have been submitted to the trustees for consideration. To view details of an individual project, click the View icon on the list below or click the project marker on the map. To highlight the location of a project from the list, click the Show on Map icon.

All projects that have met the posting guidelines are accessible from the project list, and only those projects that were submitted with valid coordinates are displayed on the map. The inclusion of a project on this list does not indicate that it has been fully reviewed for meeting project selection criteria, nor is it guaranteed to be selected and approved. All projects approved by the trustees will be subject to public review and comment.

Please Note (click to view)

Projects List Restore historic Gulf Sturgeon spawning grounds

Restore historic Gulf Sturgeon spawning grounds

General Information

Project Description:

Remove the sills on Bogue Chitto River at the Pearl River Lock and dam canal and on Pearl River at Pools Bluff. If there is too much political pressure to not remove them, install fish ladders capable and practice for adult Gulf Sturgeon to move upstream of the sills to return to historic spawning grounds. There were over 28 individuals killed as a result of the Temple Inland release. Temple Inland or any purchaser of the mill including International Paper should fund the entire project.

Organization Name: null

Activity(s):

- Restoration
- Protection

Habitat(s):

- Riverine
- Marine/Estuarine Wetlands

Status

Property/Resource Acquisition:

N/A

Project Planning/Design: Not Started

Project Permitting: Not Started

Time to Implementation: 1 year +

Time to Project Completion: 7-12 months

Included in Regional Plan? No

Cost

Estimated Cost: US\$3,000,000.00

Funding Available:

Partners

Organization

- US Army Corps of Engineers
- US Fish and Wildlife Service
- Temple Inland
- LA Nature Conservancy
- US FWS

Geographic Information

State: LA

County/Parish: St. Tammany, Washington

Watershed/Basin: Pearl River

Affected Area (acres):

Location Description: Sill at Bogue Chitto River on Pearl Canal and sill on Pearl River at Pools Bluff

Location Overview

(lat: 30.6212, long: -89.866061)



Detail Map

(size:)



Migratory Fish in the Pearl River System

1). *Anadromous* (migrate from salt to fresh water), 8 species

Alabama Shad	<i>Alosa alabamae</i>
Atlantic needlefish	<i>Strongylura marina</i>
Gizzard shad	<i>Dorosoma cepedianum</i>
* Gulf sturgeon	<i>Acipenser oxyrinchus desotoi</i>
Hogchoker	<i>Trinectes maculatus</i>
Striped bass	<i>Morone saxatilis</i>
Skipjack herring	<i>Alosa chrysochloris</i>
Threadfin shad	<i>Dorosoma petenense</i>

2). *Catadromous* (migrate from fresh to saltwater), 1 species

American eel	<i>Anguilla rostrata</i>
--------------	--------------------------

3). *Potamodromous* (migrate within river), 10 species

Blacktail redhorse	<i>Moxostoma poecilurum</i>
Blue catfish	<i>Ictalurus furcatus</i>
Channel catfish	<i>Ictalurus punctatus</i>
Flathead catfish	<i>Pylodictis olivaris</i>
Highfin carpsucker	<i>Carpionodes velifer</i>
Paddlefish	<i>Polyodon spatula</i>
Pearl darter	<i>Percina aurora</i> (extirpated)
Quillback	<i>Carpionodes cyprinus</i>
River redhorse	<i>Moxostoma carinatum</i>
Southeastern blue sucker	<i>Cypleptus meridionalis</i>
Spotted sucker	<i>Minytrema melanops</i>

Data from Dr. Hank L. Bart, Jr., Tulane University,
(Personal Comm. 2/14/02)

Will all projects which are either fully or partially implemented with RESTORE funds go through the NEPA process regardless of needing a 404 wetlands permit? Are these funds considered “Federal”, i.e., that the use of these funds would trigger the need to perform an environmental analysis under NEPA?

Thanks,

Luci

Lucila P. Silva

Vice President

Brown and Caldwell | 451 Florida Street, 1050 | Baton Rouge, La 70801

LSilva@BrwnCald.com

T 225.456.2505 | C 225.235.0123



Lords.

It is matter of pollution of the waters of the Sea by contamination Petroleo.

It is a question that the USA has developed technology which not for me to comment.

But I believe that in order to:

A long held this type of pollution causes serious damage to the nature.

Therefore I believe that the creation of a team of divers and Technicians to inspect all oil wells on the High Seas.

Steadily to investigate this type of leakage and possibilities of this ocoerencia keeping in view the service and the technologies used by companies Prospecting for Petroleum.

Which may interfere with this information in trbalhos and avoid leaks and damage to the nature.

This being for the moment.

Marcos Silva Sergio Campos.

Industrial Piping designer, seller and Garçon.

Brazil. - marserca@hotmail.co - strombler@hotmail.com - Cell. 5514-81280344

06.21.2.013

July 2, 2013

Dear Restore Council,

Please, I would like to bring this matter to your attention and possibly Relay to other Departments Or Committees.

Please, Help Save the Original Fountain Of Youth and National Treasure The Warm Mineral Springs of SW Florida due to InterGovernmental Conflict & Crisis

in Florida between Sarasota County and North Port Municipality The Only The Original Florida The Warm Mineral Springs

will be Shuts Down as of July 1, 2013

Please, Help Save the Warm Mineral Springs, SOS.....

Thank You.

Michael Levin

imulnv7@yahoo.com



www.msfb.org

MISSISSIPPI FARM BUREAU® FEDERATION

Our mission is to create an environment in which Mississippi farmers, ranchers and Farm Bureau members can have a better life and make a better living.

Randy L. Knight
President

June 28, 2013

Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Avenue, N.W., Room 4077
Washington, DC 20230

Re: Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy

On behalf of the Mississippi Farm Bureau® Federation (MFBF), I appreciate the opportunity to submit comments on the Draft Initial Comprehensive Plan and thank the Council for recognizing the importance of the Gulf Coast and the challenges we face.

We support the spirit and intent of the RESTORE Act, that these funds are to be exclusively used within the 25 miles of the coastal zone of the Gulf Coast states, that the funds are allocated to the Gulf Coast states, and that the state has the authority to allocate those funds for state projects within the 25 miles of the coastal zone. We reject and are opposed to any interpretation of the RESTORE Act that would allow RESTORE Act funds to be used upstream of the Gulf Coast states, outside of the 25 miles of the coastal zone, or that implies that the funds are allocated or directed by EPA or any other federal authority. We also reject and are opposed to any interpretation of the RESTORE Act that implies these funds may be used in developing, drafting, or setting water quality criteria, including, but not limited to, numeric nutrient criteria.

Section II Overview, subheading *Commitment to a Regional Ecosystem-based Approach to Restoration*, begins:

“The Council recognizes that upland, estuarine, and marine habitats are intrinsically connected and will promote ecosystem-based and landscape-scale restoration without regard to geographic location within the Gulf Coast region.”

MFBF believes this sentence is intended to provide justification for directing RESTORE Act funds outside of the impacted area within 25 miles of the coastal zone and outside of the areas directly impacted by the very violations that produced the penalties which fund the RESTORE Act. While we agree that all environments and ecosystems are intrinsically connected, we disagree that the spirit and intent of the RESTORE Act is to address those concerns with these funds. These funds should be used locally to restore ecosystems impacted by recent hurricanes and to restore the local economies that suffered staggering losses during and following the Deep Water Horizon oil spill.

MFBF agrees with the five (5) goals set forth in the Draft Initial Plan, provided that goals are pursued within the coastal zone and the 25-mile area adjacent to the coastal zone. Efforts to “restore” the regions habitat from upstream projects should be avoided, and funds should be allocated only to projects within the defined area.

June 28, 2013

Page 2

MFBB believes that the Objectives outlined in Section IV provide the appropriate scope for achieving the previously stated goals. We look forward to working closely with the Mississippi Department of Environmental Quality and other interested stakeholders to develop and implement a wide variety of projects aimed at restoring the health, habitat, and ecosystems of the Gulf Coast. These projects will not only revitalize our treasured coast, but will revitalize the coastal economy by providing the job opportunities necessary to implement and achieve these goals.

The working committee of the Gulf Coast Ecosystem Restoration Council is to be commended for the work they have put in developing the Draft Initial Comprehensive Plan. The plan, through its goals and objectives, addresses a broad range of areas in which states can restore and improve upon these unique ecosystems and environments, realizing that these ecosystems provide economic benefits to the coastal region. We thank the committee for their efforts.

The issues MFBB would like to see addressed in future versions of the plan are:

- Adding a clearly defined statement that identifies the state as having primacy over the selection of projects and the allocation of funds.
- Adding a very clearly defined statement that these funds are to be allocated, spent, and used ONLY in the coastal region and the adjacent areas within 25 miles of the coastal region.
- Removal of Section II Overview, subheading *Commitment to a Regional Ecosystems-based Approach to Restoration*. This paragraph, true as it may be, attempts to provide justification for expenditures of RESTORE Act funds to areas outside the coastal zone and the adjacent areas within 25 miles of the coastal zone. RESTORE Act funds are provided from civil penalties under the Clean Water Act that impacted these specific areas. To expend RESTORE Act funds elsewhere violates the spirit and intent of the RESTORE Act.
- Adding a statement that RESTORE Act funds shall not be used to develop, propose, or set new water quality standards or criteria. We believe that the water quality benefits from on-the-ground projects far outweigh the costs of developing criteria, which may or may not be attainable or achievable, and will only serve as a disincentive to economic restoration efforts. Projects such as connecting unsewered communities, urban wetlands, and greenscapes are proven nutrient reduction strategies that also create jobs and economic benefits to install.

Thank you for the opportunity to comment and your consideration of our comments and concerns.

Sincerely,



Randy Knight
President

RLK/aw/bh



PRESIDENT, MAYOR CHIP JOHNSON, HERNANDO
FIRST VICE PRESIDENT, MAYOR TIM WALDRUP, ELLISVILLE • SECOND VICE PRESIDENT, MAYOR ROBIN McCRORY, LEXINGTON

SHARI VEAZEY, EXECUTIVE DIRECTOR

Gulf Coast Ecosystem Restoration Council,
c/o U.S. Department of Commerce
1401 Constitution Avenue, N.W., Room 4077
Washington, DC 20230

July 1, 2013

The Mississippi Municipal League appreciates the opportunity to submit our comments and concerns regarding the Gulf Coast Ecosystem Restoration Council's Draft Initial Comprehensive Plan for implementation of Gulf Coast restoration projects. We view The RESTORE Act, and the funds provided by the trust fund as one of the most comprehensive, coordinated, and crucial investments in the Gulf Coast restoration efforts.

We believe the Council's draft has put forth the appropriate blueprint of goals and objectives for ecosystem and economic revitalization of the Gulf Coast. However, there are statements which could be interpreted as allowing for funds to be allocated far upstream of the Gulf Coast. As you are aware, the RESTORE Act trust fund was created by Clean Water Act penalties that resulted from violations that directly impacted the Gulf Coast States, and the coastal zone. While we agree that there are numerous challenges and issues involved from upstream areas, we disagree that RESTORE Act funds were intended to be used in this manner. The Council's Initial Comprehensive Plan should clearly reflect the intent of the Restore Act, that these funds are to be used within the coastal zone and the adjacent areas within 25 miles of the coastal zone.

The Mississippi Municipal League believes the plan should remove all ambiguity regarding the roles of State and federal partnerships. We believe that these funds should be allocated to the States, and that the States have primacy to propose, initiate, and implant Gulf Coast restoration projects. We believe that the States and their leadership, working with local government officials, stakeholders, and citizens, are the appropriate channels for ecosystem restoration and economic revitalization efforts.

While not specifically mentioned in the Draft Initial Comprehensive Plan, the Mississippi Municipal League believes the Council should provide a clear statement that RESTORE Act funds are not to be used for setting new water quality standards or criteria. The Plan should clearly define that the funds are to be used for on-the-ground projects that provide ecosystem restoration, nutrient reduction, habitat restoration, and economic revitalization. This would reflect the intent of the Act, provide real and immediate results of restoration efforts, and provide numerous jobs in the areas that have been directly affected.

Thank you for your efforts, and for considering our comments and concerns.

Sincerely,

A handwritten signature in blue ink that reads "Shari J. Veazey".

Shari Veazey
MML Executive Director



601-932-7560 Fax 601-932-7568

110 Airport Road South, Suite C Pearl, Mississippi 39208

Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Avenue, N.W., Room 4077
Washington, DC 20230

July 1, 2013

Draft Initial Comprehensive Plan: *Restoring the Gulf Coast's Ecosystem and Economy*

The Mississippi Poultry Association appreciates the opportunity to submit our comments and concerns regarding the Gulf Coast Ecosystem Restoration Council's Draft Initial Comprehensive Plan for implementation of Gulf Coast restoration projects. We view The RESTORE Act, and the funds provided by the trust fund as one of the most comprehensive, coordinated, and crucial investments in the Gulf Coast restoration efforts.

We believe the Council's draft has put forth the appropriate blueprint of goals and objectives for ecosystem and economic revitalization of the Gulf Coast. However, there are statements which could be interpreted as allowing for funds to be allocated far upstream of the Gulf Coast. As you are aware, the RESTORE Act trust fund was created by Clean Water Act penalties that resulted from violations that directly impacted the Gulf Coast States, and the coastal zone. While we agree that there are numerous challenges and issues involved from upstream areas, we disagree that RESTORE Act funds were intended to be used in this manner. The Council's Initial Comprehensive Plan should clearly reflect the intent of the Restore Act, that these funds are to be used within the coastal zone and the adjacent areas within 25 miles of the coastal zone.

The Mississippi Poultry Association believes the plan should remove all ambiguity regarding the roles of State and federal partnerships. We believe that these funds should be allocated to the States, and that the States have primacy to propose, initiate, and implant Gulf Coast restoration projects. We believe that the States and their leadership, working with local government officials, stakeholders, and citizens, are the appropriate channels for ecosystem restoration and economic revitalization efforts.

While not specifically mentioned in the Draft Initial Comprehensive Plan, the Mississippi Poultry Association believes the Council should provide a clear statement that RESTORE Act funds are not to be used for setting new water quality standards or criteria. The Plan should clearly define that the funds are to be used for on-the-ground projects that provide ecosystem restoration, nutrient reduction, habitat restoration, and economic revitalization. This would reflect the intent of the Act, provide real and immediate results of restoration efforts, and provide numerous jobs in the areas that have been directly affected.

Thank you for your efforts, and for considering our comments and concerns.

Sincerely,

A handwritten signature in black ink that reads 'Mark Leggett'. The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Mark Leggett
President



Gulf Coast Ecosystem Restoration Council
1401 Constitution Avenue, NW
Washington, DC 20230

May 1, 2013

Dear Council Members,

On behalf of our millions of members, we thank you for your commitment and your considerable ongoing work to help restore the environment and economy of the Gulf Coast region. Our organizations supported enactment of the RESTORE Act because of the unprecedented opportunity the Act presented to build a healthy Gulf ecosystem through environmental restoration projects, a need that grows more urgent each day. Given the extent to which the region's communities, industries and economies rely on a clean and healthy environment, environmental restoration projects are vital to restoring the economy and to protecting and enhancing the diverse natural resources of this unique and irreplaceable ecosystem.

In allocating fines paid under the Clean Water Act and specifying the ways in which the funds would be expended, Congress sought to balance the interests of the five Gulf Coast States and to ensure that the expenditures as a whole would address both the environment and economy of the region. With the trial still underway and further proceedings to follow, we of course do not know the total amount of funds that will be available to promote the goals established by Congress. We expect the amount to be sufficient to undertake significant projects in all five Gulf Coast States that should ultimately benefit the environment and economy of the entire region. We are also encouraged that the Council acknowledged in the *Path Forward to Restoring the Gulf Coast* that it will follow Congress' carefully crafted direction to fund these projects within the different explicit allocations in the statute.

Because the Comprehensive Plan, by statute, is to focus on environmental restoration projects, we write to provide our suggestions on activities that will make the greatest difference to the Gulf ecosystem. As you consider how best to "restore and protect the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches and coastal wetlands of the Gulf Coast region," our organizations believe that you should focus first and foremost on major restoration investments in the Mississippi River Delta. Given the central importance of these resources to the overall health of the Gulf, and to economic activity regionally and nationally, we believe that, using best available science, an early start on a major Mississippi River diversion and acceleration of barrier island renewal in the Delta are necessary cornerstones of an effective Gulf-wide response to which we can all commit. Because restoration plans for the Delta are well-developed, they also provide a helpful framework for initiatives the Council considers in the other Gulf Coast States.

We appreciate the opportunity to provide the attached recommendations for consideration by the Council. Our recommendations focus on four areas: 1) Gulf-wide project prioritization criteria; 2) recommended

projects in Louisiana, consistent with that State's Coastal Master Plan, that meet these criteria; 3) Council processes for project implementation; and 4) science integration.

The people of the Gulf are counting on meaningful environmental restoration to safeguard the natural resources on which they depend and to ensure a strong and healthy economy, now and for generations to come. We believe the attached recommendations will advance your efforts to secure that positive future, and we look forward to working with the Council to provide further perspective and assistance.¹

Sincerely,

National Audubon Society • Coalition to Restore Coastal Louisiana • Environmental Defense Fund

Lake Pontchartrain Basin Foundation • National Wildlife Federation

¹ Several of our groups are also members of the Gulf Renewal Partnership, which will also provide comments on the *Path Forward* and recommendations to the Council on the development of its Draft Comprehensive Plan. We wholeheartedly endorse those recommendations in addition to these submitted on behalf of the Mississippi River Delta Coalition.

I. INTRODUCTION

We represent a coalition of environmental groups that have worked for decades to restore the Mississippi River Delta. As the Gulf Coast Ecosystem Task Force recognized in its 2011 strategy, the Mississippi River is a driving force behind a sustainable Gulf Coast ecosystem. Sediment carried by the Mississippi River built Louisiana's productive wetlands, which are essential to the health of the Gulf ecosystem. However, river management decisions that prioritized flood protection and navigation have cut the river off from its delta, dooming existing wetlands and largely stopping the cycle of new wetlands growth. Indeed, Louisiana's coast, an area with great natural land building potential, experiences 80 percent of the nation's annual coastal wetland loss and loses land at a rate comparable to a football field per hour. This vital and already compromised resource experienced hundreds of miles oiled shoreline and marsh from the Deepwater Horizon spill and, thus, a full environmental restoration response must be a clear and overarching priority.

Given the Delta ecosystem crisis, we recommend urgent action on projects that will stem land loss and restore wetlands in the Louisiana Coastal Area and the Mississippi Delta, particularly those that use sediment brought in by the rivers or from offshore. Most of those restoration actions are already fully authorized under the Water Resources Development Act of 2007, enjoy broad public support, and have been vetted by scientists and lawmakers for decades. Now is the time to move beyond study of this system and provide clear guidance on respective state and federal actions. Simply put, we have no time to spare in averting the systematic collapse of the Mississippi River Delta.

Below, we provide detailed recommendations on how to advance restoration of the Mississippi River Delta given the RESTORE Act's requirements. Specifically, we recommend that the Council implement river reintroduction projects (i.e., diversions) that would provide sediment to rebuild, restore, and nourish areas where wetlands have been lost and will help to sustain areas where wetlands will be created or restored. Strategic use of sediments for land building will result in long-term benefits to those living in the delta by buffering storm impacts and increasing the resiliency of wetlands in the face of sea-level rise. The Council should also consider wetland and barrier island restoration projects that provide an opportunity to increase habitat productivity and strengthen the overall resilience of the Gulf Coast.

II. PROJECT PRIORITIZATION CRITERIA AND RECOMMENDED PROJECTS

The RESTORE Act mandates that the Comprehensive Plan focus on *ecosystem* restoration and requires that all decisions, including projects funded by section (t)(3)(B)(i) of the law, must be prioritized based on science. As confirmed by the Senate Environment and Public Works

Committee report (pages 10 and 11), the Council’s 30% allocation shall be disbursed to the Council for projects to “restore and protect the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region.”² Under section (t)(2)(D)(ii)(IV), the initial Comprehensive Plan must contain certain specified contents, including provisions to incorporate recommendations by the President’s Gulf Coast Ecosystem Task Force; a list of authorized federal projects that advance the RESTORE Act goals; and a three year project and program list, including a table showing the distribution of projects and programs in all five Gulf Coast States.

We think it is important to stress that section (t)(2)(D)(ii)(IV)(bb) refers only to federally authorized projects, not previously approved state projects. By so limiting the language, Congress wanted to ensure that projects would be listed only if they had received prior Congressional approval. For example, the State of Louisiana and federal partners have worked for nearly a decade developing federally authorized Louisiana Coastal Area projects, through the Water Resources Development Act of 2007. By contrast, Congress made clear that projects contained in Gulf Coast State comprehensive plans should be evaluated for inclusion on the separate three-year priority project and program list, subject to available funding.

Under section (t)(2)(D)(iii), the Council must establish priorities for funding based on the best available science. The four criteria for project prioritization are, in summary, 1) Projects that are projected to make the greatest contribution to the Gulf ecosystem; 2) Large-scale projects and programs that are projected to substantially contribute to the Gulf ecosystem; 3) Projects contained in existing Gulf Coast State comprehensive ecosystem plans; and 4) Projects that restore long-term resiliency of Gulf natural resources.

It is critical to the success of the Comprehensive Plan that the Council has a set of transparent, science-based criteria against which it evaluates restoration projects and programs. Effective project assessment based on the statutory restoration criteria will be an essential step to developing a truly comprehensive Gulf wide ecosystem plan.

Below we review the four statutory criteria and provide recommendations on how to interpret those criteria.

I) Projects that are projected to make the greatest contribution to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region, without regard to geographic location within the Gulf Coast region. Criteria include:

We recommend that the Council focus this criterion on projects that provide systemic restoration benefits to highest-priority Gulf ecosystem resources,

² (t)(2)(D)(i)(I)

benefit or improve shared or common resources across the Gulf region, and deliver multiple ecological benefits.

(II) Large-scale projects and programs that are projected to substantially contribute to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast ecosystem.

We recommend that the Council focus this criterion on projects that significantly increase habitat or increase net wetland acres compared to a no action alternative, projects that demonstrate the largest cost-efficiency, and projects that address deltaic land loss.

(III) Projects contained in existing Gulf Coast State comprehensive plans for the restoration and protection of natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region.

We recommend that the Council incorporate the ecosystem restoration components of existing state plans, for example, the Louisiana Coastal Master Plan unanimously adopted by the state legislature in 2012.

(IV) Projects that restore long-term resiliency of the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands most impacted by the Deepwater Horizon oil spill.

We recommend that the Council focus this criterion on projects that preserve or restore natural processes, projects that reduce recovery time from disturbance events with minimal human intervention or maintenance requirements, and projects that continue to produce long-term results in the face of sea level rise.

III. PROJECT RECOMMENDATIONS

	Project Name	Project Type	Project Description	RESTORE Act Restoration Priorities ⁱ					Comprehensive Plan Provisions ⁱⁱ					Total	Prior Authorization ⁱⁱⁱ	
				I	II	III	IV		1	2	3	4				
				Greatest Contribution	Large Scale	Existing State Comprehensive Plan	Most Impacted	Sub-total Restore Priorities	Restore Habitat	Water Quality	Living Coastal Resources	Community Resiliency	Sub-total Comprehensive Plan		Prior/Pending Authorization	Federal Project ^{iv}
1	Mid-Barataria Diversion: 1 st period increment (75,000 cubic feet per second [cfs])	Diversion	Establish a distributary for sub-delta marsh-building diversion of pulsed Mississippi River water and sediment through control structure	6	6	6	6	24	3	2	3	3	11	35	✓	LCA Myrtle Grove
2	Mid-Breton Diversion	Diversion	Establish distributary for sub-delta marsh-building diversion of pulsed Mississippi River water and sediment through control structure	6	6	6	6	24	3	2	3	2	10	34	✓	LCA White's Ditch
3	Lower Breton Diversion	Diversion	Establish distributary for sub-delta marsh-building diversion of pulsed Mississippi River water and sediment through control structure	6	6	6	6	24	3	2	3	2	10	34		*v

	Project Name	Project Type	Project Description	RESTORE Act Restoration Priorities ⁱ					Comprehensive Plan Provisions ⁱⁱ						Prior Authorization ⁱⁱⁱ	
				I	II	III	IV		1	2	3	4				
4	Lower Barataria Diversion	Diversion	Establish distributary for sub-delta marsh-building diversion of pulsed Mississippi River water and sediment through control structure	6	6	6	6	24	3	2	3	2	10	34		*vi
5	Increase Atchafalaya Flow to Eastern Terrebonne	Diversion	Marsh and swamp-sustaining diversion through hydrologic modification of the Gulf Intracoastal Waterway	6	6	6	4	22	3	3	3	3	12	34	✓	LCA Convey Atchafalaya
6	West Maurepas Diversions	Diversion	Marsh and swamp-sustaining diversion of pulsed Mississippi River water and sediment through control structure	6	6	6	4	22	3	3	3	2	11	33	✓	LCA Hope Canal/ Blind R.
7	Barataria Pass to Sandy Point Barrier Island Restoration	Barrier Island	Beach, dune, and back bay marsh restoration with pipeline sand delivery	6	4	6	6	22	3	1	3	3	10	32	✓	LCA BBBS
8	Belle Pass to Caminada Pass Barrier Island Restoration	Barrier Island	Beach, dune, and back bay marsh restoration with pipeline sand delivery	6	4	6	6	22	3	1	3	3	10	32	✓	LCA BBBS
9	Central Wetlands Diversion	Diversion	Marsh and swamp-sustaining diversion of pulsed Mississippi River water and sediment through control structure	6	4	6	4	20	3	3	3	3	12	32	✓	LCA MRGO

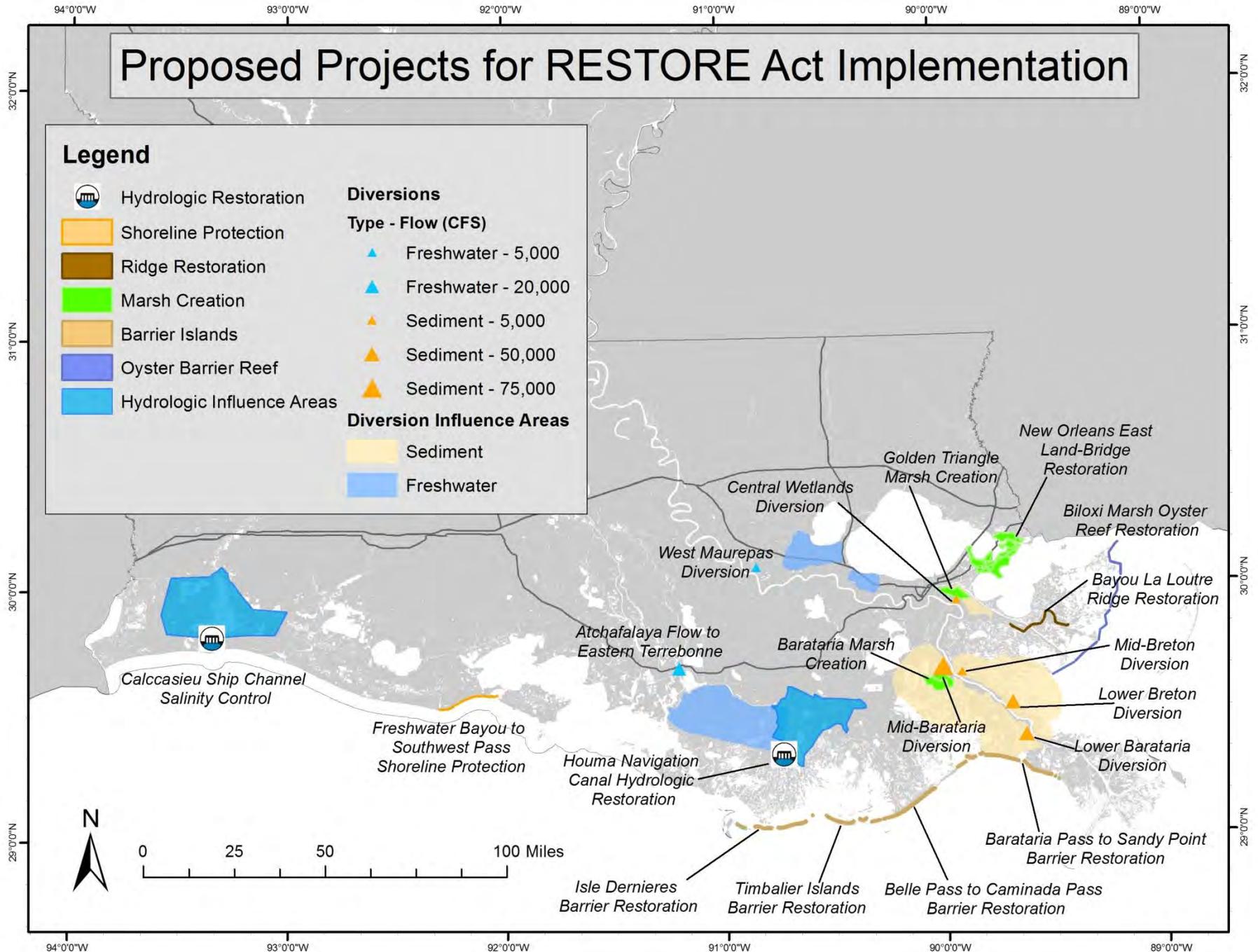
	Project Name	Project Type	Project Description	RESTORE Act Restoration Priorities ⁱ					Comprehensive Plan Provisions ⁱⁱ					Total	Prior Authorization ⁱⁱⁱ	
				I	II	III	IV		1	2	3	4			Prior Authorization?	Federal Project
				Greatest Contribution	Large Scale	Existing State Comprehensive Plan	Most Impacted	Sub-total Restore Priorities ^{vii}	Restore Habitat	Water Quality	Living Coastal Resources	Community Resiliency	Sub-total Comprehensive Plan			
10	Houma Navigation Canal Lock Hydrologic Restoration	Hydrologic Restoration	Hydrologic restoration for salinity control, sustaining wetlands, while maintaining navigation	6	4	6	4	20	3	3	3	3	12	32	✓	LCA Houma Navigation
11	Isles Dernieres Barrier Island Restoration	Barrier Island	Beach, dune, and back bay marsh restoration with pipeline sand delivery from offshore shoal	6	4	6	4	20	3	1	3	3	10	30	✓	LCA TBBS
12	Timbalier Islands Barrier Island Restoration	Barrier Island	Beach, dune, and back bay marsh restoration with pipeline sand delivery from offshore shoal	6	4	6	4	20	3	1	3	3	10	30	✓	LCA TBBS
13	Biloxi Marsh Oyster Reef	Oyster Barrier Reef	Living reef for shoreline protection and habitat	4	4	6	6	20	3	2	3	2	10	30	✓	LCA MRGO
14	Calcasieu Ship Channel Salinity Control Measures	Hydrologic Restoration	Hydrologic restoration for salinity control, sustaining wetlands, while maintaining navigation	6	4	6	2	18	3	3	3	3	12	30		*viii

	Project Name	Project Type	Project Description	RESTORE Act Restoration Priorities ⁱ					Comprehensive Plan Provisions ⁱⁱ						Prior Authorization ⁱⁱⁱ	
				I	II	III	IV		1	2	3	4				
15	New Orleans East Land-Bridge Restoration: 1 st period Increment	Marsh Creation	Marsh creation through pipeline sediment delivery	4	4	6	4	18	3	2	2	3	10	28	✓	LCA MRGO
16	Large Scale Barataria Marsh Creation-Component E: 1 st period increment	Marsh Creation	Marsh creation through pipeline sediment delivery	4	4	6	4	18	3	2	2	3	10	28	✓	LCA Myrtle Grove
17	Golden Triangle Marsh Creation	Marsh Creation	Marsh creation through pipeline sediment delivery	4	4	6	2	16	3	2	2	2	9	25	✓	LCA MRGO
18	Bayou La Loutre Ridge Restoration		Protect marsh and habitat creation using pipeline sediment delivery	4	4	6	2	16	3	1	2	2	8	24	✓	LCA MRGO
19	Gulf Shoreline Protection: Freshwater Bayou to Southwest Pass	Shoreline Protection	Parallel offshore sand capture structures construction	4	4	6	2	16	2	1	2	2	7	22		*ix

Proposed Projects for RESTORE Act Implementation

Legend

- | | | |
|---|----------------------------|---|
|  | Hydrologic Restoration | Diversions |
|  | Shoreline Protection | Type - Flow (CFS) |
|  | Ridge Restoration |  Freshwater - 5,000 |
|  | Marsh Creation |  Freshwater - 20,000 |
|  | Barrier Islands |  Sediment - 5,000 |
|  | Oyster Barrier Reef |  Sediment - 50,000 |
|  | Hydrologic Influence Areas |  Sediment - 75,000 |
| | | Diversions Influence Areas |
| | |  Sediment |
| | |  Freshwater |



IV. COMPREHENSIVE PLAN AND PROJECT IMPLEMENTATION RECOMMENDATIONS

The Council comprised of six federal agencies and five Gulf Coast states, each with different areas of expertise and resources. We recognize that the Council structure and the statutory charge are complex, and that implementation therefore will be challenging. Fortunately the RESTORE Act arms the Council with tools to address those challenges. For example, the Act permits the Council and Federal members to develop memoranda of understanding to assist with project implementation. Also, the Act requires the Council to submit a report to Congress that includes recommendations for modifications of existing laws necessary to implement the Act. We offer the following recommendations to assist the Council in fulfilling its duties and to encourage the selection of comprehensive, effective and vetted projects that should streamline implementation processes.

Implementation Recommendations:

We recommend that the Council establish a science-based adaptive management framework for implementation, both on the project-level and ecosystem-level, including baseline environmental data collection, and project monitoring to measure progress toward clear, measurable and achievable metrics and timelines.

Timetables and metrics set forth a specific commitment to completion and provide both the Council and the public with an honest assessment of the progress of projects and ecosystem goals, and allow stakeholders to set expectations. When developing project phases and timetables, the Council should collect environmental data and scientifically monitor projects prior to, during, and following construction. To effectively evaluate restoration, tools and methodologies for restoration monitoring should be developed. The resulting data will be critical for adaptive management processes and for determining the ultimate success of each restoration goal.

We recommend that the Council explicitly define the roles and responsibilities of the agencies tasked with implementing restoration projects.

The Comprehensive Plan should identify and assign a clear lead agency or entity with the appropriate authority to implement recommendations and projects. Assigning an explicit agency or entity provides accountability and expectations to effectively implement restoration projects.

We recommend that the Council outline and engage in a framework for resolving policy and procedural obstacles to project implementation.

For the Council to be effective in implementing the Comprehensive Plan and fulfilling its statutory duty, it should recognize its role in resolving policy and procedural obstacles to advance authorized restoration projects. For example, the Comprehensive Plan should include a

commitment to exercise the full authority of the Council members to resolve policy and procedural obstacles that would allow currently authorized restoration projects to move forward immediately. Where conflicts exist, the Comprehensive Plan should direct agencies to resolve those conflicts in favor of advancing projects to meet the goal of a restored ecosystem, or identify the legal, regulatory, or policy impediments to doing so.

For those conflicts that arise after the completion of the initial Plan, the Council should be prepared to update the Plan to address needs, as required by statute. The Council should include recommended statutory changes to address obstacles that cannot be overcome through administrative remedies.

V. SCIENCE INTEGRATION RECOMMENDATIONS

To inform the development of the Comprehensive Plan and assist the Council with responsibilities under the Oil Spill Impact Allocation, the Council must “collect and consider scientific and other research associated with restoration of the Gulf Coast Ecosystem.”³ We support the Council incorporating the best available science into decision processes.

The success of comprehensive ecological restoration plan and Gulf Coast Ecosystem Restoration Council will be driven in large part based on the quality of science the plan integrates and Council relies on. Sound science is essential to restoring this troubled ecosystem. To ensure the best available science is contemplated and integrated into all processes considered by the Council, especially during project prioritization, we offer the following science recommendations.

We recommend that the Council:

- **Employ a Chief Scientist to coordinate activities and lead development and implementation of a Gulf-wide monitoring, modeling, and research program to support science-based comprehensive restoration program across the member-entities**
- **Establish a Scientific Advisory Committee**
- **Adopt and incorporate by reference the Task Force Strategy and the documents prepared by its Science Coordination Team, including the Science Plan in the Gulf of Mexico Ecosystem Science Assessment and Needs document**
- **Develop a system of independent review to take place at each appropriate stage of project selection; design and engineering feasibility; construction award; and at intervals during project implementation.**
- **Ensure independent review from scientists with expertise about Gulf Coast ecosystems.**

³ (t)(2)(C)(vii)(IV)

APPENDIX

Introduction

In this appendix, we provide a list of high priority projects with detailed descriptions that we believe meet the project priority criteria in the Restore Act, are consistent with the goals of the Restore Council's *The Path Forward to Restoring the Gulf Coast: A Proposed Comprehensive Plan*, and are essential to the implementation of the Louisiana's *2012 Master Plan for Coastal Restoration and Protection* (SMP).

Every one of the nineteen ecosystem restoration projects that we include here is also included in the SMP. The State of Louisiana selected these projects as part of their master plan after a model-based and rigorous scientific review, as well as public participation. Given that rigor and support, the Louisiana legislature adopted the state's master plan unanimously. Also, Congress has authorized fifteen of these projects as part of the Title VII of the Water Resource Development Act of 2007 (WRDA). As Congress directed in WRDA 2007, the Army Corps of Engineers is studying the remaining four projects for possible authorization. Thus, scientists, engineers, economists, resource managers and the public have all vetted these nineteen projects. Indeed, with funding, these projects are ready for implementation.

We highlight these projects because they address a range of critical restoration priorities in each coastal basin. Our guiding principle was to choose projects that reestablish natural deltaic and hydrological functions or that protect critically threatened coastal systems. For example, there are four proposed controlled diversions of Mississippi River water and sediment designed to begin building new sub-delta splays into the Breton and Barataria basins; two designed to convey water and sediment into upper basin swamp and marsh ecosystems to prevent wholesale habitat conversion and loss; and one of Atchafalaya River water and sediment to sustain and enhance existing wetlands. Also, there are three large-scale projects to reestablish marsh with pipeline sediment delivery at critical locations. There is one large-scale project to establish a living oyster reef for shoreline protection. There are four massive barrier island or barrier headland restoration projects, two projects to re-establish hydrological barriers to prevent salt water intrusion from navigation projects, one project to protect eroding marsh shoreline at a critical location in the landscape, and one project to reestablish a forested natural levee ridge to serve as habitat, provide structural stability for marshes, and reduce storm surge.

We recognize that efforts to restore the Gulf ecosystem will be complex and interconnected, including those funded through the RESTORE Act, NRDA, and criminal plea agreements via the National Fish and Wildlife Foundation. All three of these efforts will require those administering the particular program, in partnership with the state of Louisiana, to identify and fund project priorities. We recommend that all parties work closely and flexibly together to ensure that projects are chosen and funded to achieve the greatest ecosystem benefits within the most urgent timeframe possible.

Project List

1. **Mid-Barataria Diversion (1st Period Increment--75k cfs)**—Establish Distributary for Sub-Delta Marsh-Building Diversion of Pulsed Mississippi River Water and Sediment through Control Structure
2. **Mid-Breton Diversion**— Establish Distributary for Sub-Delta Marsh-Building Diversion of Pulsed Mississippi River Water and Sediment through Control Structure
3. **Lower Breton Diversion**— Establish Distributary for Sub-Delta Marsh-Building Diversion of Pulsed Mississippi River Water and Sediment through Control Structure, Ideally Utilizing Existing Newly-formed Mardi Gras Pass
4. **Lower Barataria Diversion**— Establish Distributary for Sub-Delta Marsh-Building Diversion of Pulsed Mississippi River Water and Sediment through Control Structure
5. **Increase Atchafalaya Flow to Eastern Terrebonne**—Marsh and Swamp-Sustaining Diversion through Hydrologic Modification of the Gulf Intracoastal Waterway
6. **West Maurepas Diversions**—Swamp and Marsh Sustaining Diversion of Pulsed Mississippi River Water and Sediment through Control Structure
7. **Barataria Pass to Sandy Point Barrier Island Restoration and**
8. **Belle Pass to Caminada Pass Barrier Island Restoration** —Beach, Dune and Back Bay Marsh Restoration with Pipeline Sand and Sediment Delivery
9. **Central Wetlands Diversion**—Marsh and Swamp-Sustaining Diversion Pulsing Water and Sediment through Control Structure from Mississippi River
10. **Isles Dernieres Barrier Island Restoration**— Beach, Dune and Back Bay Marsh Restoration with Pipeline Sand Delivery from Offshore Shoal
11. **Timbalier Islands Barrier Island Restoration**— Beach, Dune and Back Bay Marsh Restoration with Pipeline Sand Delivery from Offshore Shoal
12. **Houma Navigation Canal Lock Hydrologic Restoration**— for Salinity Control, Sustaining Marsh and Swamp while Maintaining Navigation
13. **Biloxi Marsh Oyster Reef**—Living Reef for Shoreline Protection and Habitat
14. **Calcasieu Ship Channel Salinity Control Measures**—Hydrologic Restoration for Salinity Control, Marsh Sustaining, while Maintaining Navigation
15. **New Orleans East Land-bridge Restoration (1st Period Increment)**—Marsh Creation through Pipeline Sediment Delivery
16. **Large Scale Barataria Marsh Creation-Component E (1st Period Increment)**— Marsh Creation through Pipeline Sediment Delivery
17. **Golden Triangle Marsh Creation**— Marsh Creation through Pipeline Sediment Delivery
18. **Bayou La Loutre Ridge Restoration**—to Protect Marsh and Provide Habitat, using Pipeline Sediment Delivery
19. **Gulf Shoreline Protection (Freshwater Bayou to Southwest Pass)**—Construct parallel offshore sand capture structures.

Project Descriptions

1. Mid-Barataria Diversion (1st Period Increment--75k cfs)—SMP Barataria Basin Plaquemines and Jefferson Parishes

Medium Diversion with Dedicated Dredging at Myrtle Grove—LCA

This pulsed sediment diversion to the mid-Barataria basin, in the vicinity of Myrtle Grove, is the most critical restoration project for the near term in the LCA and State Master Plan. The mid-Barataria Basin has one of the highest land loss rates in the world, is part of one of the most productive estuaries in the world, and helps provide storm surge protection to over 250,000 people in small coastal communities and the New Orleans metropolitan area. Extensive modeling of river sediment dynamics, river and basin hydrology, fisheries, and water elevation effects make this location an important test and proof of concept for man-made land building diversions. The two-step scaling of diversion size (from to 75k cfs to 250k cfs) proposed in the SMP allows for community transition, and the advanced planning, design, and compliance of the LCA project will facilitate rapid implementation.

The Corps/State Myrtle Grove LCA project is underway, and is investigating a range of diversion sizes from 15-125k cfs, as well as marsh creation through pipeline sediment delivery of river sediment.

\$650m; 38,000 net acres after 50 years with 0.45 m of RSLR. (The SMP modeled this at 50k cfs. Subsequent analysis has led to a decision to build the project at 75k cfs. However, the net acreage estimate has not been updated to reflect the increased flow. This estimate is therefore very conservative.)

75k cfs (scaled up to 250k cfs in 2nd Period Increment)

2. Mid-Breton Diversion—SMP Breton Basin Plaquemines Parish

Medium Diversion at White Ditch—LCA

This project is well advanced as the White Ditch LCA Medium Sediment Diversion in an area long identified as a prime location for river re-introduction, marsh creation, and revival of forest on natural ridges. It is an important, easily executed project, in an area with little intervening infrastructure.

White Ditch is the probable location for the Mid-Breton Diversion—joint Corps/state LCA planning, design and compliance are well-advanced. The diversion has been modeled between 5-35k cfs. The decision as to which flow level is appropriate should be based upon continued modeling and project prioritization looking for synergies with the Upper and Lower Breton Diversions, as well as sediment availability on that stretch of the river.

\$123m; 20,232 net acres after 50 years with 0.45 m of RSLR.

5,000 cfs (or up to 35k cfs in LCA)

3. Lower Breton Diversion—SMP

**Breton Basin
Plaquemines Parish**

Delta Management Study and Comprehensive Plan –LCA

This is a sediment diversion into lower Breton Sound in the vicinity of Black Bay that will build and maintain land by creating a new sub-delta lobe and sustaining existing marshes. The project will also restore historic salinities in lower Breton Sound. A pre-engineering assessment is underway to determine optimal location and size, among other questions.

This diversion is unique in that it is planned for a segment of the river along which there are no federal river levees. Overbank spring flow and several natural and man-made distributary channels,

Mardi Gras Pass: During the 2011 flood, a new distributary, named Mardi Gras Pass, formed through the Bohemia Spillway. The location is within the area considered for the SMP Lower Breton Diversion. It is possible that the distributary channel can serve to divert some of the flow required at a fraction of the cost of constructing a new one.

\$203m; 11,976 net acres after 50 years with 0.45 m of RSLR.

**4. Lower Barataria Diversion—SMP
Barataria Basin
Plaquemines, Jefferson and Lafourche Parishes**

Delta Management Study and Comprehensive Plan –LCA

This is a sediment diversion into lower Barataria Bay in the vicinity of Empire with 50,000 cfs capacity. It will build a sub-delta lobe in area where marsh loss is nearly complete, provide a sediment stream to the Barataria Basin shoreline, restore historical salinities, and buffer lower Plaquemines communities from storm surge.

\$203m; 8,960 net acres after 50 years with 0.45 m of RSLR

**5. Increase Atchafalaya Flow to Eastern Terrebonne—SMP
Terrebonne Basin
St. Mary, Terrebonne and Lafourche Parishes**

Convey Atchafalaya River Water to Northern Terrebonne Marshes—LCA

East Terrebonne's marshes are rapidly disappearing in large part because of relentless salinity increases. The marshes are located nearly equidistant between the Mississippi and Atchafalaya rivers and are blocked from the opportunity to receive significant riverine input from diversions higher in the basin by settlement and development in the Greater Houma area. The Gulf Intracoastal Waterway (GIWW) provides a potential east west conduit for Atchafalaya River water. The project would modify the GIWW to convey up to 20,000 cfs to help sustain these marshes.

\$292m; 17,190 net acres after 50 years with 0.45 m of RSLR.

6. West Maurepas Diversions—SMP

Pontchartrain Basin

Ascension, St. John, St. James, Livingston and Tangipahoa Parishes

Small Diversion at Convent/Blind River and/or Small Diversion at Hope Canal—LCA

These diversions will sustain a rapidly declining baldcypress swamp, one of the largest in the nation, with freshwater, nutrient and sediments. It will help prevent loss of forest, conversion of marsh to open water, and fight rising salinities in the entire Pontchartrain basin.

\$120m; 5763 net acres after 50 years with 0.45 m of RSLR.

7. Barataria Pass to Sandy Point Barrier Island Restoration—SMP

Barataria Basin

Jefferson and Plaquemines Parishes

Barataria Basin Barrier Shoreline—LCA

Despite massive marsh loss, the Barataria Basin remains a highly productive and functional estuarine system, with surviving barrier island and headlands, salt marshes, bays, brackish, intermediate and fresh marshes, baldcypress swamps, bottomland hardwood communities, and both maritime and natural levee forests. In the long term, this system can only survive with river re-introduction, but in the near term the barrier islands and headlands are critical features necessary to prevent wholesale conversion of the lower estuary to a saline marine environment, with continued massive marsh loss.

Project implementation is underway, and can be financed in smaller discrete implements. Several segments have already been partially constructed, or are about to be under different authorities. Costs may therefore be adjusted downward. This is one of the most advanced LCA projects, with a signed Chief's Report. Federal appropriations are needed.

\$536m; 2,778 net acres after 50 years with 0.45 m of RSLR.

Re-contour and nourish island and headland segments along approximately 180,000 l.f. of barrier arc; beach, dune, and marsh.

Project is scalable—that is, it does not need to be constructed in one increment at full cost. A number of components are already in various stages of construction.

8. Belle Pass to Caminada Pass Barrier Island Restoration –SMP

Barataria Basin

Lafourche and Jefferson Parishes

Barataria Basin Barrier Shoreline—LCA

Despite massive marsh loss, the Barataria Basin remains a highly productive and functional estuarine system, with surviving barrier island and headlands, salt marshes, bays, brackish, intermediate and fresh marshes, baldcypress swamps, bottomland hardwood communities, and both maritime and natural levee forests. In the long term, this system can only survive with river re-introduction, but in the near term the barrier islands and headlands are critical features

necessary to prevent wholesale conversion of the lower estuary to a saline marine environment, with continued massive marsh loss.

Project implementation is underway, and can be financed in smaller discrete implements. Several segments have already been partially constructed, or are about to be under different authorities. Costs may therefore be adjusted downward. This is one of the most advanced LCA projects, with a signed Chief's Report. Federal appropriations are needed.

\$278m; 1,447 net acres after 50 years with 0.45 m of RSLR.

Restore island and headland beach, dune, and marsh segments along approximately 175,000 l.f. of barrier island arc with sand pumped from an offshore shoal.

Project is scalable—that is, it does not need to be constructed in one increment at full cost.

**9. Central Wetlands Diversion—SMP
Borgne Basin
St. Bernard and Orleans Parish**

Mississippi River Gulf Outlet Environmental Restoration {in part}—LCA

Long term sustainability of the Central Wetlands requires sediment introduction to offset relative sea level rise. The project will sustain remaining marsh and swamp and facilitate restoration of those areas now in open water. Additionally, the freshwater passing through the bayous Bienvenue and Dupree gates will help maintain optimum salinities in the Lake Borgne and Biloxi marshes.

\$189m; 5,421 net acres after 50 years with 0.45 m of RSLR.

**10. Isles Dernieres Barrier Island Restoration—SMP
Terrebonne Basin
Terrebonne Parish**

Terrebonne Basin Barrier Shoreline {in part}—LCA

Restoration of the Isles Dernieres barrier islands will provide dune, beach, and back barrier marsh habitat and enhance storm surge and wave attenuation in the Terrebonne Basin.

\$343m; 2,010 net acres after 50 years with 0.45 m of RSLR.

Re-contour and nourish island and headland segments along approximately 120,000 l.f. of barrier arc; beach, dune, and marsh.

Project is scalable—that is, it does not need to be constructed in one increment at full cost.

**11. Timbalier Islands Barrier Island Restoration—SMP
Terrebonne Basin
Terrebonne and Lafourche Parishes**

Terrebonne Basin Barrier Shoreline {in part}—LCA

Restoration of the Timbalier barrier islands will provide dune, beach, and back barrier marsh habitat and enhance storm surge and wave attenuation in the Terrebonne Basin and lower Lafourche Parish.

\$524m; 3,321 net acres after 50 years with 0.45 m of RSLR

Re-contour and nourish island and headland segments along approximately 90,000 l.f. of barrier arc; beach, dune, and marsh.

Project is scalable—that is, it does not need to be constructed in one increment at full cost.

**12. Houma Navigation Canal Lock Hydrologic Restoration—SMP
Terrebonne Basin
Terrebonne Parish**

Multipurpose Operation of Houma Navigation Lock—LCA

The Houma Navigation Canal is the single most important conduit for saltwater intrusion into Terrebonne's marshes. The lock is necessary to control salinities, and make the GIWW Atchafalaya conveyance project as effective as possible.

\$180m; 3,452 net acres after 50 years with 0.45 m of RSLR.

**13. Calcasieu Ship Channel Salinity Control Measures—SMP
Chenier Plain
Cameron, Vermilion, Jeff Davis and Calcasieu Parishes**

Southwest Louisiana Study—LCA

The Chenier Plain was a stable geological platform with low subsidence and a healthy mix of freshwater inputs and estuarine inputs. Wholesale hydrological modification resulted from the dredging of navigation canals and channels, which increased storm surge threats to interior communities, and allowed saltwater ingress to interior freshwater marshes, leading to widespread marsh loss. Key to restoring some balance and slowing the losses is to reduce saltwater and the tidal prism in the Calcasieu Ship Channel.

\$398m; 21,648 net acres after 50 years with 0.45 m of RSLR.

**14. New Orleans East Land-bridge Restoration (1st Period Increment)—SMP
Borgne-Pontchartrain Basins
Orleans and St. Tammany Parishes**

Mississippi River Gulf Outlet Environmental Restoration {in part}—LCA.

The New Orleans east marsh land bridge is a critical feature separating Lake Pontchartrain from the Gulf. It is important not only as estuarine habitat, but as a crucial line of defense from storm surge for over 1.5 million people in 8 parishes, including New Orleans, East Jefferson, Laplace, Madisonville, Mandeville, and Slidell.

This is an important component of the New Orleans East Land Bridge that can be quickly executed.

\$473m; 6,427 net acres after 50 years with 0.45 m of RSLR.

Project is scalable—that is, it does not need to be constructed in one increment at full cost.

**15. Large Scale Barataria Marsh Creation-Component E (1st Period Increment)—SMP
Barataria Basin
Plaquemines, Jefferson, and Lafourche Parishes**

Medium Diversion with Dedicated Dredging at Myrtle Grove—LCA

This marsh creation project will build upon projects already in place and under construction under CWPPRA and CIAP to strengthen the so-called Barataria Land Bridge. It will complement the Mid-Barataria/Myrtle Grove Diversion, and help protect Lafitte from storm surge and tidal flooding.

\$495m; 8,618 net acres after 50 years with 0.45 m of RSLR.

Project is scalable—that is, it does not need to be constructed in one increment at full cost.

**16. Biloxi Marsh Oyster Reef—SMP
Borgne-Breton Basins
St. Bernard Parish**

Mississippi River Gulf Outlet Environmental Restoration {in part}—LCA

The Biloxi Marshes are one of the most stable marsh platforms remaining in coastal Louisiana, due to low subsidence rates and soil platform maturation. Re-establishment of vertical oyster reefs along with re-introduction of river water via West Maurepas and Violet diversions, will further slow the deterioration of these highly productive marshes. Oyster reefs, in addition to providing wave and surge protection, also provide a host of ecosystem services. Once established, they are naturally self-maintaining.

\$83m; 231 net acres after 50 years with 0.45 m of RSLR.

Project is scalable—that is, it does not need to be constructed in one increment at full cost.

17. Gulf Shoreline Protection: Freshwater Bayou to Southwest Pass—SMP

**Chenier Plain
Vermilion Parish**

Southwest Louisiana Study—LCA

The project will protect a critical landscape feature and highly productive from erosion by constructing parallel protection along the gulf shoreline. It will anchor the southwest corner of the Chenier Plain. The structures will be designed to reduce wave energy and trap sediments, thus slowing shoreline retreat.

\$99m; 90k l.f., 1048 net acres after 50 years with 0.45 m of RSLR.

Project is scalable—that is, it does not need to be constructed in one increment at full cost.

**18. Golden Triangle Marsh Creation—SMP
Borgne Basin
Orleans and St. Bernard Parishes**

Mississippi River Gulf Outlet Environmental Restoration {in part}—LCA

The project will restore marsh in an area badly damaged by saltwater intrusion and erosion subsequent to the dredging of the MRGO. The marsh here will buffer the newly constructed surge barrier and provide important estuarine habitat for Lake Borgne.

\$293m; 2,442 net acres after 50 years with 0.45 m of RSLR.

Project is scalable—that is, it does not need to be constructed in one increment at full cost.

**19. Bayou La Loutre Ridge Restoration—SMP
Borgne Basin
St. Bernard Parish**

Mississippi River Gulf Outlet Environmental Restoration {in part}—LCA

Bayou la Loutre's natural levees are part of the structural underpinning of the Biloxi marshes. Re-establishing the ridge will improve hydrology, provide storm surge protection, decrease saltwater intrusion, and provide important habitat for migratory birds.

\$61m; 368 net acres after 50 years with 0.45 m of RSLR.

Project is scalable—that is, it does not need to be constructed in one increment at full cost.

Notes:

ⁱⁱ The initial Comprehensive Plan will adopt and expand on the four overarching Task Force Strategy goals: (1) *Restore and Conserve Habitat*; (2) *Restore Water Quality*; (3) *Replenish and Protect Living Coastal and Marine Resources*; and (4) *Enhance Community Resilience*.

ⁱⁱⁱ The Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act of 2012, the RESTORE Act requires the initial Comprehensive Plan include “...a list of any project or program authorized prior to July 6, 2012, but not yet commenced, the completion of which would further the purposes and goals of this subsection...” 33 U.S.C. § 1321(t)(2)(D)(ii)(IV)(bb) (2013).

^{iv} Louisiana Coastal Area; Water Resources Development Act of 2007; Title VII, Sections 7002 Comprehensive Plan, 7006 Construction (c)(1); (e)(3)(A), 7010 Expedited Reports (a)(2).

^v WRDA 2007, Section 7002 authorizes studies that could lead to further project authorization. The Delta Management Study is underway. The Comprehensive Plan is not complete.

^{vi} (see note ‘v’ above)

^{vii} Project Ratings (see below)

^{viii} The Southwest Louisiana Study, WRDA 2007, Section 7010 (a) (2) is underway and may lead to additional project authorizations.

^{ix} (see note 'viii' above)

Project Ratings :

The ratings are weighted x2 for statutory requirements.

2/1 = Achieves priority or goal.

4/2= Better achieves priority or goal.

6/3 = Best achieves priority or goal.

The ratings are our best collective judgment about how well each project meets the requirements laid out in the RESTORE Act and in the Restore Council's *Path Forward* vision for developing the Comprehensive Plan, based upon metrics modeled in the development of Louisiana's *2012 Comprehensive Master Plan for a Sustainable Coast*.

These metrics include:

- net project acreage against *future without action*;
- ecosystem services provided:
 - wildlife
 - hunting
 - commercial harvest
 - fisheries
 - commercial
 - recreational
 - nature-based tourism
 - storm surge/wave attenuation
 - agriculture
 - carbon sequestration
 - freshwater availability, and
 - nutrient uptake;
- flood risk (storm surge) reduction for coastal communities:
 - sustaining cultural heritage,
 - equitable distribution of risks and benefits;
- use of natural processes;
- long-term sustainability in the face of climate change uncertainties;
- use of a systems approach for project synergies;
- solutions for the long-term;
- project adaptability;
- engineering feasibility;
- third party review processes for project selection and design; and
- cost-effectiveness.

Comprehensive Plan "The Path Forward" Goals

1. Restore and Conserve Habitat:

- a. Ratings are based upon the scale of habitat restored; i.e., acres of marsh created or sustained over time as measured against future without project; linear miles of oyster reef and the cascade of ecosystem services provided over time; cubic yards of sediment moved for barrier island and marsh restoration coupled with long term sustainability of the project in the face of future conditions. Ancillary effects of projects are also evaluated, i.e., was

material obtained through natural processes; is the borrow source for dredge projects renewable and to what extent borrow removal causes ecosystem harm or beneficially offsets harm that might otherwise occur.

2. Restore Water Quality;

- a. These projects will affect highly productive estuaries first, and the northern gulf thereafter. Generally, filtering Mississippi River water through wetlands will reduce nutrient loading in the near shore Gulf, and thereby reduce the Gulf Hypoxic Zone that forms annually in the Mississippi River navigation channels' plume through nutrient retention and uptake. Estuarine water quality parameters include offsetting saltwater intrusion from anthropogenic changes to system hydrology; achieving favorable salinity gradients calculated to benefit wetland vegetation, plant growth, soil accretion, marsh sustainability, and estuarine productivity measured against future without project. Some offsetting factors include potential effects on fisheries, pathogens, and temporary eutrophication in receiving water bodies.

3. Replenish and Protect Living Coastal and Marine Resources;

- a. The Mississippi River Delta and coastal Louisiana support the highest biological productivity of any Gulf Coast ecosystem because the river brings 85% of the freshwater and 90% of the sediment that enters the Gulf. As a consequence, 97% of Gulf and 40% of national seafood production in the lower 48 states is directly supported. Between five and ten million ducks and geese winter annually, millions of neotropical migrants re-fuel on their way to and from the tropics, and the area supports large colonies of nesting wading and colonial seabirds, among many, many other living resources. Projects are rated for their scale (acres of habitat created or sustained against future without project) and their ability to directly benefit living resources by creating or sustaining breeding and foraging habitat.

4. Enhance Community Resilience

- a. Coastal Louisiana includes large metropolitan areas (Greater New Orleans), mid-size cities and small towns, villages where the economy is dependent primarily on commercial exploitation of natural resources, and traditional communities where subsistence on natural resources is important to well-being of community members. Projects are rated for their effectiveness in protecting communities from storm surge and on enhancing natural resources that provide the widest range of economic, traditional, and recreational opportunities for coastal residents. All projects are measured for sustainability and for net value against *future without* conditions.



Gulf Coast Ecosystem Restoration Council
1401 Constitution Avenue, NW
Washington, DC 20230

July 14, 2013

Dear Council Members,

On behalf of our millions of members and supporters, thank you for the ongoing opportunity to comment on the development of a plan to restore the Gulf Coast region. The attached comments on the Draft Initial Comprehensive Plan build upon and are within the framework of our prior recommendations, dated May 1, 2013, to advance restoration of the Mississippi River Delta.

We were pleased that the Draft Initial Comprehensive Plan maintains and affirms the RESTORE Act's statutory requirement that the Council-selected Restoration Component be dedicated solely to ecosystem restoration projects. This approach is absolutely essential to protect the delicate balance between varying interests that Congress considered in constructing the RESTORE Act, and we strongly urge that it be strictly maintained, as required by the Act, in the Final Initial Comprehensive Plan.

The recommendations below, which reflect that and other central tenets of the legislation, include modifications and refinements to the Draft Initial Comprehensive Plan that will help optimize the Council's ongoing restoration decisions and actions.

We again urge the Council to take full advantage of the unprecedented opportunity the RESTORE Act presents to repair the Gulf ecosystem and restore its natural resilience. The Council can effectuate meaningful, sustainable environmental restoration. Our organizations are prepared to continue serving as a resource to the Council and look forward to further discussion of our comments and recommendations. We have also attached our May 1 recommendations, which are more expansive than the scope of the Draft Initial Comprehensive Plan, for the record and continued consideration as the Council moves forward, particularly in creating a three-year priority project and program list.

Sincerely,

National Audubon Society • Coalition to Restore Coastal Louisiana • Environmental Defense Fund • Lake Pontchartrain Basin Foundation • National Wildlife Federation

Council-selected Restoration Component. The RESTORE Act mandates that the Comprehensive Plan focus on *ecosystem* restoration and requires that all decisions, including projects funded by the State Expenditure Plan component, must be prioritized based on the best available science. As confirmed by the Senate Environment and Public Works Committee report (pages 10 and 11), the Council-selected Restoration Component shall be disbursed to the Council for projects to “restore and protect the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region.” **We were pleased that the Draft Initial Comprehensive Plan maintains and affirms this statutory focus on ecosystem restoration projects, which underlies many of our recommendations below, and we urge the Council to strictly adhere to this focus in the Final Initial Comprehensive Plan.**

Specified Contents and Previously-authorized Projects. Under section (t)(2)(D)(ii)(IV), the initial Comprehensive Plan must contain certain specified contents to generate project lists to be screened through the statutory restoration priorities; including a list of “authorized” federal projects and programs that advance the RESTORE Act goals; a three year project and program list; and a table showing the distribution of projects and programs in all five Gulf Coast States. We believe that subsection (bb) of that section, which calls for the list of projects and programs “*authorized* prior to the date of enactment,” refers only to projects included in previously enacted federal authorizing legislation, and not to state or other projects simply *approved* outside the federal authorization process. By so limiting the language, we believe Congress specifically intended to restrict this list to projects that have received prior Congressional approval. For example, the State of Louisiana and federal partners have worked for nearly a decade developing federally authorized Louisiana Coastal Area projects, through the Water Resources Development Act of 2007.

Congress provided for other mechanisms through which state-approved projects could be considered, including explicit direction, in the project selection criteria, that projects contained in Gulf Coast State comprehensive plans can be evaluated for possible inclusion on the three-year priority project and program list.

Appendix A to the Draft Initial Comprehensive Plan, subtitled “Background Information,” is referenced as a preliminary version of the required list of authorized but not yet commenced projects. **For reasons stated above, we recommend that the Council confine the appendix list only to projects *authorized* by Congress. As discussed below, projects on this revised list, along with state-approved projects and all other projects considered by the Council, need to be evaluated by the Council based on the restoration priorities criteria outlined in the legislation.**

Time-span of Priority Project-selection Criteria. Under section (t)(2)(D)(iii), the Council must establish priorities for funding based on the best available science according to four required restoration priorities criteria. Those are, in summary, 1) Projects that are projected to make the greatest contribution to the Gulf ecosystem; 2) Large-scale projects and programs that are projected to substantially contribute to the Gulf ecosystem; 3) Projects contained in existing Gulf Coast State comprehensive ecosystem plans; and 4) Projects that restore long-term resiliency of Gulf natural resources. The Draft Initial Comprehensive Plan suggests that the RESTORE Act criteria and the requirement of best available science might only bind the Council for the first

three years. We find no reference in the statute or the legislative history to indicate this temporal limitation. **We believe the Council must adhere to the express statutory requirement to use the best available science and the four prioritization criteria throughout implementation of the Act, and we recommend that any language suggesting otherwise be removed from the Comprehensive Plan.**

Prioritization Criteria. We strongly recommend against adoption of additional criteria not specifically provided for in the statute. The RESTORE Act legislates the criteria to be used for project selection. We believe it is beyond the scope of the implementation process to alter that statutory framework by developing “other criteria as necessary to refine the selection process” as considered on page 14 of the Draft Initial Comprehensive Plan. We also believe that an effective, implementable three-year priority project and program list can be developed without the addition of new criteria. **To ensure optimal results using the existing legislated criteria, we do support further explanation of how the existing statutory criteria will be implemented and provide our recommendations below.**

1. *“Projects that are projected to make the greatest contribution to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region, without regard to geographic location within the Gulf Coast region.”* We recommend that the Council interpret this criterion to include ecosystem restoration projects or programs that:
 - **Provide systemic restoration benefits to highest-priority Gulf ecosystem resources,**
 - **Restore, protect, or improve shared or common resources across the Gulf region, irrespective of state lines, or**
 - **Deliver multiple ecological benefits.**
 - Restoration of the Mississippi River Delta will deliver multiple ecological benefits to shared highest-priority resources by restoring degrading coastal wetlands of Mississippi and Louisiana, while also providing water quality benefits to the Gulf of Mexico.

2. *“Large-scale projects and programs that are projected to substantially contribute to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast ecosystem.”* We recommend that the Council interpret this criterion to include ecosystem restoration projects or programs that:
 - **Significantly increase important Gulf Coast habitat,**
 - **Increase net wetland acres compared to a no action alternative, or**
 - **Address deltaic land loss.**
 - The Louisiana Coastal Master Plan ecosystem restoration projects were developed specifically to halt deltaic land loss and increase wetland acres. Implementation of

- Mississippi River diversions consistent with the Master Plan will have the effect of significantly increasing Gulf Coast habitat.
3. *“Projects contained in existing Gulf Coast State comprehensive plans for the restoration and protection of natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region.”*
 - Consistent with this legislative direction, **we recommend that the Council fully consider and place high priority on the ecosystem restoration components of the existing Louisiana Coastal Master Plan**, unanimously adopted by the state legislature in 2012. The Comprehensive Everglades Restoration Plan and the Mississippi Coastal Improvements Program are also relevant ecosystem restoration plans for purposes of this criterion.
 4. *“Projects that restore long-term resiliency of the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands most impacted by the Deepwater Horizon oil spill.”* This statutory criterion sets the RESTORE Act Comprehensive Plan apart from other restoration plans because it prioritizes increased resilience for the future. We recommend that the Council interpret this criterion to include ecosystem restoration projects or programs that:
 - **Increase the health and lessen vulnerability of the types of resources, habitat, fish and wildlife that were impacted by the Deepwater Horizon disaster,**
 - **Preserve or restore natural processes or functionality,**
 - **Reduce recovery time from disturbance events with minimal human intervention or maintenance requirements, or**
 - **Continue to produce long-term results in the face of sea level rise.**
 - The Louisiana Coastal Master Plan was crafted specifically to stabilize and ensure a more resilient and sustainable Gulf Coast and Mississippi River Delta.

Geographic Scope of the Gulf Coast Region. The RESTORE Act geographically restricts spending from the Gulf Coast Restoration Trust Fund to: (1) the coastal zones (including federal land) of the Gulf states (2) adjacent land, water, and watersheds within 25 miles of the coastal zones and (3) federal waters. The Act does not define “adjacent land, water, and watersheds.” **We recommend that the Council define those terms, and provide for public consideration, a map depicting the areas that fall under these definitions.**

Objectives. The Draft Initial Comprehensive Plan included seven objectives to further define the types of projects and programs the Council intends to select for funding. We support the Council’s efforts to meet the full spectrum of natural resource, science, and community needs outlined in these objectives. We also recognize that each of these objectives, like the broader goals carried over from the Council’s earlier *Path Forward* document, can be fully addressed through strict adherence to the four statutory criteria for Council-selected Restoration Component projects and programs, and through development of effective State Restoration Expenditure Plans as discussed below.

The criteria mandated in the RESTORE Act for the Council-selected Restoration Component are based solely on meeting environmental restoration needs. This statutory directive recognizes that the components of the Gulf ecosystem are intrinsically linked; that instituting a comprehensive ecosystem restoration plan will create jobs and sustain a robust economy; and that using economic or other non-environmental screens to select ecosystem projects would undermine the holistic environmental and economic goals of the Act. By excluding economic considerations from the Restoration Component criteria, the Act ensures an appropriate Council focus on individual restoration projects that may in themselves have varying impacts on community and economic needs, but taken together will have the greatest impact on the natural systems on which those communities and economies depend.

We recommend that the Plan clarify that the stated objectives support and do not supersede the project selection criteria; that the Council will meet these objectives in the Restoration Component through projects selected solely on the basis of those criteria; and that the objectives are not intended, and will not be used, to factor economic or other non-environmental implications into the selection of Restoration Component projects or programs.

We appreciate the acknowledgement that efforts funded under the Council-selected allocation may achieve multiple objectives at once; and also may not (and should not) be equally distributed among objectives. **We recommend that the Council refine the Objectives in the Plan as follows:**

Primary Objectives. Any project or program that meets the restoration priorities project selection criteria and is subsequently selected by the Council for funding should accomplish at least one of the following primary objectives:

1. Restore, Enhance, and Protect Habitats
2. Restore, Improve, and Protect Water Quality
3. Protect and Restore Living Coastal and Marine Resources
4. Restore and Enhance Natural Processes and Shorelines

Secondary Objectives. Secondary objectives, though important, must be viewed as co-occurring objectives that may be integrated in projects that achieve the primary objectives first. Any project or program that meets restoration priorities project selection criteria, is selected by the Council for funding, and accomplishes at least one primary restoration objective may include the following secondary objectives:

5. Promote Community Resilience
6. Promote Natural Resource Stewardship and Environmental Education

We recommend that Objective 7 in the Draft Initial Plan” “Improve Science-Based Decision-Making Processes” be a fully integrated and required overarching component both of plan development and project and program selection rather than an Objective. We believe this is supported by the statutory requirement that projects and programs be selected

based on the best available science. We also believe that this statutory requirement merits both project and Gulf-wide monitoring to inform and improve science-based decision-making and adaptive management, and evaluate effectiveness and measure progress towards restoration goals.

State Expenditure Plans are required to be “consistent with the goals *and objectives*” of the Comprehensive Plan (t)(3)(B)(i)(III). The Plan should clarify that any State Expenditure Plan that undermines or is inconsistent with either primary or secondary objectives will be ineligible for funding by the Council.

Council Role in State-specific Restoration Expenditure Plans. As the Draft Initial Comprehensive Plan notes, the RESTORE Act also requires the Council to oversee and approve development of state-specific restoration expenditure plans, which will guide 30 percent of the spending from the Gulf Coast Restoration Trust Fund, determined according to an impact formula. State Restoration Expenditure Plans must be consistent with the goals and objectives of the Comprehensive Plan.

Congress intended that the various allocations from the Gulf Coast Restoration Trust Fund be invested in the region for distinct, but not inconsistent, purposes by various coordinated local, state, and federal government entities. In requiring Council oversight of the Spill Impact Component, Congress intended that State Restoration Expenditure Plans protect and enhance the ecosystem restoration objectives of the Council-selected allocation. The Act confirms this nexus between the state plans and the Council plan by limiting spending on infrastructure in state plans. A state plan may only exceed the infrastructure spending limitation if there are no remaining environmental restoration needs.

The Draft Initial Comprehensive Plan outlines permissive elements that *may* be included in a State Restoration Expenditure Plan. The Council is required to evaluate each State Restoration Expenditure Plan for consistency with the goals and objectives of the Comprehensive Plan. While we agree that each Gulf Coast state is unique, there must be a solid base set of requirements for State Restoration Expenditure Plans.

We recommend that the Council revise the Draft Initial Comprehensive Plan to more clearly delineate required elements of state plans, criteria and process for a consistency determination, and the method for evaluating sufficiency of a state-certification of environmental health.

Specifically, the following elements should be mandatory:

- The amount of funding needed for each project, program, and activity selected by the State for planning and implementation; the proposed start and completion dates; and specific mechanisms that will be used to monitor and evaluate the outcomes and impacts of each project, program, and activity.
- A description of how the best available science, as applicable, informed the State’s project, program, and activity selection.

- A justification statement of how all included projects, programs, and activities are eligible activities under the RESTORE Act.
- A description of how each included project, program, and activity contributes to the overall economic or ecosystem recovery of the Gulf Coast.
- A certification that all included projects, programs, and activities do not exceed the 25 percent funding limit for infrastructure.
 - If the state intends to claim an exception to this limitation in accordance with the RESTORE Act, the state must provide the percentage to be spent on infrastructure, evidence that the environmental restoration needs of the state have been met, and whether the state has provided public notice of its intent to claim an exception.
- A description of how each project, program, and activity is consistent with the Goals and Objectives of this Plan. The Council views “consistent” to mean
 - Each eligible project, program, and activity will further one or more of the five Goals; *and*
 - will not negatively impact the Gulf Coast ecosystem.
- A description of the process the State will use or has used to ensure appropriate public and tribal participation and transparency in the project, program, and activity selection process.
- A description of the financial controls and other financial integrity mechanisms to be used to assure the public and Congress that funds have been managed appropriately to further the purposes of the RESTORE Act.
- A description of the methods the State will use to measure, monitor, and evaluate the outcomes and impacts of funded projects, programs, and activities.

The following elements may be included and will be useful to the Council in evaluation and approval or disapproval of State Restoration Expenditure Plans:

- To the extent known, a description of any certain or prospective collaborations or partnerships to be used or created through the selection process.
- To the extent known, a description of any additional resources that will be leveraged to meet the goals of the State Expenditure Plan.

Additionally, the Council should delineate a process by which it will evaluate the sufficiency of a submitted State Restoration Expenditure Plan, including guidelines for which elements that the Council will consider favorably and unfavorably.

Project Recommendations. We previously provided specific, detailed project recommendations for inclusion in a three-year priority project and program list. Though we acknowledge the Council’s reasons for not producing the three-year priority project and program list on the timeline set forth in the statute, **we recommend that the Draft Initial Comprehensive Plan acknowledge that an early start on a major Mississippi River diversion and acceleration of**

barrier island renewal in the Delta are necessary cornerstones of an effective Gulf-wide response to which we can all commit. As the Council develops the three-year priority project and program list, we urge the Council to incorporate our project recommendations.

Project Sponsorship. We appreciate that the Draft Initial Comprehensive Plan specifies a process for Council members to sponsor projects and programs. While we recognize that many decisions will be project-specific, we recommend that the Council further define the roles and responsibilities of the sponsor agencies tasked with implementing restoration projects. We also recommend that the Council develop a process to ensure coordination between sponsoring entities and projects.

We recommend that future project lists identify the sponsor agency or entity for public consideration, transparency, and accountability.

In addition, we recommend that the Council retain and provide guidance and oversight during planning, design, construction, completion, and management of sponsored projects.

Advisory Committees. The Draft Initial Comprehensive Plan lists establishment of one or more advisory committees as a near-term next-step. We believe the RESTORE Act contemplates that the Council will establish advisory committees on an as-needed basis. **We recommend, however, that the advisory council process be structured in a way that ensures no interference or undue delay to restoring the ecosystem.**

Science must guide Comprehensive Plan development; project selection, prioritization, implementation, monitoring, and adaptive management; and State-specific Restoration Plan evaluation. **We recommend that the Council establish an external, independent Science Advisory Committee as soon as practicable to review restoration plans after providing the public an opportunity to consider and comment on the charge and makeup of such a Committee. We also recommend that the Council further establish procedures and methods for ensuring that implementation decisions are made based on the best available science. We encourage the Council to develop framework for the scientific process for project and program selection and provide the public an opportunity to consider, commend, and expand upon the framework.**

Science Integration. To inform the development of the Comprehensive Plan and assist the Council with responsibilities under the State Restoration Expenditure Plan Component, the Council must “collect and consider scientific and other research associated with restoration of the Gulf Coast Ecosystem.” **We support the provisions in the Draft Initial Comprehensive Plan indicating the inclusion of science-based decision making to select projects and programs based on the best-available science.**

As the restoration projects and programs are implemented, it will be critical that scientists are engaged throughout project planning and design with project engineers and managers to ensure that projects succeed and goals are met. We previously provided specific science integration recommendations and urge that they be adopted as the Council moves forward.



Chris Canfield
Vice President
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June 18, 2013

Gulf Coast Ecosystem Restoration Council
C/O Mr. Justin Ehrenwerth, Executive Director
[submitted via email]

Re: National Audubon Society Comments on *Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy*

Dear Council Members:

The National Audubon Society appreciates the opportunity to share our comments and recommendations on the *Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy* (Hereafter, "Draft Plan").

We appreciate the work of the Council and the affirmation that Gulf restoration is both good for the environment and supports our natural resource-based economy. We commend the consistent emphasis throughout the Draft Plan on comprehensive, region-wide ecosystem restoration that is based on the best available science.

We appreciate the public engagement process that allows all interested parties to recommend improvements to be incorporated into the final comprehensive plan. Meaningful input from NGOs, community groups, academics and the private sector should result in more robust and comprehensive restoration. We would like to see larger windows available for such comments and greater notice of public hearings.

While the overarching intentions of your plan are commendable, we remain concerned about the level of detail that has yet to be provided, particularly on conservation plans. We are sympathetic to your explanation of uncertainties and limitations on available information (Draft Plan, pages 2-3). Timelines that may have been envisioned at the time legislation was drafted and then passed have become dependent on actions and decisions outside your control. However, we believe that resources do exist to further planning so that once funding and allocation processes are clearer, we can all move more quickly to fulfill our shared goals

of restoring the Gulf. In other communications (with a coalition of other Gulf coast environmental groups), we have offered support for expanding the time allowed for you to finalize an initial comprehensive plan, or at least to ensure another iteration with sufficient public input. Here we will more focus on conservation planning actions we believe the Council can and should undertake now, and the ways we believe Audubon and others can help.

Recommendation: Further the goals of the Gulf of Mexico Regional Ecosystem Restoration Strategy (December 2011), (hereafter ‘Strategy’), the strategy written by the Gulf Coast Ecosystem Restoration Task Force, (hereafter ‘Task Force’).

We strongly believe that each iteration of planning for Gulf of Mexico ecosystem recovery should reflect and further develop the best elements of previous efforts. By reference, you incorporate previous efforts into your proposed plan, specifically the Strategy written by the Task Force. As the Strategy incorporated and built upon recommendations of the Oil Spill Commission Report, so this Draft Plan should further develop the recommendations in the Strategy, and the Council should build upon the work of the Task Force. In addition, the Council should more explicitly indicate how outside groups will be engaged and how external plans and strategies will be evaluated and incorporated into the restoration process.

Specifically, we would like to see the following Task Force recommendations more fully developed in the Comprehensive Plan:

- Re-establish the science teams developed by the Task Force, including the Task Force’s Science Coordination Team, to forward the science of Gulf ecosystem restoration. The Science Coordination Team is vital to ensure that models for diverse taxa and natural communities converge and that the Council can understand more fully the consequences of restoration projects and how the projects will interact.
 - Include experts from NGOs, private industry, and academic institutions on these teams along with experts from state and federal resource agencies. Experts in coastal, watershed and population processes should be engaged, including hydrologists, geologists, population biologists, ecologists, and climate scientists.
 - Science teams should be organized around natural communities, including coastal wetlands, coastal forests, mangroves, oyster reefs, seagrasses, barrier and bay islands, coastal beaches, coral reefs, ocean habitats (including pelagic and deep-water benthic), and watersheds, and taxa of conservation concern, such as birds, fish, shellfish, marine mammals, and sea turtles and terrapins.
 - Science teams should develop an understanding of the historical and current extent and state of important Gulf of Mexico natural resources, and describe them in the forms that may include but not be limited to atlases, databases, and maps. They should also develop ideal future scenarios that detail configurations and amounts of habitats that will support economically- and environmentally-sustainable habitats and populations in the future. Teams should use all available tools, including but not limited to modeling, research,

and decision-support tools to establish these goals and evaluate potential future scenarios and how potential conservation and restoration projects will contribute to reaching these ideal endpoints.

- Engage more fully and with greater transparency with NGOs, communities, landowners, private industry, and others to identify and implement restoration strategies and leverage investments. Conservation and restoration may include not only land acquisition and restoration projects, but may also include a variety of tried and novel strategies, including but not limited to conservation planning, direct species management, habitat management, education, and social marketing. Audubon and other groups have offered plans and strategies that support sound and organized gulf-wide restoration (e.g., *Restoring the Gulf for Coastal Waterbirds: A Long-term Vision*; *Strategy for Restoring the Gulf of Mexico: Recommendations to the Gulf Coast Ecosystem Restoration Task Force*; May 1, 2013 comments on Path Forward signed by Audubon and other NGOs working in Louisiana). We would appreciate clarification on the process through which these plans and strategies may be incorporated into the Comprehensive Plan. Provide more detail about processes to “facilitate the formation of strategic partnerships and collaboration on innovative ecosystem restoration projects, programs, and approaches that might ultimately form the basis of a proposal to the Council” (Draft Plan, page 7).
- Incorporate explicit processes to reduce obstacles to restoration implementation and success (Strategy, page 14). Barriers identified in the Strategy included budget constraints, water resource policies, inconsistent or unclear priority-settings, and limited research and science. The Council should not only explicitly address these obstacles, but should also specify processes to ensure that State Expenditure Plans and prioritized project lists will result in comprehensive ecosystem restoration. This document should include more explicit coordination and direction for the Science Coordination Team to ensure that projects work in concert to maximize restoration of natural processes, ecosystem-wide benefits, and long-term sustainability.

Recommendation: Establish processes for incorporating expertise of non-governmental organizations and community groups and for evaluating their proposed strategies, guiding principles, and projects. Make clear the processes by which projects from outside organizations can be proposed and funded through the Trust Fund.

Collaboration across the Gulf is highlighted in your Draft Plan as key to success. We certainly agree and believe that your final plan could be clearer on process and plans for such collaboration with groups outside the Council.

- Identify and engage groups with specific expertise in strategies, natural communities, or taxa. For example, Audubon has convened three such groups that have done significant work toward implementing recommendations found in the Strategy. As one of the core priorities in Audubon’s Strategic Plan and based on more than 100 years of experience, Audubon is leading and has plans to expand Gulf-wide stewardship of coastal waterbirds to reduce direct threats and restore populations to sustainable levels. We work closely with federal and state partners, other conservation organizations, and private landowners. Audubon stands ready to deliver

coordinated, Gulf-wide environmental education and is developing sophisticated social marketing (a research-oriented approach to affecting people's behaviors) to increase community involvement in bird and habitat protection and to ensure long-term sustainability of restoration projects. With a core group of external partners from academic institutions, other NGOs, and state and federal agencies, Audubon is prepared to lead coordinated, Gulf-wide monitoring of birds. We are looking to the Council in the final Comprehensive Plan to help us understand how best to support the Council's work with our resources, science, and expertise.

- Clarify funding to NGOs. The RESTORE Act in Section (E) (III) (aa) includes provisions for funding groups outside the Council to implement elements of the comprehensive plan. While your Draft Plan references the opportunities for other entities to work through Council Members (page 16), it is not clear how the intentions of the Act to also allow funding to go to NGOs and others are going to be fulfilled by the Council. We believe that NGOs receiving grants to implement restoration priorities should be able to work directly with the Council.

Recommendation: Develop additional evaluation factors to consider so that projects can be scaled by their relative benefit to the long-term health and sustainability of the Gulf Coast ecosystem.

We support the existing criteria for project evaluation criteria as contained in the RESTORE Act legislation. Applying those criteria during project selection will ensure that projects fulfill the ecosystem restoration goals established in the RESTORE Act.

- Apply a second level of evaluation that results in prioritization of projects and plans from those selected using the evaluation criteria. Additional factors to consider in project evaluation, some of which can be found within the *Guiding Principles in the Strategy for Restoring the Gulf of Mexico: Recommendations to the Gulf Coast Ecosystem Restoration Task Force*, may include:
 - scale of projects
 - project contribution to the full complement of biodiversity of a healthy Gulf
 - project contribution to recovery from any of the systematic problems affecting the Gulf
 - project development from and adherence to best available science and research
 - degree to which projects show coordination of efforts at an appropriate scale
 - degree to which projects incorporate expert knowledge and design assistance from biologists and ecologists to ensure that habitat restoration provides optimal habitat for birds and other living resources, as well as general engineering and design assistance
- Coordinate and fund in ways that ensure Gulf-wide results and sustained commitments to conservation. In spite of the language in the Draft Plan supporting Gulf-wide and ecosystem-level planning and evaluation, we remain concerned that a system dependent largely on state-by-state project sponsorship and then seemingly independent federal project proposals will fail to fulfill those larger goals. The Council is in the unique position of overseeing a truly comprehensive approach

where the whole should be greater than the sum of the parts. The other funding streams related to Gulf restoration are alluded to in your Draft Plan (page 9), and coordination is a stated goal, but political coordination at high levels is not the same as integration of plans for outcomes measurable at the ecosystem level. Please address what overarching criteria and processes will be in place to assure that projects approved by the Council are complementary, certainly not counterproductive, and ultimately contributing to full recovery. For instance, restoration and stewardship of sites for colonies of birds is and will be important. But for the effort at one location to be most effective, it must be linked to efforts at locations across all five states. And efforts must be sustained for years, if not decades, to reap the benefits of the initial investments. Funding allocations should recognize the longevity needed and also the role of adaptive management. We appreciate the recognition that projects will often need phased investments (page 15), supporting planning, technical assistance, and implementation. We would add another category: sustained management. Under this category, funds might be reserved for a decade to allow for project changes as new science from monitoring revealed necessary adjustments. And management of restoration areas supported with funds beyond those currently available will often be the difference between short-term gains and true recovery of systems and populations

Programmatic Environmental Assessment

As you acknowledge (page 3) the Programmatic Environmental Assessment (PEA) concurrently released with your Draft Plan is very broad and “does not analyze impacts of projects or programs that could subsequently be funded by the Council.” While we do not mean to contest the legality of your effort at this stage, we do believe that only through a more comprehensive planning process and criteria based on expert advice will the Council be able to assure the public that projects funded are synergistic at best and not counterproductive at worst. Elements of the PEA underscore the importance of coordination of projects of one type with goals of restoration in another form. For instance, barrier island restoration initially motivated to enhance resistance of coasts to storms, often primarily seen as coastal engineering, should also be viewed as habitat restoration, such as for birds and turtles. They are not necessarily synonymous (as your PEA points out a number of times). Multi-discipline teams should be brought together as part of Council criteria for awarding grants to ensure that gains for one set of objectives do not undercut those for another. Proper design can usually achieve multiple goals in complementary fashion. And, of course, those projects subject to further NEPA review should assess these multiple impacts across habitats and species, as well as human communities, in the context of a larger Gulf recovery plan.

List of Authorized Projects

We concur with the Council that the list of currently authorized projects provided does not represent the prioritized list of projects to be funded over the next three years nor does it necessarily represent projects worthy of inclusion in a Ten-Year Funding Strategy. We are concerned that public misunderstanding could lead to the assumption that these listed projects

are somehow all “approved.” Please make every effort to underscore the limitations of this list so as not to create more confusion.

The Opportunity Ahead

The RESTORE Act gives us an opportunity to move the Gulf from disaster back to vitality and resiliency. The Council is in a unique and historic position to bring all the best resources of the region together for a sustained effort at recovery. The responsibility of this role is large. We would like to help with our expertise, our site-based management, and long-standing educational role in communities. Please avail yourselves of these assets and those of others by establishing clear processes for incorporating non-governmental groups into your work. Together we can fulfill the promise of the RESTORE Act for our children and for their children.

Respectfully,

A handwritten signature in black ink that reads "Chris Canfield". The signature is written in a cursive, flowing style.

Chris Canfield
Vice President, Gulf/Mississippi Flyway
National Audubon Society



Via Electronic Mail

June 24, 2013

Chair Rebecca Blank, Acting Secretary, Department of Commerce
Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Avenue, N.W., Room 4077
Washington, DC 20230RE: RESTORE Draft Comprehensive Plan

Dear Chair Blank,

For over 30 years, the National Estuarine Research Reserve System (NERRS or system) has been investigating coastal systems to find solutions to crucial issues facing America's coasts. Five of the 28 Reserves are located in the Gulf: Apalachicola (FL), Rookery Bay (FL), Weeks Bay (AL), Grand Bay (MS) and Mission-Aransas (TX). These five sites located along the shores of the Gulf of Mexico are part of a national network that is a partnership between NOAA and coastal states. We also are aware of the State of Louisiana's interest to establish what would be the sixth reserve in this region and the 29th reserve in the system.

The NERRS have the experience and expertise in coastal research, restoration, and outreach. The Reserves are poised and ready to implement the intent and depth of the RESTORE the Gulf Coast Act of 2011. As outlined below, the Reserves have specific and unique capabilities that afford them the capabilities to competently and swiftly implement the Draft Comprehensive Plan goals.

(1) Restore and Conserve Habitat – Restore and conserve the health, diversity, and resilience of key coastal, estuarine, and marine habitats.

- Each Reserve operates a stewardship program, whose direct mission is to conduct projects that meet this goal. The stewardship program has the partnerships and ability to leverage resources to conduct projects such as restoration (4,747 acres) and land acquisition (combined total of 4,200 acres in TX and AL).
- While Reserves were established as long-term ecological research and monitoring sites, extensive restoration has been carried out on portions of many Reserves and they serve as excellent reference sites of other restoration projects including generating habitat maps that monitor change and assist local communities as part of the NERRS Restoration Science Strategy.

- Through wise management the Gulf Coast Reserves have protected over a half million acres—566,633—and the NERRS land already provides numerous benefits to communities such as improved water quality, increased flood control, and buffers from storms.

(2) Restore Water Quality – Restore and protect water quality of the Gulf Coast region’s fresh, estuarine, and marine waters.

- NERRS is the nation’s leader in water quality monitoring that provides immediate and long-term data to understand real-time flood levels during storms, provides data for weather forecasting, and tracks long-term changes to sea level rise.
- The NERRS system-wide monitoring program is one-of-kind. It’s a national program that lets Reserves compare the condition of the water across state boundaries. Information like this helps our states make better decisions about everything from fish limits to pervious surface ordinances.

(3) Replenish and Protect Living Coastal and Marine Resources – Restore and protect healthy, diverse, and sustainable living coastal and marine resources.

- Protection of coastal and marine resources is vital to the functioning of the ecosystem. The Reserves are conducting cutting-edge research to help solve coastal issues and help protect these precious resources. They ask questions like – “How much does rain and flooding events really increase nutrient loading to our bays?”

(4) Enhance Community Resilience – Build upon and sustain communities with capacity to adapt to short- and long-term changes.

- The Gulf Reserves are helping increase the capacity of coastal communities and their adjacent natural habitats to respond to a perturbation or disturbance by resisting damage and recovering quickly. Through programs and workshops, the Reserves Coastal Training Program can and will assist communities to increase their resilience. Some examples of projects completed include creating *Disaster Response Plans* and assisting communities to *Implementing the Community Rating System*. Reserves are committed to science-based decision making and stand ready to assist the RESTORE comprehensive plan.

(5) Restore and Revitalize the Gulf Economy – Enhance the sustainability and resiliency of the Gulf economy.

- The Reserves are committed to restoring and revitalizing the Gulf Economy. Protected estuaries keep commercial and recreational fishermen successful, contributing over \$2.7B to the shellfish and seafood industry in 2010 in states that have a NERR and over \$26B in ocean-dependent industries along our coasts.

Scientific Advisory Board

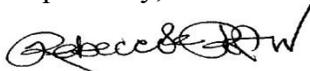
In addition to our support for the Draft Plan, we recommend that there be a creation of a scientific advisory board made up of recognized Gulf and Ecosystem scientists and resource managers to assist the Council in the selection of the funded priorities. The review of projects by established and active research scientists will ensure that the projects are using the best-available science and the review of projects by experienced resource managers will ensure that the projects have the ability to make a sustainable difference to our ecosystem and economy.

Gulf Coast Reserves Conservation Trust Fund

Secondly, in support of a major, existing conservation program, consideration within RESTORE should be given to support a NERRs Gulf Coast Reserves Conservation Trust Fund. This fund would be a \$25-50 million endowment to support Reserve research, education and stewardship activities at five Gulf Reserves. In addition, such a fund could assist the start and implementation of a potential reserve site in Louisiana.

On behalf of the National Estuarine Research Reserve Association that represents the 28 NERRs around the country, I write in support of the RESTORE Draft Comprehensive Plan. Thank you for the opportunity to review and comment.

Respectfully,



Rebecca K. Roth
Executive Director

- cc: The Honorable Bill Nelson
 The Honorable Marco Rubio
 The Honorable Richard Shelby
 The Honorable Jeff Sessions
 The Honorable Thad Cochran
 The Honorable Roger Wicker
 The Honorable John Cornyn
 The Honorable Ted Cruz
 The Honorable Mary Landrieu
 The Honorable David Vitter
 Mr. Russ Beard
 Ms. Mary Erickson
 Dr. Shelby Walker
 Dr. Becky Allee
 Dr. Julien Lartigue



June 28, 2013

Via Email and U.S. Mail

Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

Re: Public Comments for the Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy

Dear Council Members,

On behalf of our four million members and supporters nation-wide, including approximately 390,000 in the Gulf States, the National Wildlife Federation (NWF) appreciates this opportunity to provide comments on the Council's Draft Initial Comprehensive Plan. For our membership, and sportsmen and anglers throughout the country, restoring the Gulf ecosystem is a top priority. Rapid land loss, declining water quality, overfishing, natural disasters, and the tragic 2010 Deepwater Horizon Oil disaster have devastated marine and coastal habitats, fish and wildlife populations, and undermined the resiliency of coastal communities on the Gulf Coast. The long term impacts on both people and wildlife are substantial, and these issues will need to be addressed through a comprehensive, science-based, and transparent process. NWF and its state affiliates have a long history in the region, providing support to local, state, and federal organizations and agencies to rebuild and restore coastal ecosystems throughout the Gulf. We believe the RESTORE Act represents an unprecedented opportunity to ensure a healthy, resilient, and sustainable Gulf environment for the benefit of future generations. In addition to our broader Gulf presence, as a member of the Mississippi River Delta Coalition (MRD), NWF works specifically to rebuild and preserve vital ecosystems along Louisiana's coastline. The MRD Coalition will also submit comments for the record that reflect restoration priorities in the Mississippi River Delta — a cornerstone of the broader Gulf environment.

Studies show that there is broad public support for restoring the Gulf ecosystem. A recent poll by Chesapeake Beach Consulting shows that eighty-seven percent of sportsmen strongly believe that fines and penalties from the Deepwater Horizon oil spill should be used exclusively to

restore fish and wildlife habitat of the Gulf of Mexico and its fishing and hunting heritage, and not for infrastructure projects such as roads, bridges, ports and convention centers.^[1]

Every dollar invested in restoring the Gulf environment will strengthen and sustain the region's economy. The Gulf contributes many billions of dollars annually from its commercial and recreational fishing industry alone.^[2] Restoring this vital ecosystem will benefit people, coastal communities, fish and wildlife populations, as well as the national economy, and fulfill the intent of Congress in passing the RESTORE Act.

It is for that reason that we provide the following recommendations, modifications, and additions to the Draft Initial Comprehensive Plan. Thank you in advance for your consideration, and we look forward to continuing to work with you to restore the Gulf of Mexico.

Sincerely,

David J. White, Esq.
Director, Gulf of Mexico Restoration Campaign
National Wildlife Federation
1700 Fairway Avenue South, Suite 100
St. Petersburg, FL 33712

^[1] <http://www.nwf.org/News-and-Magazines/Media-Center/Reports/Archive/2012/09-25-12-National-Sportsmen-Poll.aspx>

^[2] [Gulf](#) of Mexico Regional Ecosystem Restoration Strategy, Gulf Coast Ecosystem Restoration Task Force, December 2011.

Comments of the National Wildlife Federation on the Draft Initial Comprehensive Plan

RESTORE Implementation Principle. Congress passed the RESTORE Act in direct response to the Deepwater Horizon oil spill—the largest environmental disaster in U.S. history. In this context, Congress intended the Gulf Coast Restoration Trust Fund to benefit the environment *and* economy of the region. As the disaster made abundantly clear, harming the Gulf ecosystem adversely impacts the regional economy. To carry out this overarching theme of the RESTORE Act, NWF recommends that the Council adopt the following principle:

- Each project and program selected by the Council or approved in State Expenditure Plans must avoid, minimize, and mitigate environmental harm *and* provide a net environmental benefit.

Council-selected Ecosystem Restoration Component. NWF supports provisions in the Draft Initial Comprehensive Plan that confirm the statutory requirement that Council-selected restoration projects “restore and protect the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region.” **We recommend that the Council reaffirm and strengthen this focus in the Final Initial Comprehensive Plan.**

Science-based Decision-Making. NWF supports the Council’s commitment to support decision-making based upon the best available science. In order to achieve this, the Council must commit to supporting a sound RESTORE Science Program that requires an ecosystem approach to restoration by supporting integrated research, monitoring, and modeling throughout the Gulf of Mexico, while leveraging existing partnerships. An important piece of this work was completed by the Gulf Coast Ecosystem Restoration Task Force through development of their Ecosystem Science Assessment and Needs report.¹ The Council has committed to incorporating findings and strategies from the Task Force into the Final Comprehensive Plan, however there is no mention of this report or how the Council intends to incorporate it. NWF also **urges the Council to approve, develop, and utilize, to the maximum extent possible, a Restoration Science Advisory Committee (SAC)** that will compile, update, translate, and make publically accessible, the best available science on the state of Gulf ecosystems, restoration management practices, and comprehensive monitoring and evaluation, and make recommendations to the Council based thereon. As part of this process **we recommend that the Council appoint a senior-level Chief Scientist** that would serve as Chair to the SAC in order to coordinate science objectives moving forward in implementing the Comprehensive Plan.

Project Selection Criteria. The RESTORE Act requires the Council to establish priorities for funding based on best available science and according to four required restoration priority criteria, provided below. **While NWF recommends that the Council further define statutory criteria and provide interpretive guidelines, we urge the Council not to adopt criteria outside of the scope of those specifically provided for in the statute.** NWF supports inclusion of the following considerations in evaluating whether projects or programs meet restoration criteria:

¹ Gulf of Mexico Ecosystem Science Assessment and Needs, Gulf Coast Ecosystem Restoration Task Force Science Coordination Team, April 2012.

- 1) *“Projects that are projected to make the greatest contribution to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region, without regard to geographic location within the Gulf Coast region.”* The Council should interpret this criterion to focus on projects and programs that:
 - Address existing (or prevent future) environmental degradation;
 - Restore or conserve ecologically important habitat across all ecological regions, including from upstream in watersheds, through coastal and nearshore habitats, to bluewater marine ecosystems;
 - Protect indicator species (including threatened or endangered species); and/or
 - Maximize ecological benefits by working synergistically with other restoration activities, leveraging other sources of restoration funding, such as NRDA, NFWF, and North American Wetlands Conservation Fund.

- 2) *“Large-scale projects and programs that are projected to substantially contribute to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast ecosystem.”* The Council should interpret this criterion to mean projects and programs that:
 - Regardless of geopolitical boundaries, provide large ecosystem-scale environmental restoration or protection.

- 3) *“Projects contained in existing Gulf Coast State comprehensive plans for the restoration and protection of natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region.”* This criterion should be interpreted to give priority to projects that:
 - Are contained in existing comprehensive environmental restoration plans in the Gulf Coast region, including projects that are in the Comprehensive Everglades Restoration Plan, the Louisiana Coastal Master Plan, and the Mississippi Coastal Improvement Plan that provide the greatest ecological benefits to Gulf restoration.

- 4) *“Projects that restore long-term resiliency of the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands most impacted by the Deepwater Horizon oil spill.”* The Council should interpret this criterion to address programs and projects that:
 - Provide sustainable long-term benefits;
 - Consider and account for the impacts of climate change, including sea level rise, subsidence, coastal flooding, increased frequency and severity of storms, and the impacts of ocean acidification; or
 - Benefit the long-term resiliency of the *types* of resources, ecosystems, processes, habitats, fish and wildlife that were harmed by the spill.²

² Because resources that were actually harmed by the oil disaster should be restored through the Natural Resource Damage Assessment process, this criterion should address increased benefits to the types of resources that were impacted—and not the actual reparation of damage.

Sample Project Evaluation. With our partners in the Mississippi River Delta Coalition, NWF has provided a project list prioritized using statutory criteria for funding projects within Louisiana. In addition, we provide below examples of how various kinds of projects within Texas, Alabama, Mississippi and Florida might be evaluated. These projects each help accomplish the goals of the RESTORE Act and provide benefits consistent with statutory prioritization criteria. These projects are provided for example only, are not listed according to any priority, and do not constitute all projects and programs that NWF would support.

In providing examples of projects in Texas, NWF has focused on protection and enhancement of freshwater inflows. For many Texas estuaries, the assurance of adequate freshwater inflows is arguably the most critical long-term restoration need. Freshwater inflows to the estuary systems from rivers and streams are the primary variable determining estuarine health, particularly when considered in terms of long-term viability.

Because so much of the reliably available water in Texas already has been allocated through perpetual water-rights permits that authorize complete consumptive use, a two-step process will be needed to deliver the necessary quantities of freshwater inflows to many estuaries within the Gulf Coast region. In the first step, property interests would be acquired to all or a portion of selected existing water-diversion permits to prevent the water from being taken out of the river or stream before it reaches the coast. The second step would involve adding legally enforceable downstream delivery points and mechanisms--basically moving the acquired permit downstream--to provide for physical delivery of the increased inflows to key habitat features within the Gulf Coast region.

To ensure needed freshwater inflows for some estuaries, it may be necessary to acquire interests in water permits that are located inland of the Gulf Coast region as the RESTORE Act defines it. These transactions would provide, through permit amendment or other legal means, an enforceable mechanism resulting in physically delivering water at new delivery points downstream within the defined Gulf Coast region. The result is analogous to purchasing raw materials or component parts only available from outside the region for construction of a fish hatchery along the coast. There is no requirement in the Act, and no compelling reason to infer a limitation, that would deprive the Gulf Coast region of these critical benefits. Accordingly, NWF urges the Council to avoid adopting any interpretation that would inhibit providing funding for meritorious projects designed to deliver critically important freshwater inflows to the Gulf Coast region from inland areas.

Example Restoration Projects, Texas:

Nueces Bay Productivity Enhancement Through Wastewater Relocation and Dedication: The continued productivity and health of the Nueces Bay estuary system is at risk because of reduced inflows of fresh water, and accompanying nutrients, particularly into the Nueces Bay delta. Freshwater inflows from streams and rivers are critical for the continued productivity of estuaries: delivering nutrients to support food webs, supplying sediments to sustain marshlands, and maintaining areas of moderate salinity for critical life stages of many species. Recognizing the difficulty of securing increased inflows from upstream in the river system flowing into the estuary, this project involves obtaining voluntary “dedications” of treated wastewater discharges to be delivered at advantageous locations in the Nueces Estuary. Through a voluntary dedication

of a portion of wastewater return flows, and relocation of discharge points and addition of pipelines to deliver the water where it is needed most, this project would be designed to deliver a significant amount of drought-secure inflows, and beneficial nutrients, to a key portion of the Nueces Estuary each year. The project would provide great benefits to coastal habitats, fisheries, and coastal wetlands by restoring and enhancing long-term resiliency on an ecosystem scale. (This project meets priority criteria 1, 2, and 4.)

Galveston Bay Freshwater Inflows: The continued productivity and health of the Galveston Bay system is at risk because of reduced inflows of fresh water. Freshwater inflows from streams and rivers are critical for the continued productivity of estuaries: delivering nutrients to support food webs, supplying sediments to sustain marshlands, and maintaining areas of moderate salinity for critical life stages of many species. This project involves delivering additional water within the Gulf Coast area including by paying owners of existing diversion rights not to divert that water upstream and adding downstream delivery points for conveying the water to the estuary. It would provide up to an additional 100,000 acre-feet/year of drought-secure inflows to the Galveston Bay system as compared to future conditions without the project. The project would provide great benefits to coastal habitats, fisheries, and coastal wetlands by restoring and enhancing long-term resiliency on an ecosystem scale. (This project meets priority criteria 1, 2, and 4.)

Guadalupe Estuary Freshwater Inflows: The continued productivity and health of the Guadalupe estuary system is at risk because of reduced inflows of fresh water, particularly in drought periods. Freshwater inflows from streams and rivers are critical for the continued productivity of estuaries; delivering nutrients to support food webs, supplying sediments to sustain marshlands, and maintaining areas of moderate salinity for critical life stages of many species. This project involves delivering water within the Gulf Coast area by paying existing owners of diversion rights not to divert that water upstream and by obtaining voluntary dedications of wastewater return flows. Downstream delivery points would be established for conveying the water to the estuary. The project would provide up to an additional 80,000 acre-feet/year of drought-secure inflows to the San Antonio Bay system as compared to future conditions without the project. The project would provide great benefits to coastal habitats, fisheries, and coastal wetlands by restoring and enhancing long-term resiliency on an ecosystem scale. (This project meets priority criteria 1, 2, and 4.)

Matagorda Bay Freshwater Inflows: The continued productivity and health of the Matagorda Bay and estuary system is at risk because of reduced inflows of fresh water, particularly during drought periods. Freshwater inflows from streams and rivers are critical for the continued productivity of estuaries; delivering nutrients to support food webs, supplying sediments to sustain marshlands, and maintaining areas of moderate salinity for critical life stages of many species. In this river system, there are limited options for increasing drought-period inflows to the estuary simply by paying those with existing diversion rights not to divert. Accordingly, this project involves purchasing an ongoing right to have water delivered within the Gulf Coast area from new storage facilities that are planned for imminent development. The addition of storage would allow for water to be diverted during periods of high inflows and stored for release during dry periods. This project would be designed to procure about 24,000 acre-feet/year of freshwater inflows that could be delivered when most needed. The project would provide great benefits to

coastal habitats, fisheries, and coastal wetlands by restoring and enhancing long-term resiliency on an ecosystem scale. (This project meets priority criteria 1, 2, and 4.)

Example Restoration Projects, Mississippi:

Gulf Islands National Seashore “GINS”: This project serves as a primary example of protecting and conserving significant habitat and living coastal and marine resources in Mississippi and the Gulf of Mexico. As proposed by the U.S. Department of the Interior’s National Park Service, this project supports nesting for migratory waterfowl, important fisheries, and several state and federally-listed species. It promotes community resilience against storm surge and sea level rise and supports the local economy through eco-tourism. This project complements the U.S. Army Corps of Engineers’ Mississippi Comprehensive Barrier Island and Ecosystem Restoration project. (This project meets all four priority criteria.)

Turkey Creek Ecosystem Restoration: Supported by the Mississippi Department of Environmental Quality, this project proposes to restore the hydrology and natural vegetation of a degraded wet pine savannah habitat, which is one of the most endangered ecosystems in the United States. Notably, communities throughout Turkey Creek watershed recognize the storm surge protection this area provides. (This project meets priority criteria 3 and 4).

Pascagoula River Marsh Restoration: This project is a prime example among the broad suite of emergent aquatic vegetation projects being proposed that demonstrates the value of restoring living shorelines. Projects that involve marsh restoration will support habitat for fisheries, migratory waterfowl, and shore birds. As supported by the Mississippi Department of Environmental Quality, this marsh restoration project also complements the U.S. Army Corps of Engineers’ state-wide Aquatic Ecosystem and Reef Restoration Project. (Marsh restoration projects meet priority criteria 1, 3 and 4).

Bay St. Louis and Biloxi Bay Oyster Reef Restoration: This project is an ecosystem restoration opportunity that has been identified by NWF and our Gulf Restoration Partnership allies. Specifically, the proposal is to construct up to 30 acres of subtidal oyster reef habitat in Bay St. Louis and up to 70 acres in Biloxi Bay using natural oyster shell on suitable water bottoms. As existing pilot projects have shown in these waters, this project would restore the productivity and biodiversity of Bay St. Louis and Biloxi Bay by providing water filtration, nursery habitat for commercially and recreationally important fishes and invertebrate species, food sources for wildlife such as shore birds, and additional protection for shorelines and marshlands. The project is being designed in a manner that is consistent with state and federal restoration plans for restoring Mississippi’s subtidal oyster reefs. In addition, the proposal will support the economy of the local and regional recreational and commercial seafood industry. (This project meets priority criteria 1 and 4.)

Example Restoration Projects, Alabama:

100-1000: Restore Coastal Alabama: Mobile Bay, with the fourth-largest drainage basin in the U.S., has experienced significant loss of oyster reefs, coastal marsh and seagrass beds. Despite these challenges, Mobile Bay represents one of the largest potential areas for outright restoration,

replacement and enhancement of these lost habitats due to the size of the estuary, historical distribution of oysters in the bay, high natural oyster spat sets and warm water for fast growth. Engaging in ecosystem-scale restoration is a critical first step to address impacts from the oil spill in order to help restore habitats, wildlife and fisheries of importance across Alabama and the Gulf, both immediately and for the long term. The *100-1000: Restore Coastal Alabama* partnership proposes to build 100 miles of intertidal oyster reefs, which will in turn protect and promote the growth of more than 1,000 acres of coastal marsh and seagrass. These living shoreline projects apply natural principles and construction elements that create habitat and provide other services important for estuarine functioning. They provide substrate for oyster larvae to settle and colonize, creating structural and foraging habitat for economically important estuarine fishes, vertebrates and invertebrates. Other project benefits include increased light penetration for seagrass and decreased wave energy and shoreline erosion. (This project meets all four priority criteria.)

Mobile Causeway Hydrological Restoration Project: The Mobile-Tensaw Delta, terminus of the fourth-largest watershed in the continental United States in terms of water volume, empties into Mobile Bay, contributing to one of North America's largest, most productive and most diverse estuarine systems. The Delta's importance lies in the connection between the riverine and coastal ecosystems. The dike-like Mobile Bay Causeway has reduced the Delta's critical ecosystem services, including habitat functioning, productivity and species and habitat diversity. This project will involve reconnecting the tidal exchange in the Mobile-Tensaw Delta by bridging Justin's Bay and Chocolatta Bay to address upstream and downstream modifications that have altered ecological productivity. The existing roadway has altered saltwater and freshwater exchange, adversely impacting coastal marsh and seagrass habitats north and south of the causeway and thus, the finfish, shellfish and wildlife that depend on them. The Delta's importance lies in the connection between the riverine and coastal ecosystems. This project will restore the Delta's critical ecosystems services, including habitat function, productivity, and species and habitat diversity. (This project meets priority criteria 1, 2, and 4.)

Dauphin Island Causeway Habitat Restoration & Public Access: The objectives of this project are to expand the protective buffer along the right of way of the causeway, restore and enhance the causeway shoreline to promote wetland vegetation re-growth, improving the habitat for marine life, and to provide additional public access points. A 9,000 linear foot section of the Dauphin Island Parkway will be protected through the creation of 36 acres of aquatic habitat including sandy beaches, oyster reefs, fishing reefs, and enhanced public access through the creation of two 0.33-acre roadside pocket parks. This will be accomplished by installing 3,500 wave attenuation breakwaters deployed in a double row using an offset segmented design. 12,000 cubic yards oyster cultch will be placed shoreward of the breakwaters to provide hard substrate for the setting of oyster larvae and to provide habitat for other marine vertebrates and invertebrates. A total of 8,000 cubic yards of earthen fill will be used to create two pocket parks to provide public access to the restoration site for fishing. The parks will be constructed in collaboration with the Department of Transportation to ensure proper engineering, construction, and traffic guidelines are used. Additional habitat will be added by planting of 15,000 *Spartina alterniflora* and *Spartina patens* transplants to stabilize the shoreline of the constructed pocket parks. (This project meets priority criteria 1 and 4.)

Example Restoration Projects, Florida:

C-43 West Basin Storage Reservoir Project: In Labelle, FL, this project is critical to restoring the estuaries of southwest Florida, including Charlotte Harbor National Estuary, one of the primary drivers of Gulf of Mexico fisheries. This project, sponsored by South Florida Water Management District, is an important component of the Comprehensive Everglades Restoration Plan which involves an above-ground reservoir (170,000 ac-ft capacity) located south of the Corkscrew Regional Ecosystem Watershed and west of the Ortona Lock (S-78), and will comprise a significant portion of total water storage requirement for the C-43 Basin. This project is also part of the National Estuary Program Southwest Florida Regional Restoration plan. (This project meets all four priority criteria.)

St. Marks National Wildlife Refuge: This project, in Wakulla, Jefferson, Taylor, and Franklin Counties FL, submitted by Department of the Interior/USFWS, provides habitat conservation through land acquisition, permanent conservation easements, and agreements with willing landowners. The refuge spans over 43 miles of coastline and supports 52 species of mammals such as the Florida black bear and bobcat; 40 species of amphibians such as the endangered flatwoods salamander; 65 species of reptiles; and numerous fish species, including gulf sturgeon and gulf striped bass. In addition, this project, as well as other North Florida coastal projects, provides tremendous benefit to migratory bird species. Natural salt marshes, freshwater swamps, pine forests and lakes provide a haven for wildlife and people. This project meets the Council's restoration goals of Restore and Conserve Habitat, Restore Water Quality, Enhance Community Resilience, and Replenish and Protect Living and Coastal and Marine Resources. (This project meets priority criteria 1 and 3.)

Tamiami Trail Next Steps Project: This project in Everglades National Park, FL, will help restore historic fresh water flows to Everglades National Park and Florida Bay and the Gulf of Mexico, providing improvements to wetlands and coastal fisheries of Florida Bay by dramatically improving water flows into the estuaries of Southwest Florida. (This project meets priority criteria 1, 2 and 3.)

Apalachicola River, St. Vincent Sound to Lake Wimico Ecosystem: This famed ecosystem supports one of the nation's last natural oyster fisheries as well as providing the source of one of America's great fisheries habitats: Apalachicola Bay. Acquisition of parcels totaling 11,214 acres would protect and enhance water quality going to the bay, and buffer one of the world's last great mainly-undeveloped rivers. Restoration of Tate's Hell State Forest will likewise directly benefit Apalachicola Bay. The St. Vincent Sound to Lake Wimico Ecosystem includes a vast 40,000 acre wetland tract south of Lake Wimico. Protection by conservation easement would afford water quality and quantity benefits to the Lake, as well as to Apalachicola and St. Joseph Bays and St. Vincent Sound. (This project meets priority criteria 1, 2 and 4.)

West Bay Preservation Area: This Bay County project would complement lands already protected by mitigation for the new Panama City Airport. This 4,494 acre project secures the northern side of West Bay, and has a direct impact on protection of water quality. Moreover, it is possible additional land directly on the Bay and north thereof could be part of larger conservation project to protect additional wetland areas. Alone or combined with other

watershed protection projects (such as Seven Runs Creek, South Walton Ecosystem, and others), the West Bay Preservation Area project would greatly contribute to long term health and resiliency of the area's rich and diverse fish and wildlife habitats, including marine, estuarine and freshwater systems of Gulf coastal watersheds. These areas contain many species of plants and animals, including federally designated critical habitat for the Gulf Sturgeon. (This project meets priority criteria 1, 2 and 4.)

Lower Suwannee National Wildlife Refuge: Submitted by The USFWS and others, this project is a 73 square mile watershed and coastal habitat protection project bordering more than 20 miles of state, Water Management District and federal conservation lands along the Suwannee River Sound and Gulf of Mexico. The project enhances surface and ground water quality and quantity benefits for coastal commercial and sport fishing areas, including tidal creeks and springs, marsh and marine grass beds of the Big Bend Coast, and conserves hardwood hammocks and riparian swamps. The LSNWR supports extensive migratory bird habitat, and protects habitat for imperiled aquatic species such as Gulf Sturgeon and Manatee, as well as for upland species like black bear. The LSNWR contains one of the Gulf of Mexico's most significant and wild riparian estuaries with the highest survey counts for coastal birds such as the American Oystercatcher. (This project meets priority criteria 1, 2, and 4.)

Objectives. The Draft Initial Comprehensive Plan includes seven objectives to further define the types of projects and programs the Council intends to select for funding. We appreciate the acknowledgement that efforts funded under the Council-selected allocation may achieve multiple objectives at once, and also may not (and should not) be equally distributed among objectives.

We urge the Council to avoid objectives that would limit ecosystem restoration projects based on economic considerations. Components of the Gulf ecosystem are intrinsically linked. Individual environmental restoration projects, when considered alone, may not have enormous economic benefits, but when completed as part of a Comprehensive Ecosystem Restoration plan will create jobs and sustain a robust economy. As a result, any objective that would filter out or disadvantage consideration of ecosystem projects based on potential economic impact threatens to undermine the holistic environmental and economic goals of the RESTORE Act.

In addition, NWF recommends the Council establish the following prioritization of objectives:

- **Primary Objectives:** Each selected project must be designed to attain one or more primary objective. The Council should establish Objectives 1-4 in the Draft Initial Comprehensive Plan as primary.
- **Secondary Objectives:** In addition, selected projects that achieve additional, co-occurring benefits should also be viewed favorably. Secondary objectives are those that aren't required of each project, but that add value. Objectives 5-6 should be established as secondary.
- Objective 7 is more appropriately viewed as an integrated requirement of plan development and project selection. NWF recommends that the Council establish regional scientific monitoring and adaptive management standards, and that the Plan require each

project to incorporate such project-level scientific monitoring and adaptive management strategies.

State-specific Restoration Expenditure Plans. As the Draft Initial Comprehensive Plan notes, State Restoration Expenditure Plans must be consistent with goals and objectives of the Comprehensive Plan. The RESTORE Act requires the Council to consider and approve, or deny, state plans. The Act also limits spending on infrastructure in state plans - a state may only exceed the infrastructure spending limitation if there are no remaining environmental restoration needs.

While the Draft Initial Comprehensive Plan outlines permissive elements that *may* be included in a State Restoration Expenditure Plan, it does not specify what *must* be included or what *must not* be included. **We recommend that the Council revise the Draft Initial Comprehensive Plan to more clearly delineate required elements of state plans, criteria and process for a consistency determination, and the method for evaluating sufficiency of a state-certification that environmental restoration needs have been fully met.**

Specifically, the following elements should be mandatory:

- The amount of funding needed for each project, program, and activity selected by the State for planning and implementation; the proposed start and completion dates; and specific mechanisms that will be used to monitor and evaluate the outcomes and impacts of each project, program, and activity.
- A description of how the best available science, as applicable, informed the State's project, program, and activity selection.
- A justification statement of how all included projects, programs, and activities are eligible activities under the RESTORE Act.
- A description of how each included project, program, and activity contributes to the overall economic or ecosystem recovery of the Gulf Coast.
- A certification that all included projects, programs, and activities do not exceed the 25 percent funding limit for infrastructure.
- If the state intends to claim an exception to this 25 percent limitation for infrastructure in accordance with the RESTORE Act, the state must provide the percentage to be spent on infrastructure, evidence that the environmental restoration needs of the state have been met, and certify that the state has provided adequate public notice of its intent to claim an exception.
- A description of how each project, program, and activity is consistent with the Goals and Objectives of this Plan. The Council should clarify that it views "consistent" to mean:
 - Each eligible project, program, and activity will further one or more of the five Goals; **and** will not negatively impact the Gulf Coast ecosystem.
- A description of the process the State will use or has used to ensure appropriate public and tribal participation and transparency in the project, program, and activity selection process.

- A description of financial controls and other financial integrity mechanisms to be used to assure the public and Congress that funds have been managed appropriately to further the purposes of the RESTORE Act.
- A description of the methods the State will use to measure, monitor, and evaluate the outcomes and impacts of funded projects, programs, and activities.

The following elements should be discretionary, but encouraged because they would be useful to the Council in evaluation and approval or disapproval of State Restoration Expenditure Plans:

- To the extent known, a description of any certain or prospective collaborations or partnerships to be used or created through the selection process.
- To the extent known, a description of any additional resources that will be leveraged to meet the goals of the State Expenditure Plan.

The Council should also specify elements that will lead to disapproval of a state plan, including missing or incomplete information.

Again, on behalf of our members and supporters, we thank you for the opportunity to provide these comments, and we look forward to working with you to restore the Gulf of Mexico.

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Research Opportunity Number
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Amendment 0002

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**BAA White Paper presented for technology gap area 4:
Alternative Oil Spill Response Technology
Extensive, vast and rapid biological decomposition
of the oil spill in the Gulf of Mexico**

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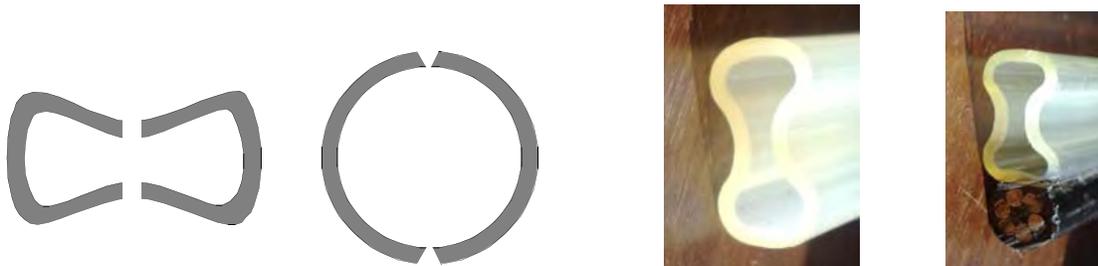
Section A: Technical Approach

Description of the Solution:

To decompose organic matter oxygen is essential. This is practiced in every sewage treatment plant, or in cleaning hydrocarbons in polluted soils or water. Any organic matter decomposes naturally either under aerobic conditions by means of oxygen (mineralization), or in anaerobic conditions so that existing microbes decompose the available nutrients in a “fouling” process.

1. Tool

The DRAUSY-system (pressure equalizing hose system) permits the even dispersion of liquid or gaseous agents over long distances homogeneously in small quantities. The balanced DRAUSY-treatment works with one input on a mile or more. The system uses the deformation of the DRAUSY hose: When inflated the cross section becomes round and the outlet holes decrease in size (conical). When pressure decreases the hose regains its original shape and the outlet holes expand. **Result: at any outlet point, the quantity delivered remains the same.**



The system is patented in US – Nr. 5,984,209. The DRAUSY hose material is polyurethane. It is extruded on our mold by a large plastic factory in Germany. Currently one type of hose is available (3/4”). At the DRAUSY plant, the hoses are pierced with a special laser. The holes have diameters from 10 to 50 μ according to the requirements of the specific application. Final construction takes place at our plant: piercing and distances of holes, alongside welding of steel cables for various applications (see photo), adaptations, fittings etc. Current production capacity is 100 kilometers/year. A multiplication of the plant poses no difficulties.

2. Process

Continuous dispersion of agents is a must to stimulate microbiology on a site. By means of the DRAUSY hose the existing environment changes. Punctual injection results in an over-dosage on the spot and the greater the distance, the greater the dilution. DRAUSY homogenous dosage facilitates the development at every outlet point of a defined microclimate, as microbes are continuously fed with necessary agents (for example oxygen). So they can take advantage of this small, but continuous dosage, and become efficient “eaters” of hydrocarbon. This impedes processes such as fouling of the crude oil in the sea will be stopped, as the environment will change in aerobic mineralization of the oil, permitting microbes to take advantage of the oxygen. Bubbles of air or oxygen injected into the water are of little use for microbiology. In sewage plants they stick to the sludge particles and on the walls, but in lakes or in the Mexican Gulf there exists no possibility of creating a bio-film. DRAUSY has therefore reversed the well-known percolation filters used for sewage water treatment. Aerating from below is already known, but even treatment over several square miles becomes possible with DRAUSY. The support media for microbiology (plastic strips) floats in the water-body. This technique permits the installation of mobile sewage treatment plants in the ocean. The efficiency of this percolation filters is well known. Our partners have built these plants for hydrocarbon decomposition even in salty water.

So linear or wide range hydrocarbon decomposition is assured at any depth or on any scale.

3. Current applications

Usually DRAUSY hoses are installed in sewage networks either in pressure or gravity mains. By dispersing linearly a small dose of oxygen (in general air) in the wastewater flow, the spontaneous oxygen demand is covered. Then H₂S microbiological production will not take place. It is also possible to start cleaning wastewater already during its flow by means of a higher dosage of oxygen. We have realized in the past many such projects in wastewater or sludge.

4. Forms of confection

DRAUSY hose is produced either with a steel cable of 4 mm to support horizontal strains, as they occur when being pulled through a sewage network (1 km or more). When inflated at 6 bars the DRAUSY hose even “swims” on the water surface. At lowering pressure the hose takes on a smaller form and the thick steel cable welded alongside the hose makes it sink down to the waterbed due to diminishing lifting forces. So the positioning of the DRAUSY hose in the water is easy, as there is no need to pull its entire weight. This functions on every water site, and by using buoys the system can be installed at any level in the water body without problems. Pressure differences at the positioning level are equalized by the DRAUSY system.

5. Procurement of agents

In current projects oil free compressors are used, and if necessary PSA units for the separation of nitrogen and oxygen to enrich oxygen in the dispersed air. In deep-sea treatment, the agent input has to be examined together with specialists: liquid oxygen coming from tanks on vessels plus an increase in pressure up to 160 bars can be pumped into the supply and attachment pipe that goes down to depth of up to 5,000 feet depths. We are in contact with a leading peroxide supplier to acquire information about decomposition at this pressure. It might be interesting to use oxygen-enriched water for deep-water treatment. DRAUSY disposes of a technology to raise oxygen content in water up to 80 mg/l over a long period time. DRAUSY also cooperates with a producer of membrane compressors and initiated the installation of a wind turbine driving a membrane compressor. A prototype of this installation exists, ready be developed for large-scale application. In cooperation with the specialists working under deep-water conditions we are in a position to adapt the system for efficient treatment there.

Section B: Rough Order of Magnitude (ROM) Cost:

The DRAUSY development started in 1996. At that time cooperation was established with a large company envisaging the cleaning of hydrocarbon polluted soils. The tests carried out have been a great success concerning the decomposing hydrocarbons, but the undertaking resulted in a failure for DRAUSY: The marketing department of the company involved refused to go on further due to the homogeneous fine dispersion of peroxide resulting in a 90 % savings of the agent. So all cooperation projects have been stopped, which is why DRAUSY is still a small entity. This has also been reflected in other sectors. Nevertheless DRAUSY continued to develop gas dispersion, and other promising applications.

If the United States Coast Guard (USCG) comes to the decision to proceed further with DRAUSY, we propose the formation of a project team and realization of the first installations within the coming three months with the aim of achieving results by the end of 2010. Our cost estimate is US \$ 10 Mio.

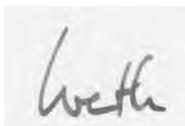
In the meantime producers for the multiplication of the different items have to be found. Proper handling techniques have to be defined, and the cooperating partners need to be structured.

Extensive multiplication can start in 2011. All necessary items for multiplication can be produced in the U.S.A. and installed and maintained by a local competent workforce.

DRAUSY proposes the creation of a Joint Venture between the main US partners involved. DRAUSY patents also include linear absorption of liquids and gas. This target could not be realized so far due to lack of finance. So USCG is invited to make an offer for a license fee using the DRAUSY patents to clean hydrocarbons in the Gulf of Mexico. Nikolaus Weth as owner of the patents will then be in a position to realize further development steps.

In the past years DRAUSY and Nikolaus Weth have been impeded by many organizations. Now the technology is ready to face huge challenges, and we are able to act quickly and efficiently.

DRAUSY GmbH



Nikolaus Weth (CEO)

Percolation filter with a Drausy-Aeration from below.

This device becomes a floating treatment station to be multiplied over square-miles at any depth.



June 28th, 2013

The Honorable Penny Pritzker
Secretary, U.S. Department of Commerce
1401 Constitution Ave, NW
Washington, DC 20230



RE: Comments on Gulf Coast Ecosystem Restoration Council Draft Comprehensive Plan

Dear Secretary Pritzker,

As the Gulf Coast Ecosystem Restoration Council completes its Comprehensive Plan, Oxfam America and its partners—grassroots groups representing coastal communities of Louisiana and Mississippi—offer these comments to ensure the needs of the region’s most vulnerable residents are reflected in this once-in-a-lifetime opportunity to revitalize America’s Gulf Coast.

These comments build on recommendations to the Council from 110 diverse organizations in Alabama, Florida, Louisiana, Mississippi and Texas, in “An Agenda to Enhance Community Resilience”, which is attached as an appendix. The memo, endorsed by faith, community, and environmental justice groups, outlines steps to restore natural protection, preserve cultural heritage, and promote opportunity.ⁱ We have also attached a letter from over 100 business leaders to the Gulf State Governors detailing the opportunity in Gulf Coast ecosystem restoration to “create local job and training opportunities, strong communities, and long-term economic health.”ⁱⁱ

The Council’s Draft Plan represents a critical step toward repairing some of our nation’s most valuable natural resources, enhancing the resilience of our communities, and fostering an emerging restoration economy. Despite numerous hurdles, the Council has displayed great leadership in moving towards an integrated vision to leverage investments under the RESTORE Act and beyond towards these goals.

People, communities and cultures are an important part of the Gulf Coast ecosystem, and they face historic challenges: extreme weather, loss of livelihoods, rising poverty, threats to well-being and way of life, hindered economic mobility, and limited access to policy-makers. The 2010 oil spill amplified each one of these challenges. The restoration of the natural resources, damaged not just by the oil spill but by decades of degradation, is essential for protection of the region’s economy, communities and way of life. While tackling our greatest ecological challenges, we should not lose sight of the linked socio-economic impacts and the inequality of how those impacts are experienced by our most vulnerable communities. This written comment includes recommendations to the Council that build on the Plan’s criteria, objectives and processes to meet the needs of the Gulf’s most vulnerable populations, including:

- 1. Adopt additional criteria to evaluate impact on communities and cultures.**
- 2. Refocus objective to *Enhance Community Resilience* on the most vulnerable populations.**
- 3. Expand support for “training” with new objective to *Promote Training and Career Ladders*.**
- 4. Establish advisory committees that give voice to the needs of the most vulnerable, leverage economic opportunities, and ensure the best science and compliance.**
- 5. Promote diversity and greater opportunity in the restoration economy through requiring local outreach, training and hiring plans from contractors.**

We thank the Department of Commerce and the Council for the opportunity to comment on the Draft Comprehensive Plan and for their thoughtful consideration of this submission. We look forward to continued engagement with the Council on these issues.

If you have any additional questions, please feel free to contact Jeffrey Buchanan of Oxfam America by email at jbuchanan@oxfamamerica.org or by phone at (202) 471-3055.

Sincerely,

Jeffrey Buchanan
Senior Domestic Policy Advisor
Oxfam America
Washington, DC

Sharon Gauthe
Executive Director
Interfaith Sponsoring Committee (BISCO)
Thibodeaux, LA

Roberta Avila
Executive Director
Steps Coalition
Biloxi, MS

Tuan Nguyen
Executive Director
Mary Queen of Viet Nam CDC
New Orleans, LA

Patrick Barnes
Founder
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Rebecca Templeton
Executive Director
Bayou Grace Community Services
Chauvin, LA

Reverend Tyrone Edwards
Executive Director
Zion Travelers Cooperative Center
Phoenix, LA

Kaitlin Truong
Chair
Asian Americans for Change
Ocean Springs, MS

CC: The Honorable Robert Bentley, Governor of Alabama
The Honorable Rick Scott, Governor of Florida
The Honorable Bobby Jindal, Governor of Louisiana
The Honorable Phil Bryant, Governor of Mississippi
The Honorable Rick Perry, Governor of Texas
The Honorable Thomas J. Vilsack, Secretary, U.S. Department of Agriculture
The Honorable John McHugh, Secretary of the Army, U.S. Department of the Army
The Honorable Bob Perciasepe, Acting Administrator, Environmental Protection Agency
The Honorable Janet Napolitano, Secretary, Department of Homeland Security
The Honorable Sally Jewell, Secretary, Department of the Interior

RECOMMENDATIONS

1) **Develop additional criteria to better assess impact on community resilience and culture.**

The Gulf Coast Ecosystem Restoration Council (“Council”) in the Draft Comprehensive Plan (“Plan”) defines “ecosystem restoration” as projects that enhance the health and resilience of the Gulf Coast ecosystem, measured in terms of both the “physical, biological, or chemical properties of the ecosystem” and the ecosystem services that “...strengthen its ability to support the diverse economies, communities, and cultures of the region.” Under current criteria, the Council cannot evaluate project impacts on communities and cultures. For instance, a project restoring 100 acres of wetlands unlikely to provide flood or surge protection to communities would be evaluated as equal to a project restoring 100 acres of wetlands that could provide natural protection and fisheries habitat to a nearby high-risk, fisheries-dependent coastal community. Without additional criteria, the Council will be very limited in its ability to select projects which best meet its own full definition of success. Advancing the Plan’s goal to *Enhance Community Resilience* without evaluating community impacts will be particularly difficult.

While purely economic criteria, like evaluating jobs created, may lack the nuance to indicate the full socio-economic value of projects, adopting criteria evaluating the impact on socially, culturally and economically vulnerable populations could ensure the Council’s project selection contributes to the goal to *Enhance Community Resilience*. Such criteria would fall in line with the recommendations of the Gulf Coast members of the U.S. House of Representatives and Senate and Gulf Coast Ecosystem Restoration Task Force to address the needs of these communities in decision-making.ⁱⁱⁱ The Council should adopt additional sub-criteria, such as:

- a) **Projects that are projected to make the greatest contribution to enhancing the resilience of the most socially vulnerable communities to short- and long-term natural and man-made hazards.** Social sciences show communities with high rates of poverty, unemployment, racial and ethnic minority and/or Native American status, and low English proficiency are more socially vulnerable to environmental hazards and have a more difficult time preparing for, responding to, and recovering from disasters. A number of agencies have examined tools like the Social Vulnerability Index to identify this inequality of risk.^{iv} Federal environmental justice laws already require environmental projects to be evaluated for impacts on such populations, a process begun in the Draft Programmatic Environmental Assessment (“PEA”) which should be more thoroughly and uniformly examined in the final PEA and as subcriteria.^v By prioritizing projects that reduce risks for disproportionately impacted, socially vulnerable populations, we can target restoration benefits to those most in need.

- b) **Projects that restore or protect culturally important natural resources, fisheries, marine and wildlife habitats, and wetlands which support communities that disproportionately depend on harvesting natural resources for their culture, livelihoods and way of life.** The Draft Plan touches on the potential of Gulf Coast ecosystem restoration to help preserve cultural heritage in our coastal communities. Fishing families, including many new immigrant and minority populations, have contributed to the region’s culture for generations, particularly the number of federally and non-federally recognized tribes who have lived along the Gulf for hundreds of years. In the aftermath of the BP Spill, a number of studies documented how communities who depend on seafood related livelihoods have suffered disproportionate economic, social and health impacts.^{vi} By prioritizing the restoration of habitat for key species (like oysters, shrimp and crabs) that these communities rely for subsistence, livelihoods and recreation, we can ensure restoration helps strengthen the culture and way of life along the coast.

Examples exist within research and decision-making tools developed by federal and state agencies along the Gulf Coast for evaluating culturally important resources and restoration.^{vii}

- c) **Projects that target job and training opportunities connected to ecosystem restoration specifically towards vulnerable populations.** Examples exist for how ecosystem restoration can include project elements around partnerships with community colleges and nonprofits to give local, disadvantaged and displaced workers access to economic opportunities, including those who lost jobs after the BP spill. Projects that incorporate such efforts into their design should receive additional consideration.

2) Refocus and prioritize the objective to *Enhance Community Resilience* on the most environmentally, economically, socially and culturally vulnerable communities.

We applaud the Council for making *Enhance Community Resilience* one of the Plan's five goals and seven objectives. Still, this objective could be improved by addressing the socioeconomic vulnerabilities experienced by coastal communities. While socioeconomic factors may not determine who may be hit by a disaster, they help indicate how a community is able to prepare for, respond to, and recover from a disaster. Communities facing higher rates of poverty, unemployment, racial and ethnic minority and/or Native American status, low English proficiency and employment in natural resource harvesting face an inequality of risk in places such as the Gulf Coast from environmental hazards. This reality is affirmed in the environmental justice section of the Draft Programmatic Environmental Assessment. Resiliency projects and programs conducted by the Council under this objective should target not only physical and environmental risks but also socio-economic and cultural risks. Ultimately priority should be given to projects and programs targeting communities facing the highest environmental and social vulnerability.

The Council should be applauded for noting the role of community-based organizations in this objective. Including collaboration, capacity building and funding for trusted community-based organizations, which are best equipped to help the Council engage these vulnerable communities, is critical to building resiliency. Similarly, supporting community-based organizations' involvement in collaborating with scientists, planning community-based restoration and nonstructural protection projects, particularly around culturally important resources, should be cornerstones of the objective. Recent meetings hosted by many of the signers of this comment with members of the Council in Dulac, LA and Biloxi, MS serve as an example of the power of partnering with community based organizations, and should serve as a foundation for expanding such engagement partnerships in the future.

The *Enhance Community Resilience* objective should also prioritize cultural and language access. Low English proficiency is a key indicator of social vulnerability to environmental hazards. It's vital to reduce the cultural and linguistic barriers to the decision-making process by providing adequate and timely access to translated documents, on-site translation and culturally appropriate forms of community engagement. With so many disproportionately impacted individuals in the commercial fishing and seafood industry being low English proficient, it is even more important to take the necessary steps to meet their needs. Community-based organizations should be consulted to develop appropriate engagement strategies and to consider potential partnerships to provide services such as translation. Due to limited resources, the Council has had difficulties in making such efforts to date around the development of the Comprehensive Plan. Efforts should be made immediately to access necessary existing resources within the federal and state member agencies on the Council, as were made during the Gulf Coast Ecosystem Restoration Task Force process, until funding is available. The White House Asian American and Pacific Islanders (AAPI) Initiative may also be able to assist in these efforts.

3) Expand support to “training” with new objective to *Promote Training and Career Ladders*.

The Draft Plan supported “training and professional development” as an activity within the objective *Promoting Natural Resource Stewardship and Environmental Education*. The Council should expand on this commitment by adding an eighth objective; namely, to promote job training and career ladders in the design, construction, and administration of ecosystem restoration and protection for Gulf Coast workers -- particularly displaced, low income and disadvantaged workers. Expanding on the training component in the Plan could yield multiple benefits helping projects move forward with the necessary skilled labor, local businesses become more competitive, and working families and vulnerable communities have greater access to economic opportunity.

Studies show ecosystem restoration can create between 17 and 36 jobs for every million dollars invested, with a significant portion of those being employment opportunities directly involved on the projects. While some of the science and engineering jobs in restoration require many years of schooling, many involve shorter vocational training--such as welders, pipefitters, deck hands, boat captains, heavy equipment operators, geotechnical, environmental and land surveyor technicians.^{viii} These jobs are already in high demand locally in the energy, construction and maritime industries. The five Gulf states have among the highest concentration of firms involved in restoration projects, according to Duke University. Recognizing the potential unmet labor demand of future large-scale ecosystem projects, together 120 Gulf Coast companies (many already involved in ecosystem restoration) recently in a letter (see *Appendix* for copy of one of the letters) urged each of the five Gulf State Governors to use RESTORE Act funds for worker training to prepare low income, disadvantaged and displaced workers for ecosystem restoration jobs to meet their needs for skilled labor and to remain competitive.^{ix} A better skilled restoration workforce can help the Council, project sponsors and their contractors to better achieve its goals to *Restore and Conserve Habitat, Restore Water Quality, Replenish and Protect Living Coastal and Marine Resources, and Enhance Community Resilience* on budget and on time.

By adding this new objective, the Council can create much needed opportunities for economic mobility and pathways out of poverty along the Gulf, contributing to both community resiliency and economic goals. Recent data from the US Census Bureau indicate that, between 2009 and 2011 (the year before and first year after the spill), coastal counties in southeastern Louisiana and Mississippi saw the number of individuals living in poverty increase by over 20 percent. Unemployment rates grew similarly. Pew Charitable Trust also recently found the five Gulf Coast states are among the worst in the nation for the economic mobility of low income residents.

^xMany of the jobs available with vocational training within ecosystem restoration offer above median area annual wages.^{xi} According to employers in maritime construction, a key player in barrier island and marsh restoration projects, new workers have a tremendous opportunity to reach higher wage jobs with hard work and some training. Focus groups of underemployed Gulf Coast workers from the fishing industry have expressed interest in accessing jobs in restoration and found that many workers already have some transferable skills for these jobs.

Congress expressed its intent that the Council should include “ecosystem restoration related workforce development” in the Plan during the passage of the RESTORE Act.^{xii} More than 100 community organizations across the region also urged the Council to include this objective in the Plan in a memo.^{xiii}

This new eighth objective could read:

8. ***Promote Job Training and Career Ladders*** - *This objective should aim to identify needed skills, form partnerships, leverage resources, and develop training programs building new pathways out of poverty towards career advancement preparing workers for in-demand jobs involved in ecosystem restoration and protection.*

The types of projects and programs that could be implemented under such an objective could address: labor market research; communication, planning and partnerships with and between industry, workforce development agencies, training providers, community colleges and community organizations; job counseling, referral, clearinghouse, and intermediary activities; industry supported curriculum development; classroom and the on-the-job training, education programs; outreach and programs targeting low income, disadvantaged, displaced and youth workers, such as conservation corps; and development of career ladders and incumbent training opportunities; and support for entrepreneurship and enterprise development. Projects and programs which promote job training and career ladders should be tied to ecosystem restoration or protection.

The programs and projects under this objective should focus on building partnerships and training programs preparing low income, disadvantaged, displaced and youth workers for in demand jobs within the sectors constructing, designing and administering ecosystem restoration and protection projects using industry supported curriculum. This requires cross-sector leadership and cooperation of contractors, community colleges and training providers, workforce agencies, community organizations and even project sponsor agencies. Given its limited resources, the Council should identify projects that leverage additional resources, not just within Council selected restoration, but across the RESTORE Act, NFWF, NRDA and other federal, state and private resources.

One example would be to create a Restoring Opportunity Ecosystem Workforce Incentive Program (“Restoring Opportunity”). Restoring Opportunity would incentivize the development of targeted multi-stakeholder, sector-based worker training initiatives across the five Gulf Coast states. The goal of Restoring Opportunity would be to promote a “race to the top” encouraging stakeholders to align resources and adopt best practices connecting low income and disadvantaged workers to new jobs, training and career ladders that best meet the needs of industry. Examples exist throughout the federal government of using similar models to leverage limited public monies to mobilize diverse human and financial resources and encourage adoption of best practices. The Council could provide matching funds to initiatives that promote a sector-based approach, and build explicit linkages between stakeholders in a way that identifies and meets the mutual needs of businesses, workers and communities by:

- **Building partnerships between regional employers, training providers and community:** Sector initiatives should include a consortium of employers and industry associations agreeing to hire newly trained workers as a “first source” for new openings, in partnership with community colleges, training providers and community-based organizations. These should include an anchor organization or intermediary to serve as a clearinghouse of communication and activity.
- **Forecasting labor demands:** Contractors and ecosystem project sponsor agencies should form collaborations to conduct regular labor market research examining needs for skilled labor based on scope and timing of upcoming projects. Priority occupations should be identified where additional training could meet demand of both future projects and the broader labor market.
- **Developing industry recognized curriculum and career pathways:** Industry should work with community colleges and other training providers to ensure appropriate hard and soft skills training and certifications are available for priority occupations. Employers should also identify career paths, including necessary training and experience to advance towards higher wage positions and how incumbent workers can access necessary training on and off the job.

- **Promoting outreach and ensuring access:** Community-based organizations with experience working with low income, disadvantaged and displaced workers should be utilized to help identify interested unemployed, low income and disadvantaged workers in their area and provide assessments of their skills, barriers and challenges to linking with skills training programs and job openings. This information should be used to modify training programs in terms of timing, location, childcare availability, need for stipends and language access to ensure greater access, participation and ultimately opportunities to advance within career pathways.
- **Ensuring accountability and transparency:** Consortiums should put in place performance measures to evaluate community benefits. As part of their grants, reports on meeting these performance measures should be made available to the public.

Such a program could provide incentive funds for new partnerships that best meet these criteria, matching private and public funds with an appropriate proportion of additional Council funds, up to a set, modest percent of the Council's annual spending. A number of examples exist of state programs in Missouri, Wisconsin and Minnesota aiming to meet demand for skilled workers and create new economic opportunity for vulnerable populations by pegging investment in targeted job training for low income and disadvantaged populations in proportion to total outlays.^{xiv} The Council's incentives should aim to promote expenditures of similar proportion across the span of BP spill related Gulf restoration investments. Monies should be made available for the planning and technical assistance phases, but the focus should remain on the implementation of such initiatives.

4) Establish advisory committees that give voice to the needs of the most vulnerable, leverage economic opportunities, and ensure the best science and compliance with goals and objectives.

It is important that the communities who most depend on the health of the Gulf of Mexico have input into the planning and implementation of this Plan, and see their needs reflected in it and its decision-making process. In particular, the Council should create a Citizens Advisory Committee with strong representation of leaders of community-based organizations working with vulnerable populations in addition to tribal, commercial and recreational fishing, and conservation leaders. This Advisory Committee should provide direct advice and oversight of the Council. At a minimum, those duties should include providing independent recommendations into the decisions before the Council and to:

- Participate in Council meetings and sponsor public hearings on issues before the Council.
- Work with council members to design culturally appropriate public engagement and education;
- Ensure project selection and implementation are transparent and reflect community values; and
- Identify areas of local concern and potentially unrepresented social, economic, and cultural impacts and benefits of proposed projects for further examination by the Council; and
- Ensure contractor compliance with all approved work plans that engage the community.

In order to further determining a selection process and duties for the Committee, the Council should consider conducting a workshop with the public and interested stakeholders to find greater agreement. An independent facilitator could conduct a workshop working with interested parties to outline remaining questions about how the committee will function, and to research, discuss and develop answers to these questions. The facilitator would present the workshop findings to the Council. The process used to develop DOI's Extractive Industries Transparency Initiative civil society advisory committee provides an example.

Additionally, a Science Advisory Committee engaging independent experts, including experts in human dimensions of ecosystem restoration and the needs of the most vulnerable communities, the science of seafood safety and habitat of commercially important species, would be valuable. Lastly, given the new opportunities around the developing restoration economy, the Council should examine ways to gather input from construction and engineering companies involved in ecosystem restoration, local workforce and economic development agencies and community organizations to identify ways the Council's investments can promote public-private partnerships, new career opportunities and more competitive restoration-related businesses along the Coast.

5) Promote diversity and greater opportunity in the restoration economy through requiring local outreach, training and hiring plans from contractors.

One of the duties of the Council under the RESTORE Act is to develop common terms for contracts incentivizing the utilization of local workers.^{xv} Congress defined this duty further giving the Council the authority to also promote contractors partnering with worker training programs, particularly those targeting low income, disadvantaged and displaced workers.^{xvi} The Council should commit in its next steps to developing these common terms, and include them as a requirement for all competitive contracts under Council grants and subgrants before beginning to approve initial expenditures.

The Council should fulfill this duty by requiring contractors to outline precisely what steps they would take to hire local unemployed, low-wage and disadvantaged workers, including coordination efforts with local workforce and community based organizations, as a part of their bids on construction or design work funded by the Council. Specifically the Council should ensure that all requests for proposals or solicitations require contractors submit a Local Outreach, Engagement, Job Training and Hiring Plan ("Outreach Plan"). This Outreach Plan must be a requirement of every project and assigned a heavily weighted factor in the scoring criteria for all bids and proposals. All projects that may be advertised as bids for construction, in a design-build manner or other project delivery method, should include a specific bid line item entitled "Local Outreach, Engagement, Job Training and Hiring". For any design-build projects, as with the project's technical specifications, the number of individuals to be trained and placed and other specifics of the plan will be determined during the project's design phase.

The Council, agency project sponsors or grantees administering contracts for Council projects and programs would evaluate these plans based on shared and publicly available criteria. Such criteria could evaluate the extent of plans to conduct outreach, history of hiring local and disadvantaged workers, agreements for worker placement, partnerships with worker training entities for contractors and their subcontractors or other factors. This would provide strong, contractually enforceable incentives for contractors and their subcontractors to reach out, prepare and consider for hiring local, disadvantaged, low income and displaced workers and collaborate with workforce and community agencies and programs without creating costly barriers for local small businesses, thus helping the Council to achieve a "win-win" solution that will benefit local employers and communities alike. Accountability mechanisms should be developed to ensure plans are followed. Oversight committees, such as those mentioned earlier, should play a role in helping the Council measure the benefits of these practices.

Oxfam America and our partners are working with the Louisiana State University School of Business, the International Economic Development Council and government, industry and development stakeholders across the five gulf Coast states to develop more detailed recommendations to present to the Council.

Endnotes

- ⁱ Oxfam America, et al. 2013. “An Agenda to Enhance Community Resilience”, *See Appendix*
- ⁱⁱ Letter from Gulf Coast Businesses to Gulf Coast Governors. 2013. Available at: <http://www.nature.org/ourinitiatives/regions/northamerica/areas/gulfofmexico/letters-to-gulf-state-governors-in-support-of-restoration.pdf> , *See Appendix*
- ⁱⁱⁱ RESTORE the Gulf Coast Act of 2011, S. 1400 § 4(1)(t)(2)(c)(vii)(VII), 1st Session (2011) ; RESTORE the Gulf Coast Act of 2011, HR. 3096 § 4(1)(t)(2)(c)(vii)(VII), 1st Session (2011) ; Gulf Coast Ecosystem Restoration Task Force. 2011. Gulf of Mexico Regional Ecosystem Restoration Strategy, pp 23.
- ^{iv} NOAA. 2011. Indicators to Assess Community-level Social Vulnerability to Climate Change; Army Corps of Engineers. 2013. Social Vulnerability Analysis: A Comparison of Tools. Available at http://www.iwr.usace.army.mil/Portals/70/docs/iwrreports/Social_Vulnerability_Analysis_Tools.pdf. Texas General Land Office. 2010. Status and Trends of Coastal Vulnerability to Natural Hazards. Available at: <http://www.glo.texas.gov/what-we-do/caring-for-the-coast/grants-funding/projects/11-025-status-and-trends-coastal-vulnerability.html>
- ^v EPA. 2011. Plan EJ 2014. Available at: <http://www.epa.gov/environmentaljustice/resources/policy/plan-ej-2014/plan-ej-2011-09.pdf> ; Gulf Coast Ecosystem Restoration Council. 2013. Draft Programmatic Environmental Assessment.
- ^{vi} Lee, Matthew R., Troy C. Blanchard. 2011. “Community Attachment and Negative Affect in the Context of the BP Deepwater Horizon Disaster.” *American Behavioral Scientist*; Picou, Steve. 2011. “The Exxon Valdez and BP Oil Spills: A Comparison of Initial Social and Psychological Impacts” *American Behavioral Scientist*; Colten, Craig, et. al. 2012. “Community Resilience and Oil Spills in Coastal Louisiana” *Ecology and Society*.
- ^{vii} LA Coastal Protection and Restoration Authority. 2012. “Coastal Master Plan. Appendix I. Cultural Heritage”; NOAA. 2009. “Fishing Communities of the United States”; Gulf & South Atlantic Fisheries Foundation, Inc. 2010. “Development of Social Indicators for Fishing Communities of the Southeast: Measures of Dependence, Vulnerability, Resilience, and Gentrification”.
- ^{viii} Laperouse, Paul. 2012. Gulf Coast Job Creation and Workforce Development. SSA Consultants. Available at: <http://recoverrestorerebuild.files.wordpress.com/2012/05/job-creation-report-oxfam-ssa.pdf>
- ^{ix} Letter from Gulf Coast Businesses to Gulf Coast Governors. 2013. Available at: <http://www.nature.org/ourinitiatives/regions/northamerica/areas/gulfofmexico/letters-to-gulf-state-governors-in-support-of-restoration.pdf>
- ^x Pew Economic Mobility Project. 2012. Economic Mobility of the States. Available at: <http://www.nature.org/ourinitiatives/regions/northamerica/areas/gulfofmexico/letters-to-gulf-state-governors-in-support-of-restoration.pdf>
- ^{xi} Laperouse, Paul. 2012.
- ^{xii} United States. Congress. Senate. Committee on Environment and Public Works. Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act of 2011. Report 112-100. Pp 10.
- ^{xiii} Oxfam America, et al. 2013. “An Agenda to Enhance Community Resilience”
- ^{xiv} Altstad, David. 2010. “Building Opportunity”. Working Poor Families Project. Available at: http://www.workingpoorfamilies.org/pdfs/Building_Oppportunity.pdf
- ^{xv} Public Law 112–141 § 1603(1)(t)(2)(c)(vii)(V)
- ^{xvi} United States. Congress. Senate. Committee on Environment and Public Works. Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act of 2011. Report 112-100. Pp 10.



AN AGENDA TO ENHANCE COMMUNITY RESILIENCY

**A MEMO TO THE GULF COAST ECOSYSTEM
RESTORATION COUNCIL**

**RESTORE NATURAL PROTECTION, CREATE ECONOMIC
OPPORTUNITY, PRESERVE CULTURAL HERITAGE AND
ENCOURAGE PARTICIPATION IN VULNERABLE COMMUNITIES**

AN AGENDA TO ENHANCE COMMUNITY RESILIENCY

A MEMO TO THE GULF COAST ECOSYSTEM RESTORATION COUNCIL

The Gulf Coast Ecosystem Restoration Council's Comprehensive Plan should be focused on restoring ecosystems in a way that builds more resilient communities and a stronger, more inclusive economy.

People and communities are an important part of our ecosystem, and they face historic challenges: the prospect of extreme weather events, loss of livelihoods and culture, rising poverty, threats to health and well-being, hindered economic mobility, and limited access to policy-makers. The 2010 oil spill amplified each one of these.

The Plan can begin to address these challenges by investing in ecosystem restoration projects which build stronger natural protection, create greater economic opportunity and security, preserve our cultural heritage, and promote greater community engagement and capacity building.

Together, we believe the Council and the Comprehensive Plan should:

ENHANCE COMMUNITY RESILIENCE

The Plan's goal to enhance community resilience should focus on addressing the resilience of those communities which are vulnerable on physical, economic, social and cultural levels. Our communities are only as resilient as our most vulnerable neighbors.

When the Gulf's natural resources are damaged, it has a disproportionate impact on the health and well-being of low-income, disadvantaged, and culturally important populations who have made their homes here for generations. It is imperative to set objectives for reducing risks and creating opportunity for vulnerable populations across the Plan, including:

- **Restore natural protection to reduce social vulnerability.** Socioeconomic factors (including poverty, race, gender and employment) affect a community's ability to recover from disaster. Since the most vulnerable communities are at the most risk from climate hazards, they would benefit the most from restoration of natural flood protection (such as barrier islands, wetlands and oyster reefs); these projects should take top priority.
- **Protect a way of life and cultural heritage.** Culture plays a significant role how communities cope with disaster. The Plan should identify and prioritize the restoration of habitats that have played a vital role in culturally important, natural resource-dependent coastal communities, especially tribes (federally recognized and non-federally recognized) for generations.
- **Promote community development, jobs, and training.** Targeting vulnerable families for jobs and skills training connected to restoration projects can promote greater financial security to deal with future hazard risks. It's vital to encourage projects that partner with and provide resources to community development organizations, and to connect vulnerable workers with economic opportunities.

FOLLOW CONGRESS'S REQUEST TO INCLUDE "RECOMMENDATIONS FOR ECOSYSTEM RESTORATION-RELATED WORKFORCE DEVELOPMENT AND JOB CREATION" IN THE PLAN

The Council has a chance to address lost livelihoods and increasing poverty across the region by leveraging direct job creation within ecosystem restoration. The Plan has a chance to catalyze efforts to prepare unemployed, low-income and disadvantaged workers (especially those impacted by the oil spill) for new careers related to ecosystem restoration, and to foster economic mobility.

The Plan should set objectives for providing skills training, professional credentials, education, job placement and new career ladders in occupations designing, constructing, and monitoring ecosystem restoration. This could help workers access good paying jobs, and advance towards greater economic security, while helping local businesses become more competitive. Promoting such investments, particularly with the RESTORE Act's state and local investments, could bring economic and social benefits of restoration projects across the RESTORE Act as well as NRDA and NFWF investments. The Council should identify ways it can support these efforts with research and convening.

The Council should also find new ways for residents to obtain the necessary credentials, financing and bonding capacity to open small businesses working on restoration-related work.

CREATE AN ECOSYSTEM RESTORATION WORKFORCE OPPORTUNITY INCENTIVE PROGRAM PROMOTING A "RACE TO THE TOP"

The Council should integrate a program in the Plan to provide incentives for state and local investments in ecosystem restoration-related worker training and education. This program should promote targets in each state for investments in workforce development in relation to the projected labor demands generated by planned ecosystem restoration investments.

The Council could provide matching funds as an incentive up to a set portion of its total spending, perhaps two percent. For instance, the Council could design the program to match every \$2 invested in

ecosystem related training by state or local entities with an additional \$1 from the Council, for training initiatives that meet criteria for best practices engaging local, unemployed, low-income and disadvantaged workers and businesses.

Such criteria include:

- **Build inclusive multi-stakeholder consortiums.** Programs should bring together all parties—employers and industry groups, community organizations, training providers, community colleges, project sponsors and other stakeholders—to align their resources and capacities to design and provide training and access to critical work-support services (such as translation, transportation, child care, and ultimately job placement).
- **Research in-demand restoration jobs.** Research should examine restoration projects’ scope and timing, and labor market trends, to identify high demand, decent wage occupations that are accessible with training and are part of a career pathway towards higher wage work.
- **Develop industry-supported, community-accessible curricula.** Training providers should work with industry to align curricula with needs for in-demand occupations and career pathways.
- **Support partnerships and funding for community-based organizations.** Community-based organizations can help identify workers, assess existing and needed skills critical to access jobs, connect them with training, and help them advance along career pathways.

INCLUDE TERMS FOR “LOCAL COMMUNITY TRAINING AND HIRING PLANS” WITHIN COMPETITIVELY BID CONTRACTS AND GRANTS

These terms, detailing goals, resources and partnerships for how contracts and grants will promote hiring and training of local, unemployed, low-income and disadvantaged workers, should be included for evaluating proposals. Efforts should be made to educate contractors on how to develop plans and what local resources are currently available. Accountability mechanisms should be developed to ensure plans are followed, and to enable the Council to measure these practices’ impact. Plans could include commitments to:

- **Encourage community hiring.** Establish standards for hiring targeted populations of local workers, including unemployed, low-income and disadvantaged workers.

- **Conduct outreach.** Work with workforce and community organizations, and information sources.
- **Partner with workforce development initiatives.** Train and place unemployed, low-income and disadvantaged trainees into new jobs and help incumbent workers obtain skills to advance.

ENGAGE THE COMMUNITY IN EFFORTS TO ENHANCE COMMUNITY RESILIENCY

The Council should set objectives to increase the number of individuals and communities that recognize themselves as stakeholders in restoration and track overall participation in engagement opportunities.

Additionally, it should develop protocols to acknowledge receipt of recommendations coming from communities, explaining how recommendations have been addressed, and providing explanations when recommendations cannot be implemented.

Information should always be provided in alternate languages to include the multi-cultural communities living along the Gulf Coast, many of whom have limited English proficiency.

CREATE A CITIZENS ADVISORY COMMITTEE (CAC) TO PROVIDE INDEPENDENT INPUT ON PLANNING, IMPLEMENTATION, AND ASSESSMENT OF THE WORK OF THE COUNCIL

The CAC should report directly to the Chair of the Council, particularly on matters related to social vulnerability, culturally important natural resources, and community economic benefits. Its role should include identifying examples of tools and models that are making a positive impact in communities, especially among the most vulnerable, and fostering collaboration and community engagement.

DEVELOP PARTNERSHIPS WITH TRUSTED COMMUNITY-BASED NONPROFITS, AND SCIENTISTS AND PLANNERS

The Council should provide resources to work with community groups to get the word out, and work with scientists and planners to provide traditional knowledge and input on planning and implementation, particularly around the restoration of culturally important resources.

Such efforts could apply vast local knowledge about the coastal habitat and estuaries, and build the capacity of communities to give more meaningful input in planning and implementation of the Comprehensive Plan.



AN AGENDA TO ENHANCE COMMUNITY RESILIENCY was drafted with contributions by Jeffrey Buchanan, Oxfam America; Roberta Avila, STEPS Coalition; Patrick Barnes, Limitless Vistas, Inc.; Rev. Tyronne Edwards, Zion Travelers Cooperative Center; Sharon Gauthe, BISCO; Diane Huhn, Bayou Grace Community Services; Daniel Nguyen, Mary Queen of Viet Nam CDC; Kaitlin Truong, Asian Americans for Change; Casi Callaway, Mobile Baykeeper; Michelle Erenberg and Raleigh Hoke, Gulf Restoration Network; Paul Nelson, South Bay Communities Alliance; Rev. Kris Peterson, First Presbyterian Church of Bayou Blue; Grace Scire, Boat People SOS; Ya-Sin Shabazz, Hijra House; Thao Vu, Mississippi Coalition for Vietnamese American Fisherfolk and Families; and Darryl Malek-Wiley, New Orleans Group of the Sierra Club.

ENDORSEMENTS

1 Anchor Ministry, New Orleans, LA
232-Help/Louisiana 211, Lafayette, LA
28 Stones, Rayne, LA
A Community Voice, New Orleans, LA
Action Communication and Education Reform, Duck Hill, AL
Air Alliance Houston, Houston, TX
Alabama Coast United, Orange Beach, AL
Alabama Coastal Heritage Trust, Mobile, AL
Alabama Fisheries Cooperative, Coden, AL
Alabama River Alliance, Birmingham, AL
Alabama Water Watch, Auburn, AL
All Churches Together (ACTII), Fairhope, AL
Alliance for Affordable Energy, Baton Rouge, LA
Arc of Greater New Orleans, New Orleans, LA
Artist Boat, Galveston, TX
Asian Americans for Change, Ocean Springs, MS
Bay Area Women Coalition, Mobile, AL
Bayou Grace Community Services, Chauvin, LA
Bayou History Center, Thibodaux, LA
Bayou Land RCSD, Metairie, LA
Biloxi Branch NAACP, Biloxi, MS
Bayou Interfaith Shared Community Organizing (BISCO), Thibodaux, LA
Black Warrior Riverkeeper, Birmingham, AL
Boat People SOS
Bread for the World New Orleans, New Orleans, LA
Cahaba Riverkeeper, Birmingham, AL
Calhoun County Resource Watch, Seadrift, TX
Carmelite NGO, New Orleans, LA
Choctawhatchee Riverkeeper, Inc., Dothan, AL
Citizens Against Toxic Exposure, Pensacola, FL
Clean Water Network of Florida, Navarre, FL
Coastal Communities Consulting, Gretna, LA
Coastal Women for Change, Biloxi, MS
Community Development Task Force Inc., Moss Point, MS
Deep South Center for Environmental Justice, New Orleans, LA
Dulac Community Center, Dulac, LA
Fe y Justicia Worker Center, Houston, TX
Federation of Southern Cooperatives/Land Assistance Fund, Epes, AL
First Presbyterian Church of Bayou Blue, Gray, LA
Florida State Conference of the NAACP, Orlando, FL
Galveston Baykeeper, Galveston, TX
Global Green
Great Plains Restoration Council, Fort Worth, TX
Greater Light Ministries, New Orleans, LA
Greater New Orleans Foundation, New Orleans, LA
Gulf Coast Center for Law & Policy, Slidell, LA
Gulf Coast Fund for Community Renewal and Ecological Health
Gulf Islands Conservancy, Gulfport, MS
Gulf Restoration Network, New Orleans, LA
Hands on Mississippi, Gulfport, MS
Hijra House, Biloxi, MS
HOPE Community Development Agency, Biloxi, MS
Hope Haven Children's Services, Bay St. Louis, MS
Immaculate Heart CDC, Lucedale, MS
Institute for Sustainability Education & Development, Inc., Mobile, AL
Isle de Jean Charles Band of Biloxi-Chitimacha-Choctaw Indians, Isle de Jean Charles, LA
Jerusalem Economic Development Corporation, New Orleans, LA
Just Advocacy of Mississippi, Jackson, MS
Kallisto Research Consulting, New Orleans, LA
Louisiana Green Corps, New Orleans, LA
Land Trust for Southeast Louisiana, New Orleans, LA
Louisiana Environmental Action Network (LEAN), Baton Rouge, LA
LIFE of Mississippi, Hattiesburg, MS
Life Sowers Community Development, Moss Point, MS
Lighthouse Community Development Corporation, Grand Bay, AL
Limitless Vistas, Inc., New Orleans, LA
Louisiana Housing Alliance, Baton Rouge, LA
Louisiana Oystermen's Association, Pointe à la Hache, LA
Louisiana Shrimp Association, Grand Isle, LA
Lower 9th Ward Center for Sustainable Engagement & Development (CSSED), New Orleans, LA
Lower Mississippi Riverkeeper, Baton Rouge, LA
Mississippi Coalition for Vietnamese American Fisherfolk and Families, Biloxi, MS
Mississippi Coast Interfaith Disaster Task Force, Gulfport, MS
Mississippi Immigrant Rights Alliance, Jackson, MS
Mississippi Low-Income Child Care Initiative, Biloxi, MS
Mobile Baykeeper, Mobile, AL
Moore Community House, Biloxi, MS
Mary Queen of Viet Nam CDC, New Orleans, LA
New Bottom Line Coalition, Dothan, AL
New Orleans Group of the Sierra Club
On Wings Of Care, New Orleans, LA
One Voice Louisiana, Baton Rouge, LA
One Voice Mississippi, Jackson, MS
Operation Homecare, Inc., York, AL
Ordinary People Society, Dothan, AL
Oxfam America
Prodigal Child Project, Dothan, AL
Public Laboratory for Open Technology and Science, New Orleans, LA
Puentes New Orleans, New Orleans, LA
SEED Coalition, Austin, TX
Seedco/Southeast Louisiana Fisheries Assistance Center, Belle Chase, LA
Sierra Club Delta Chapter, Baton Rouge, LA
Sierra Club Mississippi Chapter, Jackson, MS
South Bay Communities Alliance, Coden, AL
Southern Poverty Law Center, Birmingham, AL
SouthWings, New Orleans, LA
Steps Coalition, Biloxi, MS
The Mother's Project - Gulf Coast Mothers for Sustainability, Rayne, LA
The New Orleans Imperative, New Orleans, LA
The Repair S.H.O.P., Hattiesburg, MS
The Trinity Outreach Corporation, Moss Point, MS
TRAC, Houma, LA
Tri-Coastal Community Outreach, Grand Bay, AL
Turkey Creek Community Initiatives, Gulfport, MS
Union of Commercial Oystermen of Texas, Port O'Connor, TX
United Houma Nation, Houma, LA
Vietnamese American Young Leaders Association, New Orleans, LA
Women in Construction, Biloxi, MS
Zion Travelers Cooperative Center, Phoenix, LA

February 19, 2013

The Honorable Robert Bentley
Governor, State of Alabama
State Capitol
600 Dexter Avenue
Montgomery, AL 36130

Dear Governor Bentley,

We write as the entrepreneurs and professionals who represent a cross-section of the industries that see a healthy Gulf Coast as a key to driving private sector job growth and our state's future prosperity. We represent companies and associations who welcome the nation to enjoy our seafood, one of a kind culture and world-class fisheries, beaches and tourist destinations, as well as the wide spectrum of firms poised to conduct future ecosystem restoration projects. As such, we encourage the use of funds from the recently passed RESTORE the Gulf Coast Act to create local job and training opportunities, strong communities, and long-term economic health by investing in the restoration of the Gulf's wetlands, oyster reefs and barrier islands.

Gulf Coast ecosystems are an important economic driver for our state and our regional economy, helping us to provide critical services and products needed to drive job creation, including:

- Production of 1.3 billion pounds of seafood annually — with a dockside value of \$661 million;
- Supporting the largest remaining wild oyster harvest in the world;
- Attracting more than 23 million recreational fishing trips annually; and
- Providing more than 600,000 jobs and \$9 billion in wages annually in tourism and recreation.

Healthy wetlands, barrier islands and oyster reefs also mitigate the impacts of hurricanes and other extreme weather events on our communities and other coastal assets. The annual losses associated with these events are currently estimated at approximately \$17 billion.

Thanks to the resources made available through the RESTORE Act, there is an unprecedented opportunity to restore the Gulf, to strengthen our traditional industries, create new economic mobility and accelerate emerging markets centered on environmental restoration. Coastal restoration projects will create new business for a wide variety of firms in the engineering, construction, transportation, and manufacturing sectors, generating demand for more workers across these sectors. As a result, there will be new opportunities for employment of Gulf Coast residents, which will increase as innovative technologies are developed and exported out of the region. Further, the restoration of the Gulf of Mexico will draw more visitors to our beaches and towns, promote thriving fisheries, and make our communities more resilient in the face of future storms and sea level rise.

These benefits can only be realized with a significant investment of RESTORE Act funds into ecosystem restoration projects. A recent study conducted by Mather Economics estimated that investing these oil spill penalty funds into ecosystem restoration projects could create 77,453 new jobs over 50 years. We, therefore, encourage you to invest a substantial amount of the oil spill penalty funds from the RESTORE Act into these types of projects, which will reap the maximum benefits for the long-term prosperity of our region.

Additionally, we believe it is good public policy for firms involved in ecosystem restoration projects to work in partnership with government and workforce development stakeholders to increase their abilities to prepare and hire qualified local, low income and disadvantaged workers. Those of us that may be involved in these projects

[Copy of a Letter from 120 Gulf Businesses to Gulf State Governors, Addressed to Governor Robert Bentley]

stand prepared to partner with the State to identify the necessary skills-sets and training programs to prepare our state's workforce to conduct future restoration projects and find new economic opportunities. We encourage the State to invest a portion of the RESTORE Act funds that will be allocated to the State for this new challenge.

We look forward to working with you toward a more vibrant, productive future for the Gulf of Mexico and the region's restoration economy. Thank you for your consideration of this request, and please let us know if we can provide additional information or assistance.

Sincerely yours,

E.L. "Skip" James
Director of Transportation
Aillet, Fenner, Jolly & McClelland, Inc.
Shreveport, LA

Harry Simmons
President
American Beach and Shore Protection Association
Washington, DC*

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T & D Charters**
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Senior Scientist and NW Florida Area Manager
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Sea Life Incorporated
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Seaside Community Development Corp.
Seaside, FL

Captain Louis Skrmetta
Owner
Ship Island Excursions
Gulfport, MS

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Signal Inn Condominium Association
Sanibel, FL

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Executive Director
South Central Industrial Association
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Managing Member
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Mindy Airhart, President
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Slidell, LA

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Weeks Marine
Washington, DC*

William E. Heyd
Owner
WEH, LLC
Kalamazoo, MI

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Wilco Marsh Buggies and Draglines, Inc.
Harvey, LA

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Womack Forestry Mowing, LLC
Excel, AL

Ralph S. Woodring
Owner
**Woodring Enterprises, Inc. dba The Bait Box, Caloosa
Wholesale, Woodring Marina**

John Brawley
Senior Marine Systems Ecologist
Woods Hole Group
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Bruce French
Senior Project Manager
York Risk Services Group
Tallahassee, FL*

Gary Young
Owner
**Young's Native Plants LLC; Antioch Island Ventures
LLC**
Vanceleave, MS

Edward L. MacDonald
President
Z-Aire Corp
Captive, FL

* Indicates offices in more than one Gulf state.

##

CC: The Honorable Rick Scott, Governor of Florida
The Honorable Bobby Jindal, Governor of Louisiana
The Honorable Phil Bryant, Governor of Mississippi
The Honorable Rick Perry, Governor of Texas



Public Comments from
The Partnership for Gulf Coast Land Conservation
To the Gulf Coast Ecosystem Restoration Council
Regarding the Draft Initial Comprehensive Plan

June 25, 2013

To the Gulf Coast Ecosystem Restoration Council:

The **Partnership for Gulf Coast Land Conservation** (PGCLC) is a coalition of 30 national, local, and regional non-governmental organizations dedicated to advancing land and water conservation in the Gulf of Mexico coastal region (see current membership list attached). The organizations that make up the Partnership have been working in the Gulf region for decades to restore and protect priority natural communities and have significant expertise in land conservation.

Our mission is to work together across the Gulf of Mexico coastal region and within watersheds bordering the Gulf of Mexico to increase the pace, quality, and permanence of voluntary land and water conservation. We wish to offer our help and expertise to the Gulf Coast Ecosystem Restoration Council as you seek the best and most appropriate ways to restore the Gulf Coast's Ecosystem and Economy.

As the Trustees move forward, we urge you to make a commitment to the PERMANENT protection of natural habitats, ecosystems, and watersheds in the region. Permanent protection can be accomplished by land acquisition from willing sellers to government and non-profit organizations *and* conservation management agreements with private landowners, in addition to remedial restoration activities. Permanent land protection must be a priority in the *Deepwater Horizon* oil spill restoration effort.

Why permanent land protection?

- 1) **It works.** Permanent protection of land allows for the restoration of natural resources and services and ensures that the benefits of the natural resources will be available to the public in perpetuity.
- 2) **It is feasible.** There are thousands of willing property owners in the Gulf region who would sell their land or enter into conservation agreements.

3) It meets several Objectives. Decades of research show that permanent land protection restores and protects habitats, restores and protects water quality, protects and restores living coastal and marine resources, restores and enhances natural processes and shorelines, and promotes community resilience.

We look forward to working with the Trustees of the Gulf Coast Ecosystem Restoration Council on the further development of the Comprehensive Plan and the restoration of our region.

A handwritten signature in black ink, reading "Judy Steckler". The signature is written in a cursive, flowing style.

Judy Steckler
Chair, Executive Committee
Partnership for Gulf Coast Land Conservation
955A Howard Avenue
Biloxi, MS 39533
228-435-9191



955A Howard Avenue
Biloxi, MS 39533
228-435-9191

General Comments

The Trustees asked the public to address the specific aspects of the Draft Initial Comprehensive Plan. The PGCLC has provided comments in the format that was provided by the Trustees on pages 4 - 6. We also offer these general comments:

- *As stated on page two of the Plan, the Plan does not yet include the Ten-Year Funding Strategy or a project priority list. The PGCLC recommends that the final version of the Comprehensive Plan be delayed until these items are ready for public review.*
- *The PGCLC recommends that the Trustees provide another iteration of the plan for public comment. NGO's, community members, and the general public need to be able to review a more detailed plan in order to provide meaningful public input.*
- *The PGCLC recommends that the Council adopt a transparent process by which non-Trustees can propose projects.*
- *We advocate that the Council adopt policy that would allow RESTORE funds to be used for*
 1. *Land acquisition and protection funds for the Gulf of Mexico region, and for the states of Mississippi, Louisiana, and Texas, similar to the Forever Florida and Forever Wild funding mechanisms in Florida and Alabama.*
 2. *Match and cost-share for other federal and state conservation programs; and*
 3. *Endowments, dedicated management funds, revolving funds and similar funding mechanisms so that long-term restoration and management can be conducted.*

The Draft Plan includes restoration Priority Criteria established in the RESTORE Act and applicable to the Council's selection of projects and programs for at least the first three

years after publication of the Initial Comprehensive Plan. The Council is considering further defining these criteria and developing additional criteria for consideration.

The RESTORE Act directs the Council to use the best available science and give highest priority for at least the first three years to ecosystem projects and programs that meet one or more of the following four Priority Criteria. In order to support its vision for integrated and coordinated Gulf Coast ecosystem restoration, the Council may develop other criteria as necessary to refine the selection process. The Council will use these criteria to evaluate proposals and select the best projects and programs to achieve comprehensive ecosystem restoration.

The Council should give the highest priority to ecosystem projects and programs that meet the Priority Criteria every year – not just the first three years.

Proposed Criteria:

1. Projects that are projected to make the greatest contribution to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region, without regard to geographic location within the Gulf Coast region.
2. Large-scale projects and programs that are projected to substantially contribute to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast ecosystem.
3. Projects contained in existing Gulf Coast State comprehensive plans for the restoration and protection of natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region.

Louisiana is the only state that has a state comprehensive plan. The PGCLC advocates that Alabama, Florida, Mississippi and Texas develop their comprehensive plans through transparent and open processes with meaningful public input.

4. Projects that restore long-term resiliency of the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands most impacted by the Deepwater Horizon oil spill.

PGCLC is in general agreement with the four criteria but would like to add language that highlights the need for PERMANENT protection of natural resources. We would also like to highlight the need to consider the health of WATERSHEDs in the criteria and allow for conservation measures on inland and upland properties.

Project and Program Phases

Should the Council further define the Priority Criteria? If so, how?

Yes, the Council should further define the Priority Criteria. These criteria are so broad that it would be difficult to rank projects for funding.

PGCLC also recommends that the Council develop a ranking system so that proposers and the public can know exactly how projects will be ranked.

Should the Council develop additional criteria for consideration now or in the future? If so, what should they be?

The PGCLC recommends that the Council consider whether there is scientific evidence that the proposed strategy and/or intervention will meet its stated goals.

The “Objectives” section of the Draft Plan describes the broad types of activities the Council envisions funding in order to achieve its goals.

The Objectives are:

- 1) Restore, Enhance and Protect Habitats
- 2) Restore, Improve and Protect Water Quality
- 3) Protect and Restore Living Coastal and Marine Resources
- 4) Restore and Enhance Natural Processes and Shorelines
- 5) Promote Community Resilience
- 6) Promote Natural Resource Stewardship and Environmental Education
- 7) Improve Science-Based Decision-Making Processes

Should the Council consider other Objectives at this juncture? If not, at what point, if any, should the Council consider additional Objectives? If so, what should they be?

The PGCLC’s position is that these objectives are correct and will help the Council meet its goals under the RESTORE Act. We advocate that additional language be added regarding the PERMANENT protection of habitats, water quality, living coastal and marine resources.

Similarly, should the Council eliminate any of the Objectives?

The Council should not eliminate any of the Objectives.

How should the Council prioritize its restoration Objectives?

It is not necessary to prioritize restoration Objectives. A better strategy would be to prioritize projects based upon how many Objectives the project meets.

The Council is considering establishing or engaging advisory committees as may be necessary, such as a citizens’ advisory committee and/or a science advisory committee, to provide input to the Council in carrying out its responsibilities under

the RESTORE Act. Should the Council establish any advisory committees? If so, what type of advisory committees should the Council establish? How should the Council structure such advisory committees? What role should such advisory committees play?

The PGCLC advises that the Council establish the following advisory committees:

- 1. Science/technical*
- 2. Citizen's Advisory*
- 3. Land Protection and Restoration*

The development of the Committees should be in addition to public outreach and public input activities. We further advise that a representative of the nonprofit land protection organizations be named to the Citizen's Advisory and Lands Committees. The Lands Committee would be charged with reviewing and making recommendations on land acquisition and conservation strategies.

Member Organizations

Local and State Organizations

Alabama Forest Resources Center (AL)
Alabama Land Trust (AL)
Bayou Land Conservancy (TX)
Coastal Land Trust (AL)
Apalachee Land Conservancy (FL)
Conservation Foundation of the Gulf Coast (FL)
Dauphin Island Bird Sanctuaries (AL)
Florida Wildlife Federation (FL)
Galveston Bay Foundation (TX)
Guadalupe Blanco River Land Trust (TX)
Land Trust for Southeast Louisiana (LA)
Land Trust for the Mississippi Coastal Plain (MS)
Lemon Bay Conservancy (FL)
Mississippi Land Trust (MS)
Mississippi River Trust (MS/LA)
Pelican Coast Conservancy (FL/AL)
Tall Timbers Research Station & Land Conservancy (FL)
Tampa Bay Conservancy (FL)
Texas Land Trust Council (TX)
Texas Agricultural Land Trust (TX)
Trust for Coastal Stewardship (LA)
Weeks Bay Foundation (AL)
Wildlands Forever Trust (FL)
Wolf River Conservation Society (MS)

National organizations

Land Trust Alliance
National Audubon Society
Ducks Unlimited
The Conservation Fund
The Nature Conservancy
The Trust for Public Land



Walter C. Ernest IV
Director of Operations

June 21, 2013

Justin Ehrenwerth
Executive Director
Gulf Coast Ecosystem Restoration Council,
c/o U.S. Department of Commerce
1401 Constitution Avenue, N.W., Room 4077
Washington, DC 20230

Re: Draft Initial Comprehensive Plan Public Comments

Dear Mr. Ehrenwerth,

On behalf of the Pelican Coast Conservancy land conservation organization, I would like to take this opportunity to present the organization's public comments in regards to the **Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy**. The mission of the Pelican Coast Conservancy is to *"provide 21st century solutions and sound scientific applications for conservation of critical natural resources in the face of a changing climate focusing on environmental restoration, preservation, and conservation efforts throughout the Gulf Coast region with specific utilization of geographic information systems applications in land conservation, ecosystem services, carbon sequestration and conservation biology"*.

The draft plan addresses many of the issues relevant to the Pelican Coast Conservancy's objectives. These include; water quality, changing climate conditions, conserving land in perpetuity through the acquisition of land through fee simple transactions and conservation easements, and other environmental restoration activities.

Some suggestions for consideration and inclusion in the plan are:

- The need for adequate funds set aside to allow for proper due diligence during the acquisition stage, annual monitoring, and continued long term stewardship of properties.

403 Conti Street Mobile, Alabama 36602
(251) 222-8959

info@pelicancoastconservancy.org
www.pelicancoastconservancy.org

The land trust community can play an important role in assisting with all of these undertakings. Perpetual land conservation is one the most effective long term restoration activities that incorporates all five of the Comprehensive Plan's overarching framework and objectives

- Development and implementation of citizen advisory committees across the Gulf of Mexico region.

These committees can provide critical citizen input to the coastal decision making process. The committees should consist of local residents, environmental organizations, civic groups, church groups and the academic sector.

- Consideration of a watershed approach to future restoration and land use planning activities.

This approach can factor in the future impacts associated with climate change, land use change and non-point source storm water runoff. The acquisition of riparian watershed corridors can play an important role in sustaining healthy populations of living resources.

In closing we would also like to see the Council establish policies and procedures that insure public transparency of projects and allow uniform consistency with each of the five Gulf States implementation development and compliance with their designated Restore Act state funds. Please contact me if you have any questions and comments.

Working for perpetual conservation,



Walter C. Ernest IV
Director of Operations
Pelican Coast Conservancy

To the Restore The Gulf Council:

Restore the Gulf Coast with Gulf Coast **STEM** Scholar Award

Good afternoon, my name is Ronnie Vandiver Managing Partner Program of Vandiver Maverick Marketing Group. I would like to introduce you to a program we believe is a great fit for the Restore The Gulf efforts ... an educational platform that offers monetary awards to Gulf Coast **STEM** scholars. It's a well known the USA is not producing enough **STEM** professionals to keep up with the demand from oil/gas companies etc. We purpose that Restore The Gulf take under consideration a program called The Gulf Coast **STEM** Award™ Program. This program is designed to find, recognize and award money to deserving **STEM** scholars to attend college.

This is not a new program but one born from the successful Texas Scholar Award Program (TSA), which has been on going for seven years. The **Gulf Coast STEM Award™** emulates the TSA except now we are offering a new division dedicated to finding the best **STEM** talent, track them, and nurturing the relationship until they are ready to be recruited by oil, gas and energy company. To get a glimpse at what we have in mind click here <http://www.texasscholaraward.com/>

Energizing the youth of the Gulf Coast to become **STEM** scholars is an investment we believe will have the best return of your investment of all the projects Restore The Gulf will undertake. We would love the opportunity to talk with your group in private or in an open forum to we can share how other programs similar have preformed and how we envision the **STEM** Award Program

Sincerely

Ronnie Vandiver

Managing Partner

Vandiver Maverick Marketing Group

512-423-8715

Ronnielee@VandiverMaverickMarketingGroup.Com

Great idea that 5 cents of every dollar received to restore the Gulf goes to protect and preserve the marshes. It seems like a no brainer. Great Op-ED in the New York Times today by Ben Raines about this. Please listen.

Sandra von Unwerth



Sea Grant in the Gulf of Mexico

June 21, 2013

RE: Response of Sea Grant Programs of the Gulf of Mexico to RESTORE Council Draft Plan

Dear RESTORE Council:

The four Sea Grant programs in the Gulf of Mexico (GOM) are university-based programs that are partially funded by NOAA and each state. We support and conduct research, extension, outreach and education programs in coastal areas throughout the region, and we have a history of working in a highly collaborative mode to tackle Gulf-wide issues, and in partnership with a variety of federal, state and local entities. During the last three years the four Sea Grant programs have invested more than \$62 million in solving coastal problems through administering funds, managing leveraged funds, or having matching funds dedicated to Sea Grant activities.

The Directors of the Sea Grant programs in the GOM reviewed the “Draft Initial Comprehensive Plan: Restoring the Gulf Coast’s Ecosystem and Economy.” Here we share several opportunities for Sea Grant to collaborate and assist the Council in advancing its mission. Sea Grant focus areas are parallel to the Council’s goals and objectives, and the Sea Grant programs in the GOM have more than 40 years of experience engaging with the people, businesses and communities of the region. Our extension agents live in the coastal counties where they work and have developed a level of trust and understanding of perspectives and issues that cannot be found in any other coastal program.

Outreach and Education

Sea Grant extension agents and specialists work on a broad set of topics ranging from restoration to water quality to coastal resilience. We suggest that the Council make use of this extensive network of outreach professionals to both share the science and research that the Council funds and to solicit formal and informal feedback from communities, citizens and businesses around the GOM region. Sea Grant can serve as the outreach arm of the Council.

Objective 6 “*Promote Natural Resource Stewardship and Environmental Education*” in the draft plan specifically focuses on stewardship and environmental education. Sea Grant has well established programs at public facilities around the Gulf that provide high-quality educational programming for K-college students, public and industry. Sea Grant educators and extension staff provide formal and non-formal education and stewardship-based programs. Specialized programs already exist that promote natural resource stewardship and are tied to ecosystem restoration and protection. **We encourage the Council to keep objective 6 in the final plan and to consider Sea Grant as the program to help implement Council priorities for this objective.**

Integrating Science and Adaptive Management

Objective 7 “*Improve Science-Based Decision-Making Processes*” is an essential component of the plan and should be considered a cross-cutting objective or elevated to a goal. This should be a core element of the plan and science should be incorporated into every decision that is made. **The Council should make efforts to**

engage with the university system to ensure that scientific results from multiple sources are incorporated into the process. Because Sea Grant is a university-based program it can serve as an excellent conduit to facilitate this process. In addition, Sea Grant has funded more than 40 years of research and many results from these projects could contribute to adaptive management.

There are several specific examples of how the four Sea Grant programs in the GOM are contributing to adaptive management. The first is the Community Resilience Index (CRI). This was initiated by Sea Grant and developed with support from the Gulf of Mexico Alliance. It has been used in communities around the GOM in order to identify vulnerabilities and enable community leaders to learn more about areas they need to improve. These communities are adapting to the challenges they face through use of the CRI and related tools and through consultation with Sea Grant professionals with the training to provide tools and services to increase their resilience. In addition, Sea Grant is taking a systems approach to resilience and honing in on specific vulnerable sectors such as fisheries and tourism, to examine their vulnerabilities and help them learn from previous stressors and prepare and mitigate future stressors.

Measures of Success and Performance Measures

We suggest that the plan contain specific targets and performance measures that will set the bar high for what the Council hopes to achieve and include this in the process to select projects and programs. This is an essential component that will help guide the overall plan and assist in identifying and funding those projects that will specifically contribute to meeting the Council's priority targets. This will also require that all projects and programs include methods and an evaluation process to track if targets are being met. **A robust monitoring component will be essential for every on-the-ground restoration project to identify if targets are being met. Each project and program should include a pre- and post-implementation return on investment study.** The evaluation framework should be put into place prior to project initiation so that positive impacts can be fully accounted years later.

The Sea Grant programs of the GOM use quantitative performance measures and targets in all of our activities, and we have developed methodology to capture and report this information to a variety of audiences. Because Sea Grant and the Council share similar goals and objectives we can assist in establishing performance measures, monitoring approaches and evaluation criteria. We can also assist with developing rigorous protocols for collecting this information.

Use Existing Work

It was encouraging to see the draft plan note that multiple plans were used in its development. We would like to highlight several Sea Grant efforts that may assist you in finalizing the plan. The Sea Grant programs of the GOM led the process that resulted in the [Gulf of Mexico Research Plan](#), and we currently are updating this plan. More than 2,000 people contributed to the effort, by providing input and participating in focus sessions and workshops during the last six years. We also have worked with the NOAA Restoration Center to identify hydrological restoration sites around the GOM and have more than 75 sites identified in an inventory. By investing in the removal or alteration of a barrier, large-scale ecosystem benefits can be observed as tidal flow is resumed upstream of the barrier and freshwater exchange is resumed or enhanced. This is a very cost-effective way to positively impact a large area. We can share this inventory with you immediately, and it will also be posted to the web in the coming months.

Additional comments

In addition, Sea Grant supports:

- 1) the creation of an advisory committee and suggest that either a science committee be instituted in addition to an advisory committee or that a significant number of scientists be included in an integrated advisory/science council;**

- 2) including the Gulf of Mexico Research Initiative (GOMRI) as another science-based group that can contribute to your efforts;
- 3) coordinating with NAS, NFWF, NOAA Science Plan, GOMRI, NRDA leaders, Sea Grant and others on
 - a. the work that is being funded
 - b. integrating stakeholder engagement opportunities so there is not duplication of effort or confusion for citizens;
- 4) utilizing the Gulf of Mexico Alliance where appropriate to implement the plan, which is a well-established Gulf-wide network that has a similar set of priorities as the Council; and
- 5) including dedicated resources to long term monitoring and evaluation as a required, critical component of each funded project and program.

Responses to Council-specific Questions

Finally, we have responses to the specific questions that were posted on the RESTORE Council website:

- 1) *The Draft Plan includes restoration Priority Criteria established in the RESTORE Act and applicable to the Council's selection of projects and programs for at least the first three years after publication of the Initial Comprehensive Plan. The Council is considering further defining these criteria and developing additional criteria for consideration.*
 - a. *Should the Council further define the Priority Criteria? If so, how?*
 - b. *Should the Council develop additional criteria for consideration now or in the future? If so, what should they be?*

Yes, based on the comments at public meetings and elsewhere it is **imperative that the priority criteria be clearly defined and applied in a transparent manner. We suggest that the criteria be broadly vetted and scoring for each of the projects and programs be made public. The criteria should be uniformly applied regardless of whether it is a state proposed or council proposed project or program.** As previously mentioned the criteria should include how the project or program would help the Council meet specific targets and performance measures that are clearly defined and finalized prior to the selection process. The priority criteria may need to be slightly modified in order to evaluate and score programs versus projects. There still appears to be time to develop and vet performance measures and refine the criteria further.

- 2) *The "Objectives" section of the Draft Plan describes the broad types of activities the Council envisions funding in order to achieve its goals.*
 - a. *Should the Council consider other Objectives at this juncture? If not, at what point, if any, should the Council consider additional Objectives? If so, what should they be?*
 - b. *Similarly, should the Council eliminate any of the Objectives?*
 - c. *How should the Council prioritize its restoration Objectives?*

It is helpful to keep the broad objectives if the project and program selection criteria are well defined and specific. It was not clear if resources would be equally divided amongst the objectives (or goals) or if there was going to be some weighting of the objectives (or goals). This would be helpful to share. Objective 7 "*Improve Science-Based Decision-Making Processes*" should be a cross cutting objective.

The objectives do not explicitly identify restoring GOM economies, which was outlined in goal 5. It is not clear if economic restoration is assumed within each of the objectives, and it would be helpful to clarify this point. There may be a tendency for primarily economic development projects to be identified and selected but this is not what is outlined in the objectives. **We would encourage a balance of projects that ensure healthy coastal ecosystems; sustainable fisheries and aquaculture; resilient communities and economies; and an environmentally literate public and workforce development.**

- 3) *The Council is considering establishing or engaging advisory committees as may be necessary, such as a citizens' advisory committee and/or a science advisory committee, to provide input to the Council in carrying out its responsibilities under the RESTORE Act.*

- a. *Should the Council establish any advisory committees?*
- b. *If so, what type of advisory committees should the Council establish? How should the Council structure such advisory committees? What role should such advisory committees play?*

It could be helpful to have an advisory committee, but it should include scientists if a separate science committee is not established. The committee could assist in developing the performance measures with the Council, finalizing project and program selection process and criteria; and helping rate projects and programs. The committee could also be involved in the evaluation process of projects and programs.

Thank you for the opportunity to provide comment on the "Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy." We would enjoy an opportunity to discuss in greater detail how Gulf Sea Grant college programs can support the Council and the important work you are doing.

Sincerely,



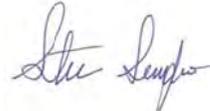
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Stan Graves
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Birmingham, Alabama 35213

June 3, 2013

Gulf Coast Ecosystem Restoration Council,
c/o U.S. Department of Commerce
1401 Constitution Avenue, N.W., Room 4077
Washington, DC 20230

To whom it may concern:

Re: Dauphin Island, Alabama Shoreline Restoration

Per the notice that I have just received from Betty McArthur of the Alabama Department of Conservation and Natural Resources, I am providing comments during the public comment period that ends June 24, 2013. It has been three years since the Gulf oil spill, the worst environmental disaster in American history. Though I am a member of the Board of Directors of the Dauphin Island Property Owners Association (DIPOA), I am writing this letter as a property owner, but it is important to recognize that the DIPOA represents approximately 3,000 members for which I am a representative. I am asking that you take action to provide the necessary funding to restore and stabilize the shoreline of Dauphin Island that was greatly affected by the oil spill.

Dauphin Island, located in coastal Alabama, is a component of the barrier island chain that forms Mississippi Sound. The sound's waters and the associated fringe of coastal mainland marsh, seagrass meadows, bayous, and oyster reefs are essential estuarine habitats upon which the recreational and commercial fisheries of Alabama and Mississippi are dependent. The importance of Dauphin Island as a barrier separating the open Gulf of Mexico from Mississippi Sound was clearly demonstrated during the 2010 oil spill as floating and submerged oil washed upon the island's Gulf beach instead of being allowed to enter the sound in an unrestricted fashion.

Even while Dauphin Island served an important role in protecting the sensitive estuarine habitats of Mississippi Sound, the island's beaches experienced considerable disturbance during the oil clean-up operations. To help control the oil spill effects, a berm was built to prevent oil from encroaching onto the beach and the island's infrastructure. The sand used to build the berm was taken from the north side of the Island. This emergency action narrowed the island, creating locations where the island could be easily breached during a future tropical storm. Given the relatively high probability that Dauphin Island could experience a hurricane landfall, time may not be on our side to address the threat for a future breach to occur.

The oil spill clean-up disruptions came upon the heels of ongoing erosion of the island that is directly attributable to the actions of man to maintain the existing 45-foot deep Mobile Harbor Channel project. In addition, the plans to widen the channel to 700 feet and deepen further to 57 feet will have unknown consequences that have not been properly explored. In fact, I do not believe a proper environmental justice study has been conducted to determine the effects of the widening and deepening of the channel. In addition, implementing a law, similar to the State of Florida, to resolve the historical sand deficits caused the Corps of Engineers dredging of the Mobile Ship Channel would be very helpful. Such a law as this should direct comprehensive beach management efforts to address the beach erosion by ensuring that all construction and maintenance dredging of beach quality sand be placed adjacent to eroding beaches on Dauphin Island.

It is evident that the erosion process of the southern shoreline is weakening the integrity of the island by contributing to decreases in its width and elevations. If Dauphin Island is allowed to continue to erode, its role as a functional barrier island would be greatly diminished should another oil spill occur in the future. Should such a situation occur, the ecological and financial losses to Alabama and Mississippi would be devastating, with the potential that indirect effects could extend over a much wider area of the northern Gulf of Mexico.

It is also important to recognize that Dauphin Island most concentration of oil/gas pipelines from the oil rigs that go under and around Dauphin Island. The pipelines deliver significant revenue to the state of Alabama as well as to other parts of the country, but yet Dauphin Island does not receive its proportionate share of revenues to repair or maintain the damage that is caused by these pipelines.

Some of the funds that would be provided by the RESTORE Act could be utilized to address Dauphin Island's shoreline erosion problems. The Town of Dauphin Island is in a unique position, having already completed a study in 2011 that developed the necessary engineering and design data for a shoreline restoration project as well as locating suitable offshore sand sources for use in the project. In addition, the Town of Dauphin Island has already applied for a U.S. Army Corps of Engineers permit. These significant completed and ongoing activities place Dauphin Island in the advantageous position of having a designed project that is ready to begin construction. All that is needed is the necessary funds to proceed with project implementation.

By directing RESTORE Act funding or NRDA funding to restore Dauphin Island's Gulf shoreline, it would be possible to reverse the effects of the severe erosion problems attributable to the long-term maintenance of the Mobile Ship Channel, as well as the devastating hurricanes of the 2000 decade. In addition, a restored Dauphin Island shoreline would provide other important environmental benefits:

- Strengthen Alabama's only barrier island
- Contribute to maintaining the integrity of Mississippi's neighboring barrier islands through sand moved westward via littoral drift
- Project Alabama's largest continuous salt marsh habitat in Mississippi Sound
- Protect Alabama's most significant oyster reefs occurring in Mississippi Sound
- Contribute to the protection of Mississippi's neighboring marsh and oyster habitats
- Protect the shallow inshore estuarine habitats of Mississippi Sound that serve as important nursery areas for a wide range of commercially and recreationally valuable species that dependent upon this habitat
- Assist in important protection by blunting the full force of tropical storms and hurricanes that impact upon the mainland's coastal communities, such as Alabama Port, Coden, Bayou La Batre, and Mobile Bay area communities.
- Provide improved habitats for endangered and threatened nesting sea turtles on Dauphin Island
- Enhance shoreline habitats required by the endangered piping plover and other shore birds

Finally, the RESTORE Act or NRDA funding will aid in creating needed private sector jobs while reclaiming vital natural and commercial assets that are unique to the Gulf Coast and critically important to the economic and environmental health of the nation. In short, this funding is vital to our efforts to bounce back from the Deepwater Horizon oil spill,

I hope that the Council will do all it can in this crucial effort to help make our communities whole by approving funding to restore and stabilize the southern shoreline of Dauphin Island.

Sincerely,

A handwritten signature in black ink that reads "Stan Graves". The signature is written in a cursive style with a large, looping initial "S" and a long, sweeping underline.

2229 Bienville Blvd
Dauphin Island, Alabama 36528

Restore Council Members:

Please accept the following public comment on behalf of the Student Conservation Association.

Regards,

Marsha Towns

Director of Partnership Development for the Gulf Region

The Student Conservation Association

3015 Richmond Ave. Suite 290
Houston, Texas 77098
Office: 713.520.1835
Mobile: 802.296.1213



Engaging youth and young adults in conservation recovery efforts.

On May 7, Secretary Sally Jewell announced the release of \$475.25 million dollars in emergency Hurricane Sandy disaster relief to be used in the repair and rebuilding of parks, refuges, recreation areas and historic sites. In addition to direct recovery and restoration, the funding will be used to support scientific studies and historic preservation.

At first look it may not appear to be a direct role for youth and young adult programs. However, the Student Conservation Association (SCA) believes that youth and young adult programming can play a key and valuable role in both the construction and mitigation phases of recovery.

Using these programs to supplement the construction efforts makes good economic sense, engaging local youth and young adults creates a strong connection with the local community.

Key benefits of youth programs:

- *Cost effective work force*- A 2012 NPS study showed that youth corps programs were as much as 60% less expensive than outside contractors. With appropriate projects, the work is the same or higher quality.

- *Large volume of work*- Youth programs by design are highly suited for debris removal projects as they are mobile and turn-key operations requiring minimal support from full time program staff.
- *Hand work*- youth programs can be effectively engaged at the final phases of large construction projects where there is opportunity for hand work, plantings and other tasks that do not require large machinery, allowing contractors to move on to additional projects.
- *Economic development*- programs provide a paid experience for local youth, many of whom have been impacted by the disasters first hand.
- *Community Engagement* – providing service opportunities for local youth and young adults in their opportunities provides a, much needed, connection to the outdoors as well as greater access to public lands.
- *Long term impact*-a recent internal survey identified that approximately 13% of the NPS workforce is an alumni of an SCA program. Participants in youth and young adult programs do go on to conservation careers, become stewards of local places and engaged citizens.

Examples of specific types of work:

- ✓ Debris removal
- ✓ Damaged tree replacement
- ✓ Repair damaged boardwalks and structures
- ✓ Historic preservation projects
- ✓ Perform Natural and Cultural Resource Damage Assessments
- ✓ Monitoring and protection
- ✓ Data Collection and reporting
- ✓ Revegetation
- ✓ GIS and Mapping
- ✓ Trail repair and restoration
- ✓ Public education and engagement

About SCA

SCA began 55 years ago as a youth movement to protect our national parks, and has achieved its place as a leader in conservation by assuring that each generation has a connection to America's Conservation Legacy. Today, as leaders understand that all efforts to ensure and extend our nation's gleaming conservation legacy must begin with youth becoming lifelong conservation leaders and stewards, SCA and its members are called to **expertly and effectively mobilize young people to assist with the restoration and recovery of federal and state public lands** affected by natural disasters.



Student Conservation Association

Environmental Restoration and Recovery



Hurricanes. Wildfires. Floods. Human-made disasters.

In today's world, natural disasters are increasing in both frequency and intensity. And the damage they cause to habitats and wildlife is only the beginning, as these crises can also wreak havoc on park staffs and budgets. Human influences from oil spills to OHRV traffic can also pose sudden threats that, if left unattended, can cause substantial, long-term negative effects.

The Student Conservation Association's Restoration and Recovery Corps offers land managers reliable, flexible, cost-effective solutions to ecological emergencies. SCA can marshal highly skilled rapid response teams as well as well trained interns to mount immediate mitigation campaigns as well as implement restoration strategies emerging from assessments and impact statements.

Harnessing the energy, innovation and passion of diverse young people, SCA has been a leader in eco-recovery since mounting an award-winning, three-year, volunteer restoration project after wildfires charred more than a third of Yellowstone National Park. The Bureau of Land Management credits SCA members with "rewriting the book" on desert restoration. And Interior Secretary Sally Jewell recently named SCA to lead a broad youth program to help the National Parks of New York Harbor rebound in the catastrophic wake of Hurricane Sandy.

"[SCA Founder] Liz Putnam's vision has set the course for youth in conservation for a long time," states Sec. Jewell. "These young people will become our future national park service rangers and conservationists."

That's why more and more of today's land managers are fueling their environmental response plans with the skills, energy and passion of SCA corps and interns.

SCA Restoration and Recovery Services Include:

- Habitat Restoration
- Reforestation and Revegetation
- Riparian Restoration
- Coastal restoration
- Wildlife Rescue
- Invasive Species Mitigation
- Trail & Campground Reconstruction
- Environmental Impact Surveys
- Monitoring, assessment and planning
- Community outreach and engagement

SCA Restoration and Recovery Projects

Hurricane Sandy, NY-NJ. In the spring of 2013, in partnership with the US Department of the Interior and the City of New York, SCA was appointed to lead a comprehensive, youth-driven effort to repair environmental damage caused by Hurricane Sandy at national park units and their partner sites in New York City and New Jersey. Locally-recruited members of The New York Harbor Conservation and Resiliency Corps will remove tons of debris and displaced sand, restore damaged habitats, replant washed out areas, conduct environmental impact studies and more over the next several years.

Mount Rainier National Park, WA. In the wake of record fall floods in 2006, SCA mounted a two-year recovery effort that rebuilt habitats, trails and campgrounds and repaired widespread erosion along ravaged rivers and streams. Over 4,000 volunteers served more than 150,000 hours—the equivalent of 19,000 work days. Park officials estimated the value of their effort at over \$3 million. The initiative earned the Interior Department's Take Pride in America Award, the Cooperative Conservation Award, and the George B. Hartzog Jr. Award for Outstanding Volunteer Service.

Angeles National Forest, CA. The 2009 Station Fire was the largest wildfire in Los Angeles history. Once the flames were out, SCA members worked more than 5,000 hours in the forest, rebuilding burned-out trails, removing invasive and flammable brush, and restoring picnic and other recreation areas. Thanks to their efforts, reported The Los Angeles Times, "Angeles National Forest...is starting to look like its old self again."

Gulf of Mexico, MS. SCA volunteers were among the first environmental responders to the 2010 Deep-water Horizon, even as oil continued to flow into the Gulf. Our interns helped rescue pelicans, egrets and other shorebirds from contaminated wetlands and others used their GPS skills to track the spill and inform government response command strategies. Two members of the SCA team received special awards from Audubon Women in Conservation in recognition of their efforts.

Big Cypress National Preserve, FL. To return the park to its natural state, Big Cypress officials turned to SCA. Scores of volunteers dismantled unauthorized structures; hauled away furniture, appliances and other items; and eradicated miles and miles of off-road vehicle tracks that were



diverting water flows in this sensitive sanctuary adjacent to Florida's Everglades.

Delaware Water Gap National Recreation Area, PA. Racked in rapid succession by a hurricane, two major storms and an historic rise in the Delaware River, parts of this 70,000 acre haven were under 30 feet of water. "Trails were covered with washed-out trees and rocks...a massive cleanup project was necessary," said Supt. John Donahue. SCA members were called in to clear debris, restore trails and rebuild campgrounds.

Mojave Desert, CA. Brilliant, resourceful, and masters of disguise, SCA members protect the vast deserts of southern California against illegal OHRVs that chew the terrain, alter the flow of surface water, and destroy habitats. They brush the soil, replant native species, and use readily available, natural materials to recreate the landscape's original appearance. The Bureau of Land Management credits our interns with rewriting the book on desert restoration, yet the ultimate tribute is that ATV riders routinely go elsewhere rather than damage restored areas.

Yellowstone National Park, WY. The 1988 wildfires scorched more than a third of this iconic park. Over the next three years, thousands of SCA volunteers reforested blackened sections, restored thousands of feet of hiking trails and rebuilt more than 100 foot bridges. The massive effort helped put Yellowstone well down the road to recovery and earned a National Points of Light Award.

I highly support the Weeks Bay Foundation idea of requiring that a nickel of every dollar of the Restore Act money be spent on protecting coastal marshes and wetlands.
I hope the Restore Council will support this excellent idea.
Thanks,
Susan Woodley Raines

Conservation Corps are a Cost-Effective Solution for Professional Gulf Coast Restoration

“In tough economic times, our nation has mobilized millions of people to conserve and protect its most vital resources, producing lasting benefits for society and providing individuals with opportunities and new skills. The Public Lands Service Corps can do this and more, by employing people from the most vulnerable sectors of our economy in jobs that would enhance their future employability, invigorating them with an enhanced sense of civic pride, and supporting President Obama’s call for people to serve.”

– Sally Jewell, U.S. Secretary of the Interior

The Corps Network, an association of 127 Youth Service and Conservation Corps, is poised to assist in the ecological and economic restoration effort in the Gulf in response to the Deepwater Horizon oil spill. Corps have a long history of responding to national disasters and meeting critical needs in a cost effective manner while employing, training and providing service opportunities for local young people and veterans.



1498 nationwide project partners evaluated the work that Conservation Corps completed in 2012. 90% rated the quality of work as “good or outstanding.”

Why Corps?

Conservation Corps mobilize young people (typically aged 18-25) and veterans (up to age 35) with trained crew leaders as self-contained units to complete significant ecological and restoration work. Built on the legacy of the CCC, Corps operate nationwide, have multiple win-wins of engaging young people and veterans, complete high quality projects, and – according to an NPS study – result in more than a 50% cost savings.



What Do Corps Provide to Land/Water Managers?

Conservation Corps programs handle their own recruiting, engaging diverse and local youth. They assume all of the administrative responsibilities of managing a workforce, including the provision of health care, worker’s compensation, and liability insurance. They provide environmental education, safety training, tools, food, supplies, transportation, and sometimes housing. They employ skilled and experienced crew leaders and project directors to supervise the youth and oversee the work.



Conservation Corps crews are self-contained including supervision, transportation, tools, gear, equipment, insurance, back-end support, and technical expertise. All 21CSC programs will be accredited and follow stringent risk management procedures and constantly re-evaluate their policies and practices to ensure that they are in line with the latest developments and requirements. Conservation Corps programs also include individual placements and internships at the land and water management agencies.

Is the Project Work High Quality?

Each year, Corps complete hundreds of high-quality and often technical projects on public lands and waters. Project sponsors consistently express a high degree of satisfaction with the quality of work and productivity of the Corps. Virtually all federal project partners (99.6%) say they would work with Corps again.



Conservation Corps are a Cost-Effective Solution for Professional Gulf Coast Restoration



Project Capacity

The National Park Service commissioned a cost evaluation which found that engaging a Corps resulted in a cost savings to the agency of more than 50%. Corps can complete a wide and broad range of projects that restore and protect the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches and coastal wetlands:

Coastal Restoration

- Bank Stabilization
- Barrier Island Restoration
- Marsh Creation
- Monitoring/Surveying to Support Sediment Diversion and Hydrologic Restoration
- Oyster Barrier Reef Seeding
- Ridge Restoration
- Riparian Habitat Restoration
- Shoreline Protection

Assessments, Studies, Inventories

- Boundary Surveys and Marking
- Ecological and Restoration Planning
- Environmental Sampling
- Hydro-biological data collection
- Population Studies and GIS Inventories
- Research Assistance
- Species Inventory and Monitoring

Emergency Response

- Debris and Hazardous Trees Removal
- Hazardous & Toxic Materials Clean Up
- Levee Protection
- Tree Removal

Maintenance and Monitoring

- Abandoned Lot Clean-Up
- Construction (Shelters, Kiosks, Cabins, etc.)
- Construction of Nesting Boxes, Fishing Piers, Boat Docks and Fish Cribs
- Decommissioning of Structures
- Erosion Control
- Fencing Installation and Removal
- Irrigation Systems
- Re-vegetation
- Trail Construction and Maintenance

“Our parks team called in a modern-day version of the former ‘soil soldiers’ of the CCC to aid in the recovery. We found them in the talented young men and women of the American YouthWorks Environmental Corps. This exemplary nonprofit conservation program focuses on job creation and service programs designed to help build and restore the natural environment.

– Carter Smith, Executive Director, Texas Wildlife and Parks Department

Many Corps have significant experience with urban conservation and engaging urban youth. In addition to providing crews, Corps have deep experience providing individual placement interns that deliver support in areas of assessment, planning, research assistance and species and habitat monitoring. Corps also have the capacity and experience leading large volunteer projects, mobilizing and managing local volunteers and donations, engaging residents of affected communities and local business.

Please contact Joe Gersen, Director of Government Relations for the Public Lands Service Coalition at The Corps Network at jgersen@plscoalition.org



Gulf Coast Ecosystem Restoration Council-

The Corps Network (TCN) stands ready and willing to assist the Gulf Coast Ecosystem Restoration Council (Council) with the ecosystem and economic restoration of the Gulf Coast. The Council can begin to repair and revitalize the Gulf Coast's ecosystem, provide training to local young people, create jobs, and stimulate economic development by partnering with Conservation Corps programs.

Conservation Corps mobilize young adults and veterans, under the leadership and supervision of well-trained crew leaders, to make up self-contained workforce units that are able to complete significant ecological and restoration work. Built on the legacy of the Civilian Conservation Corps of the 1930s, Corps operate nationwide and create win-win situations by addressing several pressing needs at the same time. They provide young people with opportunities to advance their education and obtain important life and job skills. They offer a stipend or wage that can stimulate the local economy, and they complete important and necessary projects in a high-quality, cost-effective manner. According to a recent cost analysis by Booz Allen Hamilton and the National Park Service, Corps can complete projects for a fraction of the cost of other types of labor (average project savings of more than 50 percent).

The Corps Network's 127 members operate in all states and the District of Columbia. Each year they collectively enroll over 27,000 Corpsmembers from ages 16-25. Each year Corps organize an additional 289,000 community volunteers who work alongside Corpsmembers to generate 638,684 additional hours of service every year, at an estimated value of \$14,140,463.

Please accept the attached fact sheet on Conservation Corps as public comment on the Draft Initial Comprehensive Plan and please consider including language in the final document promoting the use of partnering with conservation corps to help support ecosystem restoration, youth and workforce development, and economic recovery in the Gulf Coast.

Thank you,

Joe

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July 3, 2013

Gulf Coast Ecosystem Restoration Council
1401 Constitution Avenue, NW
Washington, DC 20230

Dear Members of the Gulf Coast Ecosystem Restoration Council:

Thank you for the opportunity to offer comments on the Council's Draft Initial Comprehensive Plan. The Nature Conservancy is a national and global non-profit conservation organization whose mission is to conserve the lands and waters on which all life depends. Our on-the-ground conservation work is carried out in all 50 states and over 30 foreign countries and is supported by approximately one million members. In the Gulf of Mexico region, we have been active for more than 40 years, and have state programs with local Boards of Trustees, land holdings, and coastal restoration projects in all of the Gulf Coast states. Our work is supported by a team of scientists who ensure that our conservation practices are grounded in the best and most current scientific understanding of coastal processes and ecosystems.

As a result of the 2010 *Deepwater Horizon* oil spill, the people of the country and the Gulf have a once in a lifetime opportunity to work together and leave a legacy for our children that we and they will be proud of – a hale and hearty Gulf of Mexico. To make the most of this opportunity, we must join together and fulfill the Congressional charge of this Council, to “. . . undertake projects and programs, using the best available science, that would restore and protect the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, coastal wetlands, and economy of the Gulf Coast.” After reviewing the Council's Draft Initial Comprehensive Plan (“Draft Plan”), we are optimistic that the Council is creating a framework that will help us meet this mandate. Further, we appreciate the extensive opportunities for public involvement in the development this Draft Plan and the consideration given to the input received thus far.

The comments herein are organized according to our recommendations on the following five elements of the Draft Plan and other areas around which the Council has solicited feedback:

- I. Comments on the proposed criteria for Council-selected restoration projects and programs, including expanded Priority Criteria and consideration of feasibility criteria;
- II. Comments on the proposed objectives for Council-selected restoration projects and programs;
- III. Recommendations regarding how the Council should consider and evaluate project proposals;
- IV. Comments on the proposed guidelines for the development of State Expenditure Plans;

- V. Comments on regional approaches to restoration and science-based decision-making, including the formation of a Science and Technical Advisory Committee.

I. Evaluation Criteria for Council-Selected Restoration Component

We recommend three sets of criteria for evaluation of Council-selected restoration projects. They should be used in sequence to identify those projects that will have the most significant restoration impact and are most likely to produce tangible and lasting results. The three sets of criteria are:

- Elaboration of the statutory criteria to better allow them to be used to evaluate specific projects
- The addition of six over-arching ecosystem restoration sub-criteria
- The further evaluation of the threshold feasibility of projects that meet statutory and ecosystem sub-criteria

These three sets of criteria are further explained as follows:

A. Elaboration of the statutory criteria

There are specific evaluation criteria that are unique to each of the four RESTORE Act “Priority Criteria” that are highlighted in bold type below. The bullets appearing under the bolded evaluation factor show the full list of detailed criteria that are relevant to each of the four evaluation factors.

1. *Projects that are projected to make the greatest contribution to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region, without regard to geographic location within the Gulf Coast region.*

- The extent to which the project or program benefits more than one natural resource or ecosystem service.
- The extent to which the project or program produces or contributes to watershed or landscape scale benefits.
- The extent to which the project or program provides lasting environmental and ecosystem service benefits.
- The return on investment in terms of benefits provided per dollar invested in a project, including societal benefits from ecosystem services.

2. *Large-scale projects and programs that are projected to substantially contribute to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast ecosystem.*

- The extent to which the large-scale project or program produces watershed or landscape scale benefits that are measurable and systemic, such as water quality

and quantity improvement to freshwater flows in estuaries that support oyster reef restoration.

- The extent to which the large-scale project or program enhances or complements existing or future restoration activities (including other *Deepwater Horizon* penalty-funded restoration projects) to leverage restoration investment.
- The extent to which the large-scale project or program creates benefits that are lasting and contribute to the long-term health of the Gulf of Mexico; and
- The return on investment in terms of benefits provided per dollar invested in a large-scale project, including societal benefits from ecosystem services.

3. *Projects contained in existing Gulf Coast State comprehensive plans for the restoration and protection of natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches and coastal wetlands of the Gulf Coast region.*

- Consideration that the project or program is contained in existing Gulf Coast State comprehensive plans, including watershed-based resource protection and restoration plans, state wildlife habitat protection plans, coastal zone management plans, marine protected area plans, and estuary protection plans.
- Consideration that the project or program is contained in Gulf Coast State plans developed following the enactment of the RESTORE Act, for the restoration and protection of natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches and coastal wetlands.
- The extent to which the large-scale project or program produces watershed or landscape scale benefits in terms of the provision of ecosystem services which are measurable and systemic.
- The extent to which the projects enhance or complement existing restoration projects or other *Deepwater Horizon* penalty restoration activities in order to leverage restoration investment.
- The return on investment in terms of benefits provided per dollar invested in a project, including societal benefit from ecosystem services.

4. *Projects that restore long-term resiliency of the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands most impacted by the Deepwater Horizon oil spill.*

- The extent to which the project or program preserves or restores natural processes and produces lasting results in the face of sea level rise.
- The extent to which the project or program reduces recovery times for natural resources and ecosystems in response to storm-surge, flooding, drought and other weather related events with minimal human intervention or maintenance.

- The extent to which the project or program provides environmental services that reduce the risk of hazards to communities along the Gulf Coast.
- The extent to which the project or program enhances or complements existing restoration projects or other *Deepwater Horizon* penalty restoration activities to leverage restoration investment.
- The return on investment in terms of benefits provided per dollar invested in a project, including societal benefits from ecosystem services.

B. Over-arching Ecosystem Restoration Criteria

We recommend that projects meeting the statutory criteria be further evaluated in light of the following six overarching ecosystem restoration sub-criteria. These were derived from the four Priority Criteria within the RESTORE Act. We believe that the sub-criteria do not change but rather further refine the Priority Criteria, therefore considering them together with the Priority Criteria will enable the Council to best prioritize projects and programs that will achieve the greatest long-term restoration of the Gulf of Mexico.

The six sub-criteria that we recommend for consideration in conjunction with the Priority Criteria include:

1. ***Multiple Ecosystem Services Benefits.*** The extent to which the project or program contributes multiple benefits in the form of improvement or creation of ecosystem services associated with the seven ecosystem restoration objectives listed on pages 11-13 of the Draft Plan. The ecosystem services provided by a project or program focused on the seven ecosystem restoration objectives may include, for example:

-Habitat value	-Benefits to other wildlife
-Support for migratory species	-Wildlife corridors
-Fisheries, freshwater and saltwater	-Nature-based tourism
-Accumulation of sediments	-Sediment delivery
-Water quality	-Carbon sequestration
-Freshwater delivery	-Freshwater availability
-Storm surge and wave attenuation	-Flood protection
2. ***Leveraging Existing Restoration Projects and Plans.*** The extent to which the project or program complements other watershed or large landscape restoration plans and existing projects to leverage and maximize restoration efforts;
3. ***Lasting Benefits.*** The extent to which the project or program creates lasting ecological benefits which contribute to the long-term health of the Gulf of Mexico;
4. ***Contributes to Resiliency to Climate Change and Sea Level Rise.*** The extent to which the project or program increases the capacity of coastal ecosystems and communities to adapt to the effects of sea level rise and changing climate.

5. ***Return on Investment.*** The return on investment in terms of benefits provided per dollar invested in a project or program, including societal benefits from ecosystem services; and
6. ***Measurable Outcomes.*** The extent to which the project or program delivers clearly defined, measurable outcomes and benefits.

To illustrate how the proposed sub-criteria can be considered in conjunction with the four Priority Criteria, see **Appendix 1**.

C. Addition of Threshold Feasibility Criteria to Evaluation Criteria

In addition to the Evaluation Criteria above which are focused on the ecosystem restoration benefit of projects or programs, we respectfully recommend that the Final Plan contain a set of Threshold Feasibility Criteria by which projects and programs will be evaluated for completeness and technical viability, as well as to ensure consistent information is provided to the Council for project evaluation. These criteria should at minimum include:

- Quality and completeness of project design
- Technical feasibility and readiness for implementation
- Best available science supporting benefit(s) of project
- Estimated project costs are reasonable given anticipated benefits and include long-term maintenance costs
- Measurable environmental benefits defined in terms of the Priority Criteria
- Economic benefits, including jobs created and ecosystem service benefits
- Relationship to other existing or planned Gulf restoration efforts
- Extent to which there has been an opportunity for public discussion and input into project
- Public outreach and environmental education associated with project
- Long-term maintenance and monitoring plan for project

II. Objectives for Council-Selected Restoration Component

In addition to the project evaluation criteria, we appreciate your solicitation for feedback on the proposed objectives for the Council-selected Restoration Component in the Draft Plan. We offer the following comments on the proposed objectives:

- In general, we believe that the objectives in the Draft Plan correctly capture the types of ecosystem restoration projects, programs, and activities that should be funded by the Council.
- We suggest that Objective 2, *Restore, Improve, and Protect Water Quality*, be modified to *Restore, Improve, and Protect Water Quality Resources*, to reflect that the scope of the objective includes improving the quantity of freshwater flows and connections in addition to water quality improvements.

- We were pleased that the Council included as an example of potential project types, in its water quality objective, “implementation of best watershed management practices.” We strongly support the notion of maximizing the impact of ecosystem restoration funds by directing them toward the restoration of “whole systems,” such as critical watersheds. For example, in Florida, we have worked closely with counties and other stakeholders to identify integrated sets of projects and programs that will restore and protect critical watersheds from the basins to the beaches. Many of the public comments have revolved around using the watershed approach to identify the right projects to address the right issues. Implementing similar system-wide approaches across the Gulf will result in the best possible solutions by identifying a set of integrated projects and/or programs that will produce tangible long lasting environmental results for the entire region.
- We are pleased that Objective 6, *Promote Natural Resource Stewardship and Environmental Education*, recognizes the importance of “professional development and training . . . for all ages” to further ecosystem restoration and protection, and support the Council working with the states and other partners to develop and promote these types of programs (such as workforce development and job training programs for restoration projects and the establishment of a Gulf Conservation Corps to train and mobilize youth and military veterans to engage in restoration work).

III. Procedures for Project Selection and Implementation

As one of the few conservation organizations that designs and implements on-the-ground restoration projects in all five Gulf States, we believe we have important insight to share with the Council regarding the Draft Plan’s proposed guidelines for project evaluation, selection, and implementation. Below we offer several recommendations regarding the submittal of proposals to the Council and resultant agency implementation of the projects or programs.

A. Submittal of Proposals to the Council

We have several concerns about the Draft Plan’s proposed process for soliciting and evaluating project proposals (p. 16), as explained in detail below.

1. ***There is a lack of specificity in the Draft Plan regarding the project submission sponsorship requirement.*** The word “sponsorship” as used on Page 16 of the Draft Plan is not defined within the RESTORE Act. As such, we encourage the Council to clearly describe what duties and obligations project sponsorship entails, including the following clarifications:

- The extent to which sponsorship conveys responsibility for long-term monitoring, evaluation, and stewardship of projects, including the acquisition of land or other rights and adaptive management measures;
- The extent to which sponsorship requires the same agency that sponsors a project or program to implement it;

- If sponsorship necessitates any level of local, state or other matching requirements;
- The extent to which sponsorship affects pass-through grant or subcontracting requirements.

2. *Requiring proposed projects to be sponsored by individual Council members may restrict the implementation of large-scale, collaborative, and/or regional projects.* We are concerned that requiring that projects or programs be sponsored by a single Council member may, in essence, pigeonhole potential projects/programs into single agencies' geographic regions or priorities and thereby impede the Council's ability to realize its stated commitment to "promot[ing] ecosystem-based and landscape-scale restoration without regard to geographic location within the Gulf Coast region." To address this concern, we recommend that the Council consider the following:

- Allowing for projects or programs to have one or more agency "sponsors," thereby enabling two or more Council members to work together to propose and implement large-scale, cross-boundary projects; and/or
- Allowing for the responsibility for the implementation and/or the long-term monitoring, evaluation and stewardship of projects or programs to be delegated by the project sponsor to another appropriate entity with mutually agreed upon terms of commitment.

3. *Varying requirements and standards among project sponsors may lead to inconsistent practices relating to project subcontractors, grantees, and/or project partners.* To address this concern, we propose:

- Including provisions in the Final Plan that require any policies or requirements associated with pass-through grants and subcontracting opportunities to be consistent among all the agencies involved in the restoration of the Gulf Coast; and
- Including provisions in the Final Plan which require that any policies or requirements associated with matching requirements should be applied uniformly among all implementers and projects/programs involved in the restoration of the Gulf Coast; and
- Considering the possibility of appointing a lead agency from the Council Members' affiliations to administer all restoration programs and serve as a single point of contact and central support unit throughout the project selection and implementation processes. Administration would include ensuring projects/programs are implemented according to the Final Comprehensive Plan, benchmarks and completion occur on schedule, budgets are evaluated for accountability, and general oversight is provided throughout the process.

4. ***There is a lack of specificity in the Draft Plan regarding the timing of project solicitations.*** The current text of the Draft Plan indicates that the Council will “periodically request proposals from its eleven State and Federal Members.” We urge the Council to specify in its Final Plan the following:

- The general time frame for which the Council will solicit project and program proposals (annually, semi-annually, etc.). We recommend that project solicitations be made at least semi-annually and follow a schedule similar to established federal restoration grant programs that have been successfully proven over time, such as the NOAA Community Restoration Program or the USFWS Coastal Program.
- The timeline of review for project or program selection.
- A schedule for scientific and public input and review.

B. Procedural Recommendations for Project Selection and Implementation

The Conservancy recommends that procedures surrounding restoration project or program implementation adhere to the highest levels of transparency and accountability in respect to selection and implementation of projects and programs. To this end, we recommend the Council implement the following procedures:

- Develop a mechanism for robust scientific oversight throughout implementation to ensure that all restoration efforts have a strong scientific foundation and include the necessary monitoring, modeling, evaluation and adaptive management. (See section below regarding Scientific and Technical Advisory Committee.)
- Provide a single source of information for the public about the status of projects selected for funding under the RESTORE Act, such as an online database that includes information about the projects, funding received to date, and the status of their design and/or implementation. The database should be updated frequently and user-friendly. (One example of such a database is the database of CWPPRA projects available at <http://lacoast.gov/new/Projects/List.aspx>).
- Develop a mechanism to systematically share best practices across projects, programs, and state borders. This could be accomplished by the creation of standardized programmatic progress reports for rigor and consistency on a regional scale.
- Provide adequate, meaningful public notice for all meetings, deadlines (including project submission deadlines), and opportunities for comment on draft strategies, plans and projects. Notice should be given, at a minimum, through the Council’s email list serve, individual Council member websites, and the Restorethegulf.gov website.
- Provide opportunities for public participation in future public hearings via webcast or other virtual means.
- Provide opportunities for culturally appropriate engagement to diverse communities, including providing translations of important documents into other languages spoken widely across the Gulf Coast, such as Vietnamese, French, and Spanish.

- Partner with non-profit organizations, academic institutions, and community organizations throughout the project selection and implementation process to take advantage of their vast experience, local expertise, and connection to local stakeholders.

C. Emphasizing a Regional Approach to Restoration

We commend the Council for its commitment to taking a regional, ecosystem-based, and landscape-scale approach to restoration, “without regard to geographic location within the Gulf Coast region” (p. 6). In addition to recommendations we have made regarding project sponsorship, above, we believe that the Council can further support a regional approach to restoration by including guidance in the Final Plan of how regional projects shall be coordinated to ensure the long-term and cumulative success of every investment and realize the best, most appropriate ecosystem restoration projects as possible throughout the Gulf Coast. This approach ensures that the entire coastal and marine system receives restoration benefits, not just those within a particular state boundary or within the immediate area around an individual project. As with every procedural recommendation listed in these comments, we encourage the Council to incorporate best practices learned from other regional interagency recovery and restoration projects, including (but not limited to):

- Project integration enhances overall project success without creating additional work by utilizing the additional capacity provided by a central support team. In many cases, and for good reasons, project managers are almost entirely focused on implementation. Additional capacity coming from a central support team saves time, keeps the focus on project implementation and raises the visibility of each project.
- Project teams are willing to pull together to coordinate and share information and create efficiencies when they do so. A central support team works with each project to facilitate the exchange of knowledge and staff so that project managers can collaborate on lessons learned.
- A central point of coordination allows lessons from each project to be shared and successfully implemented in other projects. Integration allows for greater ease of receiving and disseminating information, which in turn leverages more support.
- Working across large-scale restoration projects requires more than large-scale funding. It also takes demonstration, innovation, knowledge sharing, partnerships and leverage.

IV. Proposed Guidelines for the Development of State Expenditure Plans

The Conservancy supports the Council’s stated commitment in the Draft Plan to ensure that the “projects, programs, and activities [in the State Expenditure Plans] will be implemented in a manner that is consistent with the requirements of the RESTORE Act as well as the Goals and Objectives of the Comprehensive Plan” (p. 17). We understand that Congress intended for the eligible activities under the state plans to be broader than those within the Comprehensive Plan, and support the use of state expenditure funds for projects that are not purely ecosystem-restoration-focused. However, we believe that, because the overall intent of the RESTORE Act is to restore the long-term health of the Gulf of Mexico ecosystem, the projects and programs in the State Expenditure Plans should not negatively impact the Gulf ecosystem. Accordingly, we recommend that the Council change its definition of “consistent” to the following:

The Council views “consistent” to mean that the Gulf Coast States will implement eligible projects, programs, and activities that will further one or more of the five Goals and will be implemented in a manner that does not have a [net] negative impact on the Gulf Coast ecosystem ~~restoration projects and programs selected for implementation by the Council.~~

In addition to including the above language, the Final Plan should include clear guidance to states on the criteria that they will use to make this “consistency” determination. We also propose that the Council require State Expenditure Plans to:

- Contain a description of how the projects or programs therein leverage existing and proposed Gulf restoration activities (including from other related sources of funding) in order to maximize the ecosystem and economic value of these activities.
- Be developed with the opportunity for meaningful public comment. The Council should make clear in its Final Plan that it will not approve a State Expenditure Plan unless it is developed using a transparent process that includes stakeholder engagement and meaningful opportunities public comment.

Finally, we recommend that the Council clearly delineate a process and timeline for its own approval of State Expenditure Plans. This process should also include an opportunity for meaningful public comment.

V. Guiding Principles: Regional Approach to Restoration and Commitment to Science

Finally, we commend the Council for including in the Draft Plan several guiding principles that will guide its activities in its implementation of the RESTORE Act, including commitments to regional approaches to restoration and science-based decision-making. We respectfully offer the following suggestions as to how the Council can help ensure that those commitments are realized in its Final Plan and beyond:

D. Creation of a Science Advisory Council

The Conservancy recommends the creation of a Science Advisory Committee to guide and advise the Council in major decisions in carrying out its statutory mandate. The Science Advisory Committee should be regional in approach and its composition representative of the entire Gulf Coast region as defined by the RESTORE Act. Committee members should be comprised of both theoretical and applied scientists, along with educators who can serve as community liaisons to share and explain progress of the Final Comprehensive Plan to the public. In addition, the Science Advisory Committee would include a representative from each of the Centers of Excellence established under the RESTORE Act. A single Senior Scientist would serve as chair.

We further recommend that Scientific Advisory Committee members be selected based on expertise that is directly relevant to the Gulf ecosystem and the challenges specific to the watersheds and estuaries within the five Gulf States. The Final Plan should include a section on

how the Council will incorporate the “Best Available Science” into its evaluation of both the Council-selected Restoration Component as well as the State-Expenditure Plan-Spill Impact Component. Using the best available scientific data, decision support tools models, and polls, the Science Advisory Committee will ensure that all ecosystem restoration projects are held accountable to the Evaluation Criteria ultimately adopted by the Council.

We recommend that the Council take steps to ensure that the Science Advisory Committee is actively engaged in the implementation of the Final Plan at every step: evaluating technical feasibility, benefits, and monitoring plans; prioritizing projects; determining sequential steps to completion; and lastly, informing final selection decision making. As a part of every RESTORE Council meeting agenda, the Science Advisory Committee should also be available to provide an update on its activities and answer questions presented to it by the Council. Finally, the Scientific Advisory Committee should coordinate regularly with NRDA and NFWF, so that all of the scientific lessons generated from these concurrent ecosystem restoration processes will work together and complement each other.

Thank you for the opportunity to comment on the Draft Plan. Please consider us a resource as you move forward in formulating a Final Plan and Project List; we welcome the opportunity to provide further feedback, data, and guidance throughout this worthy and highly iterative process.

Sincerely,



Robert Bendick
Director, U.S. Government Relations
Incoming Director, Gulf of Mexico Program
The Nature Conservancy

cc: Justin Ehrenwerth, Executive Director, Gulf Coast Ecosystem Restoration Council

Appendix 1: EXPANDED RESTORE EVALUATION CRITERIA

PROJECT TYPE/ EVALUATION CRITERIA	Provides multiple benefits in terms of ecosystem services.	Complements other watershed or large landscape restoration plans maximize restoration efforts.	Creates benefits that are lasting/contribute to long-term health.	Increases resiliency of coastal ecosystems to effects of sea level rise and climate change.	Provides Return on Investment in terms of benefits provided per dollar invested, including societal benefits from ecosystem services	Delivers clearly defined, measurable outcomes and benefits.
<i>Projects proposed to make greatest contribution.....</i>						
<i>Large-scale projects & programs projected to substantially contribute...</i>						
<i>Projects contained in existing Gulf Coast State Comprehensive Plans...</i>						
<i>Projects that restore long-term resiliency....</i>						

Criteria for Defining the Restoration Program and Selecting Projects under the Gulf of Mexico Comprehensive Restoration Plan

Introduction

The RESTORE Act specifies that 30 percent of the total amount made available to the Trust Fund each year shall be disbursed to the Gulf Coast Ecosystem Restoration Council (Council) to carry out the Comprehensive Restoration Plan (Plan). The Council will also have responsibility for administering another 30 percent of Trust Fund funds that are to be spent in accordance with individual state expenditure plans consistent with the Plan. The Plan will define the program and guide development of the types of projects, using the best available science, to be implemented with the Council's portion of Trust Funds, focusing on restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast.

The Council's *Draft Initial Comprehensive Plan* recognizes five overarching goals for the Comprehensive Restoration Plan: four on environmental restoration and one on economic recovery. Ecosystem restoration projects benefit the economy and communities by generating demand for goods and services provided by local contractors or by supporting local jobs. However, economic development projects might not be compatible with environmental restoration goals, with some potentially resulting in undesirable environmental impacts. Therefore, the Council should select projects for funding with the intent of maximizing environmental benefits and avoiding or minimizing project impacts on natural resources it aims to restore.

To help the Council restore and protect the Gulf ecosystem, the RESTORE Act directs the Council to use the "best available science" in defining the restoration program and selecting and undertaking relevant projects. The RESTORE Act also states that the Council shall give preference to projects that address one or more criteria addressing key restoration priorities. Therefore, the Plan should: 1) serve as a guide for selecting preferred projects and 2) contain science-based criteria to ensure that only the best and most appropriate projects are funded by the Council.

The ultimate success of the restoration program and the projects selected to implement it—which must be measured by the recovery and resilience of the ecosystem—rests on selection, implementation, evaluation, and adaptive management of a series of integrated projects. The Council has an unprecedented opportunity to develop a Plan that embraces a comprehensive, integrated ecosystem approach to restoration and that strives for results that are greater than the sum of the individual projects.

Guidance for Selecting Preferred Restoration Projects

- The proposed project addresses at least one of the following criteria specified in the RESTORE Act aimed at restoring or protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region:

- Projects that are projected to make the greatest contribution without regard to geographic location within the Gulf Coast region;
- Large-scale projects and programs projected to contribute substantially to Gulf ecosystem recovery;
- Projects contained in existing Gulf Coast state comprehensive plans; and
- Projects that restore long-term resiliency based on impacts resulting from the Deepwater Horizon oil spill.

Science-based Project Selection Criteria

The criteria listed below are based in part on the Council's duties as specified in the RESTORE Act or were adapted from other natural resource restoration plans. The criteria can be applied at the strategic and programmatic level as well as at the level of individual projects. *Threshold* criteria represent a minimum standard, and all threshold criteria must be met in order for individual projects to be considered further. *Supplemental* criteria are those intended to help decision-makers further prioritize projects based on benefit and other attributes. That is, the greater the number of supplemental criteria met, the greater the contribution of projects to ecosystem recovery and to the local economies and communities.

Threshold Criteria

Restoration Benefit Defined

- The proposed project clearly defines the expected benefits and is consistent with and contributes to fulfilling comprehensive ecosystem restoration plans and objectives.

Feasible

- The proposed project is appropriate under federal and state law, technically feasible and can realistically be implemented within a reasonable timeframe;

Meets Minimum Design Standards

- Project sponsors demonstrate due diligence that includes scientific, technical, economic and social evaluation of design, design alternatives and implementation;
- Restoration activities should have clear, measurable and achievable end points;
- The proposed project incorporates a monitoring plan that will enable evaluation of its progress and ultimate success;

Likely to Succeed

- The proposed project is likely to result in a successful outcome, measurably contribute (even if indirectly) at an appropriate scale to the recovery of a natural resource or ecosystem service, or is a small-scale pilot intended to demonstrate effectiveness before larger scale funding or implementation is considered.

Cost Effective

- The cost to carry out and monitor the proposed project or program is reasonable relative to benefits and available funds; and

Implementation Impacts

- A project's potential harmful effects on natural resources and ecological services are evaluated and deemed acceptable only if:
 - the project would result in a net benefit or improvement for the environment, and
 - any adverse impacts resulting from the project can be fully mitigated by restoring, replacing, rehabilitating or acquiring the equivalent of the same or similar resources harmed by the project.

Supplemental Criteria

Benefits Multiple Resources

- Priority will be given to projects or programs that benefit multiple species or resources; and
- The project contributes to an ecologically balanced (coast to offshore environment), integrated approach to restoration.

Benefits to Economy, People and Communities

- Priority will be given to projects or programs that:
 - give a preference to individuals, organizations and companies that reside in, are headquartered in, or are principally engaged in business in a Gulf Coast state;
 - protect or restore livelihoods in any of the following economic sectors: tourism, fisheries, maritime and recreation; and
 - build community resiliency and benefit communities vulnerable to disasters.

Addresses Root Causes of Degradation

- The project addresses underlying sources of environmental stress and seeks long-term approaches and solutions to restoring natural processes rather than addressing the symptoms of environmental degradation through short-term fixes.

Changes in the Coastal and Marine Environment

- The project should yield long-term ecological benefits commensurate with investment and with due consideration of sea level rise;
- The project would enhance resilience and adaptation of coastal and marine environments and species with respect to climate change impacts;

Proposal Quality and Scope

- Competitive, innovative, collaborative and cost-effective proposals for restoration projects or programs will be encouraged;
- Projects or programs that leverage funding from public or private sources outside the restoration process will be encouraged; and
- Projects or programs that are scalable may be funded in part, provided that the funded component stands alone in terms of its benefits, even if the rest of the project is not funded.

Public Support

- The project represents a restoration approach for which the public has expressed support or would likely support based on previous public comment or input; and
- The project contains a public education component such as on-site interpretation, signage or some other means to inform the public about the project's importance and results.

Ocean Conservancy's Rapid Assessment of the Gulf Coast Ecosystem Restoration Council's Draft Initial Comprehensive Plan

Released May 23, 2013, the Draft Initial Comprehensive Plan is intended to serve as a framework to implement a coordinated, region-wide restoration effort. Ocean Conservancy reviewed the draft initial plan for the components we believe are integral to the success of restoration of the Gulf of Mexico's natural resources. This review constitutes a rapid assessment intended to help shape comments at one of the many public meetings for this plan and to inform a full comment letter, including an analysis of the environmental assessment and appendix project list. We evaluated the Plan based on the Council's approach to several critical components; we indicate whether their approach is **on track**, **needs improvement**, or **requires significant work**.

Ocean Conservancy's initial assessment of the Plan indicates that the Council is on the right track, but there is still much work to be done to flesh out the specific milestones and objectives that must be contained in the Draft Initial Comprehensive Plan in order to fully restore the Gulf of Mexico. The task at hand is monumental, but the Council cannot afford to put off the tough decisions needed to develop an implementation plan that serves the citizens of the Gulf of Mexico and protects and restores the resources we rely on for food, recreation and livelihood.

Comprehensive Approach to Restoration

From the Plan: Page 6: "The Council recognizes that upland, estuarine, and marine habitats are intrinsically connected, and will provide ecosystem-based and landscape-scale restoration without regard to geographic location within the Gulf Coast region."

Our View: The interlinked nature of the Gulf's coastal and marine resources, combined with the fact that environmental stressors are associated with both land- and ocean-based activities, make an ecologically and geographically balanced restoration approach essential.

From the Plan: Page 9: "The Council will coordinate, as appropriate, with states, federal agencies, tribes, and other entities working in the Gulf Coast region to achieve common goals, create regulatory efficiencies, and collectively work towards an integrated vision for comprehensive restoration."

We Recommend: The final plan must demonstrate an integrated, regional approach and include specific objectives and detailed information on how progress will be monitored to ensure that projects are contributing to an overall approach that addresses restoration of both coastal and marine environments as well as coastal communities.

The Council should enter into a formal agreement with the BP Deepwater Horizon NRDA Trustee Council, the National Fish and Wildlife Foundation and the National Academy of Sciences to link and coordinate restoration efforts in response to the oil disaster as well as to the decades of degradation in the Gulf.

Science-based Approach to Restoration

From the Plan: Page 6: “The decisions made pursuant to the Plan will be based on the best available science and this Plan will evolve over time to incorporate new science, information, and changing conditions. The Council will coordinate with the scientific community to improve decision-making.”

Page 13: The council recognizes that science must be the foundation for project selection and for ensuring that projects are contributing to the overall goals of the Council.

Our View: We commend the Council’s commitment to fund projects that “implement or improve: science-based adaptive management and project-level and regional ecosystem monitoring; including the coordination and interoperability of ecosystem monitoring programs...” However, the specific process and objectives needed to achieve this goal are missing in the plan. As science and adaptive management are the core underpinnings of a successful restoration program, the Council must articulate in the final plan how science will inform restoration decision-making and measure project success over time.

We Recommend: Toward this goal, the Council should devote the resources necessary to provide or obtain the science needed to support effective restoration, as well as to promote long-term sustainable use of the Gulf ecosystem. This program should be cooperative in nature, taking advantage of existing and new efforts, including but not limited to the Gulf Coast Ecosystem Restoration Science, Observation, Monitoring and Technology Program and the Centers of Excellence, both established under the RESTORE Act, as well as any ongoing science program related to the Deepwater Horizon NRDA process. Use of the best available science is paramount; this should include traditional, environmental science, social science and the incorporation of local and tribal knowledge, regardless of official federal or state recognition.

The professional staff of the Council should include a senior-level chief scientist who advises the executive director and Council and who manages and works with independent peer reviewers and a scientific advisory committee to provide guidance and feedback at programmatic and project levels.

The Council should establish at least two advisory committees: a scientific advisory committee to provide advice on “the best available science” and on restoration at a programmatic level, and a public advisory committee with regional and stakeholder representation to ensure public participation and transparency in decision-making. The Gulf of Mexico Fishery Management Council, which has established science and public advisory bodies and robust public participation procedures, is a useful model for the Council.

Ecosystem Focus

From the Plan: The Council has adopted five goals to provide the overarching framework for a coordinated approach to restoration. Four of these goals are ecosystem-focused, and a fifth goal to restore and revitalize the Gulf economy is also included in the Plan. The Council asserts that “To achieve all five goals, the Council will support ecosystem restoration that can enhance local communities by giving people desirable places to live, work and play, while creating opportunities for new and existing businesses of all sizes, especially those dependent on natural resources.”

Page 18: Projects implemented under the state impact allocation of the RESTORE Act “will be implemented in a manner that does not have a negative impact on the Gulf Coast Ecosystem restoration projects and programs selected for implementation by the Council.”

Our View: We believe the four ecosystem goals outlined are the correct goals. The task before the Council is to develop a plan, a set of criteria for project selection, and a science-supported decision making process to achieve all of these goals in a way that is comprehensive and based on the best available science. This requires the commitment of all of the Council members to think beyond political boundaries to ensure that restoration projects are coordinated to create an outcome that is larger than the sum of the individual projects.

Clear Criteria for Decision-making

From the Plan: The Plan reiterates the four priority criteria contained in the RESTORE Act to inform project decision-making. However, these criteria alone are not sufficient to ensure that projects will achieve the vision of full restoration of the Gulf ecosystem.

Our View: As restoration moves from planning to implementation, there will be myriad project proposals on which to spend restoration funds. The ultimate success of these projects—which must be measured by the health and resilience of the ecosystem—rests on selection, implementation and evaluation of a series of integrated projects, consistent with a Gulf-wide plan and rigorous application of criteria, to ensure that only the best and most appropriate projects are funded. The restoration program that emerges should take a comprehensive, integrated ecosystem approach and strive for results that are greater than the sum of the individual projects.

We Recommend: Adopt and adhere to additional criteria that will ensure a successful restoration outcome. See attachment for Ocean Conservancy’s recommended criteria.

Public Engagement

From the Plan: Page 1: “...Gulf Coast restoration will not be successful without genuine and meaningful input from the people in the region.”

The Council will accept comments on the plan as well as project ideas via a series of public meetings as well as on their website at www.restorethegulf.gov.

We Recommend: Meaningful public participation includes the following: meetings open to the public (except for occasional executive sessions when necessary), advance public notice of meetings, opportunities for public comment at meetings, and opportunities for comment on draft strategies, plans and projects. Council meetings should be rotated across the Gulf states to afford opportunities for the public to attend meetings in person.

Adequate notice of meetings dates and locations must be provided to ensure meaningful public participation and input. Adequate notice means a minimum of 15 business days.



Rebecca Blank, PhD
Acting Secretary
Department of Commerce
Chair
Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Ave., N.W. Room 4077
Washington, DC 20230

Re: Draft Initial Comprehensive Plan Land Trust for Southeast Louisiana Public Comments

Dear Dr. Blank,

I am writing on behalf of Tierra Resources, L.L.C. to submit public comments in regards to the Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy. Tierra Resources, L.L.C. is a nationally recognized innovator and quality leader in the research, development, and monetization of blue carbon contained in coastal wetland ecosystems. We wish to extend our help and expertise to the Gulf Coast Ecosystem Restoration Council as you continue to develop the Initial Comprehensive Plan.

We support the Council's plan and goals as they echo the beliefs of Tierra Resources with regards to water quality, coastal restoration, changing climate conditions, and protecting coastal ecosystems and habitats. We would like to take this opportunity to encourage the Council to explore blue carbon funding opportunities through wetland carbon sequestration. Blue carbon is when wetlands store atmospheric CO₂ through photosynthesis, which is retained in the plants and soil, thus permanently storing carbon dioxide. Tierra Resources developed the first wetland carbon offset methodology "Restoration of Degraded Deltaic Wetlands of the Mississippi Delta" that was certified by the American Carbon Registry in 2012. This is an innovative, forward-thinking approach to creating and leveraging funds while simultaneously rebuilding coastal Louisiana, and parts of Mississippi and Texas by giving a dollar value to restoring, conserving, and permanently protecting wetland ecosystems. Presently, blue carbon credits are traded in American voluntary markets and will likely be included in California's regulatory market. Approximately 4 million acres of fresh-to-saline wetlands in the Mississippi River Delta are ready and eligible for restoration under this wetland carbon credit methodology. We encourage the Council to support projects and plans that will facilitate and encourage blue carbon financing.

We advise the Council to establish a citizens advisory committee, a scientific advisory committee, and a lands committee. These committees could provide critical input to the coastal decision making process and should be in addition to public outreach and public input activities. We suggest the final version of the Comprehensive Plan be



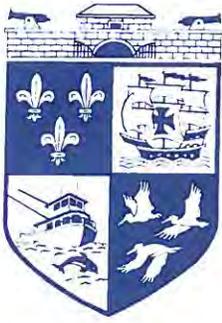
delayed for several months until the Department of Treasury issues regulations and the Council provides the required Ten-Year Funding Strategy and finalized project priority list. We recommend the Trustees provide another iteration of the plan for public comment. NGO's, community members, and the general public need to be able to review a more detailed plan in order to provide meaningful public input. Tierra Resources recommends the Council adopt a transparent process by which non-Trustees can propose projects. Finally, we urge the Council to establish policies and procedures that would ensure public transparency of projects and allow uniform consistency with each of the five Gulf States implementation development and compliance with their designated RESTORE state funds.

We look forward to working with the Trustees of the Gulf Coast Ecosystem Restoration Council on further developing the Comprehensive Plan and the restoration of our region. Thank you for your time and your dedication to restoring the Gulf Coast Region.

Kindly,

A handwritten signature in dark ink, appearing to read "Sarah Mack", is written over a light blue horizontal line.

Sarah K. Mack, MSPH, PhD, CFM
President and CEO
Tierra Resources LLC
1310 St. Andrew St Suite 1
New Orleans, LA 70130



Town of Dauphin Island

1011 Bienville Blvd. • Dauphin Island, Alabama 36528
Phone: (251) 861-5525 • Fax: (251) 861-2154 • Email: dialgovmt@townofdauphinisland.org

June 20, 2013

Gulf Coast Ecosystem Restoration Council,

The Town of Dauphin Island, Alabama, applauds the Gulf Coast Ecosystem Restoration Council's Draft Initial Comprehensive Plan for its inclusive and open-minded perspective on the issues surrounding the restoration of the Gulf Coast region in the wake of the Deepwater Horizon oil spill. The Town acknowledges that goals of the plan will go a long way toward revitalizing the region, its ecosystem, and its economy, provided a substantial amount of available recovery funds are invested in those areas directly impacted by the spill itself.

The plan specifically outlines its restoration and protection goals under five major categories: habitat, water quality, coastal/marine resources, community resilience, and economy. The Town wholeheartedly shares these goals and suggests Dauphin Island would be an ideal place to achieve all five, as follows:

- The island provides and protects **habitat** for a variety of bird, fish, and shellfish species, which is in danger of being lost due to significant erosion.
- As a barrier island, it acts as a first line of defense for Mississippi Sound and helped to protect the **water quality** of this vitally important area during the oil spill.
- The island maintains a delicate ecosystem in the Sound, which includes highly productive oyster beds, salt marshes, and other valuable **marine resources**.
- As a barrier island, it provides an enhanced level of **resilience** to south Mobile County in the form of hurricane and storm surge protection, thus substantially reducing the amount of damage that would otherwise occur.
- By defending some of the Gulf Coast's most productive oyster reefs and wetlands, the island contributes to the Gulf Coast **economy** in a significant manner.

In short, the island is a coastal community dedicated to the preservation of the coastal habitat, water quality, resources, resilience and economy. However, significant storm damage and inefficient dredge disposal practices threaten the island, and the added cost due to the oil spill has taken a major toll on the island. The restoration of Dauphin Island would represent an investment in the long-term health of Mobile County and the entire Gulf Coast region.

The Town of Dauphin Island currently has a "shovel ready" plan in place to address these issues. A barrier island restoration plan has been developed and approved that would contribute to all of the issues addressed by the Council. The plan (when implemented) would provide the following:

- Restoration of a highly effective barrier island, which is responsible for maintaining and protecting both the mainland and the delicate ecosystem of Mississippi Sound.
- Creation of an additional three miles of public beach, contributing to one of the best beach tourism industries in the region.
- Restoration of the island's dune and beach features, which provide important habitat to a variety of endangered species.

On behalf of the Town of Dauphin Island, Alabama, thank you for giving us the opportunity to comment on the Gulf Coast Ecosystem Restoration Council's Draft Initial Comprehensive Plan. Our island community commends the Council for establishing a blueprint that will create a more sustainable and resilient Gulf Coast region in the wake of the worst environmental disaster of our time. The Town of Dauphin Island shares your vision and will continue to provide itself as an important resource to the ecosystem, communities, and economy of the area.

Respectfully submitted,

Jeff Collier
Mayor

TRCP Gulf Restoration Workshop.

May 1, 2013.

FWRI, St. Petersburg, Fla.

Meeting began at approximately 9:00 a.m and ended at approximately 2:30 p.m.

Attendees:

Name	Affiliation
Chris Macaluso	Theodore Roosevelt Conservation Partnership
Ken Leber	MOTE Marine Laboratory
George Cooper	TRCP/American Sportfishing Association
Jeff Angers	Center for Coastal Conservation
Ed Sherwood	Tampa Bay Estuary Program
Darryl Boudreau	The Nature Conservancy
Yuying Zhang	Fisheries Biologist, Fla. International Univ
Richard Cody	Florida Fish and Wildlife Commission
Kim Amendola	NOAA Fisheries
Roy Crabtree	NOAA Fisheries
Gil McRae	Florida Marine Research Institute
Capt. Buddy Bradham	Mother Ocean Charters
Brett Boston	Florida Wildlife Foundation
Chris Bergh	The Nature Conservancy
Trip Aukeman	Coastal Conservation Association – Florida
Russell Dunn	NOAA Fisheries
Aaron Adams	Bonefish and Tarpon Trust
Steve Bortone	E.D. Gulf of Mexico Fisheries Management Council

Rick Roberts	Snook and Gamefish Foundation
Brett Fitzgerald	Snook and Gamefish Foundation
Capt. Pat Kelly	Florida Guides Association
Ken Haddad	American Sportfishing Association

Ken Haddad served as the moderator of the meeting.

Gil McRae delivered an approximately one and a half hour presentation regarding the state of the fisheries in the Gulf of Mexico in the wake of the 2010 oil spill. McRae reviewed aspects of the Natural Resource Damage Assessment Process, the Restore Council and the Restore process and some brief details regarding the funds being handled by the National Fish and Wildlife Foundation.

Dr. Roy Crabtree, regional administrator for NOAA Fisheries' Service Southeast Regional Office, was asked to make comments regarding best investment of oil spill recovery dollars from his perspective. Crabtree recommended the following:

- There is obviously a lot of potential money to come to the Gulf from many different sources and several funds. The states are likely to have a lot of say in how the money is spent
- NOAA would like to see as much of the money as possible be used to fill in the gaps in the data collection regarding fisheries in the Gulf.
- NOAA Fisheries can benefit substantially from a systematic, long-term investment in fisheries independent data gathering on a Gulf-wide basis. That kind of program and investment has been lacking historically.
- NOAA does not have the resources right now to do a robust stock assessment on one species, let alone multiple species. Despite that, fisheries in the Gulf are still in the best shape now than they have been over the last three to four decades.
- NOAA Fisheries would also benefit from efforts to get better information regarding recreational fishing including participation, harvest data and catch and release mortality. It would be a huge missed opportunity if some of the money wasn't invested in long-term data collection.
- Healthy fisheries habitat is also an enormous issue that must be addressed with oil spill recovery dollars. There are still areas in the Northern Gulf that are still oiled and are still posing problems.
- Focusing on the restoration of wetlands of the Mississippi River Delta in Louisiana is very important. That area is sinking and washing away and it is a vital nursery ground for fish throughout the Gulf of Mexico. We will have enormous difficulty with fisheries production in the Gulf if the nursery grounds in Louisiana continue to disappear.

Gil McRae, Director of the Florida Marine Resource Institute, delivered a presentation about the various restoration funds and the ongoing research into the impacts of the oil spill on Gulf Fisheries.

- Natural Resource Damage Assessment is the largest and most cumbersome of the restoration processes for the Gulf. Because the 2010 Deepwater Horizon Spill was the biggest in U.S. history, this NRDA is unprecedented in its size and scope.
- The federal and state trustees are gathering their data and making their case, as is BP and other responsible parties.
- There are several working groups examining impacts to the following:
 - Birds,
 - Terrestrial and aquatic organisms
 - Water column
 - Coral
 - Fish
 - Marine mammals and turtle
 - Shoreline
 - SAV (Submerged Aquatic Vegetation)
 - Neashore sediment
 - Oysters
 - Nearshore shallow benthics
 - Sargassum
- So far, there have been no large fish kills associated with the spill but there has been documented fish displacement. Researchers are examining whether or not the fish thrived in the place where they were displaced to.
- Louisiana suffered the most direct impact to fish habitat.
- Oysters are a very complicated issue because of the impact of freshwater diversions in Louisiana and drought in other places in the Gulf leading to too much saltwater. Oysters are complicated to evaluate in any year because water quality, salt and fresh content is constantly changing.
- Researchers have found that oil even in very low concentrations can have detrimental impacts to larval fish.
- Loss of human use restoration projects like boat ramps, fishing piers and artificial reefs will be a part of any NRDA settlement.
- The Mississippi River is a key source of nutrients for the Gulf as a whole. Gulf Menhaden and mullet, two vital food sources for sportfish, need a certain amount of nutrients supplied by the Mississippi River to reproduce and thrive.
- Researchers are still examining impacts to offshore fish. Looking at oil in various states such as intact, dispersed and photo exposed because they all affect organisms differently.
- It takes a very long time to examine one sample because of the enormous amount of organisms in the samples. At times, analyzing one sample can take as long as 6-8 month.

- There is an enormous need for long-term investments in the data analysis. Gathering the data takes a relatively short amount of time, but analyzing the data is lengthy, time consuming and takes an enormous amount of resources.
- The National Fish and Wildlife Foundation is working with the states to identify the kinds of projects it will fund. Those projects will likely be ones that are going to be hard to fund in the short term with NRDA funds.
- There is an enormous need for better data on fish harvested and fish released. Better understanding and evaluation of fish stocks.
- Programs like the iAngler program from the Snook and Gamefish Foundation can help researchers gather better data.
- More important is fishery independent data, data collected that is not reliant upon intercepting fishermen and asking and evaluating what they have caught.

Gulf Wide Project Recommendations from the group:

Habitat Restoration and Improvement:

- Artificial reefs can provide benefit for fish and fishermen and will likely be built with spill recovery dollars because they can address a loss of human use component.
 - Not a lot of information about how well they are working based on where they are located, what they are constructed with, what kinds of fish are orienting to reefs built with different materials and located in different currents and at different depths.
 - Need for examination of reefs to see what works best.
 - Don't take a "shotgun blast" approach to reef building and assume that just by building a reef that fish will find and use that reef.
- There is a need for a map of the benthic structures of the Gulf, a map that details the locations of reefs both natural and artificial. This would benefit fishermen as well as researchers analyzing the efficacy of the structures.
- Living shorelines such as marsh restoration and oyster reef construction.
 - The Nature Conservancy has built several projects to restore salt marshes and oyster reefs in the Pensacola Bay area and they are holding fish and protecting shorelines.
- Make sure that any habitat creation projects are not doing harm to existing habitats or functions in the system that are already working.
- Particular attention needs to be paid to the role the Mississippi River plays on fish stocks in the Gulf.

Stock Enhancement Centers "Hatcheries"

- Ken Leber, MOTE Marine Lab: There are many widely acceptable and responsible practices being used currently to operate marine labs and hatcheries.

- Fish stocks can be evaluated to determine if they are habitat limited or recruitment limited.
- Fish restocking efforts are futile if the habitat and the forage base cannot support more predator fish in the system.
- Fish restocking efforts can be restricted to specific bay systems or river systems to ensure the genetic integrity of the fish in those areas.
- Stock enhancement centers can also play an important role in studying genetics, impacts of hydrocarbons and dispersants and other environmental factors.
- Stock enhancement centers can also serve as labs for examining marsh restoration efforts, living shoreline projects and other restoration techniques.
- Can forage fish be restocked along with the predators? That question needs to be answered.
- There is opportunity for sportfishing advocacy groups to help with restocking efforts, especially when there are natural mortality issues such as freezes.
- Russ Dunn: NOAA is evolving its thinking to be more inclusive of stock enhancement centers. There is a recognition of the importance of aquaculture and the role that hatcheries can play in providing aquaculture fish as well as wild stock enhancement.

Data Collection and Science and Research and Education efforts:

- Find ways for recreational fishermen to participate in the data collection through programs such as the iAngler program from Snook and Gamefish Foundation. Gulf-wide education program for such data collection efforts is needed to allay fears from anglers that the data will be “used against” them.
 - Intercepting anglers simply isn’t working well enough. The sample size, especially in a place like Florida, is far too small. It also does not take into account caught and released fish in stock assessments. In Florida, approximately 90 percent of gamefish are released after being caught.
- More socio-economic data needs to be included. More of an effort to determine the cultural and social importance of recreational fishing since determining the exact dollar value of recreationally-harvested fish is difficult to determine.
- Whatever stock assessment and scientific improvements can be made with recovery money, there needs to be long-term investments made in those efforts. Short-term investments won’t fix long-term problems.
- Gulf-wide education programs are needed to teach fishermen how to properly handle caught fish so they can be released and survive.
- Barotrauma reduction devices work and can be deployed throughout the Gulf and used by more fishermen if there are more extensive education efforts to teach more fishermen how to use the devices.
- Needs to be an evaluation of the impacts of climate change on habitat, spawning and migration patterns and baitfish stocks. Also needs to be an examination of the onshore impacts to fisheries infrastructure.

Florida Specific Habitat and Human Use improvement projects:

- Aaron Adams: there needs to be a comprehensive evaluation of tarpon habitats and an effort to restore those as well as bonefish.
- Ed Sherwood: there are several regional habitat restoration efforts taking place in Florida that could use an infusion of additional funds to help them along, help to make up funding gaps between project development and implementation.
- Chris Bergh: Florida could benefit greatly from coral restocking efforts, an evaluation of existing coral habitats, how those habitats can be enhanced and how the fisheries enhancement centers can be used to help develop coral "spat" to help with reef regeneration.
- Ken Leber: Funds should be used to evaluate different artificial habitat configurations, different reef building techniques. Fisheries stock enhancement labs can be used to evaluate different habitats in a lab setting to determine which ones different species prefer.
- Darryl Boudreau: Living shoreline and marsh creation projects have been very successful and become fish habitat very quickly. More effort is needed to find suitable locations and evaluate those locations.
- An effort needs to be made to enhance sea grass beds, scallop beds and mangroves.
- While Florida does not have oil rigs, there are still some structures like aging lighthouses and boat docks that can be considered "idle iron" that are popular places to fish. An effort to evaluate and preserve that habitat is needed.
- Education programs, especially those that get children involved in fishing, like fishing clinics and education outreach efforts in the classroom are needed to ensure another generation of fishermen.
- There are aging boat ramps and fishing piers along the Gulf coast of Florida that could use upgrading and repairs. Local officials should identify the facilities in need of repair with the help of fishermen and direct funding where needed.

3 June 2013

Dear Council Members —



Mr. Walter McClatchey
203 Terra Ave.
Alexandria, LA 71303-2237

I am writing to comment on the draft initial comprehensive plan for spending Clean Water Act fines.

The draft plan fails to include a priority list or spending allocation plan for projects that will restore the Gulf's ecosystem and economy.

I propose the three projects be ~~implemented~~ implemented quickly to restore the Gulf Coast:

① Create a Beneficial Use Trust Fund to use dredged sediments beneficially and rebuild barrier islands like Deer Island and Ship Island;

② Restore oyster reefs or place designed reefs for habitat in Mississippi Sound;

③ Restore seagrass beds to historic levels, and

④ Create a Coastal Preserve Trust Fund to acquire private marshes and shorelines or to manage public lands for preservation. Thank you.

W. Mc



4210 Silver Reef PBW#1, Galveston, TX 77554

TEL: 409-737-5768 FAX: 409-737-5951

Email: mohn@msn.com

June 17, 2013

Honorable Members of the Restore Act Council:

Thank you for the opportunity to submit these comments. First, let me introduce you to the West Galveston Island Property Owners Association consisting of 38 property owner associations and our main mission is protecting and preserving the natural resources and the quality of life on West Galveston Island.

Second, you are facing a very big and job, but the potential impact to the Gulf coast is tremendous. The RESTORE program is a unique opportunity to cause long term positive change and the decisions you make will have a lasting effect on millions of people.

There has been a great deal of discussion about which projects should or should not be implemented, and many of the proposed projects have been on the shelves of various agencies for many years. But I am asking that you take a step back from the "canned" projects that many groups are proposing; especially the acquisition projects. While acquisitions can be very good projects that are often created with noble intent, they will in effect be taking funds away from areas that are impacted daily by the offshore oil and gas industry and are also subjected to constant erosional forces. Often these acquisition projects are located away from the gulf shoreline, but the areas to be acquired rely on the protection of a wide beach or healthy dune system to preserve their integrity. Without this protection over time the acquisition properties will become submerged and lost to future generations.

When considering which projects to fund, priority should be given to those projects that have important environmental and species benefits, as well as those projects that restore habitat for endangered species and provide upland protection. Wide beaches provide foraging habitat for many species including the Piping Plover; and healthy dunes provide nesting habitat for the endangered Kemps Ridley sea turtle and both provide protection to upland areas.

Additionally, when the oil from the Deepwater Horizon tragedy was washing ashore it was not in a vast majority of cases landing on areas that are now being considered for acquisition; instead it washed ashore on the beach. There are many funding mechanisms to acquire properties for preservation, but the funding stream for beach and dune restoration projects is much smaller.

Coastal communities are economic engines that often generate large tax revenues for State and federal governments as supported by Dr. James Houston's work to track the benefits provided by coastal restoration projects.

Stated simply- Beach restoration projects and dune restoration projects should be given priority consideration for funding. The upper Texas coast is a critically eroding area and following Hurricane Ike is in dire need of coastal restoration.

Thank you again for this opportunity to provide these comments.

Sincerely,



Jerry A. Mohn
President

WETLANDS
PROTECTION AND RESTORATION
IN
PLAQUEMINES PARISH

Kenneth Savastano
May 2012

Wetlands Protection and Restoration in Plaquemines Parish

- Wetland Losses in Plaquemines Parish
- Causes of Wetland Losses in Plaquemines Parish
- Solutions to Maintain and Restore the Wetlands in Plaquemines Parish

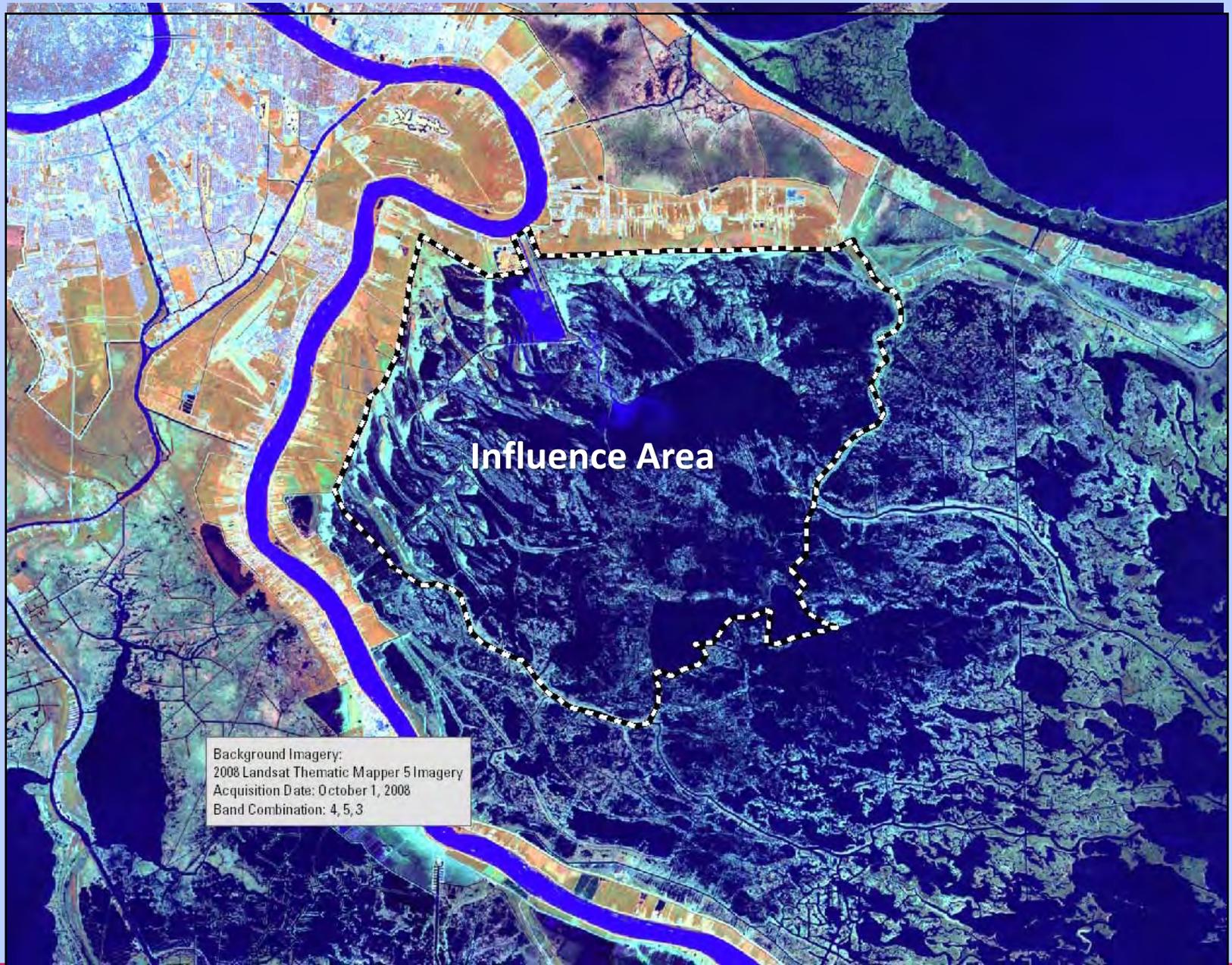
Wetland Losses in Plaquemines Parish

- Freshwater Diversions at Naomi, West Point ala Hache and Caernarvon have been a failure in maintaining and building wetlands¹
- The loss of the marsh has increased the storm surge in the Caernarvon outfall area by 1 ½ feet
- Lower salinity, below what the C D was originally designed for, resulted in destruction to the oyster industry for several years
- Lowering the salinity below 5 parts destroyed/converted over 100,000 acres of essential fishery habitat to a fresh water habitat which inhibits the production of brown and white shrimp, speckle trout, etc.

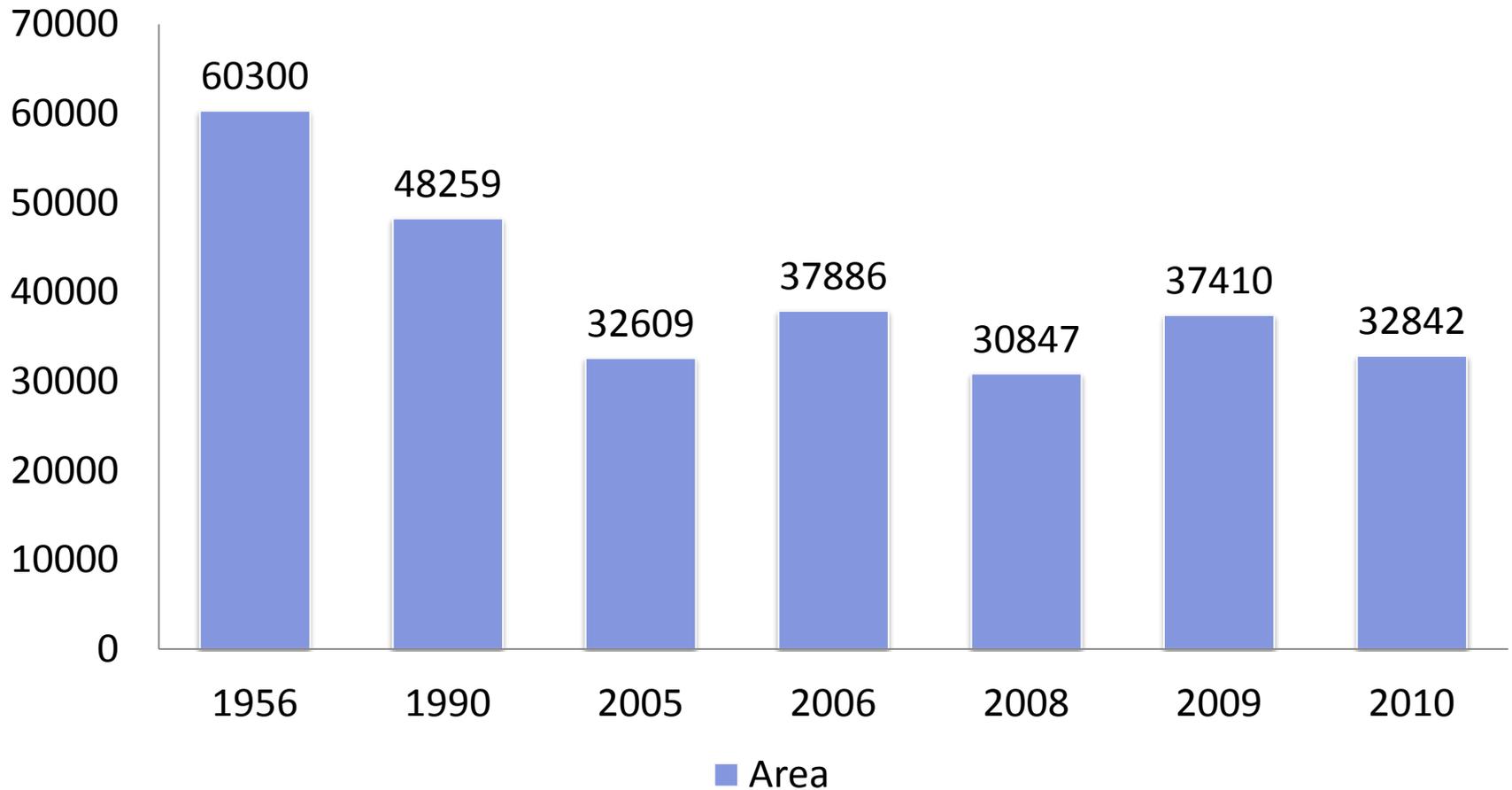
¹ Kearney, Michael S., J.C. Alexis Riter, R. Eugene Turner. 2011. Freshwater river diversions for marsh restoration in Louisiana: Twenty-six years of changing vegetative cover and marsh area. *Geophysical Research Letters*, Vol. 38.

1990 Landsat Map

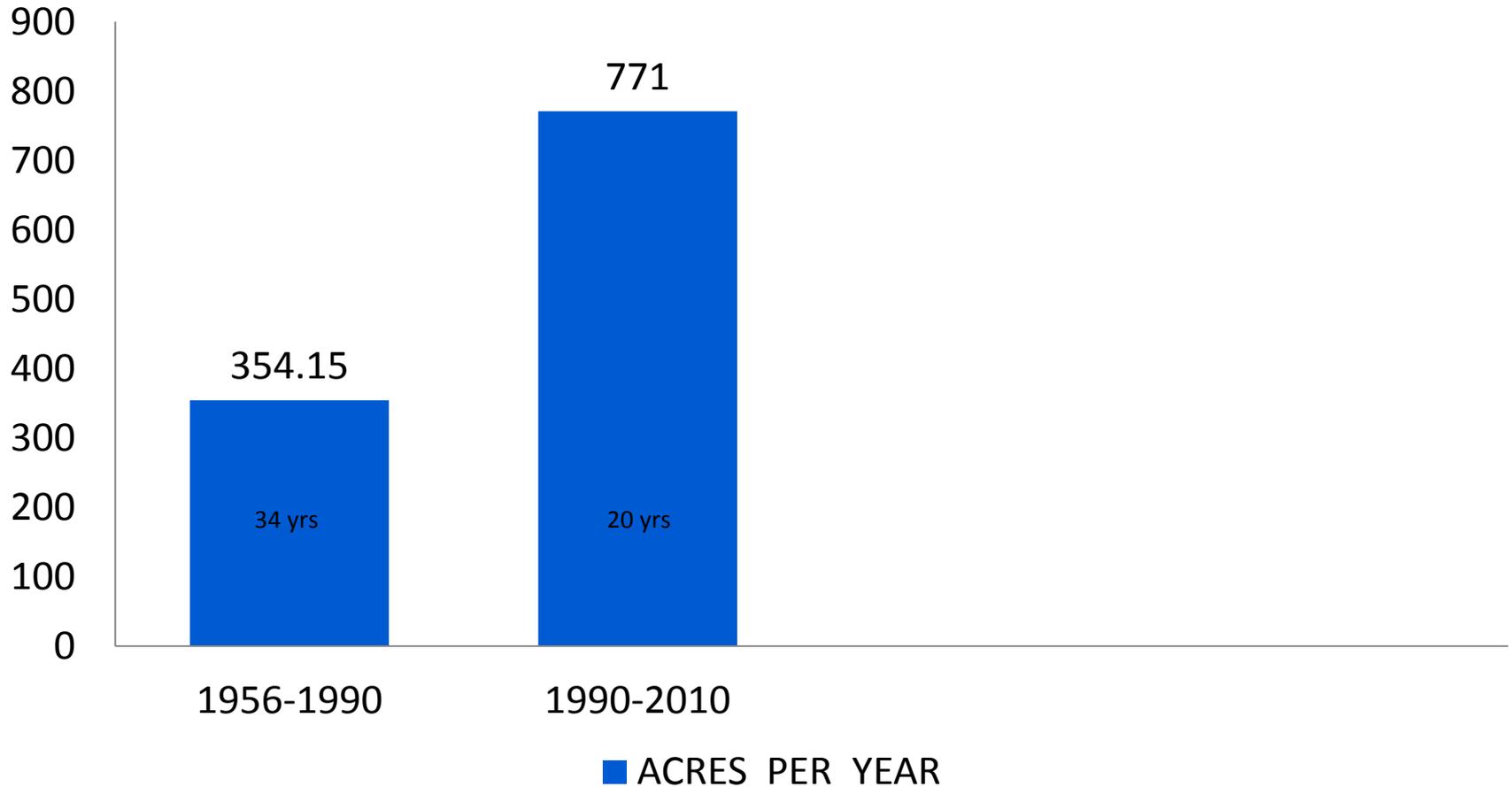
2008 Landsat Map



CAERNARVON INFLUENCE AREA LAND ACREAGE 1956-2010

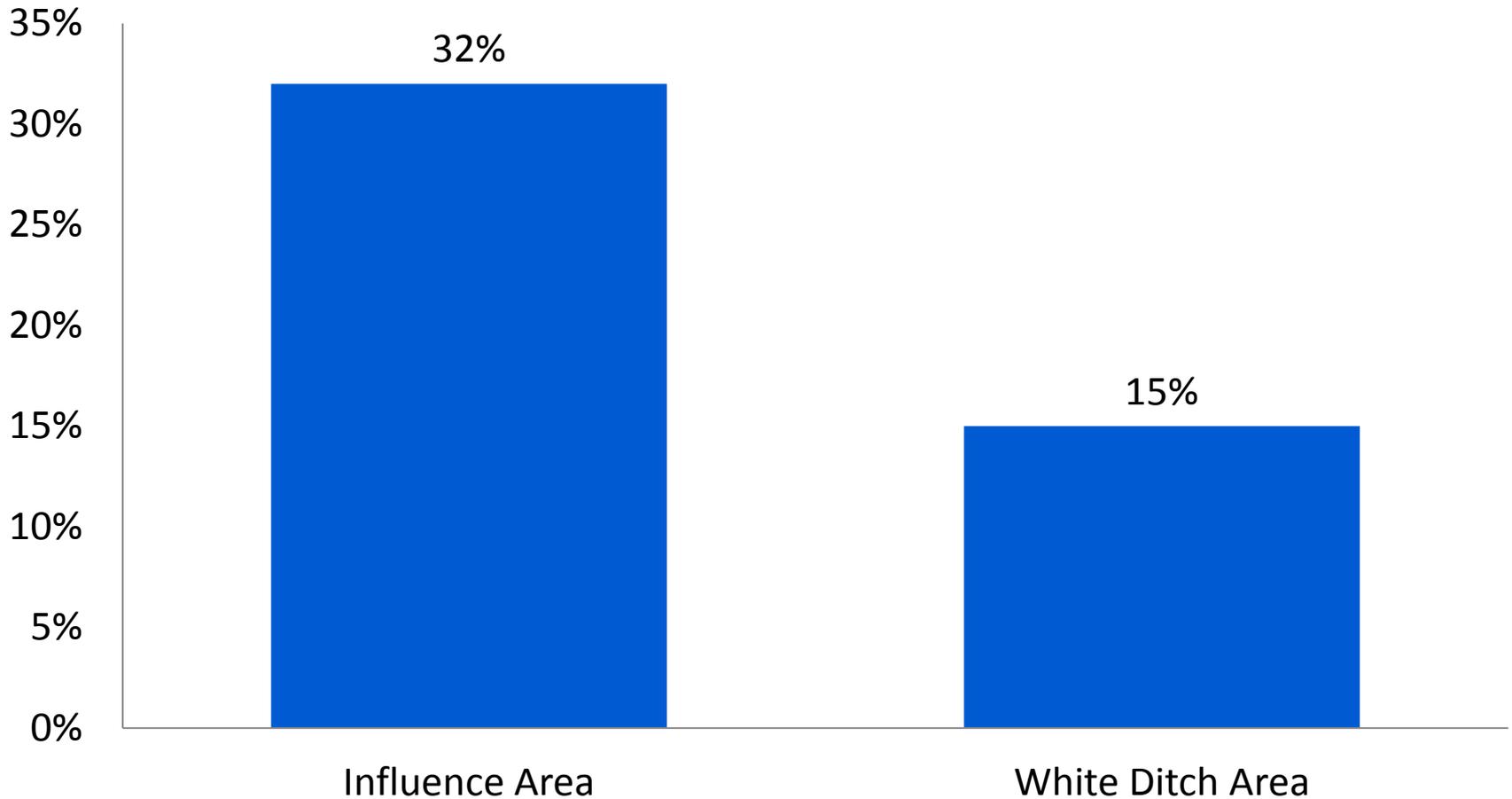


CAERNARVON INFLUENCE AREA LAND LOSS AVERAGE ACRES PER YEAR

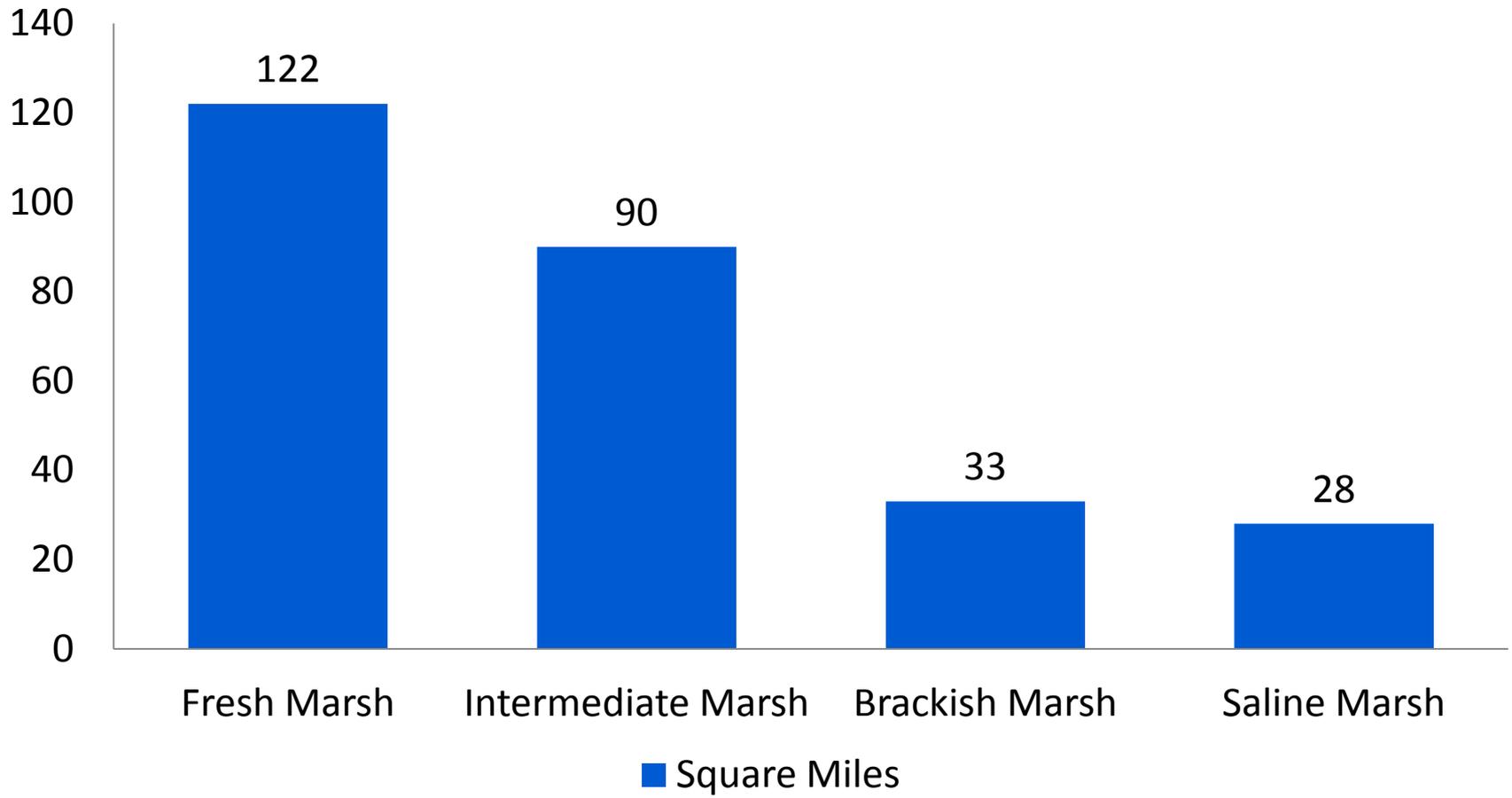


CAERNARVON PROJECT 1990 – 2010

PERCENT OF LAND LOSS



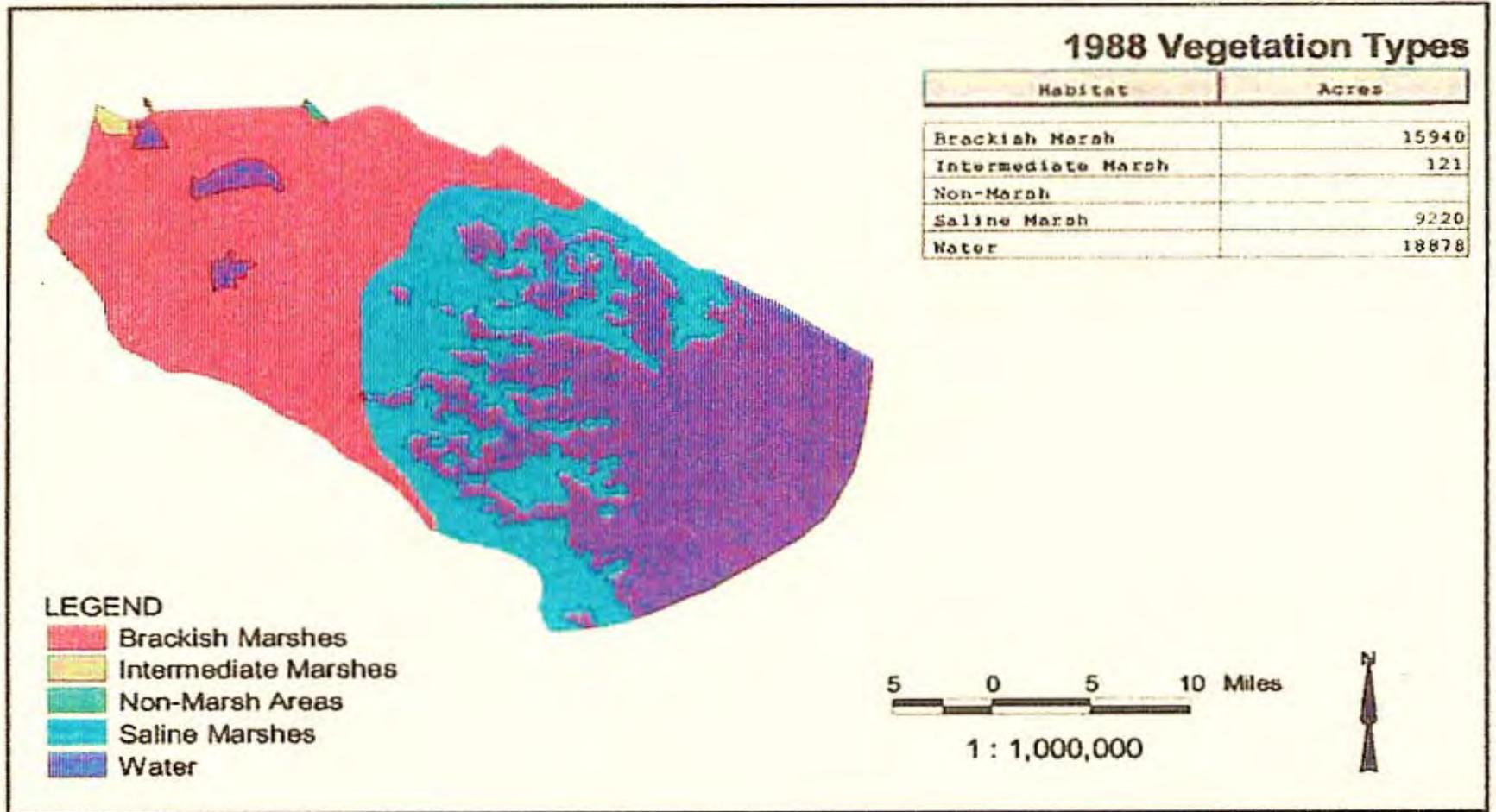
SQUARE MILES LOSS IN COASTAL LOUISIANA AFTER 2005 HURRICANES



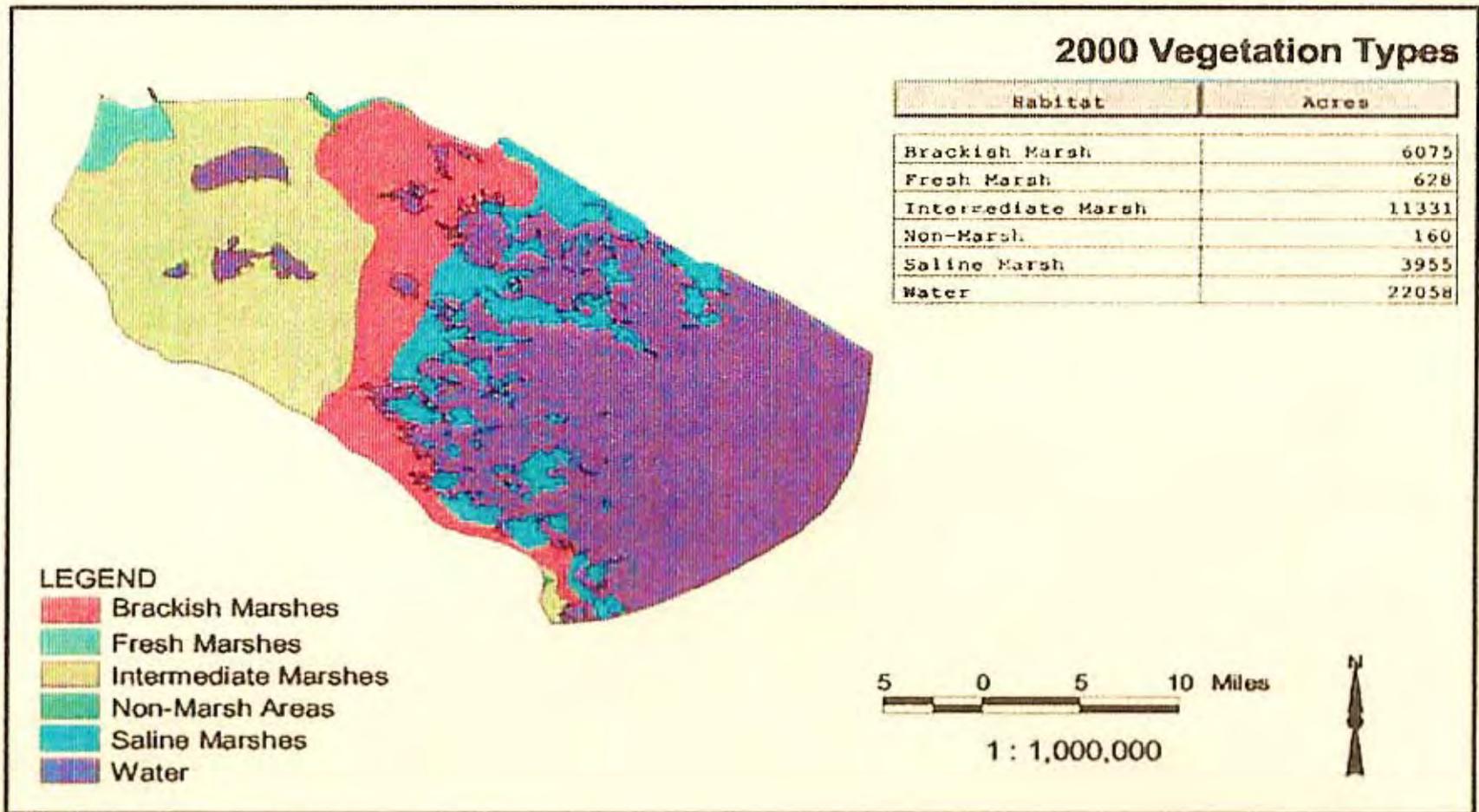
CAUSES OF WETLAND LOSSES IN PLAQUEMINES PARISH

- FRESHWATER FROM THE CAERNARVON DIVERSION LOWERED SALINITIES
- LOWER SALINITIES CONVERTED BRACKISH MARSH TO LOW SALINITY MARSH
- LOWER SALINITY MARSH HAS SHALLOW ROOT SYSTEMS AS COMPARED TO BRACKISH AND SALT MARSH AND IS LESS SUSTAINABLE IN A STORM ENVIRONMENT
- LEVEL OF NUTRIENTS, FIVE TIMES HIGHER THAN HISTORIC LEVELS, CAUSED MARSH GRASSES TO GROW SHALLOWER ROOT SYSTEMS AND INCREASED ABOVE GROUND MARSH CANOPIES
- STORM STRESS EXCEEDED SOIL STRENGTH OF THE LOW SALINITY MARSH AND ACCELERATED THE LOSS OF THE LAND

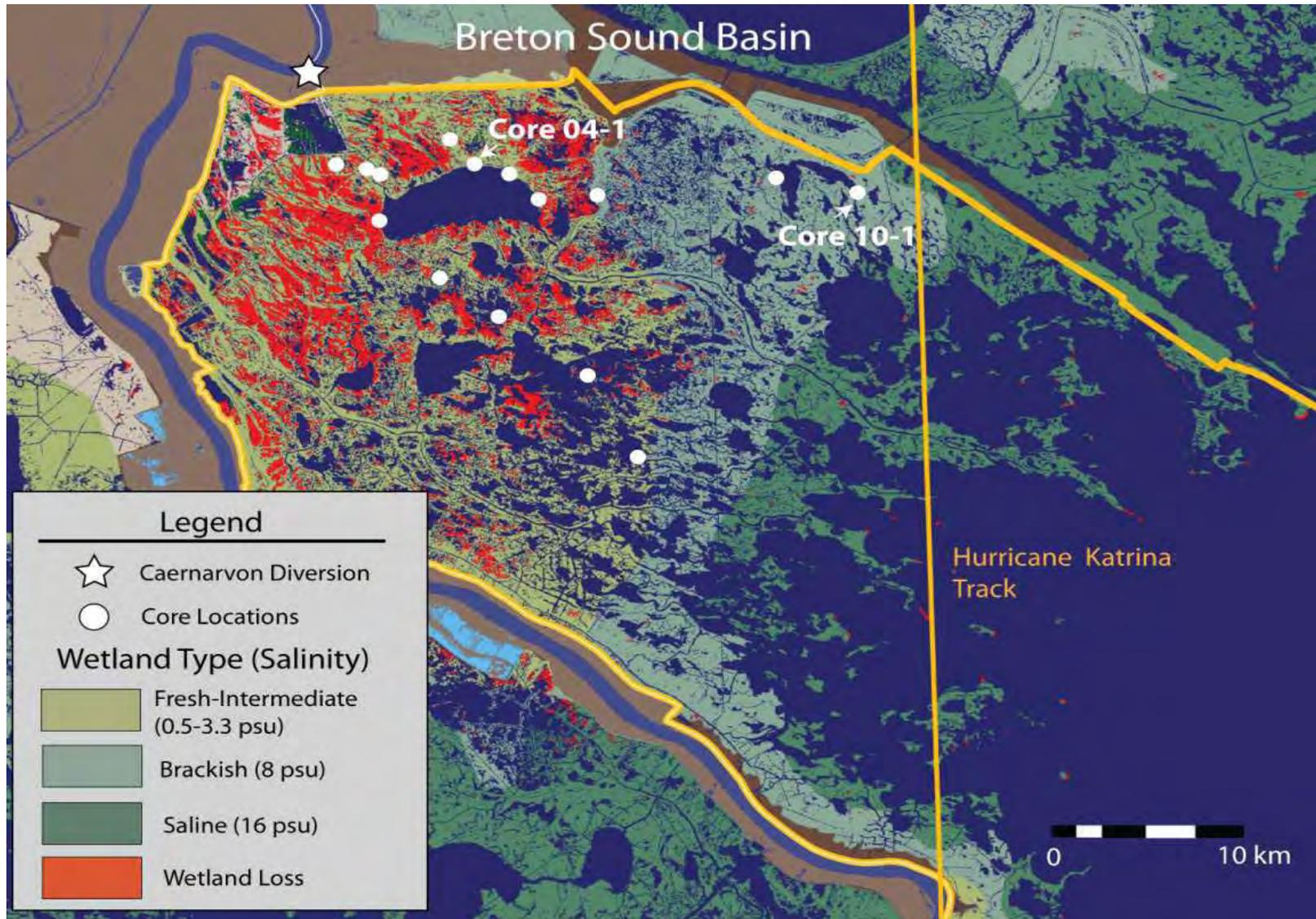
CAERNARVON PROJECT AREA PRE DIVERSION



CAERNARVON PROJECT AREA AFTER NINE YEARS OF OPERATION



BASIN MAP WITH WETLAND TYPE



SOLUTIONS TO MAINTAIN AND RESTORE THE WETLANDS IN PLAQUEMINES PARISH

- Rebuild Barrier Islands
- Restore shorelines and islands inside Breton Sound
- Build ridges in the marsh
- Reduce storm surge by dredging/pumping in sediment from the Mississippi River 1000 feet on West side and 5000 feet on East side of the river from the back levee outward
- Dredge the marsh debris in the canals and lakes and use this debris to restore marsh
- Use small diversions to maintain salinity regimes to grow sustainable brackish and salt marsh in the existing and restored wetlands

July 8, 2013



Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Avenue, NW, Room 4077
Washington, DC 20230

Dear Gulf Coast Ecosystem Restoration Council Members,

I am sending this letter on behalf of the Board of Directors, staff and volunteers of the Alabama Coastal Foundation. We thank the Council for the opportunity to provide our feedback on the Draft Initial Comprehensive Plan. As promised during the first public hearing you held last fall, we have encouraged others to share their thoughts and recommendations as well. This letter is in addition to the comments I shared with Council members on June 5th in Alabama at the Five Rivers Delta Resource Center.

The Alabama Coastal Foundation (ACF) is a non-partisan, non-profit organization with a mission to improve and protect Alabama's coastal environment through cooperation, education, and participation. The ACF has worked to create a healthy balance between the conservation needs of Alabama's priceless coastal resources and the inevitable pressures of economic growth. Over the past two decades, the ACF has sought common ground among business, government and private citizens. We accomplish our work by bringing together stakeholders with differing interests to facilitate mutually beneficial solutions to our environmental challenges.

While we do not have a large budget, we do cooperate with other non-profit organizations in our field that do including The Nature Conservancy and Ocean Conservancy. I have read each of the detailed comments they have submitted and concur wholeheartedly with their observations and recommendations. In particular, the diagram that Bethany Kraft, OC's Gulf Restoration Program Director, created for defining Restoration Science would be a very positive concept to bring into reality.

Given ACF's emphasis on environmental education, we also request that all projects have a public education component in order to use this tragedy to build a stronger understanding of how our ecosystems support our economy and quality of life. We see the "Promote Natural Resource Stewardship and Environmental Education" objective as a foundational one which should support all restoration projects. Finally, we ask that the Council considers embedding in the Plan a 5% allocation of funds to purchase and protect coastal marshes and wetlands.

The Alabama Coastal Foundation is willing and able to help the Council take the best path forward from this disaster. We look forward to working with you and others as we protect and celebrate all that Alabama's Coast and the Gulf Coast as a whole has to offer for generations to come.

Sincerely,

A handwritten signature in black ink that reads "Mark Berte".

Mark Berte, Executive Director
Alabama Coastal Foundation

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July 8, 2013

Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Avenue, N.W., Room 4077
Washington, DC 20230
via email: RestoreCouncil@doc.gov

Dear Gulf Coast Ecosystem Restoration Council:

The Alliance for Affordable Energy wishes to submit the following comments on the “Draft Initial Comprehensive Plan” for implementation of the RESTORE Act to the Gulf Coast Ecosystem Restoration Council. Our responses answer the questions posed by the Gulf Council in your request for comments – “Should the Council develop further criteria for consideration now or in the future?” and “Should the Council consider other Objectives at this juncture?” The Alliance is a non-profit organization that has worked since 1985 to promote fair, affordable, and environmentally responsible energy policy for Louisiana and the nation.

Energy production, its benefits and drawbacks, touches every Louisiana citizen’s life. The industry directly provides a great number of jobs, point source pollution, tax revenues, and dangerous working conditions. Indirectly, the industry has exacerbated coastal erosion, climate change, and political interference. The trend towards riskier deepwater drilling is indicative of a larger problem often described, as “the easy oil is gone.” Deepwater drilling of the kind that failed at the Macondo Well is more expensive and riskier both financially and in terms of human lives. Though many improvements have been made in the leasing and oversight of off-shore drilling, more needs to be done to protect this vulnerable region while maintaining our communities and economies. The creation of a Science Advisory Committee and a Gulf Coast Citizen’s Committee would help insure that the Council reaches these goals in an open and substantive way.

We are pleased that the Draft Initial Plan includes protecting and conserving ecosystems so they can continue “to reduce impacts from tropical storms and other disasters, support robust economies, and assist in mitigating and adapting to the impacts of climate change (per Executive Order 13554)”. The resilience of our coastal is integral to the health of our communities, economies, and habitats but time is running out. Our biggest challenge is coming from the impacts of climate change, such as sea-level rise, more intense storms, and alterations in hydrological cycles. These effects have major implications for the Draft Plan’s Objectives (pp.11-13), including restoration of habitats and natural processes, restoration of natural processes and shorelines, protection and restoration of living coastal and marine resources, and community resilience.

We strongly recommend including more information on what will qualify a project for ‘assisting in mitigation and adaptation’ to local authorities. Without this guidance, we suspect that too much time and resources will be wasted on project proposals that simply will not qualify under the President’s executive order.

Locally, our efforts should be informed by the degree of adaptation necessary, which will be determined by the degree of change expected for the region. The drivers of climate impacts – sea level rise, storms, extreme weather, etc. – are in turn driven by greenhouse gas emissions at the global level. Including more information about *how* to include climate change factors in the Initial Draft Plan will dramatically enhance the Plan’s seventh Objective – to Improve Science-Based Decision-Making Processes, and provide a level playing field for each project proposal. Every project must be based on the same sound facts, i.e. the different scenarios for projected carbon emissions, sea-level rise, hurricane activity, hydrological changes, etc.

We would stress the importance of “mitigation” in the plan and allow for ecosystem sustainability to include energy efficiency across all sectors and to diversify the region’s energy systems with distributed generation and renewable energy. The American Council for an Energy Efficient Economy (ACEEE) ranked the Gulf Coast states on their State Energy Efficiency Scorecard, and found a wide range, from 51st (Mississippi) to 29th (Florida), with Louisiana (43), Alabama (40), and Texas (33) falling between (<http://aceee.org/sector/state-policy/scorecard>). Increasing efficiency and renewable energy capacity are easily integrated with programs to improve storm and weather resiliency in coastal communities. Other quantifiable benefits include reduction in energy bills for consumers, energy rate suppression, and decreases in pollution.

In the Gulf Coast city of New Orleans, programs such as Energy Smart (<http://www.energysmartnola.info/>) and NOLA Wise (<http://www.nolawise.org/the-process/case-studies.html>) are enabling residential and commercial consumers to reduce their energy use and their monthly bills through greater efficiency. Reduced emissions are a collateral benefit of these programs, along with a stronger economy. The ACEEE released a report in May 2013 which estimated that new or expanded energy efficiency policies and programs could save Louisiana customers \$4.2 billion in lower energy costs and support 27,100 jobs within the state by 2030 (<http://www.aceee.org/press/2013/05/energy-efficiency-programs-and-polic>).

Given these opportunities and the region’s striking vulnerability, it is reasonable and fair to demand that Gulf Coast states commit to reducing climate change pollution as part of the regional resiliency effort under the RESTORE Act. This is consistent with all of the Draft Initial Plan’s Objectives (pp. 11-14).

In conclusion, climate change must be integrated into the criteria and objectives of the RESTORE Plan. Define resilience more clearly, require each state to provide a vision for the Gulf Coast in 50 – 100 years and answer the question: what do you need to do to get there?

Every project needs to define its role in climate mitigation and/or adaptation. It must be made clear that projects with greenhouse gas emission reduction targets will be prioritized over projects that have no mitigation benefit. The Council needs to provide adequate guidance for how to comply with this requirement by providing projected carbon emissions, sea level rise, etc. Non-traditional ecosystem protection projects, like energy efficiency and renewable energy, should be authorized for RESTORE plan dollars.

The danger of not explicitly and comprehensively including climate change in the Plan's actions, as well as complementary policies and programs, is that critical one-time resources will be wasted on trying to save a region that simply cannot survive 3-10 feet of sea level rise and repeated disasters. Let's not squander billions of dollars.

Sincerely,

Casey DeMoss Roberts
Executive Director
Alliance for Affordable Energy

The Honorable Penny Pritzker
Secretary, U.S. Department of Commerce
1401 Constitution Ave. NW
Washington, DC 20230

July 8, 2013

RE: Comments on Gulf Cost Ecosystem Restoration Council Draft Comprehensive Plan

Dear Secretary Pritzker,

The Gulf Coast sits at a crossroads. With potentially billions in civil and administrative penalties from the Deepwater Horizon oil spill slatted for coastal restoration and hurricane protection projects under the RESTORE Act, Gulf Coast states and the Council have an unprecedented opportunity to make a real, lasting impact on saving coastal parishes from catastrophic land loss and future hurricane damages, while strengthening the economic and human resilience of communities with some of the highest poverty rates in the country.

However, fine monies risk being misused: If Gulf States re-appropriate their pot of fine money to fill budget gaps or funnel it to politically motivated boondoggles – under the guise of “economic development” – vulnerable communities will be placed at greater risk, and Gulf States risk losing future federal funding for coastal restoration and protection projects.

Such risks are real. News outlets and coastal advocacy groups across the Gulf Coast report a “feeding frenzy” by local politicians to divert coastal restoration funds to “pet projects.” At the recent Gulf Coast Restoration Summit held at Tulane University in New Orleans, Gulf Coast politicians presented multiple plans to fund everything from roads to nowhere – but through highly vulnerable wetlands – to baseball stadiums with oil spill fine money.

For these reasons, demand is widespread for scientific scrutiny to ensure Deepwater Horizon Oil Spill monies are spent as Congress intended: To restore the ecological and socio-economic resilience of oil spill-affected environments and communities.

Congress slatted 5 percent of RESTORE Act fines for research focused on monitoring the restoration of the Gulf Coast. Monitoring how Gulf Coast states and the Council (through the Gulf Coast Restoration Trust Fund) spend RESTORE Act monies is essential to strengthening the region’s ecological and socio-economic resilience and ensuring future federal support.

Therefore, I respectfully propose that the Council consider appropriating a significant portion of RESTORE Act monies dedicated for research to multiple-methods, longitudinal studies that monitor how fine monies are spent and whether funded projects help strengthen the ecological and socio-economic resilience of highly vulnerable and low-income coastal communities. Allocating a portion of research funds to such priorities will provide increased authority to institutions to gain access to documentation necessary to effectively monitor, analyze and publicize findings in real time, increasing the transparency and accountability and potential impact of funded projects. Lastly, institutions should be chosen from the Gulf States, as they bring local knowledge and a commitment to the region.

Thank you for the opportunity to comment and for your consideration of this proposal.

Sincerely,

Ariane Wiltse, MS DRL & MAMC
316 Delery St. NOLA 70117



Go Wild!
...and Learn the Florida Story



July 6, 2013

Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Avenue, N.W., Room 4077
Washington, DC 20230

RE: Draft Initial Comprehensive Plan Comments

Dear Council,

Around the Bend Nature Tours has been providing environmental education experiences to students and adults since 1999. We especially commend the Restoration Council for adopting Objective Number 6 **Promote Natural Resource Stewardship and Environmental Education**. It is essential that you keep this objective in the final version of the Comprehensive Plan to Restore the Gulf Coast Ecosystem and Economy.

Environmental education can provide citizen engagement within each of your 5 Goals: ***Restore and Conserve Habitat, Restore Water Quality, Replenish and Protect Living Coastal and Marine Resources, Enhance Community Resilience, Restore and Revitalize the Gulf Economy***. Therefore it is very important not to allow any sequestration to cut or reduce this objective.

The Florida Estuary Programs have provided a great model for choosing projects in Southwest Florida. You should include all of their programs and utilize their expertise in local projects such as environmental education that can be scaled for use in the entire Gulf ecosystem.

Thank you for all the work you are doing to promote the future health of the Gulf of Mexico. Please consider these comments in your final Comprehensive Plan to Restore the Gulf Coast Ecosystem and Economy as a result of the April 2010 tragedy.

Sincerely,

Karen Fraley, Owner/Naturalist

1815 Palma Sola Blvd. Bradenton, FL 34209
www.aroundbend.com karen@aroundbend.com

(941) 794-8773
fax: (815) 366-8020



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District 5 - Mike Thomas

July 8, 2013

Chairman Cameron Kerry
Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Avenue, N.W., Room 4077
Washington, DC 20230

Dear Chairman Kerry,

Thank you for the opportunity to comment on the Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy. We appreciate the Council's effort to coordinate preparation of this plan. If properly planned and implemented, the Gulf restoration initiative will benefit the people and environment of the Gulf Coast, and the entire nation. Below we offer a series of comments that we hope will help increase the clarity and effectiveness of the Plan.

- Please specify how the Council plans to allow the public to review and comment on the Funded Priorities List before it becomes official. We believe that substantial public engagement prior to decisions being made is critical to the success of Gulf restoration.
- Please define what “project or program authorized prior to enactment of the RESTORE Act, but not yet commenced” means. Language in the plan body and Appendix A did not fully clarify the role of the list. Depending on how “authorized” is defined, the list either did not include all authorized projects, or contained many projects that were not authorized. After clarification of “authorized”, it is likely that this list will be greatly reduced. If not, it should be made clear that the list has not been vetted by the Council, and that the Council is not endorsing the list and that projects on the list will not necessarily receive more consideration than projects that are not on the list.
 - What type of authorization is necessary, and by whom? Who decides whether a project is authorized or not? What does “commenced” mean - any actions beyond the planning stage? What is the process for getting a project or program on this list? Does an authorized project have to be proposed by a Council member?
- The phrase “existing Gulf Coast State comprehensive plans” needs to be defined. The State of Florida has comprehensive land acquisition and restoration plans through its Florida Forever programs. The Florida Forever/Board of Trustees plan is the result of a thorough public evaluation process including public hearings, intense staff evaluations, recommendations by an expert panel, and approval by the Governor and Cabinet. Projects on this Florida Forever list within Gulf coast watersheds should be considered as meeting the existing Gulf Coast State comprehensive plans criterion. Most of these projects also meet one or more of the other three Priority Criteria.
- We recommend that land acquisition and restoration of the same parcel of land be considered as one project, with perhaps a ten-year horizon. Restoration costs should be included in the project cost.

- We encourage the Council to make sure that the focus on existing projects does not unfairly tilt funding to those needs that already have or were anticipated to have a funding source. The considerable effort required to plan projects that address important needs is sometimes not undertaken because of the unlikelihood of available funding. The lack of a plan to address important issues, especially across a region, does not diminish the importance of an issue. While it makes sense in the early stages of RESTORE to provide funds to those projects that are already planned, funds should also be available to address issues that need additional time to plan programs or projects.
- We recommend that the Plan define when the Council anticipates more detailed National Environmental Policy Act (NEPA) analysis will be required. The NEPA process could add a substantial amount of time to plan preparation and could hinder coordination with multi-year implementation plans and state expenditure plans. We do not believe the project-level NEPA analysis should be required prior to a project being placed on the Three-Year Prioritized Project List. This could cause a substantial delay to the preparation of the list. The NEPA project analysis could be performed later as each project goes through more detailed planning and budgeting.
- We think it is important that the Council start holding public meetings. As stated in the RESTORE Act, "... Appropriate actions of the Council, including significant actions and associated deliberations, shall be made available to the public via electronic means prior to any vote...". Public meetings of the Council will provide some public transparency to the Council's actions, as required by the Act. The Plan should specifically address this issue.
- We recommend that the Council establish at least two advisory committees.
 - The science committee should be comprised of top tier scientists with Gulf of Mexico expertise that covers the full gamut of environmental considerations. This group should use the "best available science" to evaluate natural resource and restoration projects proposed to the Council. For natural resource/environmental projects, priority should be given to those anticipated to provide the greatest benefit to the Gulf environment, subject to the direction provided in the RESTORE Act. The committee should make recommendations to the Council on projects proposed for Council funding, and also review State Expenditure Plan projects to ensure they are consistent with the Council's plan.
 - The citizen advisory board members should represent the geographic, economic and cultural diversity of residents of the Gulf of Mexico. The citizen advisory committee should review all projects proposed for Council funding. In addition, this committee should make recommendations to the Council on interacting with the citizens and communities of the Gulf Coast.

Thank you for the opportunity to comment on the Plan. Bay County looks forward to partnering with the Council on the restoration of the Gulf's environment and economy.

Sincerely,



James W. Muller
RESTORE Act Coordinator
Bay County, FL



Cameron County Parks & Recreation

33174 State Park Rd 100 • South Padre Island, Texas 78597

Phone: (956) 761-3700 • Fax: (956) 761-5317 • <http://www.co.cameron.tx.us/parks/index.htm>

July 8, 2013

Gulf Coast Ecosystem Restoration Council
c/o U. S. Department of Commerce
1401 Constitution Avenue, N.W.
Room 4007
Washington, DC 20230

Re: Draft Initial Comprehensive Plan: Restoring the Gulf Coasts Ecosystem and Economy Submission of Comments – Cameron County, Texas

Gentlemen:

This letter provides our comments on the above referenced document. Cameron County is the southernmost Texas Coastal County that borders the Rio Grande River and U.S.-Mexican border region. This barrier island in Cameron County, including the various communities, are located along the Texas Gulf of Mexico Coastline and includes the expansive Laguna Madre Bay System and barrier island dune complexes. This barrier island eco-system also provides some of the riches Gulf of Mexico-barrier island habitat of importance to the various threatened and endangered marine turtles, and the endangered piping plover. As the Cameron County Parks Director, I am responsible for managing large areas of the barrier island to meet the public need while also helping protect our coastal natural resources.

As a coastal political subdivision the County manages the beachfront, dune system, and our County Park System, and is also a key owner of barrier island habitat. Cameron County, as a Texas political subdivision, incorporates public comments and also resource agency comments into the development and management of its park system, beachfront maintenance, and dune protection in a manner to provide for the public need while protecting the ecological/coastal natural resources of this barrier island and coastal mainland. The RESTORE Act provides an opportunity to enhance these barrier island management programs and thereby enhance the Gulf Coasts' Eco-system and related economy.

We are providing the following comments:

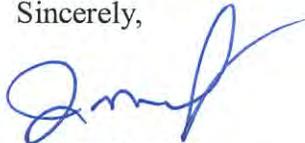
- Cameron County is in the process of further developing and expanding the scope of projects located in Cameron County and identified in Appendix A of the Draft Initial Plan and which will include community and resource agency participation to ensure projects respond to the public need.

- The Cameron County Coastal Impact Assistance Program “Projects” and also the projects recently submitted to the National Oceanic and Atmospheric Administration will serve as the baseline for continued project development to satisfy RESTORE Act goals and objectives.
- Projects located within Cameron County and submitted by other interests and listed in Appendix A will also provide opportunities for partnerships while seeking public input to ensure compatible eco-system enhancement with park public access and economic development.
- Cameron County requests to be included in Advisory Committees developed as part of the Texas RESTORE Act Plan and other Council Advisory Committees to help ensure Texas political subdivision are “involved” with project development.

Cameron County has already developed a model program for involving the public and communities in a needs assessment and project development, involving not only our Park Master Plans but also project development for our Coastal Impact Assistance Program and other beachfront and dune protection programs. By involving Cameron County more directly in the RESTORE Act we have the best opportunity for helping Texas restore the gulf’s eco-system and economy. We would like to further develop these projects and partnerships and request your acknowledgement to consider these projects as part of the overall Comprehension Plan.

I appreciate this opportunity to comment and can be reached at (956) 761-3700 or jmendez@co.cameron.tx.us

Sincerely,



Javier Mendez
Cameron County Parks Director



July 5, 2013

City of
Corpus
Christi

Justin Ehrenwerth
Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Avenue NW, Room 4077
Washington, DC 20230.

Dear Mr. Ehrenwerth:

On behalf of the City of Corpus Christi, Texas, I want to thank you for the opportunity to comment on the Draft Plan both at the June 10th public meeting in Galveston, Texas, and through a formal written comment process.

In order to achieve the shared goal of restoring the Gulf of Mexico, the Restoration Council should carefully consider the restoration opportunities available within the 367 miles of Gulf shoreline and 3,300 miles of bay shoreline along the Texas coast.

The Texas Gulf Coast includes 18 counties and is home to six of the nine national wildlife refuges within the Gulf States that rank in the Top 50 on the U.S. Fish and Wildlife Service's (USFWS) Land Acquisition Priorities list. Those biological diversity-based rankings clearly reflect the fish and wildlife habitat richness of the Texas coast. As you know, wildlife do not care about human made boundaries, they choose their homes, their nesting, feeding and breeding areas and migration routes where the conditions are best for them. As the USFWS refuge rankings show, more wildlife chooses the Texas coast over the rest of the Gulf and have done so long before humans settled this area.

Corpus Christi agrees with Congress' intent in the RESTORE Act directing the spending of *Deepwater Horizon* funds to mitigate decades' worth of damage that the Gulf States have borne as a result of producing 90% of the nation's off-shore energy. In that regard, Texas and Louisiana have paid the highest price compared to the other three Gulf States and that historic contribution to the nation's energy supply should be weighed as a factor in the Council's allocation decisions going forward.

Corpus Christi is the second most populous city on the Gulf of Mexico behind only Tampa, Florida and our job growth trends and age demographics means Corpus Christi will be the largest city directly on the Gulf within a decade, if not sooner.

As our June 10th testimony stated, Corpus Christi believes that the critical nexus between humans and the marine environment is at its zenith within the Gulf's

OFFICE OF THE MAYOR

Nelda Martinez
NeldaM@cctexas.com

Kristina Leal
Chief of Staff
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*Moving
Corpus Christi
Forward
¡Adelante!*

major cities. Therefore, we believe the Council has its greatest opportunity to restore the Gulf by investing in results-oriented outcomes within those cities. Corpus Christi is ready, willing and able to help the Council achieve those resiliency results. In short, to properly address the issues in the Gulf, it is imperative that both Texas and her municipalities on the Gulf play a large role in the RESTORE process.

Many residents in the Coastal Bend depend on a healthy and sustainable Gulf of Mexico and its related bay systems for their livelihoods in agriculture, energy production, manufacturing, shipping, fishing, recreational industries and tourism. **Given that reality, the City of Corpus Christi strongly believes that water quality improvement is the single greatest need that the Restoration Council and the State Council can help accomplish.**

Promoting regional, sustainable, and multi-dimensional water quality projects in the bays and the Gulf will improve habitat, enhance recreational and commercial fisheries, protect endangered species, promote tourism, improve the quality of life in coastal communities, and ensure the viability of the Gulf for future generations. In that light, the City of Corpus Christi is eager to share the reasons why Restoring, Improving, and Protecting Water Quality is our foremost objective.

Additionally, the economic component of the RESTORE Act cannot be overlooked especially when it overlaps with environmental benefits. For example, tourism in Texas coastal communities suffered economic loss following the disaster and they would benefit greatly from an investment in advertising and promotion, recreational infrastructure, including parks, beaches, and other amenities, and enhancement of nature tourism. Investments that enhance port operations and commercial fisheries would also have a significant economic benefit and should be part of the picture.

We encourage the Council remain flexible in development of its priority criteria to encourage partnerships, complementary and scalable project development that addresses region-specific solutions and not a one-size-fits-all-top-down process.

The “Objectives” section of the Draft Plan describes the broad types of activities to restore, enhance and protect marine habitat, but does not specifically mention bay systems, which contribute significantly to the health of the Gulf. The bay and Gulf are inextricably linked and, thus, must be considered together as an objective.

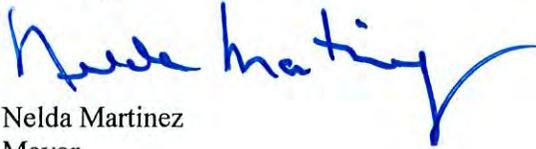
If the Restoration Council creates a citizens’ advisory committee, the City of Corpus Christi hereby formally requests the privilege to serve on the committee.

The City of Corpus Christi has already held one public meeting and continues to conduct on-going roundtable discussions to gather citizen and stakeholder input. My office and the City Council are committed to a process that melds with the goals and purposes of the RESTORE Act. During and immediately following the

public meeting that we held in Corpus Christi in April, the members of the community provided potential projects which are listed in an attachment for your consideration. The attached list is submitted as a complement to the projects in Appendix A of the Draft Plan.

The City of Corpus Christi encourages the Restoration Council to come to Corpus Christi, Texas, to see the bright future of a vibrant Gulf of Mexico community. We are appreciative of the Council's outreach activities and we are confident that we can assist you and the Council with information and support whenever you need to achieve the goal of restoring the Gulf.

Sincerely,



Nelda Martinez
Mayor

NM/twt

Attachment

cc: The Honorable Rick Perry Governor of Texas
Toby Baker, Commissioner, Texas Commission on Environmental Quality
Jerry Patterson, Land Commissioner, Texas General Land Office
Carter Smith, Executive Director, Texas Parks and Wildlife Department
Tim Richardson, Meyers & Associates
Larry Meyers, Meyers & Associates

RESTORE Act
List of Proposals and Public Comments
(updated 6/21/2013)

1. Adaptive Management for Nueces Delta/Bay (City of Corpus Christi)
2. Mary Rhodes Pipeline Phase II (City of Corpus Christi)
3. Desalination Pilot Project (City of Corpus Christi)
4. Downtown Flood Protection System(City of Corpus Christi)
5. Oso Bay Nature Preserve Wetland Restoration(City of Corpus Christi)
6. Oso Bay Nature Preserve Learning Center and Wetlab (City of Corpus Christi)
7. North Beach Nourishment (City of Corpus Christi)
8. Oso WRP Nutrient Removal(City of Corpus Christi)
9. Allison WWTP Nueces Delta Habitat Improvements(City of Corpus Christi)
10. Whitecap UV Improvements(City of Corpus Christi)
11. Find, Document, and Rescue and Protect Stranded and Nesting Sea Turtles in Texas Coastal Bend (Dr. Donna Shaver, Padre Island National Seashore)
12. Nueces Bay Basin Area Stakeholders Committee Work Plan for Adaptive Management and Priority Projects (Ray Allen, Coastal Bend Bays and Estuary Program; Tom Ballou, Nueces River and Corpus Christi and Baffin Bays Stakeholder Committee)
13. Corpus Christi Near-Shore Artificial Reef (Saltwater Fisheries Enhancement Association or S.E.A, John Blaha)
14. Parking Lot Renovation at JFK Bridge Boat Ramps (S.E.A.)
15. New Reef Site South of Packery Channel (S.E.A.)
16. Guadalupe, San Antonio, Mission, & Aransas Rivers and Mission, Copano, Aransas, & San Antonio Bays Basin & Bay Area Stakeholders Committee Work Plan for Adaptive Management report (San Antonio River Authority)
17. Nueces Estuary Treated Wastewater Discharges Project (National Wildlife Federation and the Coastal Bend Bays & Estuaries Program)
18. Toby Globy Eco Action Early Childhood Environmental Education Curriculum (Humberto Almarez, private citizen)
19. Texas State Aquarium Expansion (Hank Nuss, private citizen)
20. North Beach Corpus Christi, Texas – New Groin for Sand Capture for Beach Renourishment (JoAnn Gilbertson, North Beach Funding Committee)
21. North Beach Corpus Christi, Texas – Paradise Pier(JoAnn Gilbertson, North Beach Funding Committee)
22. North Beach Corpus Christi, Texas – Wetlands Enhancement and Birding Educational Trail (JoAnn Gilbertson, North Beach Funding Committee)
23. North Beach Corpus Christi – Drainage Assessment and Improvement Program(JoAnn Gilbertson, North Beach Funding Committee)
24. Fishing Tournament Pavilion at Packery Channel (Gabi Hilpold , Island Strategic Action Committee)
25. Completion of Packery Project - North Padre Island Storm Damage and Environmental Restoration Project (Johnny French-private citizen)
26. Development of a Whooping Crane Habitat Conservation Plan (Johnny French-private citizen)

27. Reopen/ Restoration of Cedar Bayou/Vinson's Slough (John Blaha/Johnny French, private citizens)
28. Upgrading WWTP for nitrification (Jace Tunnell)
29. Create a saltwater barrier dam on the Oso Creek (John Torrey/Jace Tunnell)
30. EIS for Kemp's Ridley sea turtle Recovery Plan (Plan) second breeding population, outside of the Mexican beaches, on the Padre Island National Seashore projects that improve overall maritime safety (Larry White/Johnny French, private citizens)
31. Establishment of a Special Wildlife Rescue Unit (i.e. "Appropriately Equipped Ambulance" and Staff, Tony Amos, Director the ARK)
32. Clean up and Conservation of Egery Flats FM136 in Aransas County (Lillian Gasca, South Texas Master Naturalist Chapter)
33. Secure a Mobile Emergency Unit for Natural Disaster/Environmental/Emergency Response (A&B Communications)
34. Oyster Reef Habitat Restoration and Creation Projects (Jennifer Pollack, TAMUCC/John Torrey and John Blaha-private citizens, Sandford Jaques, TAMUCC)
35. Surf Pier at Newport Pass(Carolyn Moon, private citizen)
36. City of Corpus Christi Storm Water and Wastewater Infrastructure replacement in TMDL areas (Carolyn Moon)
37. Baffin Bay (Carolyn Moon)
38. Unified Pollution and Trash Reduction Effort along the Coast including increased Education/Outreach and Enforcement (Chris Bird)
39. Little Bay Circulation, Marsh restoration and Erosion Project (Greg Harlan)
40. Enhance Connectivity of Freshwater flow from upper reaches to Nueces River Delta to the lower delta (Kevin Nelson, Harte Research Institute (HRI) at Texas A& M University Corpus Christi (TAMUCC))
41. Shoreline erosion (Kevin Nelson, HRI-TAMUCC)
42. Delta Conservancy (Kevin Nelson, HRI-TAMUCC)
43. Coastal Bend Bays & Estuary Program projects (Kevin Nelson, HRI-TAMUCC)
44. Cole and Ropes Parks Implementation Plan Activities (Sandra Heatherley, private citizen)
45. Fresh water inflows to Estuaries (Sandford Jaques, TAMUCC)
46. Environmental Education Curriculum in public schools (Sandford Jaques, TAMUCC)
47. Restoration and Protection of colonial bird habitat and nesting including Black Skimmers (Hal Suter, private citizen)
48. County and City Park Maintenance (Hal Suter, private citizen)
49. Protection and sustainability of water supply (Judy Loverde, private citizen)
50. Seawater Desalination Project (Judy Loverde, private citizen)
51. Conn Brown Harbor Restoration (Sylvia Carrillo, City of Aransas Pass)
52. Develop Aransas Mobility and Recreation Pathway through beach renourishment, kayak trail (Sylvia Carrillo-City of Aransas Pass)
53. Creation of Science and Technology, Engineering and Math Academy (Guy Watts, Del Mar College Board of Regents)
54. Repair and restore eroding park next to Hans Suter Park(Nelida Ortiz)



COLUMBUS
COMMUNITIES,
L.L.C. ("TRADITION")

VIA U.S. MAIL

June 11, 2013

Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Avenue, N.W., Room 4077
Washington, DC 20230

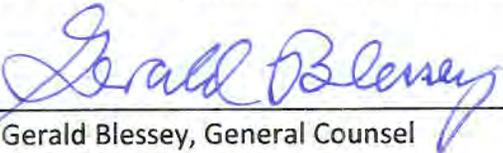
Re: Restoring the Gulf Coast's Ecosystem and Economy

Members of the Council:

Please see enclosed my comments dated June 11, 2013 on the Council's Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy, May 2013.

Sincerely,

COLUMBUS COMMUNITIES, LLC ("TRADITION")

By: 
Gerald Blessey, General Counsel
(228) 806-4755
gblessey@traditionms.com

Enclosures: Comment June 11, 2013 by Gerald Blessey

COMMENT

RE: DRAFT INITIAL COMPREHENSIVE PLAN
Restoring the Gulf Coast’s Ecosystem and Economy

SUBMITTED TO: Gulf Coast Ecosystem Restoration Council and
Trudy Fisher, Executive Director, Mississippi DEQ

SUBMITTED BY: Gerald Blessey, General Counsel
Columbus Communities, LLC, dba “Tradition”
12500 Village Avenue, E.
Biloxi, MS 39532
(228) 396-9622
gblessey@traditionms.com

DATE: June 11, 2013

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Mississippi Dusky Gopher Frog

SUMMARY OF COMMENTS/RECOMMENDATIONS

RECOMMENDATIONS TO THE COUNCIL AND MDEQ:

(1) CLARIFY THAT COASTAL WATERSHEDS ARE ESSENTIAL TO ECOSYSTEM-BASED

RESTORATION: The Council's plan should clarify that projects for acquisition and preservation of land bordering fresh water creeks, rivers and streams of watersheds in the Coastal Zone, preservation of endangered and threatened species in and near watersheds, and restoration of longleaf pine in uplands bordering watersheds are essential to a holistic, ecosystem-based approach for restoration of the ecosystem and economy of the Gulf Coast.

(2) PLACE THE DUSKY GOPHER FROG PARCEL AT TRADITION ON THE LIST OF AUTHORIZED

PROJECTS: The plan should place on the Council's preliminary list of authorized but not yet commenced projects and programs a project for (a) state or land trust acquisition of a 270-acre parcel from Tradition on the headwaters of the Biloxi River and bordering the Desoto National Forest and (b) an endowment for preservation of the parcel to (i) enhance future water quality, nutrients and sediments that nourish marine life in the Biloxi River-Biloxi Bay estuary; (ii) provide additional habitat to enhance the survivability of the Mississippi dusky gopher frog, the red-cockaded woodpecker and the gopher tortoise; and (iii) restore longleaf pine ecosystem in the parcel.

(3) PLACE THE DUSKY GOPHER FROG PARCEL AT TRADITION ON THE 2013 PRIORITY LIST FOR THE NFWF GULF ENVIRONMENTAL BENEFIT FUND FOR MISSISSIPPI: The Council and MS DEQ should recommend to National Fish and Wildlife Foundation that a project for state or land trust acquisition and an endowment for preservation of the 270-acre Mississippi Dusky Gopher Frog Preservation Parcel at Tradition should be on the 2013 priority list for NFWF's Gulf Environmental Benefit Fund for Mississippi.

SUMMARY OF COMMENTS:

WATERSHEDS, ENDANGERED SPECIES, AND LONGLEAF PINE. Watersheds are essential to holistic restoration of the gulf coast ecosystem and economy. The plan should clarify that enhancement of watersheds in the Coastal Zone, preservation of endangered and threatened species in watersheds, acquisition of land bordering watersheds, and restoration of longleaf pine in uplands bordering watersheds are essential to a holistic, ecosystem-based approach toward restoration of the Gulf Coast's ecosystem and economy.

COMPREHENSIVE PLANS AND GUIDELINES. Acquisition and preservation of land to enhance future water quality of coastal zone watersheds, save endangered species, and restore longleaf pine ecosystem serve strategic plans and guidelines stated in the GCERC's Draft Initial Comprehensive plan, the BP and Transocean Criminal Plea Settlement Agreements, and the Mississippi GoCoast 2020 Commission Report.

COUNCIL'S LIST OF AUTHORIZED PROJECTS. The plan should place on the Council's preliminary list of authorized but not yet commenced projects and programs a project for state or land trust

acquisition of a 270-acre parcel from Tradition on the headwaters of the Biloxi River and bordering the Desoto National Forest, with an endowment for preservation and restoration, to (i) enhance future water quality, nutrients and sediments that nourish marine life in the Biloxi River-Biloxi Bay estuary; (ii) provide additional habitat to enhance the survivability of the Mississippi dusky gopher frog, the red-cockaded woodpecker and the gopher tortoise; and (iii) restore longleaf pine ecosystem in the parcel.

NFWF's GULF ENVIRONMENTAL FUND 2013 PRIORITY LIST. The Council and MS DEQ should recommend to National Fish and Wildlife Foundation that a project for state or land trust acquisition of the 270-acre Mississippi dusky gopher frog parcel at Tradition, with an endowment for preservation and restoration, should be on the 2013 priority list for NFWF's Gulf Environmental Benefit Fund for Mississippi (BP/Transocean criminal plea settlement funds. The State of Mississippi or a state-approved land trust should acquire the parcel from Columbus Communities, LLC ("Tradition"), a willing seller, at fair market value determined by appropriate governmental procurement laws and regulations. A current MAI appraisal values the land at \$4.3 Million (\$16,000 per acre.) The project funding should include a small endowment (approximately \$200,000) for future state or land trust management and restoration activities.

ECONOMIC RECOVERY AND SUSTAINABILITY DEPENDS ON ECOSYSTEM RECOVERY AND SUSTAINABILITY. These comments and recommendations for ecosystem restoration and protection of endangered species also serve holistic strategies for economic recovery of the Mississippi Coast and the whole Gulf Region. Recreation and ecotourism in forests and watersheds are essential to a diversified recovery of the Gulf Coast tourism industry. E.O. Wilson states that 80% of all income from forests comes from recreation, not logging. He emphasizes that, "Everywhere, and not just in hot spots and wildernesses, we need to direct special attention to the lakes and river systems, which are the most threatened ecosystems of all."¹

Programs for research, education and preservation of endangered species generate jobs not only for scientists, educators, managers and staff in laboratories and the field, but also for ecotourism rangers, guides, and managers. Enhancing the water quality, nutrients and sediments from watersheds that flow into the marine nursery areas in the estuaries of the Gulf are essential elements of restoring not only the marine life of the Gulf Region, but also the fishery and tourism industries that depend now and forever upon the recovery and sustainability of marine life.

GLOBAL WARMING, RESILIENCE AND SUSTAINABILITY. Implementation of these recommendations would support the resilience and sustainability of Gulf Coast communities, economies and ecosystems. Implementing these recommendations will reduce carbon dioxide in the atmosphere, thus reducing global warming.²

SCIENCE-BASED. The foregoing comments and recommendations are science based. See the footnotes and Appendices herein.

¹ Schueler, Donald G., Mississippi Department of Wildlife, Fisheries and Parks, *Preserving the Pascagoula* (University Press of Mississippi, 2d ed. 2002). Afterword Keynote Address by E.O. Wilson at p. 187.

² *Standing Tall: How Restoring Longleaf Pine Can Help Prepare the Southeast for Global Warming*, National Wildlife Federation (2009). Foreword by E.O. Wilson.

DUSKY GOPHER FROG PARCEL OVERVIEW

ACQUISITION AND PRESERVATION OF THE DUSKY GOPHER FROG PARCEL WILL ENHANCE ESTUARINE WATER QUALITY AS WELL AS HABITAT FOR ENDANGERED SPECIES: The map in Figure 2, below, identifies a 270-acre parcel, currently owned by Columbus Communities, LLC, contiguous with the DeSoto National Forest in central Harrison County, that is available for acquisition and preservation by an appropriate public agency or land trust to (a) enhance future water quality of the Biloxi River watershed flowing into the Biloxi Bay-Mississippi Sound ecosystem and (b) increase permanent habitat around Glen's Pond, the primary breeding site of the Mississippi Dusky Gopher Frog, an endangered species.

ACQUISITION AND PRESERVATION OF THE PARCEL WILL GREATLY ENHANCE RESTORATION OF THE BILOXI RIVER-BAY OF BILOXI-MISSISSIPPI SOUND ESTUARY AND THEREBY REMEDY HARM, AND REDUCE THE RISK OF FUTURE HARM, TO GULF COAST NATURAL RESOURCES: "In general the coastal zone encompasses both the neighboring uplands and the adjacent salt waters that are mutually influenced by the interactive complex of various ecological processes (natural and human-influenced) occurring in each region."³ The currently undeveloped 270-acre dusky gopher frog parcel at Tradition straddles Tiger Creek, a natural stream that flows into the Biloxi River which flows into the Bay of Biloxi and thence to the Mississippi Sound and Gulf of Mexico. If acquired by a public agency or land trust, this land would provide natural filtering of storm water runoff, and, if the longleaf pine ecosystem were also restored on this parcel, it would restore historic, natural nutrients and sediments in this watershed to enhance future water quality contributing to restoration of the estuarine ecosystem formed by the Biloxi River watershed, Bay of Biloxi and Mississippi Sound that serve as nursery grounds for marine life harmed by the Macondo oil spill.⁴ Therefore, acquisition and preservation of the parcel and restoration of longleaf pine on it would remedy harm, and reduce the risk of future harm, to Gulf Coast natural resources.

PRESERVATION OF ENDANGERED SPECIES: This additional habitat would likely increase the population and survivability of the Mississippi Dusky Gopher Frog. This 270-acre parcel borders critical habitat recently designated by USFWS for the Mississippi Dusky Gopher Frog.⁵ Approximately 100 Mississippi Dusky Gopher Frogs breed in Glen's Pond, in the National Forest adjacent to the parcel proposed for acquisition, making this parcel and the Desoto National Forest contiguous for ease of controlled burns and other ecosystem management techniques. Recently, USFWS has successfully

³ Vernberg, F. John, and Vernberg, Winona B. *The Coastal Zone: Past, Present and Future*, Columbia: University of South Carolina Press, 2001, p. 3.

⁴ Holland, A. F., D. M. Sanger, C. P. Gawle, S. B. Lerberg, M. S. Santiago, G. H. M. Riekerk, L. E. Zimmerman, and G. I. Scott. 2004. "Linkages between tidal creek ecosystems and the landscape and demographic attributes of their watersheds." *Journal of Experimental Marine Biology and Ecology*. 298: pp. 151-178; see also, Holland, A. F., D. M. Sanger. 2008. *Tidal Creek Habitats: Sentinels of Coastal Health*, available at http://www.scseagrant.org/pdf_files/tidal_creeks_booklet.pdf.

⁵ 77 FR 35117 35161, *Designation of Critical Habitat for Dusky Gopher Frog (Previously Mississippi Gopher Frog)*; *Final Rule*, Department of the Interior Fish and Wildlife Service.

Location Maps:



Figure 1 - Harrison County Map Showing Tradition, Major Cities, and Coastal Geography



Figure 2 - Dusky Gopher Frog Preservation Parcel at Tradition: Detail View With DeSoto Natl. Forest and Glen's Pond

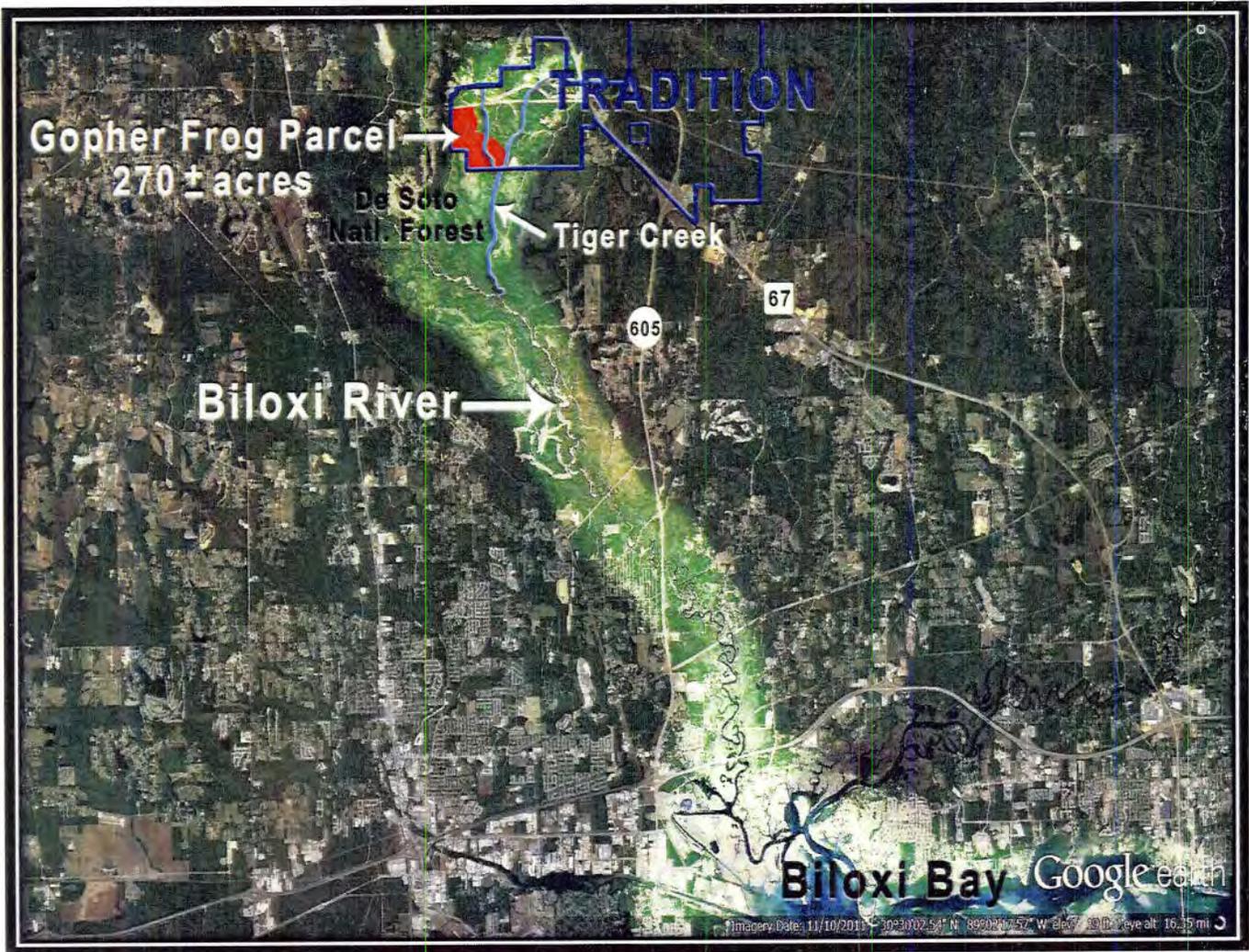
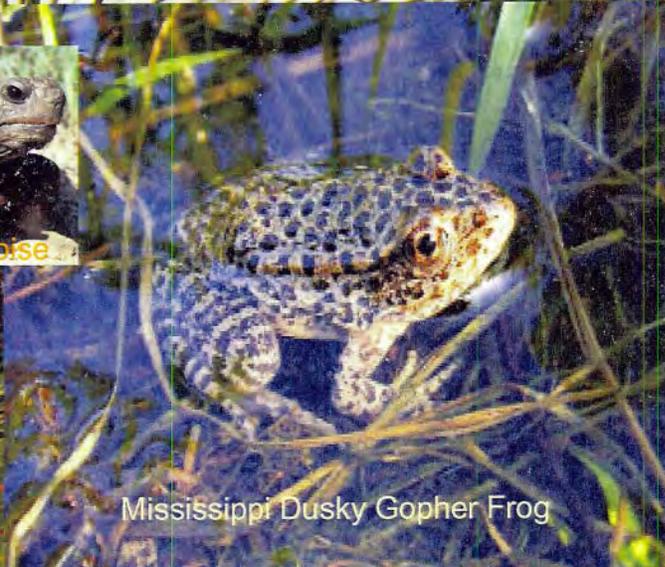


Figure 3 - Dusky Gopher Frog Preservation Parcel Map Showing Biloxi River Watershed

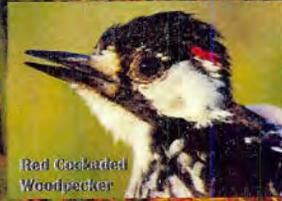
Longleaf Pine



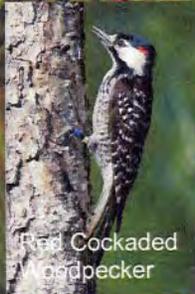
Gopher Tortoise



Mississippi Dusky Gopher Frog



Red Cockaded Woodpecker



Red Cockaded Woodpecker



Gopher Tortoise Hatchling



MS Dusky Gopher Frog

ACQUIRING THE PARCEL MEETS GUIDELINES AND PRIORITIES

Acquisition and preservation of this parcel by a public agency or land trust would contribute to regional, holistic, ecosystem-based, landscape-scale, science-based restoration of the natural resources, economy and communities of the Gulf Coast by providing:

- Enhancement of water quality contributing to restoration of the estuarine ecosystem of the Biloxi River, Bay of Biloxi & Mississippi Sound that was harmed by the Macondo oil spill
- Additional Habitat to enhance the survivability of Mississippi Dusky Gopher Frog (Endangered Species) and Gopher Tortoise (Threatened Species)
- Longleaf pine ecosystem restoration and habitat for Red-cockaded Woodpecker (Endangered Species)
- Diversification and enhancement of public recreation, eco-tourism and general tourism
- Opportunities for education and research regarding survivability of the dusky gopher frog and restoration of the longleaf pine ecosystem in the watersheds of the Gulf region
- Reduction of carbon dioxide in the atmosphere

This additional habitat would likely increase the population and survivability of the frog. The purchase price would be fair market value, set by MAI appraiser selected by the buyer. Approximately 100 of the frogs breed in Glen's Pond, in the National Forest adjacent to the parcel proposed for acquisition. This parcel would provide additional habitat within 1,000 meters of Glen's Pond, the estimated range of the frog.

Although the 2010 Macondo oil spill has resulted in multiple funding sources subject to somewhat varying guidelines, rules, and decision-making bodies, the guidelines published to date about project eligibility and priority exhibit consistent parallels. Additionally, NFWF will seek input from MDEQ, USFWS, and NOAA to identify projects and help develop consensus. These organizations' input will also be the "primary means" through which NFWF's Gulf Environmental Benefit Fund projects are coordinated with those being implemented through the RESTORE Act and other funds. Like NFWF, the Gulf Coast Ecosystem Restoration Council, and other involved agencies, are committed to cooperation and coordination of projects to maximize efforts and efficiency. This section demonstrates how acquiring the gopher frog parcel using NFWF'S funds from the BP/Transocean criminal plea settlements would constitute a project that satisfies goals, priorities, criteria, and guidelines across the board, facilitating easy cooperation and coordination at the decision-making level.

Deepwater Horizon criminal settlement plea agreement guidelines and NFWF criteria

The plea agreement for the BP and Transocean criminal settlements state that ½ of the \$2.5 billion in settlement funds directed to the National Fish & Wildlife Foundation must be used "to **remedy harm** and eliminate or **reduce the risk of future harm** to Gulf Coast **natural resources**" across the five affected Gulf states.¹¹ (Emphasis added.)

¹¹ Order, par. 37, p. 17, implementing the Guilty Plea Agreement, *United States of America v. BP Exploration & Production, Inc.*, (E. D. La., 2012).

Permanent enhancement of water quality in the estuarine ecosystem will “remedy harm” and reduce the “risk of future harm” to “Gulf Coast natural resources”, especially marine life dependent upon the nursery grounds in the Biloxi River, Bay of Biloxi and Mississippi Sound. Additional permanent habitat for the gopher frog, gopher tortoise and red-cockaded woodpecker will “reduce the risk of future harm” to those species.

NFWF’s published information on the Gulf Environmental Benefit Fund for Mississippi states that “Mississippi is working to develop a holistic approach to restoration efforts that maximizes the benefit of current and future funding with the overall goal of achieving long-lasting and sustainable environmental benefit for the state and region” and that “Projects are expected to occur within reasonable proximity to where the impacts occurred, as appropriate.”¹² The dusky gopher frog parcel at Tradition is within Harrison County, one of Mississippi’s three Coastal Zone counties, is on the headwaters of the Biloxi River, and is approximately 12 miles from the Mississippi Sound.

State or land trust acquisition of the gopher frog parcel represents a holistic approach that meets these overall goals in several ways. Preservation of this parcel of land protects two endangered and one threatened species, and also adds permanent habitat into which they can expand and increase their numbers. Protection and restoration of the longleaf pine ecosystem that shelters these three species is critical to maintaining biological diversity in the Gulf region, as well as preserving the integrity of Tiger Creek, a freshwater creek which feeds the Biloxi River and Biloxi Bay/Mississippi Sound estuarine and marine ecosystems with a critical influx of fresh water and nutrients drained from the upland watershed. Recovery of the coastal and marine ecosystems directly affected by the spill is dependent on recognizing the “big picture” of the entire coastal ecosystem, and taking measures to ensure each part is healthy.¹³ Thus, preserving the gopher frog parcel represents a double-header in that not only does it directly benefit the endangered and threatened species of the longleaf pine ecosystem within its borders, but it also contributes to the recovery and continued resilience of the entire coastal ecosystem downstream.

In addition to the plea agreement criteria, NFWF also states that further criteria may call for projects that:

- Advance priorities in natural resource management plans;
- Are cost-effective and maximize environmental benefits;
- Are science-based; and
- Produce measurable and meaningful conservation outcomes¹⁴

Again, preservation of this parcel and restoration of the longleaf pine ecosystem constitutes an extremely cost-effective project with maximized environmental benefits that advance priorities in natural resource management plans because it (a) enhances survivability of two endangered and one threatened species and (b) encourages the restoration, sustainability, and future resilience of not just

¹² “Gulf Environmental Benefit Fund: Mississippi”; <http://www.nfwf.org/Pages/gulf/GEBF-Mississippi.aspx#.Ua4Cvet4Np9>.

¹³ See, Sklar, Fred H., Joan A. Browder. “Coastal Environmental Impacts Brought About by Alterations to Freshwater Flow in the Gulf of Mexico.” *Environmental Management*, July 1998, Volume 22, Issue 4, pp 547-562.

¹⁴ “Gulf Environmental Benefit Fund: Mississippi”, *supra*.

the coastal and estuarine ecosystem whose headwaters it is a part of, but of the longleaf forest ecosystem -- which itself is tied to the Gulf's ecosystems because the forest's health affects the water type, quality, toxicity, and nutrient availability that feeds into the estuaries and Gulf (See map of Mississippi Coastal Preserves and the watershed of the three coast counties, published by Mississippi Department of Marine Resources, in Figure 4, below). See also the extensive conservation mapping in "Conservation Strategy for the Mississippi Gulf Coast" published by the Land Trust for the Mississippi Coastal Plain under a grant from USFWS and Mississippi DMR.¹⁵

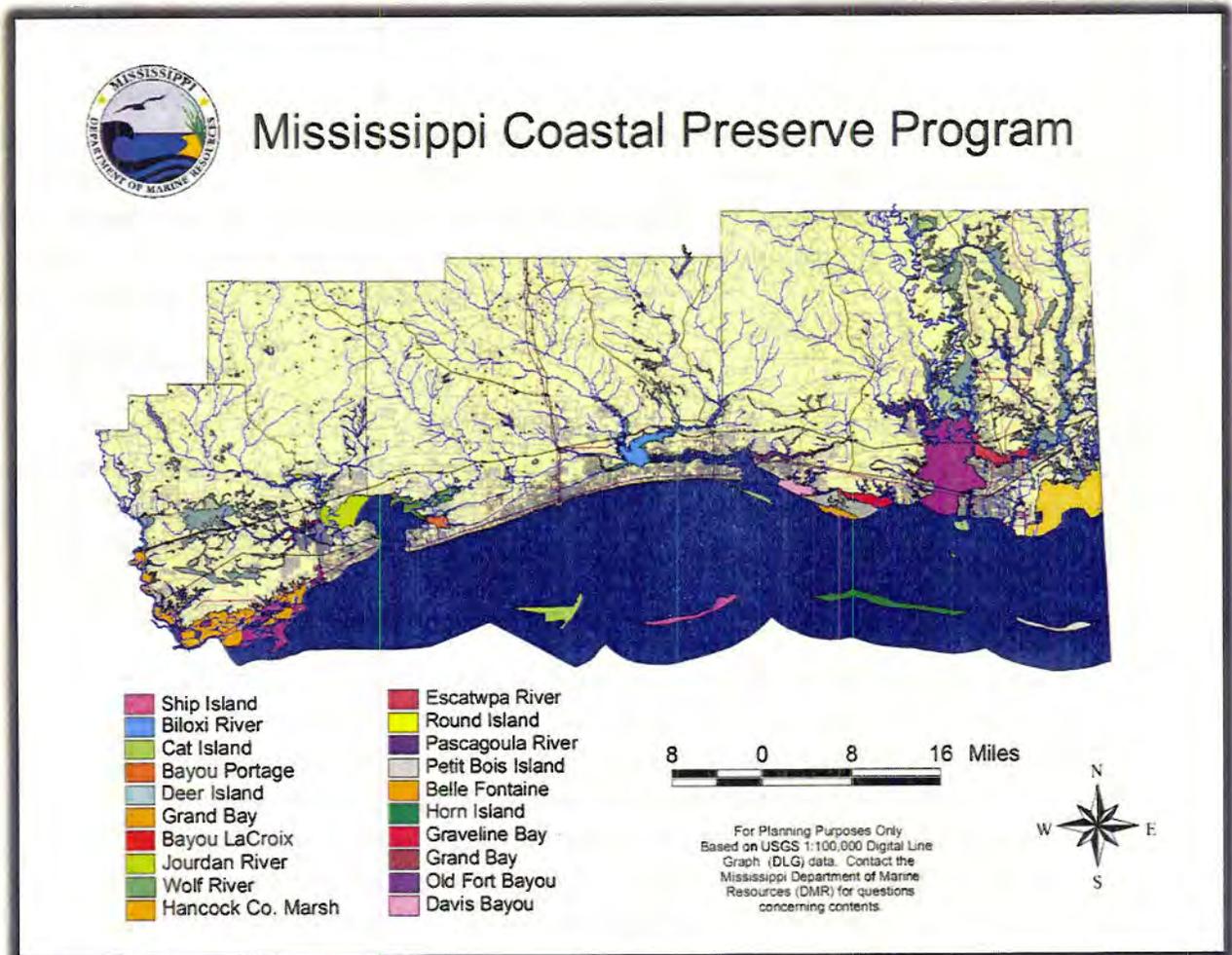


Figure 4 - Mississippi Coastal Preserve Program Map

¹⁵ *Conservation Strategy for the Mississippi Gulf Coast, Conservation Mapping Report*, Land Trust for the Mississippi Coastal Plain, Miss. Dept. of Marine Resources, Miss. Dept. of Wildlife, Fisheries and Parks, CDM (Nov. 2001)

recovery for marine ecosystems downstream by reducing the amount of contaminants and increasing the amount of natural nutrients feeding into the system. Further, longleaf pine restoration will mitigate the impacts of climate change. Longleaf pine can withstand hurricane winds, fire, and drought better than loblolly and slash pine, and restoration of the mature longleaf canopy and the flora and fauna that thrive in the mature longleaf ecosystem will reduce carbon dioxide in the atmosphere, thus contributing to the reduction of global warming.¹⁷

Specific goals and objectives

The Council lists 5 specific goals for the Plan:¹⁸

1. Restore and conserve habitat
 - a. Acquiring the parcel ensures conservation of critical habitat for an endangered species and will allow for future efforts to restore longleaf pine in the area.
2. Restore water quality
 - a. Acquiring the parcel would help protect the integrity and quality of Tiger Creek, which feeds directly into the Biloxi River and the estuarine ecosystem of the MS Gulf Coast.
3. Replenish and protect living coast and marine resources
 - a. Protecting this area of land allows it to continue to perform critical functions for the Gulf's estuaries by reducing the amount of toxins and pollutants that reach the Gulf, as well as feeding it with essential nutrients young fish, crabs, and shrimp need to thrive. As a result, coastal and marine resources will be assisted in their recovery from the oil spill.
4. Community resilience
 - a. Community resilience in a coastal region depends on resilience of the coastal environment itself. This project would contribute to the overall resilience, recovery, and sustainability of the region's ecology.
5. Restore and revitalize the Gulf economy
 - a. The Gulf economy depends on the health of its natural environment. By assisting in the recovery of marine resources affected by the spill, as well as maintaining or increasing the diversity of species in marine ecosystem's headwaters, this project directly and indirectly helps the Gulf economy by healing its environmental woes.

All of the above benefits can be expected should the dusky gopher frog parcel be acquired and preserved, and all would be further enhanced by future efforts to restore the longleaf pine forest in the area in collaboration with the USDA Forest Service in the contiguous Desoto National Forest.

Council Objectives

Section IV of the plan also provides many sample Objectives for selection by the Council. Projects must fall within the scope of at least one these Objectives for ecosystem restoration. The Gopher Frog Parcel falls under the scope of several of these Objectives:

¹⁷ See, Finch, Bill, Beth Maynor Young, Rhett Johnson and John C. Hall. *Longleaf, Far as the Eye Can See: A New Vision of North America's Richest Forest, supra*; *Standing Tall: How Restoring Longleaf Pine Can Help Prepare the Southeast for Global Warming, supra*.

¹⁸ Draft Initial Comprehensive Plan, p. 8

- Restore, Enhance, and Protect Habitats: Restore, enhance, and protect the extent, functionality, resiliency, and sustainability of coastal, freshwater, estuarine, wildlife, and marine habitats.
- Restore, Improve, and Protect Water Quality: By reducing or treating nutrient and pollutant loading; and improving the management of freshwater flows, discharges to, and withdrawals from critical systems.
- Protect and Restore Living Coastal and Marine Resources: Restore and protect healthy, diverse, and sustainable living coastal and marine resources. The types of projects and programs that could be implemented under this objective may address recovery of threatened and endangered species.

Finally, the Council has stated in the Draft Plan that it will give highest priority for at least the first three years to ecosystem projects that meet one or more of its four Priority Criteria.¹⁹ These are:

1. Projects that are projected to make the greatest contribution to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region, without regard to geographic location within the Gulf Coast region.
2. Large-scale projects and programs that will substantially contribute to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region.
3. Projects contained in existing Gulf Coast State comprehensive plans for the restoration and protection of Gulf Coast region's natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands.
4. Projects that restore long-term resiliency of the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands most impacted by the *Deepwater Horizon* oil spill.

Timely actions to add habitat and enhance survivability of endangered and threatened species are always of the highest priority in comprehensive plans for environmental restoration and protection. See: plans of Miss. Dept. of Wildlife, Fish & Parks, and USFWS for preserving the Dusky Gopher Frog and Red-cockaded Woodpecker.

Acquisition of the gopher frog parcel easily meets the Council's Priority Criteria. By benefitting our marine, estuarine, and longleaf pine forest ecosystems, preservation of the gopher frog parcel constitutes a large benefit to the area. Furthermore, active restoration of the longleaf pine ecosystem in and around this parcel would represent an important piece of a larger, ongoing effort throughout the Southeast US to restore this critical habitat and natural resources. These actions combined result in both immediate and long-term restoration and health of the environment on the MS Gulf Coast.

¹⁹ Draft Initial Comprehensive Plan, p. 14

community development can serve as a model for a positive business environmental where there can be “progress with preservation.” As E.O. Wilson so wisely stated in his keynote address at ‘Celebrate the Pascagoula’, “I think it is also essential to make conservation profitable.”²⁴

Seafood GoTeam: The Seafood GoTeam committee identified “habitat development and restoration” and “seafood research” as two of its six priority areas.²⁵ Projects that preserve and enhance the water quality, nutrients and sediments that flow from the watersheds of the Coastal counties into the estuarine nursery grounds for marine life clearly serve habitat development and restoration, as well as future sustainability of the marine life upon which the commercial and recreational seafood and fisheries industries depend, all of which are served by acquisition and preservation of land bordering Coastal watersheds and in particular acquisition and preservation of the dusky gopher frog parcel. Likewise, acquisition by a public agency or land trust that will preserve the dusky gopher frog parcel and restore the longleaf pine ecosystem on it in order to enhance the water quality of the fresh water flowing into the estuary formed by the Biloxi River, Bay of Biloxi and Mississippi Sound will provide an excellent opportunity for the following areas of specific research identified by the Seafood GoTeam:

- “Understanding of water quality issues that an guide management issues focused on improving water quality throughout the Northern Gulf, and in particular in the areas supporting oysters.
- Identification of declining species and management decisions that can be made to reduce or eliminate these declines.”²⁶

Tourism GoTeam: The Tourism GoTeam found specific “gaps” that “inhibit the success of the Value Propositions” that will bring substantially more visitors to the Coast, as outlined in the Tourism GoTeam’s report.²⁷ The GoTeam defined one of the major gaps as follows:

There are tremendous unspoiled natural assets to explore, and worldwide eco-tourism is exploding. But the Coast lacks quality campgrounds, walking trails, recreational parks, biking trails, etc.²⁸

Although access to Glen’s Pond in the Desoto National Forest should be limited to supervised scientific and educational groups, the state agency or land trust that acquires and manages the dusky gopher parcel could allow hiking trails, some of which already exist on the parcel and in the contiguous Desoto National Forest. Proper management could provide a unique eco-tourism opportunity for hikers, bird-watchers, students, teachers and scientists to observe and study the restoration of the longleaf pine ecosystem and the extraordinarily biodiversity that it will support along Tiger Creek and in the contiguous National Forest.

²⁴ Schueler, Donald G., *Preserving the Pascagoula*, p. 188, , *supra*.

²⁵ GO COAST 2020 Final Report, pp. 23-24.

²⁶ GO COAST 2020 Final Report, p. 24.

²⁷ GO COAST 2020 Final Report, pp. 41-44.

²⁸ GO COAST 2020 Final Report, pp. 43-44.

The dusky gopher frog parcel at Tradition includes private wetlands and is an integral part of Harrison County's coastal and wetland ecosystem, because it provides a critical influx of clean freshwater, nutrients and sediments essential to estuarine health and the sustainability of marine life. Preservation of the land also allows it to continue the vital function of naturally removing potentially harmful toxins and pollutants from the coastal ecosystem, thereby reducing the risk of potential harm to coastal and wetland natural resources as well as helping to minimize added stress on the Gulf Coast ecosystem as it continues to recover from the Deepwater Horizon oil spill.

PLANNING, TECHNICAL ASSISTANCE, AND IMPLEMENTATION

At the basic level the proposed preservation of the dusky gopher frog parcel is ready for immediate execution and requires minimal work. There is nothing to construct. Environmental agency groups are already doing scientific work on the frog. Immediate acquisition, with a modest endowment, would motivate immediate planning and implementation of enhancement of gopher frog habitat and longleaf restoration, which would serve to further enhance and greatly magnify over time all the same benefits that simply preserving the parcel would achieve. Technical assistance for controlled burns, habitat restoration, water quality enhancement and restoration of longleaf pine are available through USFWS, USDA Forest Service, Mississippi Forestry Commission, Mississippi Department of Environmental Quality, Mississippi Department of Wildlife, Fisheries and Parks, Mississippi Department of Marine Resources. Tradition has already expressed its willingness to cooperate in, and not object to, controlled burns in the dusky gopher frog parcel and the contiguous Desoto National Forest. Implementation can begin in 2013.

CONCLUSION

State or land trust acquisition and preservation of the dusky gopher frog parcel at Tradition, in 2013, would provide both immediate and long-term benefits to the overall sustainability, recovery, resilience, health, and biodiversity of the entire Gulf Coast ecosystem and its interdependent regional economy and communities.

Restoring longleaf pine on the parcel will reduce carbon dioxide in the atmosphere, thus reducing global warming.

The comments and recommendations in this document are science-based. See further scientific references in the Appendices.

ABOUT THE AUTHOR OF THESE COMMENTS:

Gerald Blessey is General Counsel for Columbus Communities, LLC, a Mississippi limited liability company, dba "Tradition", recognized, according to state law criteria, by the Mississippi Development Authority and the Harrison County Board of Supervisors as a "master-planned community". He received a B.A. and J.D. from the University of Mississippi and an LL.M from Harvard Law School. He served as a Member of the Mississippi House of Representatives from Harrison County (1972-1981) and was the author of the Mississippi Coastal Wetlands Protection Act of 1973. He served as Mayor of Biloxi from 1981-1989.

Appendix A:

Endnotes: *Standing Tall: How Restoring Longleaf Pine Can Help Prepare the Southeast for Global Warming*, National Wildlife Federation (2009). Foreword by E.O. Wilson.

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County of Monroe

The Florida Keys



BOARD OF COUNTY COMMISSIONERS

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July 8, 2013

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Gulf Coast Restoration Council
C/o U.S. Department of Commerce
1401 Constitution Avenue, N.W. Room 4077
Washington, DC 20230

Dear Chairman Ehrenwerth:

Monroe County appreciates this opportunity to provide comments on the Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy, pursuant to the Federal Register notice dated May 29, 2013. We also appreciate the scope of this effort on the part of the staff of the Federal Council, especially in consideration of your tight deadlines and limited resources.

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Monroe County (also known as the "Florida Keys") is the southernmost political sub-division in the State of Florida. With a coastline that extends from the Everglades to the Dry Tortugas, Monroe County has the longest coastline of exposure on the Gulf of Mexico. As a chain of 800 islands, spanning 220 miles from the tip of the Florida peninsula into the Gulf of Mexico, and 90 miles from the island of Cuba, Monroe County has the highest level of exposure to both domestic & international energy extraction activities (oil drilling, natural gas, etc.) on both the Gulf of Mexico and Atlantic Ocean coastlines.

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Monroe County is the only county on the Gulf coast with a barrier reef. The coral reef tract in the Florida Keys is the third largest in the world, and the only living reef in the continental US. Our marine ecosystem supports over 6,000 species of fish, invertebrates and plants providing unparalleled support to fisheries and essential habitats throughout Florida, the Gulf of Mexico and southeast Atlantic coasts.

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This environment generates more than 70,000 jobs and \$6 billion dollars in economic activity annually.

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In the spirit of cooperation and support we offer the following comments which mirror the thoughtful, detailed comments submitted by our sister county, Escambia. For any questions regarding these comments, please do not hesitate to contact me at (305) 292-4444.

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Sincerely,

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Lisa Tennyson

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[Lisa Tennyson](#)
[Legislative Affairs and Grants Acquisition Director](#)

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1. Comments Regarding the Draft Initial Comprehensive Plan

In order to assist the Council in finalizing the Draft Initial Comprehensive Plan, Escambia County/Monroe County is providing more specific comments on various issues related to this draft Plan, Programmatic Environmental Assessment (“PEA”) and further Plan/process development.

While Escambia/Monroe County understands that the RESTORE Act is unique, other major federal efforts to restore aquatic ecosystems that have been altered or impaired by development, habitat loss, and federal water resource projects are instructive to build upon and to create a process for implementation. Some of these restoration initiatives include those in the Everglades, Coastal Louisiana, California Bay-Delta, Great Lakes, Chesapeake Bay, Klamath Basin, and elsewhere. Plans and projects for RESTORE are still subject to the typical environmental permitting¹ context, including but not limited to:

- the National Environmental Policy Act (“NEPA”),
- the Clean Water Act (“CWA”),
- the Endangered Species Act (“ESA”),
- the Fish and Wildlife Coordination Act (“FWCA”),
- Flood Control Acts, and
- the Rivers and Harbors Acts.

This process needs to build upon the successes of other restoration efforts to address issues such as: project formulation, alternatives analysis, project documentation requirements, defining key terms and developing implementation policy guidance.

a. Defining “authorized but not yet commenced” projects.

Monroe/Escambia County understands there are two different requirements set forth in the Act regarding the creation of “project lists” and that Appendix A is not “the list” of initial projects.² The import is that Appendix A is only meant to fulfill a narrow requirement producing a list of “any project or program authorized prior to the date of enactment of this subsection but not yet commenced the completion of which would further the purposes and goals of this subsection” Problematic is that the Plan states: “In general, Council Members put forward projects and programs that have either been federally authorized by Congress or approved under a State

¹ Under these authorities, Corps authorization is needed for work performed in, over or under a navigable water of the U.S.; for discharge of dredged or fill material into waters of the U.S., including jurisdictional wetlands; and for transportation of dredged material to the ocean for disposal. In nearly all situations, authority rests with District Commanders of the U.S. Army Corps of Engineers for permit decisions.

² Section 1603(t)(2)(D)(ii)(IV) CONTENTS.—The initial Comprehensive Plan shall include—
(aa) such provisions as are necessary to fully incorporate in the Comprehensive Plan the strategy, projects, and programs recommended by the President’s Gulf Coast Restoration Task Force;
(bb) a list of any project or program authorized prior to the date of enactment of this subsection but not yet commenced, the completion of which would further the purposes and goals of this subsection and of the Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act of 2012;
(cc) a description of the manner in which amounts from the Trust Fund projected to be made available to the Council for the succeeding 10 years will be allocated; and
(dd) subject to available funding in accordance with clause (iii), a prioritized list of specific projects and programs to be funded and carried out during the 3-year period immediately following the date of publication of the initial Comprehensive Plan, including a table that illustrates the distribution of projects and programs by the Gulf Coast State.

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program, plan, or action.” With this language, the Draft Plan seems to qualify “projects and programs” as federally authorized or approved under a State initiative which seems more limited than the RESTORE Act language “any project or program”.

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None of the projects that Eseambia-Monroe County has submitted thus far to the Florida Department of Environmental Protection (“DEP”) (~~over 100 projects~~) appear on Appendix A. That said, they may not have met the “authorized but not yet commenced” threshold, but without a clear definition of how a project must be “authorized” or at what level, it is impossible to know if any of Eseambia-Monroe County’s projects meet that criteria and could likely be included in the Plan or first 3-Year Prioritized Project List. When compared against the Restoration Priorities, some projects on Appendix A remotely, or do not even at all, provide a benefit to the Gulf Coast region or ecosystem or rectify harm caused by the spill. This is a basic premise of all of the Restoration Priorities listed in Section 1603(t)(2)(D)(iii).

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Recommendation: Resolve inconsistencies in language regarding project thresholds that are simply “authorized but not yet commenced” versus those “that have either been federally authorized by Congress or approved under a State program, plan, or action” to assure clear understanding of those projects that are eligible for inclusion on the Appendix A List.

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Recommendation: Define level of authorization for projects. Specific issues to address are whether or not the project already had to receive regulatory approvals (at the state or Federal level) such as NEPA or CWA or other environmental resource permitting requirements at the State level to be included in the Council’s Plan.

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Recommendation: Refine Appendix A for consistency with Restoration Priorities. Eseambia Monroe County would urge the Council to further refine this list to assure that all projects meet the requirements of the Act, fundamentally, projects must “further the purposes and goals” which are the Restoration Priorities outlined in the Act.

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b. Defining the process for future project evaluation

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The Plan states, “the Council will use an open and transparent process to evaluate and select ecosystem restoration projects under the Council-selected Restoration Component” and the “Council will further review the projects and programs on this list to determine whether each project or program meets all applicable requirements of the RESTORE Act.” The Plan needs more detail on how this process might work, and at the local level, it is important that this process be clearly outlined so that projects can be developed and targeted for the appropriate planning process or source of funds.

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The Plan states that the Council will fund and implement projects through its members, but more clarity is needed as to what this means. For instance, the Council will request proposals from its members and they then choose to sponsor or submit for consideration projects and programs. Eseambia-Monroe County recommends the Plan should clarify the following issues:

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Recommendation: Outline project submittal and assignment procedures. Clarify how a member can submit, as opposed to implement, a project. For instance, if another Council member (agency) is better qualified to actually implement the project, but hasn’t proposed it, the Plan should clarify how that project will be implemented by the most appropriate Member. While the RESTORE Act itself states that primary authority for each project and program included in the Comprehensive Plan shall be assigned to a Gulf Coast State or a Federal agency, that process of “assignment” should be provided in further detail since being accountable for a project is a large commitment on behalf of any state or agency.

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Recommendation: Create one set of streamlined project documentation requirements. The Council needs to set the stage for a streamlined documentation process so that state environmental resource and

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Plan to be updated every five (5) years.⁶ Escambia-Monroe County does not believe the Council should wait that long to produce the next version of the Plan. Producing the first 3-Year Prioritized Project List as soon as possible is important because all of the planning efforts must be consistent with one another. The Draft Initial Comprehensive Plan has the largest scope and provides the biggest picture approach for restoration with the State Expenditure Plans and Multi-Year Implementation Plans of the Coastal Political Subdivisions providing more localized projects. Without the big picture, it's difficult to fill in the gaps.⁷ That said, Escambia-Monroe County also understands that the Council's planning process must be scientifically-driven, and given the staff and time constraints to meet the RESTORE Act deadline to produce the Comprehensive Plan, producing this List now could be premature.⁸ Clearly Escambia-Monroe County understands that if the first 3-year Prioritized Project List cannot be produced yet, then it is equally difficult to meet the requirement that the Plan identify which amounts from the Trust Fund are projected to be made available to the Council for the succeeding ten (10) years and how they will be allocated. Obviously, this is equally impossible to determine given there is no real understanding of the amount or flow of money over that duration let alone the short term.⁹

Recommendation: Develop timeline for Plan Update and 3-Year Prioritized Project List. It is important that the Plan explain how and when development of the Plan Update and the 3-Year Prioritized Project List will occur (and when) so that the State and Local governments can begin their planning process focusing on the more finite level given that the Council's Plan is focusing on larger scale regional projects.⁹

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⁶ Section 1603(t)(2)(D)(i)(IV), PLAN UPDATES.—The Council shall update— ‘(aa) the Comprehensive Plan every 5 years in a manner comparable to the manner established in this subparagraph for each 5-year period for which amounts are expected to be made available to the Gulf Coast States from the Trust Fund; and ‘(bb) the 3-year list of projects and programs described in subclause (IV)(dd) annually.

⁷ On page 4, the document states, “Before Gulf States can receive funds from their Spill Impact Component for specific projects and programs, they must develop ... a State Expenditure Plan that ... takes into consider the Plan and is consistent with the Plan’s goals and objectives.” This reinforces the notion that the Council must begin the Plan update process immediately (and most importantly the development of the 3-Year Prioritized List of Projects) so that the State Expenditure Plans can fill in the gaps and be completed expeditiously.

⁸ Section 1603(t)(2)(D)(iii): “...in selecting projects and programs to include on the 3-year list described in clause (ii)(IV)(dd), based on the best available science, the Council shall give highest priority to projects that address 1 or more of the following criteria:

- (I) Projects that are projected to make the greatest contribution to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region, without regard to geographic location within the Gulf Coast region.
- (II) Large-scale projects and programs that are projected to substantially contribute to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast ecosystem.
- (III) Projects contained in existing Gulf Coast State comprehensive plans for the restoration and protection of natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region.
- (IV) Projects that restore long-term resiliency of the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands most impacted by the Deepwater Horizon oil spill.

⁹ On January 3, 2013, Transocean Deepwater Inc. and related entities agreed to pay \$1 billion in civil penalties for violating the Clean Water Act in relation to their conduct in the Deepwater Horizon oil spill. That settlement was approved by the court in February, and Transocean paid the first installment of its civil penalties to the United States at the end of March. These funds are subject to the RESTORE Act.

Recommendation: Certainty of some funding amounts. The first 3-Year Prioritized Project List should address the Council's portion of the first \$800 million from the Transocean settlement that will be available for RESTORE implementation.

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Recommendation: Build upon previous project submittals. The first 3-Year Year Prioritized Project List should build upon projects submitted pursuant to the NRDA process that have not yet received funding. The point would be to not require duplication of the project submittal process and build upon applications already deemed critical and completed, whether or not they have been funded.

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Recommendation: Sort projects by type. The first 3-Year Prioritized project List should begin sorting and identifying projects that can be categorized in the various project and program phases (Planning, Technical Assistance and Implementation) building upon work already completed by the Task Force.

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d. **Clarify NEPA evaluation requirements**

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It is important to note that this process not only seeks comments on the Draft Plan but also seeks comments in accordance with NEPA, 42 U.S.C. §§ 4321-4335, and the Council on Environmental Quality's regulations implementing NEPA, 40 C.F.R. Parts 1500-1507, for the PEA on the Draft Plan.

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As the states and local governments are currently launching their planning efforts, they need to know if a particular planning process or document will require an accompanying NEPA analysis or if these requirements will be met on a project by project basis. Additionally, as required by regulations of the Council on Environmental Quality (40 C.F.R. 1505.1 and 1507.3), agencies must identify classes of actions generally requiring an Environmental Impact Statement ("EIS"), generally not subject to NEPA, and actions requiring an Environmental Assessment ("EA"). For ease of review, our comments or questions track the various sections of the PEA document.

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Recommendation: Clarify approach to NEPA analysis. The most important point regarding NEPA evaluation is that the Council needs to quickly define programmatic and project-level NEPA analysis requirements for Council actions, State actions and those for coastal political subdivisions. Given that state and local governments are already launching their planning processes, it would be prudent to provide guidance on whether or not these planning efforts will require full NEPA EIS analysis, EA analysis or be categorically exempt. For instance would these efforts fall under a "programmatic" NEPA analysis or require a full range of alternatives analysis?

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1.2.1 The Resources and Ecosystems Sustainability, Tourist Opportunities and Revived Economic of the Gulf Coast States Act of 2012

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While not necessarily within the purview of the PEA, this Section outlines the tasks of the Council and refers to approving State Expenditure Plans and overseeing grants. As quickly as possible, the Council needs to define this process, and in particular, the flow of funds through a combination of reimbursement and advance payments.

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Recommendation: Develop reimbursement and advance payment procedures. The Council should establish a threshold to ensure that large projects can be funded as certain milestones are achieved rather than completely relying on establishing a reimbursement program. Long review times for reimbursement procedures could result in tremendous budgetary and fiscal challenges for implementation at the State or local level.

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1.2.2 The National Environmental Policy Act

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On page 5, the document states, "The Council has determined that a Programmatic Environmental Assessment (PEA) is the appropriate level of analysis to perform at this time" and that the Plan "does not authorize any specific projects or programs or reach decisions on funding allocations ... and therefore no direct environmental

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effects flow from the Plan.” “The Council developed this PEA to assist it in determining whether the Plan ... results in potentially significant impacts to the quality of the human environment, in which case the Council would prepare an EIS.”

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Recommendation: Define when more detailed NEPA analysis is likely required. The PEA is the appropriate vehicle for this planning level analysis. Since no specific projects are authorized, there is no way to determine what the direct impacts may be. That said, EscambiaMonroe County believes that the next version of the Plan, presumably including the first 3-Year Prioritized Project List would include more specificity to determine direct impacts and likely would require an EIS.

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The document states on page 6, “The draft PEA does not analyze the specific effects of projects that the Council may later fund. The appropriate level of NEPA analysis will be performed on proposed projects *prior* to their selection by the Council for funding.”

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Recommendation: Clarify when project-level NEPA analysis is required (after project selection by Council as opposed to before). This is a crucial issue to clarify and address. The Council must define how the NEPA evaluation will evolve both at the plan development level as well as the project level. If this statement holds true, does this mean that projects will have to be completely documented for NEPA compliance *prior* to Council inclusion in the Draft Plan (or logistically the 3-Year Prioritized Project List)? If so, this could add significant time to the development of that 3-Year Prioritized Project List thus making it much more difficult to coordinate Plan development for the State Expenditure Plans or Multi-Year Implementation Plans at the local level. It would stand to reason that the Council would be selecting the projects, developing the first Plan update, developing the first 3-Year Prioritized Project List and then completing its next NEPA review on the Plan. Then as projects start to undergo implementation individually, they would be subject to NEPA based on the size and threshold. Requiring the appropriate NEPA analysis *prior* to Council selection will likely add years to the process before a project can even be included in the first 3-Year Prioritized Project List.

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1.5 Compliance with Other Authorities

The section states that projects must comply with applicable Federal statutes, regulations and Executive Orders. The list of these authorities is described as non-exclusive.

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Recommendation: Include wage and procurement requirements in table of authorities. This section and Appendix C should list all applicable wage and procurement requirements so that entities proposing or implementing projects understand the full array of what is entailed in project implementation. For example, implementation of the Davis Bacon Act (40 U.S.C. § 3141 et seq.) will have a large impact on project implementation and it would be important to list its applicability at this stage.

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2.1 Alternative A: No Action

The section states, “The Act also requires another 30 percent of the amounts in the Trust Fund to be allocated ..., once the States have submitted, and the Council has approved a State Expenditure Plan, that is consistent with the Council’s Plan” and “The State’s expenditure of funds for projects under the Direct Component ... is not dependent on the Council’s issuance of the Plan, and may be utilized by the States on projects and programs regardless of adoption of the Plan.”

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Recommendation: Explain the timeline and process for planning consistency determinations. While this may be technically accurate because these are two different funding sources, the Multi-Year Implementation Plan, State Expenditure Plans and the Council’s Comprehensive Plan are required to be consistent with one another so it will be difficult for the States to begin expending funds until the first 3-

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Year Prioritized Project List is developed so that the State and local planning efforts are synergistic and not duplicative.

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4.6 SUMMARY

The PEA states, “The Council may not select projects until the Plan is published and the States cannot expend funds under the Spill Impact Component until the Plan is released, since the projects and activities in their State Expenditure Plan must take into consideration and be consistent with the Goals and Objectives of the Plan.”

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Recommendation: It will be difficult for the other planning process to be consistent with the *Initial Comprehensive Plan* because there is no base of projects to build upon. Without the 3-Year Prioritized Project List, it will be hard to determine consistency amongst the planning efforts. Determining that consistency will include little more than reviewing projects against the 5 very broad goals and 7 objectives in the Plan. Until the first Plan Update occurs, truly harmonizing the planning efforts and projects at the Council, State and local levels will be challenging.

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2.1. Establish clear and consistent policies and procedures across RESTORE Act implementation

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The Draft Plan also described the State Expenditure Plan process for the Spill Impact Component in that these plans must be approved by the Council and a “grant” will be awarded to the State. The Draft Plan then provides a permissive list of what could be included in the State Expenditure Plans. Given that states are starting to launch these planning efforts now, it would be important to provide more specificity to what a State Expenditure Plan must have to receive approval.

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Recommendation: Provide more guidance on the State Expenditure Plan development and approval process. The Draft Plan should clarify what will be required in a State Expenditure Plan and provide guidance so that states can begin development of their Plans. Several key concepts that the Draft Plan should address to provide this guidance include:

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o In the Draft Plan, as well as the PEA, there are statements regarding oversight of “grants” to the Gulf Coast States for the Spill Impact Component of the Trust Fund. Escambia-Monroe County would urge the Council to start developing this grant process as quickly as possible because as the Expenditure Plans are being developed, the flow of funds in particular is important to understand.

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o Criteria to meet the various project purposes (including economic recovery). This will avoid proffering projects that will not be approved wasting both time and expense for the Council, local governments and Treasury.

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o Better define activities considered as “administrative costs” and “planning assistance”. Administrative costs must capture all costs including auditing, monitoring and reporting.

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o Explain how “certification” will occur (criteria to achieve certification and who will provide it or approve it) for determining that the project or program;

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(I) is designed to restore and protect the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, coastal wetlands, or economy of the Gulf Coast;

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(II) carries out 1 or more of the activities described in clauses (i) and (ii) of subparagraph (B);

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(III) was selected based on meaningful input from the public, including broad-based participation from individuals, businesses, and nonprofit organizations; and

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(IV) in the case of a natural resource protection or restoration project, is based on the best available science”

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Given that the Council has the authority to develop memoranda of understanding establishing integrated funding and implementation plans, and that other rules and processes are currently being developed, we urge you to adopt an overarching and coordinated regime of policies that expedites the approval and reporting processes for project approval and disbursement of funds. It is EscambiaMonroe County’s belief that all of the project approval processes across the 3 planning efforts must have some level of consistency. Finally, these procedures must not impede the restoration progress.

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Recommendation: Defining specific terms and processes now will save time and effort to comply with the Act and expedite distribution of funds. Escambia-Monroe County’s chief concerns include clarifying the process and procedures to comply with the Act, whether that be for specific determinations

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required by the Act itself or what documentation the regulations will require for project funding. Such processes, concepts and terms include:

- The process or processes for distribution of project funds and making “grants” both generally and pursuant to Section 1603(t)(2)(E)(ii)(III) “Limitation on transfers” (presumably different from other types of funds distributions).
- The requirements (including documentation) for “previously approved projects and programs” (as opposed to new project starts). For instance, will the development of a Multi-Year Implementation Plan be considered a “previously approved project or program” if it is started before a local government actually receives RESTORE Act funds thus reimbursable with RESTORE Act funds, or is a previously approved project and program something authorized under a separate initiative?
- Identify the content of Multi-Year Implementation Plans to assure compliance with RESTORE Act and specify procedures for project modifications, project phasing as well as modifications to projects individually or Multi-Year Implementation Plans. Perhaps an outline of contents should be developed to assist in this endeavor. This will aid local governments in quickly developing clear plans also resulting in a more streamlined review process for Treasury.
- Define “significant actions and associated deliberations” subject to public transparency requirements (and what those requirements will be).
- Land acquisition requirements should be described whether the project lands are initiated at the federal, state, local or private entity level.
- Identify back end project monitoring, performance measures or milestones and reporting of pre and post project benefits (including evaluating progress during project implementation). Review timeframes and deadlines should be established for various steps of the approval, auditing and monitoring processes.
- Specify the role and procedures of the Office of the Inspector General of the Department of the Treasury to conduct, supervise, and coordinate audits and investigations of projects, programs, and activities funded.
- Clarify any enforcement provisions and what that process may entail, including timeframes associated with those provisions.

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goal of restoring and revitalizing the Gulf economy (enhancing the sustainability and resiliency of the Gulf economy) must demonstrate a nexus to Gulf of Mexico restoration.

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Finally, examples of projects should be added to further define the types of projects that will satisfy these criteria and goals. For example, would a long-term watershed monitoring program be an acceptable project?

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Should the Council develop additional criteria for consideration now or in the future? If so, what should they be? The Priority Criteria appear to be broad enough to encompass the projects that will achieve the stated goal of comprehensive ecosystem restoration.

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b. Objectives

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Should the Council consider other Objectives at this juncture? If not, at what point, if any, should the Council consider additional Objectives? If so, what should they be? The 7 objectives that outline the broad types of activities that are expected to achieve the stated goals appear to be adequate to encompass the types of projects that will achieve the five goals outlined in the Plan.

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Similarly, should the Council eliminate any of the Objectives? We do not believe the Council should eliminate any of the objectives.

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How should the Council prioritize its restoration Objectives? While all of the Objectives are important and contribute to comprehensive ecosystem restoration, proposed projects that meet objectives 1-4¹⁰ should be ranked higher in priority than objectives 5-7¹¹. We believe the first 4 objectives best meet the Restoration Priorities for the Council's Plan outlined in in Section (t)(2)(D)(iii) already defined by the Act.

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c. Advisory Committees

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Should the Council establish any advisory committees? Science Advisory Sub-Committees for each Gulf Coast watershed should be established under a primary Committee. It is important to assure strong peer review and checks and balances between national and local scientists who have been working in their respective watersheds or knowledgeable about them for their entire careers. These individuals should have the best knowledge of the projects that are needed to comprehensively restore the local ecosystem and watershed. This could be modeled after structures currently in existence through the National Estuary Programs.

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If so, what type of advisory committees should the Council establish? How should the Council structure such advisory committees? What role should such advisory committees play? Each Watershed Science Advisory Committee should fall under a larger Science Advisory Committee and should prioritize submitted projects based on applicability, scientific merit, expected results, chance of success, and cost versus ecosystem benefit. The work of these committees should feed into a "Project Review Committee" later described in these comments.

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¹⁰ These objectives include: (1) Restore, Enhance and Protect Habitats; (2) Restore, Improve and Protect Water Quality; (3) Protect and Restore Living Coastal and Marine Resources; (4) Restore and Enhance Natural Processes and Shorelines.

¹¹ These objectives include: (5) Promote Community Resiliency; (6) Promote Natural Resource Stewardship and Environmental Education; (7) Improve Science-Based Decision-Making Processes.

Dauphin Island, Live the Experience

How do mere words describe natural beauty? How can anyone portray a rare delicate place such as Dauphin Island, Alabama? How can anyone possible explain to people who have only witnessed cookie-cutter areas that all look and act the same? How can you reveal to someone the flavor if they have never tried a taste of something different?

Dauphin Island is a place you must experience, not just read about, a place with so much to offer. So much variance of costal lifestyle, a community, not just touristy T-shirt shops, Dauphin Island is full of interesting historical details, combined with current attractions. So many fascinating items all combined in one tiny area. To experience Dauphin Island is like finding a large rare diamond in the sand; once found you never want to give it up.

Dauphin Island is in dire need of your assistance. Mother Nature has not been kind, along with other factors, and the island is in desperate need of revitalization. Hurricanes have decimated the coastline where once sandy beaches reigned are now angry waves. This can be reversed but with desperately needed funds.

Before division of funds, please just take some time and live the experience yourself. Walk the fort, check out the parks, the wonderful bird sanctuary, and do not forget just walking the beach then ask yourself where else in the world have you witnessed such a wonder.

Dauphin Island is worth saving.

Highest Regards,

Darlene Perry

P. O. Box 76

Lithopolis, OH 43136

614-837-1121

bamabosh@gmail.com



Florida Office

223 3rd Street North, Suite 201 | St. Petersburg, FL 33701 | tel 727.823.3888 | fax 727.823.3873
www.defenders.org

Note new address:

**3637 Fourth Street North, Suite 230
St. Petersburg, Florida 33704**

July 8, 2013

**Gulf Coast Ecosystem Restoration Council
c/o U.S. Department of Commerce
1401 Constitution Avenue, N.W., Room 4077
Washington, DC 20230
RestoreCouncil@doc.gov**

Re: Comments on the *Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystems and Economy*, Gulf Coast Ecosystem Restoration Council, May 2013

Dear Council Members:

On behalf of our one million members and supporters, Defenders of Wildlife (“Defenders”) appreciates the opportunity to comment on the Council’s *Draft Initial Comprehensive Plan: Restoring the Gulf Coast’s Ecosystems and Economy*. Defenders is a national, nonprofit membership organization dedicated to the protection of all native animals and plants in their natural communities. We advocate for innovative wildlife conservation approaches to sustain entire ecosystems and interconnected habitat and prevent threats to species.

We appreciate the Council’s work on the Draft Initial Comprehensive Plan. Overall, we support the five goals, seven objectives and four project/program evaluation criteria. Defenders is pleased to see the commitment to science-based decision making. We also appreciate the recognition that upland, estuarine and marine habitats are intrinsically connected and will promote ecosystem-based and landscape-scale restoration without regard to geographic location within the Gulf Coast region.

We recommend that the Council specifically mention identifying, conserving and restoring wildlife corridors in its goals, objectives and evaluation criteria. Creative and collaborative solutions should be considered including partnerships among public agencies and private landowners.

We also recommend that each project and program selected to receive funding should need to provide a net environmental benefit.

National Headquarters

1130 17th Street, N.W.

Washington, D.C. 20036-4604

tel 202.682.9400 | fax 202.682.3331

Defenders encourages the establishment of a citizens' advisory committee, a science advisory committee and other committees as needed to advise the Council.

We also agree with making full use of existing comprehensive plans and data sets to help guide project planning. For example, there are extensive mapping tools and GIS data sets, at various scales, for Florida's natural resources that can help planners identify and prioritize important conservation and restoration opportunities. Some of these include the following:

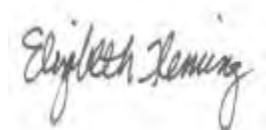
- The Florida Ecological Greenways Network identifies opportunities to protect large, intact landscapes important for conserving Florida's biodiversity and ecosystem services.
- *Florida Forever* is Florida's conservation and recreation lands acquisition program, a blueprint for conserving natural resources and renewing Florida's commitment to conserve the state's natural and cultural heritage. The *Florida Forever* list of projects is an important source of information regarding conservation and restoration projects.
- The Critical Lands and Waters Identification Project (CLIP) is an identification of those lands and waters in the state that are critical to the conservation of Florida's natural resources. CLIP is a GIS database of statewide conservation priorities for a broad range of natural resources, including biodiversity, landscape function, surface water, groundwater, and marine resources.
- The Cooperative Conservation Blueprint builds upon CLIP that uses science and the best available statewide spatial data to show Florida's critical environmental resources in a database that can be used as a decision-support tool for collaborative statewide and regional conservation and land use planning to envision and ensure the sustainability of Florida's green infrastructure and vital ecosystem services.

Regarding the "Preliminary list of authorized but not yet commenced projects and programs," I have heard some concern and confusion about whether some projects may have been placed on the list inappropriately. It is my understanding that the list was published to fulfill the requirements of the RESTORE Act, and that it is by no means a definitive list. Clarification about the purpose of this list would be appreciated.

It goes without saying, but no funding should be allocated towards any project that could possibly harm the environment. And finally, Defenders encourages the Council to make additional opportunities available for public comment and input on the selection of projects.

Thank you for your consideration of Defenders' comments on the Draft Initial Comprehensive Plan.

Sincerely,



Elizabeth Fleming
Florida Representative



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O S EXECUTIVE SECRETARIAT

Gulf Coast Ecosystem Restoration Council
1401 Constitution Avenue, NW
Washington, DC 20230

June 14, 2013

Dear Council Members,

On behalf of our millions of members and supporters, thank you for the ongoing opportunity to comment on the development of a plan to restore the Gulf Coast region. The attached comments on the Draft Initial Comprehensive Plan build upon and are within the framework of our prior recommendations, dated May 1, 2013, to advance restoration of the Mississippi River Delta.

We were pleased that the Draft Initial Comprehensive Plan maintains and affirms the RESTORE Act's statutory requirement that the Council-selected Restoration Component be dedicated solely to ecosystem restoration projects. This approach is absolutely essential to protect the delicate balance between varying interests that Congress considered in constructing the RESTORE Act, and we strongly urge that it be strictly maintained, as required by the Act, in the Final Initial Comprehensive Plan.

The recommendations below, which reflect that and other central tenets of the legislation, include modifications and refinements to the Draft Initial Comprehensive Plan that will help optimize the Council's ongoing restoration decisions and actions.

We again urge the Council to take full advantage of the unprecedented opportunity the RESTORE Act presents to repair the Gulf ecosystem and restore its natural resilience. The Council can effectuate meaningful, sustainable environmental restoration. Our organizations are prepared to continue serving as a resource to the Council and look forward to further discussion of our comments and recommendations. We have also attached our May 1 recommendations, which are more expansive than the scope of the Draft Initial Comprehensive Plan, for the record and continued consideration as the Council moves forward, particularly in creating a three-year priority project and program list.

Sincerely,

National Audubon Society • Coalition to Restore Coastal Louisiana • Environmental Defense Fund • Lake Pontchartrain Basin Foundation • National Wildlife Federation

Council-selected Restoration Component. The RESTORE Act mandates that the Comprehensive Plan focus on *ecosystem* restoration and requires that all decisions, including projects funded by the State Expenditure Plan component, must be prioritized based on the best available science. As confirmed by the Senate Environment and Public Works Committee report (pages 10 and 11), the Council-selected Restoration Component shall be disbursed to the Council for projects to “restore and protect the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region.” We were pleased that the Draft Initial Comprehensive Plan maintains and affirms this statutory focus on ecosystem restoration projects, which underlies many of our recommendations below, and we urge the Council to strictly adhere to this focus in the Final Initial Comprehensive Plan.

Specified Contents and Previously-authorized Projects. Under section (t)(2)(D)(ii)(IV), the initial Comprehensive Plan must contain certain specified contents to generate project lists to be screened through the statutory restoration priorities; including a list of “authorized” federal projects and programs that advance the RESTORE Act goals; a three year project and program list; and a table showing the distribution of projects and programs in all five Gulf Coast States. We believe that subsection (bb) of that section, which calls for the list of projects and programs “authorized prior to the date of enactment,” refers only to projects included in previously enacted federal authorizing legislation, and not to state or other projects simply approved outside the federal authorization process. By so limiting the language, we believe Congress specifically intended to restrict this list to projects that have received prior Congressional approval. For example, the State of Louisiana and federal partners have worked for nearly a decade developing federally authorized Louisiana Coastal Area projects, through the Water Resources Development Act of 2007.

Congress provided for other mechanisms through which state-approved projects could be considered, including explicit direction, in the project selection criteria, that projects contained in Gulf Coast State comprehensive plans can be evaluated for possible inclusion on the three-year priority project and program list.

Appendix A to the Draft Initial Comprehensive Plan, subtitled “Background Information,” is referenced as a preliminary version of the required list of authorized but not yet commenced projects. For reasons stated above, we recommend that the Council confine the appendix list only to projects authorized by Congress. As discussed below, projects on this revised list, along with state-approved projects and all other projects considered by the Council, need to be evaluated by the Council based on the restoration priorities criteria outlined in the legislation.

Time-span of Priority Project-selection Criteria. Under section (t)(2)(D)(iii), the Council must establish priorities for funding based on the best available science according to four required restoration priorities criteria. Those are, in summary, 1) Projects that are projected to make the greatest contribution to the Gulf ecosystem; 2) Large-scale projects and programs that are projected to substantially contribute to the Gulf ecosystem; 3) Projects contained in existing Gulf Coast State comprehensive ecosystem plans; and 4) Projects that restore long-term resiliency of Gulf natural resources. The Draft Initial Comprehensive Plan suggests that the RESTORE Act criteria and the requirement of best available science might only bind the Council for the first

three years. We find no reference in the statute or the legislative history to indicate this temporal limitation. We believe the Council must adhere to the express statutory requirement to use the best available science and the four prioritization criteria throughout implementation of the Act, and we recommend that any language suggesting otherwise be removed from the Comprehensive Plan.

Prioritization Criteria. We strongly recommend against adoption of additional criteria not specifically provided for in the statute. The RESTORE Act legislates the criteria to be used for project selection. We believe it is beyond the scope of the implementation process to alter that statutory framework by developing “other criteria as necessary to refine the selection process” as considered on page 14 of the Draft Initial Comprehensive Plan. We also believe that an effective, implementable three-year priority project and program list can be developed without the addition of new criteria. **To ensure optimal results using the existing legislated criteria, we do support further explanation of how the existing statutory criteria will be implemented and provide our recommendations below.**

1. *“Projects that are projected to make the greatest contribution to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region, without regard to geographic location within the Gulf Coast region.”* We recommend that the Council interpret this criterion to include ecosystem restoration projects or programs that:
 - **Provide systemic restoration benefits to highest-priority Gulf ecosystem resources,**
 - **Restore, protect, or improve shared or common resources across the Gulf region, irrespective of state lines, or**
 - **Deliver multiple ecological benefits.**
 - Restoration of the Mississippi River Delta will deliver multiple ecological benefits to shared highest-priority resources by restoring degrading coastal wetlands of Mississippi and Louisiana, while also providing water quality benefits to the Gulf of Mexico.

2. *“Large-scale projects and programs that are projected to substantially contribute to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast ecosystem.”* We recommend that the Council interpret this criterion to include ecosystem restoration projects or programs that:
 - **Significantly increase important Gulf Coast habitat,**
 - **Increase net wetland acres compared to a no action alternative, or**
 - **Address deltaic land loss.**
 - The Louisiana Coastal Master Plan ecosystem restoration projects were developed specifically to halt deltaic land loss and increase wetland acres. Implementation of

Mississippi River diversions consistent with the Master Plan will have the effect of significantly increasing Gulf Coast habitat.

3. *“Projects contained in existing Gulf Coast State comprehensive plans for the restoration and protection of natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region.”*

- Consistent with this legislative direction, **we recommend that the Council fully consider and place high priority on the ecosystem restoration components of the existing Louisiana Coastal Master Plan**, unanimously adopted by the state legislature in 2012. The Comprehensive Everglades Restoration Plan and the Mississippi Coastal Improvements Program are also relevant ecosystem restoration plans for purposes of this criterion.

4. *“Projects that restore long-term resiliency of the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands most impacted by the Deepwater Horizon oil spill.”* This statutory criterion sets the RESTORE Act Comprehensive Plan apart from other restoration plans because it prioritizes increased resilience for the future. We recommend that the Council interpret this criterion to include ecosystem restoration projects or programs that:

- **Increase the health and lessen vulnerability of the types of resources, habitat, fish and wildlife that were impacted by the Deepwater Horizon disaster,**
- **Preserve or restore natural processes or functionality,**
- **Reduce recovery time from disturbance events with minimal human intervention or maintenance requirements, or**
- **Continue to produce long-term results in the face of sea level rise.**

- The Louisiana Coastal Master Plan was crafted specifically to stabilize and ensure a more resilient and sustainable Gulf Coast and Mississippi River Delta.

Geographic Scope of the Gulf Coast Region. The RESTORE Act geographically restricts spending from the Gulf Coast Restoration Trust Fund to: (1) the coastal zones (including federal land) of the Gulf states (2) adjacent land, water, and watersheds within 25 miles of the coastal zones and (3) federal waters. The Act does not define “adjacent land, water, and watersheds.”

We recommend that the Council define those terms, and provide for public consideration, a map depicting the areas that fall under these definitions.

Objectives. The Draft Initial Comprehensive Plan included seven objectives to further define the types of projects and programs the Council intends to select for funding. We support the Council’s efforts to meet the full spectrum of natural resource, science, and community needs outlined in these objectives. We also recognize that each of these objectives, like the broader goals carried over from the Council’s earlier *Path Forward* document, can be fully addressed through strict adherence to the four statutory criteria for Council-selected Restoration Component projects and programs, and through development of effective State Restoration Expenditure Plans as discussed below.

The criteria mandated in the RESTORE Act for the Council-selected Restoration Component are based solely on meeting environmental restoration needs. This statutory directive recognizes that the components of the Gulf ecosystem are intrinsically linked; that instituting a comprehensive ecosystem restoration plan will create jobs and sustain a robust economy; and that using economic or other non-environmental screens to select ecosystem projects would undermine the holistic environmental and economic goals of the Act. By excluding economic considerations from the Restoration Component criteria, the Act ensures an appropriate Council focus on individual restoration projects that may in themselves have varying impacts on community and economic needs, but taken together will have the greatest impact on the natural systems on which those communities and economies depend.

We recommend that the Plan clarify that the stated objectives support and do not supersede the project selection criteria; that the Council will meet these objectives in the Restoration Component through projects selected solely on the basis of those criteria; and that the objectives are not intended, and will not be used, to factor economic or other non-environmental implications into the selection of Restoration Component projects or programs.

We appreciate the acknowledgement that efforts funded under the Council-selected allocation may achieve multiple objectives at once; and also may not (and should not) be equally distributed among objectives. **We recommend that the Council refine the Objectives in the Plan as follows:**

Primary Objectives. Any project or program that meets the restoration priorities project selection criteria and is subsequently selected by the Council for funding should accomplish at least one of the following primary objectives:

1. Restore, Enhance, and Protect Habitats
2. Restore, Improve, and Protect Water Quality
3. Protect and Restore Living Coastal and Marine Resources
4. Restore and Enhance Natural Processes and Shorelines

Secondary Objectives. Secondary objectives, though important, must be viewed as co-occurring objectives that may be integrated in projects that achieve the primary objectives first. Any project or program that meets restoration priorities project selection criteria, is selected by the Council for funding, and accomplishes at least one primary restoration objective may include the following secondary objectives:

5. Promote Community Resilience
6. Promote Natural Resource Stewardship and Environmental Education

We recommend that Objective 7 in the Draft Initial Plan” “Improve Science-Based Decision-Making Processes” be a fully integrated and required overarching component both of plan development and project and program selection rather than an Objective. We believe this is supported by the statutory requirement that projects and programs be selected

based on the best available science. We also believe that this statutory requirement merits both project and Gulf-wide monitoring to inform and improve science-based decision-making and adaptive management, and evaluate effectiveness and measure progress towards restoration goals.

State Expenditure Plans are required to be “consistent with the goals *and objectives*” of the Comprehensive Plan (t)(3)(B)(i)(III). The Plan should clarify that any State Expenditure Plan that undermines or is inconsistent with either primary or secondary objectives will be ineligible for funding by the Council.

Council Role in State-specific Restoration Expenditure Plans. As the Draft Initial Comprehensive Plan notes, the RESTORE Act also requires the Council to oversee and approve development of state-specific restoration expenditure plans, which will guide 30 percent of the spending from the Gulf Coast Restoration Trust Fund, determined according to an impact formula. State Restoration Expenditure Plans must be consistent with the goals and objectives of the Comprehensive Plan.

Congress intended that the various allocations from the Gulf Coast Restoration Trust Fund be invested in the region for distinct, but not inconsistent, purposes by various coordinated local, state, and federal government entities. In requiring Council oversight of the Spill Impact Component, Congress intended that State Restoration Expenditure Plans protect and enhance the ecosystem restoration objectives of the Council-selected allocation. The Act confirms this nexus between the state plans and the Council plan by limiting spending on infrastructure in state plans. A state plan may only exceed the infrastructure spending limitation if there are no remaining environmental restoration needs.

The Draft Initial Comprehensive Plan outlines permissive elements that *may* be included in a State Restoration Expenditure Plan. The Council is required to evaluate each State Restoration Expenditure Plan for consistency with the goals and objectives of the Comprehensive Plan. While we agree that each Gulf Coast state is unique, there must be a solid base set of requirements for State Restoration Expenditure Plans.

We recommend that the Council revise the Draft Initial Comprehensive Plan to more clearly delineate required elements of state plans, criteria and process for a consistency determination, and the method for evaluating sufficiency of a state-certification of environmental health.

Specifically, the following elements should be mandatory:

- The amount of funding needed for each project, program, and activity selected by the State for planning and implementation; the proposed start and completion dates; and specific mechanisms that will be used to monitor and evaluate the outcomes and impacts of each project, program, and activity.
- A description of how the best available science, as applicable, informed the State’s project, program, and activity selection.

- A justification statement of how all included projects, programs, and activities are eligible activities under the RESTORE Act.
- A description of how each included project, program, and activity contributes to the overall economic or ecosystem recovery of the Gulf Coast.
- A certification that all included projects, programs, and activities do not exceed the 25 percent funding limit for infrastructure.
 - If the state intends to claim an exception to this limitation in accordance with the RESTORE Act, the state must provide the percentage to be spent on infrastructure, evidence that the environmental restoration needs of the state have been met, and whether the state has provided public notice of its intent to claim an exception.
- A description of how each project, program, and activity is consistent with the Goals and Objectives of this Plan. The Council views "consistent" to mean
 - Each eligible project, program, and activity will further one or more of the five Goals; *and*
 - will not negatively impact the Gulf Coast ecosystem.
- A description of the process the State will use or has used to ensure appropriate public and tribal participation and transparency in the project, program, and activity selection process.
- A description of the financial controls and other financial integrity mechanisms to be used to assure the public and Congress that funds have been managed appropriately to further the purposes of the RESTORE Act.
- A description of the methods the State will use to measure, monitor, and evaluate the outcomes and impacts of funded projects, programs, and activities.

The following elements may be included and will be useful to the Council in evaluation and approval or disapproval of State Restoration Expenditure Plans:

- To the extent known, a description of any certain or prospective collaborations or partnerships to be used or created through the selection process.
- To the extent known, a description of any additional resources that will be leveraged to meet the goals of the State Expenditure Plan.

Additionally, the Council should delineate a process by which it will evaluate the sufficiency of a submitted State Restoration Expenditure Plan, including guidelines for which elements that the Council will consider favorably and unfavorably.

Project Recommendations. We previously provided specific, detailed project recommendations for inclusion in a three-year priority project and program list. Though we acknowledge the Council's reasons for not producing the three-year priority project and program list on the timeline set forth in the statute, **we recommend that the Draft Initial Comprehensive Plan acknowledge that an early start on a major Mississippi River diversion and acceleration of**

barrier island renewal in the Delta are necessary cornerstones of an effective Gulf-wide response to which we can all commit. As the Council develops the three-year priority project and program list, we urge the Council to incorporate our project recommendations.

Project Sponsorship. We appreciate that the Draft Initial Comprehensive Plan specifies a process for Council members to sponsor projects and programs. While we recognize that many decisions will be project-specific, we recommend that the Council further define the roles and responsibilities of the sponsor agencies tasked with implementing restoration projects. We also recommend that the Council develop a process to ensure coordination between sponsoring entities and projects.

We recommend that future project lists identify the sponsor agency or entity for public consideration, transparency, and accountability.

In addition, we recommend that the Council retain and provide guidance and oversight during planning, design, construction, completion, and management of sponsored projects.

Advisory Committees. The Draft Initial Comprehensive Plan lists establishment of one or more advisory committees as a near-term next-step. We believe the RESTORE Act contemplates that the Council will establish advisory committees on an as-needed basis. We recommend, however, that the advisory council process be structured in a way that ensures no interference or undue delay to restoring the ecosystem.

Science must guide Comprehensive Plan development; project selection, prioritization, implementation, monitoring, and adaptive management; and State-specific Restoration Plan evaluation. We recommend that the Council establish an external, independent Science Advisory Committee as soon as practicable to review restoration plans after providing the public an opportunity to consider and comment on the charge and makeup of such a Committee. We also recommend that the Council further establish procedures and methods for ensuring that implementation decisions are made based on the best available science. We encourage the Council to develop framework for the scientific process for project and program selection and provide the public an opportunity to consider, commend, and expand upon the framework.

Science Integration. To inform the development of the Comprehensive Plan and assist the Council with responsibilities under the State Restoration Expenditure Plan Component, the Council must "collect and consider scientific and other research associated with restoration of the Gulf Coast Ecosystem." We support the provisions in the Draft Initial Comprehensive Plan indicating the inclusion of science-based decision making to select projects and programs based on the best-available science.

As the restoration projects and programs are implemented, it will be critical that scientists are engaged throughout project planning and design with project engineers and managers to ensure that projects succeed and goals are met. We previously provided specific science integration recommendations and urge that they be adopted as the Council moves forward.



July 8, 2013

VIA ELECTRONIC & US MAIL

Chair of the Gulf Coast Ecosystem Restoration Council
United States Department of Commerce
Attn: Teresa Christopher
Senior Advisor for Gulf Restoration
1401 Constitution Ave
Washington, D.C. 20230

Dear Ms. Christopher:

On behalf of Florida's Gulf Consortium (Consortium), this correspondence is intended to provide comments on the Gulf Coast Ecosystem Restoration Council's Draft Initial Comprehensive Plan (Draft Initial Plan) published in May 2013. The Consortium represents Florida's 23 Gulf coast counties and, as such, appreciates the opportunity to comment on the Draft Initial Plan.

To avoid duplication and to effectively utilize available resources, Florida's local governments are working in partnership with the State of Florida to fully recover the Gulf of Mexico following the Deepwater Horizon disaster. Florida's economy and environment are inextricably linked, and we recognize the critical importance of collaboration and cooperation in order to achieve our shared objectives. The publication of the Draft Initial Plan is another milestone in our joint implementation of the RESTORE Act and we look forward to working with the Gulf Coast Ecosystem Restoration Council in the years ahead.

About the Gulf Consortium

The Gulf Consortium is a public entity created in October 2012 by interlocal agreement among Florida's 23 Gulf Coast counties, from Escambia County in the western panhandle of Florida to Monroe County on the southern tip of Florida and the United States (Attachment 1). The 23 Gulf Coast Counties formed the Consortium to

meet the following requirement of the RESTORE Act: “a consortia of local political subdivisions that includes at a minimum 1 representative of each affected county;” shall develop a State Expenditure Plan that will improve the ecosystems and economy of the Florida Gulf Coast region. Sub-Clause (t)(3)(B)(iii)(II) of Section 311, Federal Water Pollution Control Act. The Consortium Board of Directors consists of one representative from each county government. As a public entity, the Consortium must meet all government transparency requirements in Florida, including open public records and meetings, ethics and state auditing obligations.

Since its inception in 2012, the Consortium has met seven times and held several committee meetings to begin developing Florida’s State Expenditure Plan. To foster the development of its plan, enhance coordination and ensure consistency with the goals and objectives of the Council’s plan, the Consortium has entered into a Memorandum of Understanding with Florida Governor Rick Scott (Attachment 2).

Comments on the Draft Initial Plan

Developing an appropriate and comprehensive plan to restore the Gulf of Mexico, while recognizing the diversity and complexity of environmental and economic challenges across five states and dozens of local jurisdictions, is a monumental undertaking. The Gulf Consortium commends the Council on putting forward a considerate Draft Initial Plan and for its transparent and inclusive approach to plan development.

The Gulf Consortium respectfully offers the following initial input on the Draft Initial Plan:

- **Establish the comprehensive plan based on sound science.** Establish a scientifically-driven process with coordination across watersheds.
- **Recognize the benefits of regionalism in project selection.** Consider providing additional weight to watershed-based projects and programs that cross multiple jurisdictions and deliver significant environmental benefits to shared water resources. Adding “regional benefit” as a priority criterion would recognize projects that provide watershed benefits across political jurisdictions.
- **Identify economic restoration as a clearly stated plan Objective.** One of the Plan’s Goals is to “Restore and Revitalize the Gulf Economy” by enhancing “the sustainability and resiliency of the Gulf economy.” This goal should be fully realized later in the plan’s Objectives.
- **Prioritize the Objectives consistent with the RESTORE Act.**

- **Clarify the Council’s decision-making process for evaluating, prioritizing and selecting ecosystem restoration projects.** Identify timeframes for project submittal, as well as requirements for project implementation.
- **Clarify the weighting for each criterion identified within the Priority Criteria.** Define and clarify terms such as “greatest contribution”, “large-scale” and “long-term resiliency”.
- **Streamline federal regulatory requirements to ensure unhindered planning, project and program implementation; Clarify National Environmental Policy Act (NEPA) analysis requirements.** Multiple and overlapping federal regulatory requirements have the capacity to slow development of the Council’s plan and, consequently, restoration of the Gulf of Mexico. For example, full NEPA review of projects prior to Council selection could significantly increase the time to develop the 3-year Prioritized Project List and the first plan update. Since state and local governments are undertaking their planning processes, clarification and guidance on the level of NEPA analysis required is needed.
- **For Appendix A, define “authorized but not yet commenced.”** The Consortium recognizes that Appendix A to the Draft Initial Plan does not include projects submitted to the Florida Department of Environmental Protection for the Council-selected Restoration Component, and that the Council may or may not choose projects from Appendix A for funding. However, a clear definition of how a project must be “authorized,” and at what level, is required for stakeholders to understand which projects meet the “authorized but not yet commenced” criteria and are, therefore, eligible for inclusion in the Draft Initial Plan or first 3-Year Prioritized project list.
- **Work with State and local officials to coordinate project selection and refine Appendix A.** Currently, Appendix A includes projects that provide only marginal benefits to the Gulf coast, if any. Likewise, there are projects appropriate for RESTORE Act consideration that are not yet included in Appendix A. In determining projects for Appendix A, and in selecting projects for the 3-Year and 10-Year plans, provide consideration for the fact that almost 50 percent of the Gulf Coast coastline is within Florida.
- **Allow for infrastructure projects and structural enhancements to mitigate risks to coastal resiliency.** Much of Florida’s coastline is developed, which limits options for non-structural mitigation for coastal resiliency. The Consortium recommends accepting infrastructure projects for flood control and other structural enhancements that would mitigate risks to coastal resiliency and protect communities.

Provide for Administrative and Planning Expense Reimbursement

The Consortium is a new governmental entity without the power to levy taxes. To date, the Consortium has been funded by contributions from its member county governments. With its limited resources, the Consortium is relying on the RESTORE Act's authorization for administrative expenses and planning assistance to provide the resources necessary to meet its obligation to develop the plan called for under the RESTORE Act Clause (t)(3)(B)(i) of Section 311, Federal Water Pollution Control Act. With this in mind, the Consortium respectfully requests the following:

Revise the Draft Initial Plan to allow expenditures from Florida's allocation of the Spill Impact Component for the Consortium's administrative and planning costs associated with the development of the State Expenditure Plan.

In the Council's Draft Initial Plan, Section V, titled "State Expenditure Plans—State Impact Component" expenditures from a State's allocation of the Spill Impact Allocation is addressed. Page 19 includes the following paragraph:

The State Council Member may submit a State Expenditure Plan for Council consideration at any time after the publication of this Plan and the promulgation of appropriate regulations. There is no specific timeframe required for State Expenditure Plan submission, *but no funds may be expended from a State's allocation pursuant to the spill impact formula before the Council approves the State Expenditure Plan and an associated initial project, program, and activity list.*

The RESTORE Act authorization for the Council to disburse amounts to the Gulf Coast States, including for the State of Florida, to the Consortium, provides as follows:

The Council shall disburse amounts to the respective Gulf Coast States in accordance with the formula developed under subparagraph (A) for projects, programs, and activities that will improve the ecosystems or economy of the Gulf Coast region, subject to the condition that each Gulf Coast State submits a plan for the expenditure of amounts disbursed under this paragraph that meets the following criteria

Clause (t)(3)(B)(i) of Section 311, Federal Water Pollution Control Act.

The listed criteria cross references allowable expenditures under subparagraph (t)(1)(B). The cross referenced subparagraph includes planning assistance in (t)(1)(B)(i)(VIII) and administrative expenses in (t)(1)(B)(i), which itself cross-references

the limitation on administrative expenses in (t)(1)(B)(iii). Thus, the Spill Impact Component may be expended for planning and administrative expenses.

Planning is perhaps the most important step to ensure that resources are used to the greatest benefit. Using RESTORE funds to plan appropriately will facilitate a timely restoration impact, a hallmark of the law. The Consortium respectfully requests that the Council's Draft Initial Plan be revised to allow it to receive a Spill Impact Allocation for the purpose of planning and administrative expenses associated with the development of Florida's State Expenditure Plan prior to the development and submission of the plan and an associated initial project, program, and activity list. As explained above, such a revision to the Council's Draft Initial Plan is expressly authorized by the RESTORE Act's list of allowable expenditures and the Council's authority to expend the Spill Impact Component. It is also necessary for the Consortium to ensure the development of Florida's State Expenditure Plan that selects the best projects, programs, and activities for funding from the Spill Impact Allocation in a manner that uses the best available science and solicits and considers maximum public comment as mandated by the RESTORE Act.

The Consortium recognizes that such an award for administrative and planning expenses for plan development to the Consortium will be "subject to the condition that...[Florida] submit a plan for the expenditure of amounts disbursed under this paragraph that meets . . ." the RESTORE Act criteria as cited above. The condition for plan submittal could be guaranteed through a binding agreement between the Consortium and the Council for the award of planning and administrative expenses. Specifically, the Consortium requests that the Council's Draft Initial Plan Section V provision cited above be revised as follows with the addition of the underscored language:

The State Council Member may submit a State Expenditure Plan for Council consideration at any time after the publication of this Plan and the promulgation of appropriate regulations. There is no specific timeframe required for State Expenditure Plan submission, *but no funds may be expended from a State's allocation pursuant to the spill impact formula, except for administrative expenses and planning costs associated with the development of the State Expenditure Plan, before the Council approves the State Expenditure Plan and an associated initial project, program, and activity list.*

Thank you, again, for the opportunity to comment on the Council's Draft Initial Plan. We look forward to working with the Council as an active and collaborative partner in the economic and environmental restoration of the Gulf of Mexico.

Sincerely,

A handwritten signature in black ink, appearing to read "Grover C. Robinson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Grover C. Robinson
Chairman
Florida's Gulf Consortium

cc: VIA ELECTRONIC MAIL ONLY
The Honorable Rick Scott, Governor, State of Florida
Sarah Bleakley, Nabors, Giblin & Nickerson
Doug Darling, Gulf Consortium
Mimi Drew, Florida Department of Environmental Protection
Gulf Consortium Directors
Chris Holley, Florida Association of Counties
Deena Reppen, Florida Association of Counties

Comments of Gulf Future on the Gulf Coast Ecosystem Restoration Council's Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy

Gulf Future, a network of conservation, community civil rights and faith based organizations across the five Gulf States, is providing our comments and concerns with regard to the Gulf Coast Ecosystem Restoration Council's (*Council*) Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy (Draft Plan). Gulf Future recognizes that RESTORE Act funds constitute a unique opportunity to the Gulf States and our nation to create a legacy for conservation, and this is our best chance to meaningfully kick-start restoration of critical shared natural resource in the Gulf region. Since the BP drilling disaster, communities from across the Gulf have been working together to establish our priorities for how to restore and protect the resources in this place we call home.

Restoring the Gulf Ecosystem

Gulf Future is pleased to see that the Draft Plan states the *Council's* commitment to science based decision making and adaptive management of plans and projects. We believe that all projects funded under the RESTORE Act must be required to have a plan for evaluation and a system for measuring outcomes which would allow true adaptive management to occur.

We support the *Council's* commitment to (1) focusing the *Council*-selected Restoration Component and the Spill Impact Component on funding for ecosystem restoration (as defined by the 5 Plan goals), which is necessary to ensure that we benefit the natural resources, our economy, and our communities; and (2) taking a regional, ecosystem-based, and landscape-scale approach to restoration that addresses the entire Gulf as one interconnected ecosystem. *However*, we are concerned that so far restoration efforts appear focused on the coastal environment ignoring the critical resource in the Deepwater of the Gulf of Mexico. We believe that a significant impact of the oil disaster occurred in the marine environment and we would like to see a focused commitment by the *Council* to addressing both the coastal *and* marine restoration and recovery.

We also support the *Council's* stated intent to use an integrated and coordinated approach and work closely to ensure that efforts funded through the Natural Resource Damage Assessment (NRDA) and the National Fish and Wildlife Foundation (NFWF) are complimentary. Since funding for comprehensive restoration will be limited in relation to the restoration need, leveraging multiple funding sources will be critical to getting the most bang for our buck on environmental restoration. Efforts to integrate restoration should also consider and prioritize the increasing need for community protection.

Creating Economic Benefits of Ecosystem Restoration for Local Communities:

Restoring the Environment Restores the Economy

Our coastal communities are some of the most vulnerable in the nation to the impacts of storms. The efforts of the *Council* represent our best opportunity to make our Gulf coast, our communities and our coastal-dependent economies more resilient in the face of rising seas and stronger storms. Every dollar the *Council* approves, either through state or *Council*-led plans, should increase our resilience, providing non-structural storm protection and facilitating climate change adaptation (strengthening barrier islands, restoring coastal marshes and forest, etc.). We must use available restoration dollars to protect critical infrastructure that ensures the economic and cultural survival of coastal communities. For coastal communities dependent for their livelihoods on the natural resources of the Gulf, environmental restoration is essential to economic recovery.

Implementing ecosystem restoration could create thousands of new local jobs for coastal communities significantly impacted by the BP drilling disaster. If project selection includes consideration of local hire, a new restoration economy could provide ecologically sustainable economic opportunities and broad public benefit to local communities, including disadvantaged and distressed communities. The *Council* has the ability to build a solid foundation for decades of positive social, economic, and environmental outcomes by setting a strong precedent for managing large-scale restoration with an eye to community economic recovery and sustainability.

Commit to Creating Safe, Healthy and Just Communities

One glaring omission in the Draft Plan is a commitment to including communities in the priorities and objectives of restoring the Gulf. Our communities are historically left out, leading to a Gulf-wide epidemic of environmental injustices. According to the government's own definition, Environmental Justice calls for fair treatment and meaningful involvement of all people with respect to development, implementation and enforcement of environmental laws, regulations and policies.

Environmental Justice demands that those who have historically been excluded from environmental decision-making, traditionally minority, low-income and tribal communities, have the same access to environmental decision-makers, decision-making processes and the ability to make reasoned contributions to decisions.

We urge the *Council* to comply with Executive Order 12898¹ by integrating environmental justice considerations into all programs and projects funded by the *Council*.

Much of the ground work has been laid in this effort and the *Council* should build on this and seek the advice of the **National Environmental Justice Advisory Council (NEJAC)** and the **Gulf of Mexico Coastal Environmental Justice Ambassadors** who have made recommendations² that must be incorporated into the Comprehensive Plan including, but not limited to:

- Advancement of environmental literacy and capacity building among vulnerable populations including indigenous populations and those with language barriers
 - Increased awareness of indigenous communities
 - Increased outreach and education in indigenous communities
 - Increase participation by indigenous communities
 - Increased number of economic development and disaster preparedness projects
- Foster stronger collaboration with communities and NGOs
- Increase reciprocal communications with environmental justice communities
- Increase awareness of and access to funding opportunities for established community groups and nonprofits
- Fund non-research community engagement projects
- Ensure that information is presented in a manner easily understood by all
- Promotion of culturally sensitive local community involvement, engagement and project designs

Giving Citizens a Seat at the Table

Because the understanding of the critical role that communities play in decision-making exists, we encourage the *Council* to work to engage coastal communities in a meaningful way. We are pleased that the *Council* is considering the formation of a Citizen Advisory Committee and Science Advisory Committee. As the *Council* has experienced during this comment period, communities are eager to provide input to the *Council* on the considerations that should guide the *Council* in choosing projects. Greater transparency and community participation in *Council* decision-making in a meaningful way is something that the public has asked for repeatedly. Traditional public hearings do not provide the needed participation. Creating a formal Citizens' Advisory Council will:

- help to establish a trusting relationship between the community and the members of the *Council* throughout project selection and implementation;
- provide guidance to the *Council* on how to better obtain input from communities;
- provide more buy-in and social investment in the projects in those communities; and
- utilize the traditional knowledge of community members, including fishermen and natives to inform project selection, implementation and evaluation.

We hope to see in the coming months a stronger commitment to establishing these committees and a move to quickly begin the nomination process for membership on these committees.

Areas of Concern

Although generally pleased with the direction set by the Draft Plan, we have numerous concerns with the lack of specificity in the Draft Plan. According to comments collected at community meetings in three Gulf States, the priority criteria was too broad, leaving it open for just about any type of project to qualify for funding. The *Council* should develop additional criteria for vetting projects. For example, in selecting projects the *Council* should be required to consider whether a project will involve hiring of local workers, including the potential workforce development and job training programs that will allow local workers to compete for employment in a restoration economy. Similarly, the *Council* should consider whether projects:

¹ Executive Order 12898 of 1994. <http://www.archives.gov/federal-register/executive-orders/pdf/12898.pdf>

² Presentation from the GoM Coastal Environmental Justice Ambassadors August 2011 New Orleans, LA. http://www.gulfofmexicoalliance.org/pdfs/GOMA_August_2011/GOMA_All_Hands_Coastal_Environmental_Justice_Ambassadors.pdf

- invest in the resiliency of distressed communities, helping these communities to adapt to climate change and sea level rise;
- invest in green infrastructure and energy efficiency upgrades while reducing our dependence on fossil fuels and investing in clean, renewable sources of energy;
- contribute to restoration or protection of critical habitat for endangered species; and
- protect and preserve the unique cultures of the Gulf people.

We are disappointed that the plan does not contain a list of priority projects or an allocation plan as required by the RESTORE Act. We understand the *Council's* lack of certainty regarding the amount and timing of monies available under the RESTORE Act. A draft list of priority projects should be released to the public as soon as possible to allow for full public review and comment. We would request that the *Council* establish a publicly accessible portal where projects may be submitted and viewed and where the status of publicly submitted projects can be updated by the *Council*. *Council* members do not have access to all of the worthy conservation and restoration projects that exist in the Gulf.

We also believe that the *Council* must commit to full compliance with environmental laws for all projects and programs. There is some concern the Draft Plan does not include clear definition from the *Council* as to what qualifies as economic restoration, particularly when it comes to infrastructure -- funding for which is limited under the RESTORE Act. We believe that economic restoration in the context of RESTORE must consider project sustainability and environmental impact -- does the project create a healthier environment or will it add to pollution and environmental degradation. Since RESTORE Act funds will flow through penalties for violation of an environmental law, the *Council* must commit to ensuring that economic restoration projects -- whether funded through the *Council* controlled or state impact component - will not degrade the environment nor negatively impact ecosystem restoration projects funded under RESTORE, NRDA or NFWF.

Finally, we have major concerns about the proposed project selection method of requiring projects to be *sponsored* by one the 11 *Council* members. This has the almost certain potential for project selection to move forward without transparency, in back room deals and with lobbyist and special interests playing a more significant role in moving projects forward than Gulf coast community members. *Council* members, both state and federal, are not and cannot be aware of the myriad of worthy restoration and conservation projects being developed by universities, nonprofit conservation groups, municipalities, and coastal counties/parishes throughout the Gulf. It is, therefore, critical that the *Council* establish a process that allows submission of projects for review by *Council* members for possible sponsorship.

We appreciate this opportunity to comment on the Draft Plan and look forward to working with the Gulf Coast Ecosystem Restoration Council as it moves forward.

Respectfully submitted,

Comments of Gulf Future on the Gulf Coast Ecosystem Restoration Council's Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy

Gulf Future, a network of conservation, community civil rights and faith based organizations across the five Gulf States, is providing our comments and concerns with regard to the Gulf Coast Ecosystem Restoration Council's (*Council*) Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy (Draft Plan). Gulf Future recognizes that RESTORE Act funds constitute a unique opportunity to the Gulf States and our nation to create a legacy for conservation, and this is our best chance to meaningfully kick-start restoration of critical shared natural resource in the Gulf region. Since the BP drilling disaster, communities from across the Gulf have been working together to establish our priorities for how to restore and protect the resources in this place we call home.

Restoring the Gulf Ecosystem

Gulf Future is pleased to see that the Draft Plan states the *Council's* commitment to science based decision making and adaptive management of plans and projects. We believe that all projects funded under the RESTORE Act must be required to have a plan for evaluation and a system for measuring outcomes which would allow true adaptive management to occur.

We support the *Council's* commitment to (1) focusing the *Council*-selected Restoration Component and the Spill Impact Component on funding for ecosystem restoration (as defined by the 5 Plan goals), which is necessary to ensure that we benefit the natural resources, our economy, and our communities; and (2) taking a regional, ecosystem-based, and landscape-scale approach to restoration that addresses the entire Gulf as one interconnected ecosystem. *However*, we are concerned that so far restoration efforts appear focused on the coastal environment ignoring the critical resource in the Deepwater of the Gulf of Mexico. We believe that a significant impact of the oil disaster occurred in the marine environment and we would like to see a focused commitment by the *Council* to addressing both the coastal *and* marine restoration and recovery.

We also support the *Council's* stated intent to use an integrated and coordinated approach and work closely to ensure that efforts funded through the Natural Resource Damage Assessment (NRDA) and the National Fish and Wildlife Foundation (NFWF) are complimentary. Since funding for comprehensive restoration will be limited in relation to the restoration need, leveraging multiple funding sources will be critical to getting the most bang for our buck on environmental restoration. Efforts to integrate restoration should also consider and prioritize the increasing need for community protection.

Creating Economic Benefits of Ecosystem Restoration for Local Communities:

Restoring the Environment Restores the Economy

Our coastal communities are some of the most vulnerable in the nation to the impacts of storms. The efforts of the *Council* represent our best opportunity to make our Gulf coast, our communities and our coastal-dependent economies more resilient in the face of rising seas and stronger storms. Every dollar the *Council* approves,

either through state or *Council*-led plans, should increase our resilience, providing non-structural storm protection and facilitating climate change adaptation (strengthening barrier islands, restoring coastal marshes and forest, etc.). We must use available restoration dollars to protect critical infrastructure that ensures the economic and cultural survival of coastal communities. For coastal communities dependent for their livelihoods on the natural resources of the Gulf, environmental restoration is essential to economic recovery.

Implementing ecosystem restoration could create thousands of new local jobs for coastal communities significantly impacted by the BP drilling disaster. If project selection includes consideration of local hire, a new restoration economy could provide ecologically sustainable economic opportunities and broad public benefit to local communities, including disadvantaged and distressed communities. The *Council* has the ability to build a solid foundation for decades of positive social, economic, and environmental outcomes by setting a strong precedent for managing large-scale restoration with an eye to community economic recovery and sustainability.

Commit to Creating Safe, Healthy and Just Communities

One glaring omission in the Draft Plan is a commitment to including communities in the priorities and objectives of restoring the Gulf. Our communities are historically left out, leading to a Gulf-wide epidemic of environmental injustices. We urge the *Council* to adhere to the recommendations outlined in the Gulf Future Guidance for Sustainable Restoration.¹ According to the government's own definition, Environmental Justice calls for fair treatment and meaningful involvement of all people with respect to development, implementation and enforcement of environmental laws, regulations and policies. Creating justice demands that those who have historically been excluded from environmental decision-making, traditionally minority, low-income and tribal communities, have the same access to environmental decision-makers, decision-making processes and the ability to make reasoned contributions to decisions.

We urge the *Council* to comply with Executive Order 12898² by integrating environmental justice considerations into all programs and projects funded by the *Council*.

Much of the ground work has been laid in this effort and the *Council* should build on this and seek the advice of the **National Environmental Justice Advisory Council (NEJAC)** and the **Gulf of Mexico Coastal Environmental Justice Ambassadors** who have made recommendations³ that must be incorporated into the Comprehensive Plan including, but not limited to:

- Advancement of environmental literacy and capacity building among vulnerable populations including indigenous populations and those with language barriers
 - Increased awareness of indigenous communities
 - Increased outreach and education in indigenous communities
 - Increase participation by indigenous communities
 - Increased number of economic development and disaster preparedness projects
- Foster stronger collaboration with communities and NGOs
- Increase reciprocal communications with environmental justice communities

¹ Gulf Future Guidance for Sustainable Restoration (April 2013)

<http://www.gulffuture.org/images/stories/3%20year%20memorial/GulfFutureGuidanceforSustainableRestoration.pdf>

² Executive Order 12898 of 1994. <http://www.archives.gov/federal-register/executive-orders/pdf/12898.pdf>

³ Presentation from the GoM Coastal Environmental Justice Ambassadors (August 2011) New Orleans, LA.

http://www.gulfofmexicoalliance.org/pdfs/GOMA_August_2011/GOMA_All_Hands_Coastal_Environmental_Justice_Ambassadors.pdf

- Increase awareness of and access to funding opportunities for established community groups and nonprofits
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- provide guidance to the *Council* on how to better obtain input from communities;
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- utilize the traditional knowledge of community members, including fishermen and natives to inform project selection, implementation and evaluation.

We hope to see in the coming months a stronger commitment to establishing these committees and a move to quickly begin the nomination process for membership on these committees.

Areas of Concern

Although generally pleased with the direction set by the Draft Plan, we have numerous concerns with the lack of specificity in the Draft Plan. According to comments collected at community meetings in three Gulf States, the priority criteria was too broad, leaving it open for just about any type of project to qualify for funding. The *Council* should develop additional criteria for vetting projects. For example, in selecting projects the *Council* should be required to consider whether a project will involve hiring of local workers, including the potential workforce development and job training programs that will allow local workers to compete for employment in a restoration economy. Similarly, the *Council* should consider whether projects:

- invest in the resiliency of distressed communities, helping these communities to adapt to climate change and sea level rise;
- invest in green infrastructure and energy efficiency upgrades while reducing our dependence on fossil fuels and investing in clean, renewable sources of energy;
- contribute to restoration or protection of critical habitat for endangered species; and
- protect and preserve the unique cultures of the Gulf people.

We are disappointed that the plan does not contain a list of priority projects or an allocation plan as required by the RESTORE Act. We understand the *Council's* lack of certainty regarding the amount and timing of monies available under the RESTORE Act. A draft list of priority projects should be released to the public as soon as possible to allow for full public review and comment. We would request that the *Council* establish a publicly accessible portal where projects may be submitted and viewed and where the status of publicly submitted

projects can be updated by the *Council*. *Council* members do not have access to all of the worthy conservation and restoration projects that exist in the Gulf.

We also believe that the *Council* must commit to full compliance with environmental laws for all projects and programs.

There is some concern the Draft Plan does not include clear definition from the *Council* as to what qualifies as economic restoration, particularly when it comes to infrastructure -- funding for which is limited under the RESTORE Act. We believe that economic restoration in the context of RESTORE must consider project sustainability and environmental impact – does the project create a healthier environment or will it add to pollution and environmental degradation. Since RESTORE Act funds will flow through penalties for violation of an environmental law, the *Council* must commit to ensuring that economic restoration projects – whether funded through the *Council* controlled or state impact component - will not degrade the environment nor negatively impact ecosystem restoration projects funded under RESTORE, NRDA or NFWF.

Finally, we have major concerns about the proposed project selection method of requiring projects to be *sponsored* by one the 11 *Council* members. This has the almost certain potential for project selection to move forward without transparency, with lobbyist and special interests playing a more significant role in moving projects forward than Gulf coast community members. *Council* members, both state and federal, are not and cannot be aware of the myriad of worthy restoration and conservation projects being developed by universities, nonprofit conservation groups, municipalities, and coastal counties/parishes throughout the Gulf. It is, therefore, critical that the *Council* establish a process that allows submission of projects for review by *Council* members for possible sponsorship.

We appreciate this opportunity to comment on the Draft Plan and look forward to working with the Gulf Coast Ecosystem Restoration Council as it moves forward.

Respectfully submitted,

Alabama Coastal Heritage Trust
Hank Caddell, Secretary/Treasurer

Apalachicola Riverkeeper
Dan Tonsmeire

Asian Americans for Change
Kaitlin Truong, Director

Atchafalaya Basinkeeper.
Dean A. Wilson, Executive Director

Bayou History Center, Inc.
Patricia Whitney, Director

BISCO (Bayou Interfaith Shared Community Organizing)
Sharon Gauthé, Director

Boat People SOS
Grace Scire, Gulf Coast Regional Director

Coastal Women for Change
Sharon Hanshaw, Director

Galveston Baykeeper
Sharron Stewart, Board Member

Gulf Coast Center for Law and Policy
Colette Pichon Battle, Director

Gulf Islands Conservancy
Terese Collins, President

Gulf Restoration Network
Cynthia Sarthou , Executive Director

Hijra House
Ya-Sin Shabazz, Director of Programs and Development

Louisiana Environmental Action Network (LEAN)
Mary Lee Or, Executive Director

Lower Mississippi Riverkeeper
Paul Orr

Mississippi Center for Justice
Reilly Morse, Managing Director

Mobile Baykeeper
Casi Callaway, Executive Director

MS Coalition for Vietnamese-American Fisher Folks
and Families
Thao Vu, Coordinator

On Wings of Care
Bonny Schumaker, President and Founder

Pelican Coast Conservancy
Walter C. Ernest IV, Director of Operations

Sierra Club
Jordan Macha, Gulf States Representative

SouthWings
Hume Davenport, Executive Director

Steps Coalition
Roberta Avila, Executive Director

Turkey Creek Community Initiatives
Derrick Evans, Director

Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan

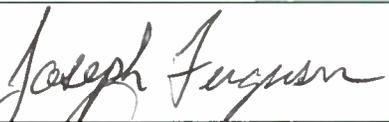
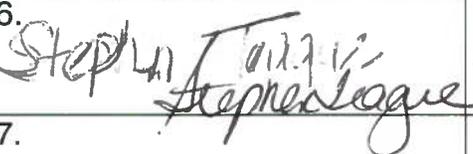
DeMiller Hall, 610 Water St, Biloxi, MS

June x 2013 from 6:00 pm – 8:00 pm

30% of funding
Ecosystem

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1. 	Kelly Lucas	1411 Bayview Ave Biloxi MS 39530	MDMR
2. 	Joseph Ferguson	14624 John Smith Rd Vancleave, MS 39565	Joseph's travel Seaira club
3. 	CHARISSE GORDON	963 Division St. Biloxi, MS (39530)	MCF
4.  ←  →	Jennifer Johnson	"	MCF
5. 	Jennifer Johnson	POB 4686 Jackson, MS 39296-4686	Oxfam America
6. 	Stephen Tague	963 Division Street Biloxi, MS 39530	Mississippi Center for Justice
7.			

Table

Evaluation

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response: Yes No

Areas of debate, concern, discussion, etc.

① Need to learn more about Gulf of Mexico restoration - Bottom habitats
health substrate at the Bottom

② Ongoing Research

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response: Exactly Right Needs More Definition Doesn't Apply

→ Human are extensions of the Ecosystem
Use the resources that address their household
address their resiliency

3. What criteria do you think are good?

4. Are there any criteria you disagree with?

Just need to

5. Are there any missing criteria?

→ Social Sciences

III. Funding Objectives

1. Do you agree with the funding objectives? *more*

① *wants to see* Oversight & Accountability for projects
Funding that comes from the objective

② Make compliance part of the oversight
and make it clear what
the compliance is and how to comply

2. Which objectives are most important to you, your family and your community?

Focus on the most vulnerable
communities, who depend
on the fisheries.

- Workforce Resiliency Training

3. Which objectives are least important to you, your family and your community? - Other Comm

The objective

~~By~~ all work together

these objectives
- Use to improve overall
sustainability of the community

- would like to see objective coordinated
in some way so this overlaps

e.g. Training for those who live with ⁶ to be trained to collect
data & make data folks who use in technology

4. Are there any objectives that you feel are important and missing from this list?

Local, have first access to jobs

Go to Local Businesses, first for the work
work force training of jobs

-Competing for those who are impacted by the firm,

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

yes

2. If so what types of Advisory Committees should they set up?

Science

Citizen Advisory

& a combination of both

with 2 members

- should be diverse w/ different

perspectives if they are going to have 2 Vol

3. What role and powers should an Advisory Committee be granted?

① When is the Advisory Committee - going to
get the review of the Project?

① Be able to vet project - up front

② - Have a vote

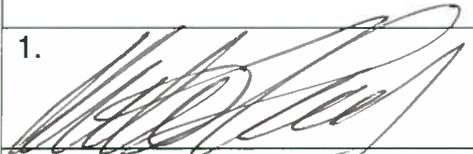
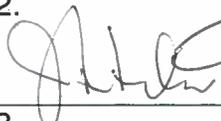
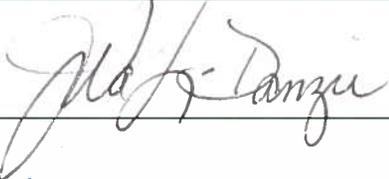
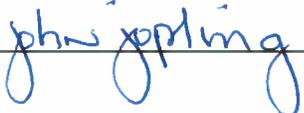
4. If an Advisory Committee was established, who should serve on such a committee?

1) ^{Advisory} Science / Hard Science & Social Science ^{of community}	
2) Citizens Advisory	
→ (Fishes/Shrimp/...)	→ Local Scientist & Scientists who serve on Federal agencies or other national expertise on the issue
① - constituent groups who	
② - Environmental Justice	
③ Recreational Fishery	
④ Charter Captains	
⑤ Ecotourism	
⑥	

Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan
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SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1. 	Victoria Phaneuf	3924 Idaho St New Orleans, LA 70014	U. of Arizona
2. 	Jackie Antun	ophomecare@yahoo.com	Operator Home Care
3. 	DON BLANCHER	300 Fern Hill Dr. Mobile AL 36608	MDER blancher@restorationssystem.com
4. 	JACKIE WASHINGTON-DAVIE	223 Nixon St Biloxi 39530	Harrison Co Federation of Women
5. 	John Jopling	1309 Father Ryan Ave Biloxi, MS	MS Center for Justice.
6.			
7.			

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response:

Yes No

Areas of debate, concern, discussion, etc.

need for criteria to ^{recognize} include community/people resilience - that citizens benefit from ecosystem restoration.

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response:

Exactly Right

Needs More Definition Doesn't Apply

as it relates to what "resiliency" means.

people need to be emphasized as part of the ecosystem.

3. What criteria do you think are good?

emphasis on ecosystem restoration.

4. Are there any criteria you disagree with?

5. Are there any missing criteria?

ecosystem restoration

✓ projects need to bring jobs to the local economies of where they are taking place.

~~projects should~~

III. Funding Objectives

1. Do you agree with the funding objectives?

~~create a pot of money~~

look at overall but... see next page.

2. Which objectives are most important to you, your family and your community?

prioritize resiliency and restoring + protecting living coastal and marine resources - so many of the Gulf people make their living off the waters.

promote community resilience : "resilience" should be expanded to address LArc disasters.

3. Which objectives are least important to you, your family and your community?

4. Are there any objectives that you feel are important and missing from this list?

- need to ~~use~~^{leverage} local community and NGO resources to direct the community resilience objective.
- create a pot of money dedicated to locally-based NGOs and community resource organizations to support green workforce development.
- need to emphasize local workforce development and jobs training so that communities where environmental restoration projects occur receive jobs.
- Gulf Coast residents need to be prioritized for jobs. - ecosystem restoration projects should bring local jobs. for example, supporting the fisheries.

• Promote Community Resilience : expand to provide training and information to citizens on ~~the~~ oil disaster response measures (ex. dispersant) so citizens are informed.

IV. Advisory Committees

- add language that addresses "man made" disasters.

1. Do you think Advisory Committees would be useful to the work of the Council?

YES!
=

2. If so what types of Advisory Committees should they set up?

Citizens Advisory Committee

3. What role and powers should an Advisory Committee be granted?

- power to make recommendations and comments on the Council's actions, plans, etc
- build in a way to build in diverse voices but ~~structure~~ allow rotation off the committee so not one or two people or representative groups can dominate.
- power to make Council reassess projects that are prioritized for funding that have been on the books for decades - this would prevent questionable projects that have been proposed for years ^{from} being allowed to move forward without public buy-in.
- power to propose projects - this ~~may eliminate~~ expands possibilities ~~than~~ just council member proposed projects.

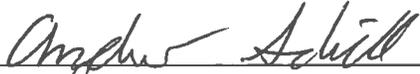
Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan

DeMiller Hall, 610 Water St, Biloxi, MS

June x 2013 from 6:00 pm – 8:00 pm

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1. 	Andrew Schill	1525 E Pass Rd Gulfport, MS	Mississippi Center for Justice
2. 	Irene McIntosh	3047 Chottam Rd D'Iberville MS 39540	DVF (D'Iberville Volunteers Foundation)
3. 	ED CAKE	2510 Ridgewood Road Ocean Springs, MS 39564	Gulf Environmental Associates & DVF
4. 	AVERY BATES	8260 N. MEADOW, LN. IRVINGTON, AL. 36544	Vice PRESIDENT ORGANIZED SEAFOOD ASSOC. OF AL.
5.			
6.			
7.			

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response:

Yes No

Areas of debate, concern, discussion, etc.

* OVERALLLY BROAD - "WISH LIST" NOT SPECIFIC ENOUGH; HOW CAN YOU EVALUATE A PROJECT?

NEED A RUBRIC OF FACTORS

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response:

Exactly Right

Needs More Definition Doesn't Apply

3. What criteria do you think are good?

4. Are there any criteria you disagree with?

5. Are there any missing criteria?

• EMPLOY FISHERMAN; 80% OF WORKFORCE (LOCAL FISHERMAN); SUSTAINABILITY OF HUMAN CAPACITY; WATER QUALITY MEASURE; DEFINE "NATURAL RESOURCES"; MEASURABLE CRITERIA

III. Funding Objectives

1. Do you agree with the funding objectives?

✗ TOO BROAD; HOW WELL DOES THE CRITERIA MEET THE OBJECTIVE; ONE RUBRIC FOR EVERY PROJECT; USE OBJECTIVES AS RUBRIC... HOW CRITICAL ARE HABITATS? ... WHAT WATER? ... HOW DOES THAT CONTRIBUTE TO SUSTAINABILITY?

* EACH ONE NEEDS TO BE SPECIFIC; ALL SHOULD HAVE AN EDUCATIONAL COMPONENT

2. Which objectives are most important to you, your family and your community?

RESTORE!... FRESH WATER IN-FLOW; ISLANDS ; ALL EQUALLY ~~WAS~~ IMPORTANT

ENVIRONMENTAL EDUCATION FOR EACH OBJECTIVE!

WEIGHT EQUALLY IN RUBRIC

3. Which objectives are least important to you, your family and your community?

ALL EQUALLY IMPORTANT

4. Are there any objectives that you feel are important and missing from this list?

OVERSIGHT BY LOCAL POLITICIANS? HOW DO WE PREVENT ^{TOO MUCH} POLITICAL OVERSIGHT?

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

BOTH - CITIZEN & SCIENCE ADVISORY COMMITTEES NEEDED

2. If so what types of Advisory Committees should they set up?

CITIZEN & SCIENCE

EPA "NEEDS" A CITIZEN COMMITTEE

* SPREAD OUT THROUGHOUT COMMUNITIES

3. What role and powers should an Advisory Committee be granted?

PREFER THROUGHOUT ENTIRE PROCESS BUT "OKAY" WITH REVIEW

CITIZEN → ^{SOCIAL SCIENCE VIEWS.} ~~SOCIAL SCIENTIST~~; FISHERMAN; POPULATION VARIES SO MUCH, NEED MANY DIFF. REPRESENTATIVE

* COMMITTEES SPREAD OUT THAT FEEDS INTO THE COUNCIL

* DIFFERENT ISSUES / VIEWPOINTS NEEDED!

* NOT ABOUT VOTING FOR PROJECTS BUT ^{PROJECT} OVERSIGHT!

4. If an Advisory Committee was established, who should serve on such a committee?

V. Additional Notes

SPONSORSHIP PROCESS: → DO POLITICS COME IN TO PLAY?

* WHAT IS THE PROCESS? TRANSPARENCY?

ZERO TRUST IN POLICY MAKERS

Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan
 DeMiller Hall, 610 Water St, Biloxi, MS
 June x 2013 from 6:00 pm – 8:00 pm

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1. 	Richly Duong	100 Winnie CT Gulfport, MS 39503	
2. 	N. SIN SHABAZZ	P.O. 913 Biloxi, MS 39533	
3. 	Amy J. Carter	403 Maginnis Avenue OS, MS 39564	AAC
4. 	Kara Leckford	PO Box 7891 Spanish Fort, AL 36577	ocean conservancy, inc
5.			
6.			
7.			

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response:

Yes No

Areas of debate, concern, discussion, etc.

*details
more ~~details~~ around objectives around resiliency*

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response:

Exactly Right

Needs More Definition

Doesn't Apply

how does community resiliency

4 criteria sounds similar

3. What criteria do you think are good?

long term resiliency → however should be more defined

not for tourism, should be focused on ecosystem / community ~~resiliency~~ ^{resiliency}

less focus on economy

community resiliency → minority, distressed, fishing

how to enhance natural protects.

4. Are there any criteria you disagree with?

existing plans vs. existing projects → should ~~be~~ existing plans be considered? concerns that they won't address damages to the current problem. Should have additional criteria

↳ wording unclear as to how \$\$ being spent

Very broad criteria → needs more specifics

"can check anything in" → no

5. Are there any missing criteria?

missing specificity

↳ workforce development. coastal workers for restoration work

↳ minority requirements for coastal workforce development.

↳ specificity on ~~what~~ job hires. ex. 15% of minorities

↳ training opportunities for ~~some~~ disenfranchised / distressed communities

III. Funding Objectives

1. Do you agree with the funding objectives?

hit all the objectives for restoration initiatives. Broad net.

there are some things missing

2. Which objectives are most important to you, your family and your community?

Coastal restoration, ~~forming~~ fisheries

Community resiliency

Oyster reefs - sustainable fisheries → long term planning for oyster reefs / fisheries

living coastal resources

all objects meet long term sustainability

Environmental Stewardship / Education → community engagement & make projects sustainable.

cont. education needs to be part of the plan for sustainability

3. Which objectives are least important to you, your family and your community?

Water Quality → should not allow cities to repair infrastructure.

needs better detailed criteria. loopholes need to be addressed

~~Water~~

4. Are there any objectives that you feel are important and missing from this list?

Community training &/or retraining → under community resiliency.

Community resiliency → not only from storm protection / coastal erosion

↳ more sustainable ways to make a community resiliency

↳ long term trust fund for vulnerable communities → administered by minority stakeholders

↳ resiliency of community

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

Yes

2. If so what types of Advisory Committees should they set up?

* LOCAL → Gulf Coast stakeholders.

- Science based committees
- ~~financial~~ social responsibility : citizens advisory committee
- Oversight of Funds → fiscal advis. committees
- Large scale advisory body.

3. What role and powers should an Advisory Committee be granted?

look to other advisory bodies for examples in places that work.

* a vote or weighted decision making power

* administrative power / role for committee

Who should serve? how are they selected? → criteria

broader representation

4. If an Advisory Committee was established, who should serve on such a committee?

minority groups → representatives

~~fishery~~ making livelihood from the coast.

representation from coastal counties

~~students living on the coast~~ / University, academic representation

↳ what role can

divide commercial & recreation fishermen as representatives on Advis. committee

V. Additional Notes

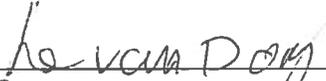
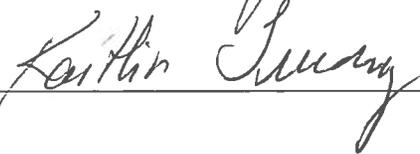
Funding

WORK FORCE DEVELOPMENT

Biloxi, MS

Thứ Tư, Ngày 18 Tháng 6, 2013

CÔNG NGHỊ VÀ NHẬN XÉT CÔNG CỘNG

I. Tham Gia Công Nghị			
Ký Tên	Tên Viết Hoa	Địa Chỉ	Nếu đại diện cho tổ chức hoặc cơ quan, hãy liệt kê:
1. 	Nguyen, Non Van	3600 Jo Beth Terrace Gautier, MS 39553	
2. 	Dong, Le Van	1905 Porpoise Drive Ocean Springs, MS 39564	
3. 	Kaitlin Truong	2112 Bienville Blvd Suite 11, OS 39564	Asian Americans for Change
4. 	Thanh	1136 Papps Ferry Rd, Suite 205 223 Biloxi, MS 39532	MS Coalition for Vietnamese-American Fishermen & Families
5.			
6.			
7.			

V. Lưu Ý Bổ Sung

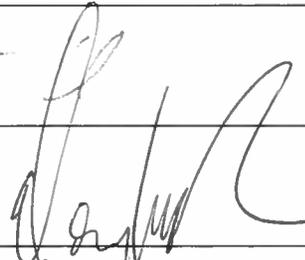
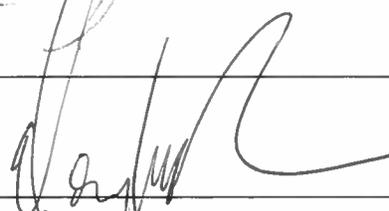
1. Language users needs not addressed on frontend, didn't receive Draft Comp. Plan ⁱⁿ timely manner
2. very little crabs
3. Paid training for ecosystem restoration projects
4. Water quality ^{issues} needs to be addressed
5. Oyster restoration projects need relay / transplant program
6. Monitoring program - NOAA funds for monitoring
^{community-based}
7. Advisory committee or Steering Committee w/ voting committee
8. No project should cause any adverse impact (e.g. River diversions project may harm ~~injure~~ oyster reefs)

Biloxi, MS

Thứ Tư, Ngày 18 Tháng 6, 2013

CÔNG NGHỊ VÀ NHÂN XÉT CÔNG CÔNG

I. Tham Gia Công Nghị

Ký Tên	Tên Viết Hoa	Địa Chỉ	Nếu đại diện cho tổ chức hoặc cơ quan, hãy liệt kê:
1. Suongpham	SUONG PHAM	6020W Greene St Bay St Louis MS 39590	
2. 	THU VAN HUYNH	6159 E Jackson St Bay St Louis MS 39520	
3. nguyen tran	Nguyen Tran	100 ESPANA PARK Waveland MS 39576	
4. N3 VAN NGUYEN	Nguyen, N3 Van N	3074 Big Ridge Rd #4 Dikerville, MS 39540	
5. 	UThang Nguyen	277 Nichols Dr. Biloxi, MS 39530	
6. 	TUAN DANG	7613 RESTON DR Biloxi, MS 39532	AAC ASIAN AMERICANS FOR CHANGE Asian Americans for Change
7. Kaitlin Truong	Kaitlin Truong	2112 Bienville Blvd. Suite 11, Ocean Springs, MS 39564	Asian Americans for Change.

II. Ưu Tiên Tiêu Chí Cung Cấp Tài Liệu

1. Bạn có đồng ý với sự chọn lựa kế hoạch ưu tiên dùng để nhận tài trợ không?

Sự trả lời của nhóm: Đồng Ý Không

Lĩnh vực cuộc tranh luận, quan tâm, và thảo luận....v.v

Restoring the fisheries, marine & wildlife habitats, habitats, natural resources is important in restoring livelihood of fishermen & families, and communities along the Gulf Coast.

2. Những tiêu chí có quá rộng lớn, có cần phải xác định rõ hơn không?

Sự trả lời của nhóm: Rất Chính Xác Cần định nghĩa thêm Không áp dụng

3. Tiêu chí nào bạn nghĩ là tốt?

a) Restore, improve; & protect water quality

~~b) Restore & enhance NG~~

b) Protect & Restore living coastal & natural resources.

c) Promote Community Resilience

Important for fishermen population

4. Có tiêu chí nào bạn không đồng ý không?

5. Có tiêu chí nào bị thiếu không? (Missing Objective)

III. Mục Tiêu Tài Trợ

1. Bạn có đồng ý với mục tiêu tài trợ này không?

2. Mục tiêu nào là quan trọng đối với bạn, gia đình bạn và cộng đồng của bạn?

3. Mục tiêu nào ít quan trọng nhất đối với bạn, gia đình bạn và cộng đồng của bạn?

4. Có mục tiêu nào bạn cảm thấy là quan trọng và bị thiếu sót trong danh sách này không?

IV. Ủy Ban Tư Vấn

1. Bạn nghĩ rằng Ủy Ban Tư Vấn có thể hữu ích cho công việc Hội Đồng không?

Advisory Committee should include people who are expert on the water which include fishermen population. Other knowledge should be permitted. Collaboration of Scientist and fishermen bridge the gap in knowledge on the advisory council.

2. Nếu có vậy loại Ủy Ban Tư Vấn nào họ nên thiết lập?

3. Vai trò và quyền hạn gì mà Ủy Ban Tư Vấn nên cấp?

4. Nếu Ủy Ban Tư Vấn được thành lập, ai sẽ là người đảm trách nhiệm này?

V. Lưu Ý Bổ Sung

- Translation of scientific terms to help Vietnamese understand the process of recovery particularly estuaries, fisheries
- Language barriers is a challenge to restore the people who live along the Gulf Coast.
- Restoring the Gulf Coast mean it is imperative to implement objectives which include wellfare and economic development
- Sequential Monitoring of water, fisheries should utilize fishermen directly impacted to assist with process. This will provide job opportunities and maintenance of water quality.

Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan

Bayou La Batre, AL
Wednesday, June 19, 2013

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1.	Dan Dealy		
2.	Gil Johnson		
3.	Sean Johnson		
4.	Annette Johnson	P.O. Box 137 Bayou La Batre, AL 36509	
5.	Rosa Zirlott	P.O. Box 366 Irvington, AL 36544	Organized seafood
6.	RT Lewis	15360 CLARK RD GODEN, AL 36523	CITIZEN
7.	Joey Wilkerson		

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response: Yes No

Areas of debate, concern, discussion, etc.

Concern over breakwater projects being called oyster reef
Alabama has 0 miles oyster reef for these projects
Maintain natural reefs & spend money on oyster farming (aquiculture)
Ensure reef is cleaned & in good condition (water quality)
Input from oyster catcher on where they will grow (understand system)

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response: Exactly Right Needs More Definition Doesn't Apply

* Natural resources need to be broken down into categories
(Fisheries too broad - oyster, crabbing, fisheries, etc.)

3. What criteria do you think are good?

Longterm focus - in Bayou need to look at infrastructure
Broad scale (Sewer system- detriment to health &
Efficiencies growth of the community)
(Can regain what's been lost in storms with the right
Infrastructure)

4. Are there any criteria you disagree with?

5. Are there any missing criteria?

III. Funding Objectives

1. Do you agree with the funding objectives?

2. Which objectives are most important to you, your family and your community?

Safe Harbor - safe harbor & place to dock (Hard to find place to dock boat)

- Build inlet & place to leave boats in water. Could be protected during oil spill This would be out of way of storm surge.

• Protect seafood industry

* • Infrastructure

* • Protect water quality (reducing contaminants from up river)

* • Monitoring

Protecting water quality most important

3. Which objectives are least important to you, your family and your community?

4. Are there any objectives that you feel are important and missing from this list?

- Metrics must satisfy all people involved - must include all stakeholders
- Monitoring should be included upstream so we know what is coming from north of us & flowing into our watershed
- Resources to rebuild reef here on coast
- Rebuild what's on the coast, monitor what's coming from upstream (not just on coastline)

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

Yes

How can we structure it so we can make place based decisions?

2. If so what types of Advisory Committees should they set up?

One committee w/ representation from local communities to represent voices & concerns from all diverse groups across 5 states

3. What role and powers should an Advisory Committee be granted?

Sit in on discussion of projects & have a vote

4. If an Advisory Committee was established, who should serve on such a committee?

Local groups sports fishermen, business owners, commercial fishers -
Gil everyone from local community → bubble that up
to Federal Council

Rosa Someone permitted in the industry -

RT

V. Additional Notes

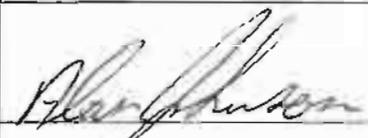
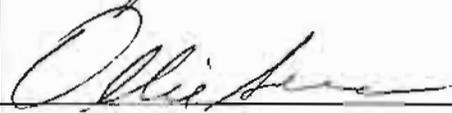
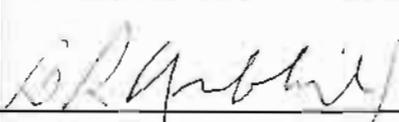
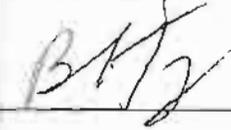
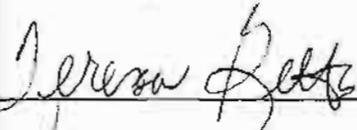
Community Meeting on Draft Initial Comprehensive Plan
Gulf Coast Ecosystem Restoration Council
June 19, 2013
Bayou La Batre, AL

Name	Signature	Address	If representing an organization or agency, please list:
David Stiller		PO Box 124 Bon Secour AL 36511	

Community Meeting on Draft Initial Comprehensive Plan
 Gulf Coast Ecosystem Restoration Council

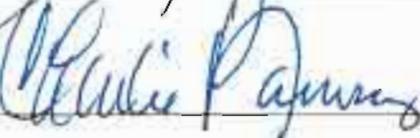
~~June 18, 2013~~
 Biloxi, MS

June 19
 Bayou La Batre

Name	Signature	Address	If representing an organization or agency, please list:
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DAVID UNDERHILL		PO Box 792 Mobile, AL 36601	Mobile Bay 50415
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Teresa Betts		602 Bel Air Blvd II Mobile, AL 36606	Center for Fair Housing
Jean Halder		PO Box 82084 Mobile 36695	WR, LLC
James Belen	 251-370-8266	PO Box 82084 Mobile, AL 36689	WR, LLC mnjuncvs@aol.com
Debbie Pelso		Mobile AL.	WR, LLC

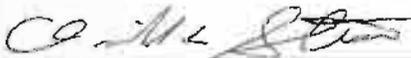
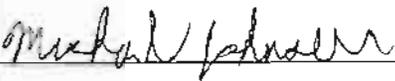
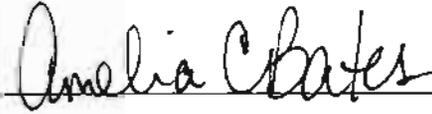
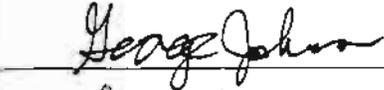
Community Meeting on Draft Initial Comprehensive Plan
 Gulf Coast Ecosystem Restoration Council
 June 19, 2013
 Bayou La Batre, AL

Sign in Sheet

Name	Signature	Address	If representing an organization or agency, please list:
Stefanie Christensen		450-C Government Mobile, AL 36688	Mobile Polykeeper
Therley Dean Baker	HARLEY D. BATES	Bayou La Batre, AL	out of work Fisherman
Rennie Woodman	Rennie Woodman	13955 Bayou La Batre Bayou La Batre	out of work Fisherman
Randy Salmer	Randy Salmer	13955 B. Terberg AVE.	out of work Fisherman
Otis L. Collier Jr.	OTIS L. COLLIER	8114 MCKEE RD N. IRVINGTON, AL 36544	
Sam Macon		Property owner Cotton -	
CHARLIE RAMSEY		P.O. Box 905 Grenada, AL	NRCS/USDA

Community Meeting on Draft Initial Comprehensive Plan
 Gulf Coast Ecosystem Restoration Council
 June 19, 2013
 Bayou La Batre, AL

Sign in Sheet

Name	Signature	Address	If representing an organization or agency, please list:
Orville Stuart		8850 midway st Coden, AL 36523	Self
Harry L Johnson		14301 Old Pascagoula P.D. Grand Bay AL 36541	
Charles Johnson		8830 Midway St Coden AL 36523	Self
Michael Johnson		3921 Johnson Rd coden ³⁶⁵²³	Self
Amelia Cates		8605 Powell Lane Bayou La Batre, AL ³⁶⁵²⁹	Self
George Johnson		11630 Boe Rd ext. Grand Bay AL 36541	
Danielle Johnson		11630 Boe Rd ext. Grand Bay AL 36541	

Community Meeting on Draft Initial Comprehensive Plan
 Gulf Coast Ecosystem Restoration Council
 June 19, 2013
 Bayou La Batre, AL

Sign in Sheet

Name	Signature	Address	If representing an organization or agency, please list:
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Joyce Nichols		1070 Schullinger Rd Mobile, AL 36608	
Randy Nichols			
Annold Steele Jr		10595 Rainbow Drive East Irwington AL	
JAMES E. MORRIS	James E. Morris	14530 RIVA RD CODEN, AL. 36523	
Bunda Nelson		4525 Smith Rd Codon AL 36523	
Kent Nelson		4525 Smith Rd Codon AL 36523	

Community Meeting on Draft Initial Comprehensive Plan
 Gulf Coast Ecosystem Restoration Council
 June 19, 2013
 Bayou La Batre, AL

Sign in Sheet

Name	Signature	Address	If representing an organization or agency, please list:
Russell L Floyd	Russell LeMar Floyd	PO Box 185 Bayou La Batre	
Robert E Barbour	Robert E Barbour	14497 Arribraux ST Gorton	
Kandice O'Grady	Kandice O'Grady		
Evan Corneille	Evan Corneille		
Mark Bert	Mark Bert		AL Coastal Foundation
HUGH TRAN	Hugh Tran		EPA, U.S.
AVERY BATES	Avery Bates	8260 N. MEADOW LN IRVINGTON, AL 36544	organized Seafood Assoc AL
JACK SKINNER	Jack Skinner	14539 ST MICHAEL ST CODEN ALA	OUT WORK FRESHWAY

Facilitator: Kandice O'Grady
Table #2

Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan

Bayou La Batre, AL

Wednesday, June 19, 2013

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1.	James Morris		
2.	Debbie Devore		
3.	arnie Anderson		
4.	Chuck Beyregne		
5.	David Stiller		
6.			
7.			

II. Input on Priority Criteria ^{3min}

1. Do you agree with the priority criteria used to select projects for funding?

Yes & No

Overall group response: ___ Yes ___ No

Areas of debate, concern, discussion, etc.

• Across the Bay - it seems like there is more going on. We're working area. Its not all just about cleaning the beaches - here these people make their LIVINGS off the water.

Post fishery issues, always been a criteria that includes local community - Economic impact should weigh in. Some projects negatively affect a fishery. - This is a concern. Projects need to ~~to~~ include economic impact statements. This culture of people are naturally a part of the ecosystem.

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response:

___ Exactly Right

^{Repetitive}
 Needs More Definition

___ Doesn't Apply

• Economic impacts need to be included. Consider things outside of 'marine life'. Commercial fishermen are restricted - Reefs (artificial) get in the way of commercial fishermen.

We can't answer 'Yes' to any of these questions - but we haven't seen any progress yet!

Debbie mentioned 'stock assessments' - the group is happy to hear this possibility

- Community impact - environmental & economic - keep community involved in criteria

3) What criteria do you think are good?

Can't agree with it, everyone wants clean flourishing environment - but -
{ economic }

4. Are there any criteria you disagree with?

with regard to
Geographical location' → Disturbing, this could just go to aesthetic beaches
This needs to be reworded

5. Are there any missing criteria?

- Economic impacts
- Culture of the community
- Economic assessments
- Including the local community as part of the ecosystem

III. Funding Objectives

1. Do you agree with the funding objectives?

Shouldn't be a blanket/uniform plan for every community. Each has its own needs. There should be leeway. You can't have the same criteria/objectives for Orange Beach and Bayou La Batre. Shouldn't be the same criteria.

~~Shoreline~~ ~~shoreside~~ - is different based on each location.
Shoreline/project needs

How do you balance the needs of tourism vs. commercial fishing.

Objectives are vague and they run over each other. Objectives do not focus on the end result

2. Which objectives are most important to you, your family and your community?

• Included

• Projects different & specific & appropriate the specific location

3. Which objectives are least important to you, your family and your community?

4. Are there any objectives that you feel are important and missing from this list?

- There needs to be a grading process for projects w/ more impact
- More science before any projects & change is implemented
- ^{True} Management → in replace of political management
- Community resilience → Safe harbors are needed to keep community resilient in wake up storms
(infrastructure) - hope this included in community resiliency.

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

Concern - Means that I have to miss work (can't pay the bills) if I want to participate/listen in
I have to miss work.

Concerned/wonder - What folks would end up there?

2. If so what types of Advisory Committees should they set up?

Particular gatherings - Finfish, shrimp, oyster - Representative from each industry
↳ All separate task forces
↳ environmental representative.

These committees are usually dominated by rich people with a lot of money.

Recreational, commercial fishermen, tourism - all these committees meet.

Have the meetings in each gulf state - all above representatives to attend.

But how are each representatives chosen? Outreach through marine resources? - discussion surrounded this.

③ What role and powers should an Advisory Committee be granted?

Crab task force, shrimp task force, finfish

Meet point because it is currently not set up this way.

4. If an Advisory Committee was established, who should serve on such a committee?

- Finfish ~~tax~~ force etc - various representation from each user groups. - tourism
fishermen,

So do we include a scientist in this as well?

V. Additional Notes

◦ Why don't we give/distribute money to each group: commercial fishermen, tourism, environment etc

3 Main ^{Objective} Criteria points

- Economic impact of projects
- People/Fishermen are part of the ecosystem

Objectives: Can't argue these are warm & fuzzy - Clean & happy ^{environment}

Resiliency includes ~~safe~~ work but... need specifics - Projects cannot be blanket B&W ^{specific to} regions

Advisory committee - Consists of folks in specialized ~~for~~ forces

Crab, shrimp, tourism, environment

- resiliency.

Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan

DeMiller Hall, 610 Water St. Biloxi, MS

June x 2013 from 6:00 pm - 8:00 pm

BIB AL

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SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1. <i>D R Underhill</i>	D R UNDERHILL	PO Box 792 Mobile AL 36601	Mobile Bay Sonic Club
2. <i>Madelyne Wright</i>	Madelyne Wright	10345 Beverly Rd Irvington 36544	
3. <i>Michael D Sowa</i>	Michael D Sowa	10345 Beverly Rd. IRVINGTON AL 36544	
4. <i>Ervin Royal</i>	ERVIN ROYAL	PO Box 184 CG BE, AL 8701 MidWAY ST.	
5. <i>Nancy McCall</i>	NANCY MCCALL	Code AL 36523	Resident
6. <i>Kara Leath</i>	Kara Leath	PO Box 7891 Spanish Fort, AL 36577	
7. <i>Thomas Johnson</i>		Code Ala Box 24	

8.	<i>Ray Johnson</i>	<i>Ray Johnson</i>	<i>8310 BAYVIEW DR</i>	
9.				
10.				
11.				
12.				
13.				
14.				
15.				

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response:

Yes No

Areas of debate, concern, discussion, etc.

Broad Criteria - anything can be fit into it; more weighted scale

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response:

Exactly Right

Needs More Definition

Doesn't Apply

3. What criteria do you think are good?

greatest contribution to restoring + protecting natural resources.

long-term resiliency *

4. Are there any criteria you disagree with?

5. Are there any missing criteria?

Must employ local workers - Work to specific problems in a community

Incorporate public works projects

Set measures to protect communities, citizens, small businesses and home owners

R

III. Funding Objectives

1. Do you agree with the funding objectives?

Yes, they are all important

2. Which objectives are most important to you, your family and your community?

~~Public works; employ local workers~~

Education; Restore and Enhance Natural Process and Shorelines; Promote Natural Resource Stewardship; Promote Community Resiliency;

3. Which objectives are least important to you, your family and your community?

~~No tourist attraction~~

4. Are there any objectives that you feel are important and missing from this list?

Preventing man-made disasters; protecting small businesses and homeowners protected from larger corporate threats.

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

Yes, very helpful.

2. If so what types of Advisory Committees should they set up?

People who are deeply and intimately involved with and understand the communities that they are working with.

2 or 3 old fisherman for the gear food - they made their living and know what it takes to grow resources. - Resource Committees, Small Business Protection Committee

3. What role and powers should an Advisory Committee be granted?

power of transparency - Can have Council explain why advice is ignored; advice must be explicitly accepted or rejected.

4. If an Advisory Committee was established, who should serve on such a committee?

local businessmen, land owners, workers + fisherman

↓
local tradesmen

↓
commercial + recreational

*Mark Berte
Facilitator*

Bayou La Batre, AL
Wednesday, June 19, 2013

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1. <i>[Signature]</i>	Kellyn Garrison	200 First Ave North Bham AL 35203	The Nature Conservancy
2. <i>[Signature]</i>	Randy Nicholas	PO Box 144 Grand Bay, AL 36544	Mobile SWCD
3. <i>[Signature]</i>	Joyce Nicholas	1070 Schillinger Rd N Mobile, AL 36608	USDA-NRCS
4. <i>[Signature]</i>	Charlie Ramsey	PO Box 905 Grove Hill, AL 36451	USDA-NRCS
5. <i>[Signature]</i>	<i>aholbert2003@yahoo.com</i> ANN HOLBERT	4611 MYERS Rd EIGHT MILE, 36613	FAIR HOUSING
6. <i>[Signature]</i>	Tida Mae Cochran	8625 W Warran St Bayou La Batre 36509	Pro. Temp
7. <i>[Signature]</i>			

8.	Lawrence Crompton	10741 W. Meadow Ln Irvington AL 36544	Sea School
9.			
10.			
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15.			

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response:

Yes

No

Areas of debate, concern, discussion, etc.

- helps us best
- 1st is top - b/c takes a big view - State boundaries don't get in the way / facilitates learning from each other
 - 2nd is basically the same // ^{could include} large scale = galpwide & local
 - 3 - seems like they might miss one if
 - 4th - long term yes // No - b/c
- this is important // this is fine

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response:

Exactly Right

Needs More Definition

Doesn't Apply

↳ long term means a lot of things to do of high

~~Add this~~

↳ Need to define this

3. What criteria do you think are good?

See other page

4. Are there any criteria you disagree with?

See other page

2. Which objectives are most important to you, your family and your community?

- ① - provide natural resources stewardship education
- ② - ^{community} Resilience -
- ③ - Natural processes & Stewardship

Add
Use the organization
already in place --
Create an umbrella
organization
to enhance
their work.

3. Which objectives are least important to you, your family and your community?

Agreed & least important //

politics !!!

4. Are there any objectives that you feel are important and missing from this list?

(lost one)
Needs to be real science - Needs
to deal w/ real resources that
have a real world impact.

all agreed
⊗ everyone is coordinated through this process
Advisory Councils // Needs to be comprehensive
- good long committees

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

Ⓛ - yes 108!
can't do it w/out it.

2. If so what types of Advisory Committees should they set up?

- ONE group overseeing the entire Gulf Coast - this group would have reps from ~~State~~ groups + those have local groups should
-
-

Set up a trust/Revers of a river.

- Citizen committee
↳ Reps for each city.

- Science Committee (Technical)

universities, State Scientists

3. What role and powers should an Advisory Committee be granted?

- ↳ monitoring
- ↳ help w/ project selection + adaptation

↳ ensure that \$ is going where it should go.

Communities of faith //

4. If an Advisory Committee was established, who should serve on such a committee?

- biz

- system / fostering

- farmers

- citizens two from each
~~each~~ city should have a representative // plus

- Education / state sci

unincorporated areas

V. Additional Notes

Report out -

①

②

③

④

Bayou La Batre, AL
Wednesday, June 19, 2013

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants



Signature	Print Name	Address	If representing an organization or agency, please list:
1. Jack Skinner			
2. Arvay Bates			
3. Otis			
4. Otis Collier Sr.			
5. Ollie Seaman Jr.			
6. Anne Steele			
7. DANNY TAPPER			

8.			
EARL BARBOUR			
9.			
AVERY BATES			
10.			
HARLEY DEAN BATES			
11.			
JACK R. SKINNER			
12.			
JENNING BARNES			
13.			
14.			
15.			

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response: Yes No

Areas of debate, concern, discussion, etc.

- freshwater intrusion - long-term sustainability of projects that are close to shore
- projects should have economic, ecological, stabilization effects, not just one facet
- increased access for commercial fishing - no negative effects from construction; health impacts of projects; purification of ^{power} systems

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response: Exactly Right Needs More Definition Doesn't Apply

3. What criteria do you think are good?

- Natural resources focus
- long-term projects

4. Are there any criteria you disagree with?

- lack of human element - need better access to water + boat docks, especially in historic fishing grounds - not just tourism, recreation
- lack of equity in criteria to ensure that commercial fishing is included + equally spread around geographical area (Baldwin, Mobile Counties)
- community benefit, not just environmental

5. Are there any missing criteria?

see #4

III. Funding Objectives

1. Do you agree with the funding objectives?

yes.

2. Which objectives are most important to you, your family and your community?

- Science-based decision-making projects
- habitat restoration
- water quality
- living resources
- shoreline restoration
- community resilience

3. Which objectives are least important to you, your family and your community?

4. Are there any objectives that you feel are important and missing from this list?

- input from workforce to evaluate project
- measurement of long-term success

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

Yes.

2. If so what types of Advisory Committees should they set up?

shrimp
aquaculture
fish

Stakeholders — fishers, processors, Charter fishermen, recreational fishermen

* dependent on personalities — who you choose will inform quality of committee; each industry should send a representative (each industry gets one)

* include State-wide University researchers

3. What role and powers should an Advisory Committee be granted?

- data collection + analysis (academic)
- advisory committee should have veto power on projects — final say: so on which projects were approved

4. If an Advisory Committee was established, who should serve on such a committee?

See question # 2

Bethany

Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan

Bayou La Batre, AL
Wednesday, June 19, 2013

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants			
Signature	Print Name	Address	If representing an organization or agency, please list:
1. <i>Amy Bates</i>			
2. <i>Rennie woodman</i>			
3. <i>Randy Ladner</i>			
4. <i>Sam Schjott</i>			
5. <i>Nanci Regalado</i>			
6. <i>Barbara Robbins</i>			
7. <i>Jill Mastotaro (?) NWF (sorry!!)</i>			

8.	Teneja Beth's		
9.			
10.			
11.			
12.			
13.			
14.			
15.			

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response: Yes No

see #2

Areas of debate, concern, discussion, etc.

DNR

Help oyster population - conservation needs to talk to oystermen

* Priority given to industries directly affected ^{areas?}

Hotels should not be built before this happens

Why haven't they refilled the oyster ~~beds~~ in AL? (LA + MS have)

Universities should be involved

Concern about seafood safety / testing

Concern about comprehensive plans - community input

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response:

Exactly Right

Needs More Definition

Doesn't Apply

3. What criteria do you think are good?

* long-term projects, resiliency

4. Are there any criteria you disagree with?

* concern about comprehensive plans - community input/
involvement

5. Are there any missing criteria?

- *equitability standard (Mob. v. Bald. priorities)
- *local hiring

III. Funding Objectives

1. Do you agree with the funding objectives?

- (pretty comprehensive
- tap into fisherman's expertise, include local expertise universities
-

◦ some objectives are redundant

2. Which objectives are most important to you, your family and your community?

↳ Who does the work for these projects? local living
↳ what will have the biggest impact?

◦ Nat. resource stewardship & environmental education

◦ ^{mental health} ~~mentality~~ of students/children w/ out of work parents

→ part of resiliency
◦ physical health

* ◦ protect + restore' should be priority #1
→ restore, enhance, & protect habitats #2"

3. Which objectives are least important to you, your family and your community?

* ◦ Question: how would you 'promote community resiliency'?

back-up systems [no dredge policy / reefs ^{more}
→ CA, MS, TX have policies

4. Are there any objectives that you feel are important and missing from this list?

- equitability
 - workforce development
 - restoring wholeness to community
 - maritime industry preservation
 - physical & mental health — part of community resiliency
but also stand alone objective
- ~~What is the~~ ~~past~~ what is the plan for (a) preventing another BP oil spill, (b) responding if a disaster does happen

IV. Advisory Committees

— BLB is creating a disaster response plan (hurricanes, etc)

1. Do you think Advisory Committees would be useful to the work of the Council?

- yes — this is great, stop starting at top & then asking for input
- don't ask the scientists, ask locals; Conservation dept. is scary

- local expertise needs to be part of process
- * ◦ sitting at the table together from the start
- 60 yrs local experience > 2-3 years "professional" exp

2. If so what types of Advisory Committees should they set up?

(* room for everyone at the table, environmental, needs, seafood, industry, scientists, government)

- BLB: chamber, shipbuilder, nonprofit, seafood, citizens

* committees should be geographically representative of community / county

- panels from each side

3. What role and powers should an Advisory Committee be granted?

- correct disparity between
- (A) committees representative of community ^{2 countries affected}
- * (2) ideas should come from the committees, from the community members

- what power will committee have? veto power? will we actually be able to influence decision-making?

4. If an Advisory Committee was established, who should serve on such a committee?

• Money should not be used for building a bridge
across the bay or a hotel
* people directly affected should be taken care of first

V. Additional Notes

• ~~at the end~~

• cultural + language barriers — who is really representing Southeast Asian communities

• accessibility — internet-only + english-only are prohibitive barriers

• are there translators at public council meetings?
is this advertised if so?

• impact on ^{disadvantaged} disabled community, have people become disabled as a result?

— physical, mental, financial

→ how do you bridge the gap to help get back to the way you were before BP?

• connect the region

• focus on erosion problems (codon Bayou)

Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan

Bayou La Batre, AL
Wednesday, June 19, 2013

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1. Brett Dungan		8271 McKee Rd Irvington AL 36544	AL working waterfront Coalition
2. 	George Jackson	4306 Bent Tree Rd. Eight Mile AL	community watch
3. Beatrice B. Jackson	Beatrice Jackson	4306 Bent Tree Rd Eight Mile, AL 36613	
4. Chad Fincher	Chad Fincher		
5. 			
6. 			
7. 			

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response: ___ Yes ___ No

Areas of debate, concern, discussion, etc.

~~W~~ without regard to geographic location - areas impacted more so by the disaster seems a very reasonable comment - focus should be on those areas most impacted.

- grateful ppl in US care more @ Gulf than we do / very little public access -
- we need a 3d grid of Gulf.

- not thinking large enough or without science.

NCC Regional Approach rather than too parochial.

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response: ___ Exactly Right ___ Needs More Definition ___ Doesn't Apply

- expand public access, projects should focus on areas that are accessible to all rather than private property
So broad it can be used to justify anything. / should not be

3. What criteria do you think are good?

Scientific review & analysis as ^{add'l.} or criteria

← • alternative energy

• very vague - same thing w/ different words.

• job training, workforce development — • leveraged investment, strong.
larger bang for buck.

4. Are there any criteria you disagree with?

see ~~*~~ on front.

5. Are there any missing criteria?

Increasing / match - not required, but could be an add.
add value

- ensure projects don't fill in for things that are
must do requirements + bail out projects as it is.

III. Funding Objectives

1. Do you agree with the funding objectives?

very broad still. lots of projects that ~~are~~ ^{are great} but have we been good stewards
of that money? Do these criteria enable or prohibit wasting it.

• define accountability

• easier to endorse than evaluation criteria

2. Which objectives are most important to you, your family and your community?

land acquisition, land access; ensure projects
restore riparian habitats.

vitaly important to do
education; rain awareness.

water quality.

promote community resilience - safe harbor = protect fishing community
ensure against enviro damage
withstand inclement weather

Science based decision making process. *all need to be
depend on them.*

if this

3. Which objectives are least important to you, your family and your community?

all are important

side note - we have too much waste on our waterways. Tar sands need to be considered.

4. Are there any objectives that you feel are important and missing from this list?

waterfront, public access to waterways. sacred trust
hard to educate folks @ waterway importance if they can't get to it

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

yes,

Should be a regional one and a state one. ^{Advisory} Councils should be able
to submit comments on projects

2. If so what types of Advisory Committees should they set up?

Each one or multiples should be well represented including science.

regional, state-wide, all stakeholders communities should be rep'd.

① ppl affected by oil spill, ②

gubernatorial must be included.

→ separate scientific committee so that citizens & scientists don't

3. What role and powers should an Advisory Committee be granted?

~~How should the~~ ppl ^{should} ~~who can~~ have a say, a way to sway the elected officials on projects

project review; must be a mechanism that ensures Council listens

because, it is an unpaid position, those able to participate must feel validated.

4. If an Advisory Committee was established, who should serve on such a committee?

selection process must be clearly defined or wrong ppl. could hold sway through politics
net must be cast as broadly as possible

V. Additional Notes

- ② objectives ^{good}
- Public Access to waterways

• areas most impacted 1st

- ① ^{criteria} ~~objectives~~ need much more specificity
- including accountability
 - scientific review

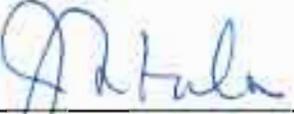
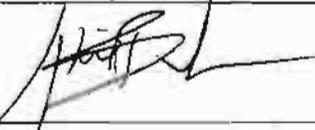
- ③ • (AC → do it, give citizens)

don't let \$ be used to bail out problems that should have been handled

Bayou La Batre, AL
Wednesday, June 19, 2013

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1. 	Jackie Antala	operation HomeCare	OHC
2. 	Dicky Peltso	—	WR. LLC.
3. 	James Belen cell # 251-370-8266	PO Box 82084 Mobile, AL. 36689	WR, LLC Email: Mrjuncus@aol.com
4. 	Jean Holder	Same as above	
5. 	SOUKHANH VIRAVONG	8830 McColough Rd Grand Bay AL 36541	INDEPENDENT VOLUNTEER sq.viravong@hotmail.com
6. 	GRACE SEIRE	13835 S. Wintzell Ave Bayou La Batre AL	grace.seire@bpsas.org
7. 	Ivan (Dave) Do	13835 S. Wintzell Ave BLB, AL 36509	ivan.do@bpsas.org

Objectives

- ③ * Restore, Enhance, and Protect Habitats
- ② * Restore, Improve, and Protect Water Quality
- ④ * Protect and Restore Living Coastal and Marine Resources
- ① * Restore and Enhance Natural Processes and Shorelines
- ⑤ * Promote Community Resilience
- ⑥ * Promote Natural Resource Stewardship and Environmental Education
- ⑦ * Improve Science-Based Decision-Making Processes -

Mục Tiêu

- * Phục hồi, tăng cường và bảo vệ môi trường sống
- * Khôi Phục, Cải Thiện và Bảo Vệ Chất Lượng Nước
- * Bảo Vệ và Phục Hồi Nguồn Hải Sản Ngoài khơi và Ven Biển
- * Khôi Phục và Cải Tạo Bờ Biển và Quá Trình Tự Nhiên
- * Tăng Cường Khả Năng Phục Hồi của Cộng Đồng
- * Thúc Đẩy Bảo Tồn Tài Nguyên Thiên Nhiên và Giáo Dục về Môi Trường
- * Cải Thiện Quá Trình Làm Quyết Định Trên Nền Tảng Khoa Học

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response: Yes No

Areas of debate, concern, discussion, etc.

Who will establish criteria:

How to submit projects:

What avenues are available to submit good, technical assistance.

Is there any help available for someone with a good idea but poor writing skills?

How can the community get involved? When will we know about the time frame and when to submit the proposal?

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response: Exactly Right Needs More Definition Doesn't Apply

be more specific - more detailed

Transparency - Public notice

3. What criteria do you think are good?

5y
Health (~~Human~~) Resiliency - Prevention Programs

Emergency Disaster Preparedness

4. Are there any criteria you disagree with?

5. Are there any missing criteria?

III. Funding Objectives

1. Do you agree with the funding objectives?

2. Which objectives are most important to you, your family and your community?

3. Which objectives are least important to you, your family and your community?

4. Are there any objectives that you feel are important and missing from this list?

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

Yes

2. If so what types of Advisory Committees should they set up? Broad representative of impacted communities

3. What role and powers should an Advisory Committee be granted?

* should evaluate the first wave of proposal and suggest what they support.

4. If an Advisory Committee was established, who should serve on such a committee?

Broad representatives from all aspects of the community.

V. Additional Notes

* Restore more marine and wild life. (including all the wild life not only oysters) close + rotate

* To find the best possible way to directly connect. or have a close meetings between the fishermen and the scientists. To share information and develop projects. Excluding the rest of the groups.

Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan
 Dulac Community Center
 Thursday, June 13, 2013

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
DAVID GAUTHE			
1. Allison Dean Allison	Allison Dean		
2. Emelda Dean	Emelda Dean		
3. JOSEPH L DEAN			
4. Janie V. Luster Janie V. Luster	Janie V. Luster	2247 Brady Rd. Theriot, LA 70397	UHAN
5. Colleen Dean	Colleen Dean		
6. NIKKI BUSKEY	NIKKI BUSKEY	323 St. Mary St., Thibodaux	
7. Ben			

⑧ Michelle

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II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response:

Yes No

Areas of debate, concern, discussion, etc.

Order - how going to be used !

HUMAN being needs to be in discussion

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response:

Exactly Right

Needs More Definition

Doesn't Apply

examples need to be in place

What criteria do you think are good?

Long term

long term

4. Are there any criteria you disagree with?

"with out Reguard to geo' location"
Feel should be just Coastal Area

~~Full~~

3 minutes
each

5. Are there any missing criteria?

Private land ownership

Local People Get Local Jobs

Projects with multiple criteria should go into 1st place

III. Funding Objectives

1. Do you agree with the funding objectives?

yes

2. Which objectives are most important to you, your family and your community?

- ① Education
 - ② Protect + Restore living coastal + marine resource
 - ③ Community Resilience
 - ④ Restore + Restore shoreline + natural processes
- ~~As Native Am. = kept out Po~~

3. Which objectives are least important to you, your family and your community?

(None - All play major part
All agree on above)

15

4. Are there any objectives that you feel are important and missing from this list?

~~Printed hand~~

37 minutes

① Local Fishermen on the science making process
Expand on

② Trash in bayou! Educate Community

③ AS NATIVE Am - Left out - Focus Com. Efforts
ON those hardest to bounce back

④ Com-munit a way of **IV. Advisory Committees**
getting info out!

1. Do you think Advisory Committees would be useful to the work of the Council?

Would Help - A lot

* Large Advisors answer to small
Advisory Com-

2. If so what types of Advisory Committees should they set up?

EXT. AFFAIRS

→ Large Advisory Com.

← ~~Small~~

Smaller Advisory Com.

3. What role and powers should an Advisory Committee be granted?

Should answer to EXT. AFFAIRS to get action

4. If an Advisory Committee was established, who should serve on such a committee?

✓ gov OFFICIAL - if grew up here & has experience

✓ ANY body who understands & can bring SACAC
to community!

Council People - Native American

V. Additional Notes

Everyone in group participated

Very positive

Felt relaxed

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response: Yes No

Areas of debate, concern, discussion, etc.

good but more - how will they be used - is there an order,

missing the people - protecting the people's habitat
restore barrier islands

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response: Exactly Right Needs More Definition Doesn't Apply

examples of projects would help define
make them easier to understand for community

If projects meet multiple criteria they should rise to the top

3. What criteria do you think are good?

long-term resiliency is good
- might help the short-term

4. Are there any criteria you disagree with?

5. Are there any missing criteria?

Community protection

III. Funding Objectives

1. Do you agree with the funding objectives?

Yes, but need to be expanded

How can we make sure the community takes care of the resources that we restore

- Community education
- Sustainability

2. Which objectives are most important to you, your family and your community?

Education about our risk + resource protection

Coastal/marine resources - that's what pple know
+ how they make a living

Community resilience - focus on vulnerable + native community

Natural Processes/Shoreline

3. Which objectives are least important to you, your family and your community?

they are all important - you can't do one and not
-the other

4. Are there any objectives that you feel are important and missing from this list?

- focus on vulnerable + native communities
- Community education - to sustain the restored resources
- include community in decision-making especially in evaluation + implementation

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

it would help to hear it from the community - are these projects working

2. If so what types of Advisory Committees should they set up?

Community based committees that could maintain communication formally to the community & the council on the projects

- hold meetings regularly to tell what projects are in the ^{community} ~~interest areas~~ - community feedback on the project
- > the council -> feedback from council about what's going on
- meetings/materials need to be in multiple languages

3. What role and powers should an Advisory Committee be granted?

4. If an Advisory Committee was established, who should serve on such a committee?

Local
NGOs

anyone who has the information who can
communicate in the language of the people
to the people

Fishermen

Tribal Leaders

Pastors

V. Additional Notes

Needs: to communicate in terms people know, community meetings, fund non-profits to do the community meetings

- invest in young people to give them the tools to educate their communities about restoration

Our Communities are not computer literate

Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan
 Dulac Community Center
 Thursday, June 13, 2013

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1. <i>Teresa Christman</i>		Dept. of Commerce Washington, DC	
2. <i>Solomon Weiner</i>		7911 Oak St. New Orleans 78011	Gulf Coast Center for
3. <i>Al Russell</i>	Al Russell	1440 Canal St., Ste 2100 New Orleans, LA 70112	Law & Policy Tulane Global Environmental
4. <i>Lora Ann Chaisson</i>	Lora Ann Chaisson	2375 Huey 665 Montegut, LA 70377	Health Sciences United Nations
5. <i>Anesie Verdin</i>	Anesie Verdin	4003 OAKPOINT Rd. Montegut, La 70377	
6. <i>Jane Verdin</i>	Jane Verdin	4003 Oak Pt. Rd. Montegut, La. 70377	

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II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response:

Yes

No

Areas of debate, concern, discussion, etc.

Are ~~very~~ ~~too~~ broad, difficult to relate to a local issue level.

How do you ~~can~~ determine what will be "resilient" to storms, etc.

Some of those terms need more definition/criteria.

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response:

Exactly Right

Needs More Definition

Doesn't Apply

More examples would be helpful. What is a big project, what is next level. Budget levels and examples that local community can relate to. Barrier islands are a priority, including the systems that support & protect the barrier islands.

3. What criteria do you think are good?

They're all good, ~~are~~ need to be done, but is question of how and when. Important not just to study but also to implement. Historically have seen more study than action.

4. Are there any criteria you disagree with?

- ① human element should be included, since also very important
- ② criteria for local workforce should have fewer barriers in terms of providing so much proof of so many criteria that the average applicant has difficulty
- ③ Vocational training should also be a priority

5. Are there any missing criteria?

see above — human element
vocational training
realistic hiring processes

III. Funding Objectives

1. Do you agree with the funding objectives?

Objectives still broad, but easier to relate to, more specific,
than the first set of criteria.

Concern about whether these objectives will survive
reality of Louisiana politics.

2. Which objectives are most important to you, your family and your community?

Make sure action happens, not just study.

Flood protection to support vibrant communities,

Reverse northward migration of families & businesses,

5 very important, need human element

3. Which objectives are least important to you, your family and your community?

6 is most difficult to achieve, particularly

with people no longer in school / older and working people

4. Are there any objectives that you feel are important and missing from this list?

Where is the human element? Make sure we are taking into account how human communities are affected.

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

Yes! Provided they represent a cross section of business and community members rather than overly represented by politicians.

2. If so what types of Advisory Committees should they set up?

Scientific, business (including small business), tribes, other community groups.

Representatives from community organizations that have their finger on the pulse of the community.

Natural resources committees on state level might contribute useful members.

3. What role and powers should an Advisory Committee be granted?

Should give coastal communities a voice.

Should be empowered to both advise and vote on final decisions — advisory committee might have a vote.

Voting members/council should listen to advisory board recommendations.

4. If an Advisory Committee was established, who should serve on such a committee?

See responses in # 2.

Scientific, business (including small business), tribes,
other community groups.

Representatives from community organizations that have
their finger on the pulse of the community.

Natural resources committees @ state level might
contribute useful members.

V. Additional Notes

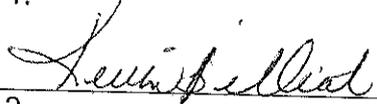
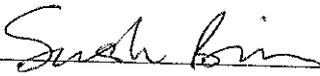
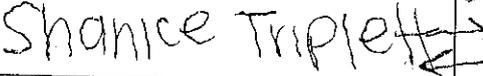
Best way of getting word to communities—

- community dinners
- email, facebook, local newspaper & radio stations
- flyers to local businesses, churches, libraries, community organizations
- create facebook posts that can be easily liked & reposted on community & facebook pages

Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan
 Dulac Community Center
 Thursday, June 13, 2013

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1. 	Kevin Billiot	235 Coast Guard Dr Dulac LA 70353	ITC of LA-11D-Community Member
2. 	Sasha Birman	2525 Burgundy St New Orleans, LA 70117	
3. 	Alayna Spaulding	Schriener LA 70395	
4. 	Shanice Triplett	277 Isle of Cuba Rd Marrero, LA	BISCO
5. 	GIL B BIRMAN	2527 BURGUNDY NOLA 70117	
6.			
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II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response:

Yes No

Areas of debate, concern, discussion, etc.

There are concerns about the definition of "Gulf Coast Region." 25 miles further area of gulf may mean some bayou communities going without assistance.

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response:

Exactly Right

Needs More Definition

Doesn't Apply

There are concerns about the term "without regard" in first bullet point.

3. What criteria do you think are good?

One group member likes the last bullet point.

4. Are there any criteria you disagree with?

The group doesn't disagree with any of the criteria. There are concerns about wording "without regard."

5. Are there any missing criteria?

N/A

III. Funding Objectives

1. Do you agree with the funding objectives?

How can you promote community resilience without jobs?
Companies would need to invest in the area, not only those living off water.

If you are restoring why spend money on ^{environmental} education.
Companies do that for free.

I don't think the money should be equal. Some areas are more important than others.

2. Which objectives are most important to you, your family and your community?

- #4 is most important because building up wetlands will improve everything else.
- #1-4 are important.
- How can you restore the ~~#~~ area when the MS is still backed up. (river)

3. Which objectives are least important to you, your family and your community?

#5-7 is not important. It sounds like it finances projects but not help the people. It seems like politics. Those help those already with power, not the community.

What does it mean to "promote" Community resiliency?
Define "promote."

4. Are there any objectives that you feel are important and missing from this list?

Incentives for companies to open jobs in the areas that have been affected. Seafood can't be the only source of income in bayou communities.

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

- Yes They can't do it alone.
- ^{Environmental} Experts from different areas would be helpful.
- Sure. It's good to have Consultants.

2. If so what types of Advisory Committees should they set up?

- Environmental experts in each field they want to fund.
- No one from EPA or other vested entities.
- Restoration, Protection and Promotion Committee
- Committee should be community based

3. What role and powers should an Advisory Committee be granted?

- * They should have decision making power over their areas of expertise.
- * Their role is to get info from the community, gather scientific info, research so that best decisions can be made.
- * I don't know enough.

4. If an Advisory Committee was established, who should serve on such a committee?

People from the community, experts from the environment

V. Additional Notes

It sounds good and look good but ~~is~~ it really going to happen? How much red tape is there.

There needs to be a science-based long term solution to restore the system, not just build levees on sinking land.

Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan
 Dulac Community Center
 Thursday, June 13, 2013

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1. (Facilitator) PATRICIA WHITNEY	Patricia Whitney	1206 Cardinal Dr. Thibodaux La 70301	Bisco
2. Dore Banta Winters	Dore Banta Winters	dore.banti@la.gov	State of Louisiana
3. Heather Parfait	Heather Parfait	227 Isle of Cuba Rd Schriever, LA 70395	
4. Joyce Thibodeaux	Joyce Thibodeaux	113 Oakdale Loop Houma LA 70360	Dulac Community Center
5. Therese Pellegrin	Therese Pellegrin	124 Branche St Houma, La.	Bayou Grove
6.			
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II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response:

Yes No

Areas of debate, concern, discussion, etc.

- Define the biggest bang for your buck.
- eval criteria should have place for human resiliency
- some prioritize human over natural system
- environmental natural system more important

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response: Exactly Right Needs More Definition Doesn't Apply

3. What criteria do you think are good?

All good
The one that brings the most dirt.
Just need refining & maybe more.

4. Are there any criteria you disagree with?

- All should be there.
- Comprehensive plan focuses on natural process of rebuilding.
- discussion/concern with large scale diversion projects w/o enough benefit / causing flooding / salinity
- Questions about science of diversion / wetlands carbon banking

5. Are there any missing criteria?

- ^{Missing} criteria focused specifically on human aspect of ecosystem. Include evaluation criteria for each goal.
- missing specific examples of each criteria
- address federal mandates re minorities, EJ, etc.
- system for preventing future industrial disaster & pollution (man-made)
- need criteria for enforcement
- does it clean up unused industrial sites (wells, canals)

III. Funding Objectives

1. Do you agree with the funding objectives?

yes - IIII all agree

2. Which objectives are most important to you, your family and your community?

- science-based will most important ✓✓
- education very important too
- ~~all~~ building land most important, but make sure it's based on science & fact
- don't forget people + social sciences

3. Which objectives are least important to you, your family and your community?

Mike - promote stewardship " yes ^{to least important} ~~no~~ "

it comes down to \$ - most important
all important

most bang for buck : indicators of success : dirt, clean water,
good seafood production,
can't make a decision on current information; all needed

4. Are there any objectives that you feel are important and missing from this list?

- Clarify definition of non-structural adaptations & get #
- voluntary buyouts

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

yes IIII
OOOO

2. If so what types of Advisory Committees should they set up?

Citizens -
"makeup scientists, business, fishermen, seafood
reflect the community at large"
diversity
tourist, environmental

3. What role and powers should an Advisory Committee be granted?

advising the committee / dialogue on priorities, community needs
helping set priorities

what's happening on the ground

formal vs informal? How big a stick

some prefer informal

some prefer formal

some want to measure power of each type and get
most benefit.

4. If an Advisory Committee was established, who should serve on such a committee?

diverse community
sports, ^{fishing} commercial, ^{fishing} ngo's, faith groups, cultural, vulnerable communities
political leaders maybe? local or populations

V. Additional Notes

who selects? council only option

create a voting sheet

box it off & vote

self nomination & organization nominations
references & recommendations

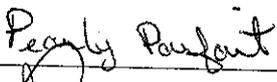
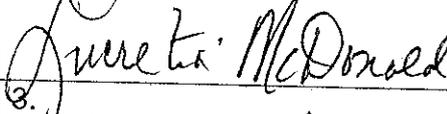
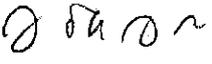
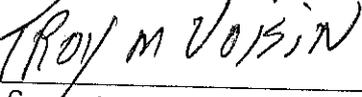
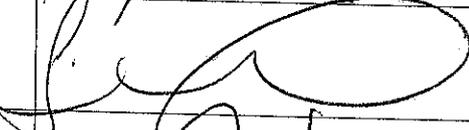
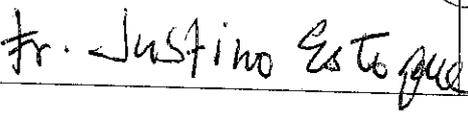
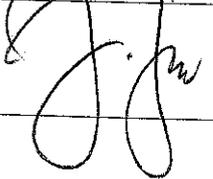
Categories as above / all states represented

Commitments by adv. council nominees to build relationships
for input w/ similar type rep's across the gulf.

Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan
 Dulac Community Center
 Thursday, June 13, 2013

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1. 	Pearly Parfait	5463-A G.C. Rd. Houma, LA 70363	
2. 	Lucretia McDonald	1113 Barma Rd. Thibodaux, LA 70301	Tribal Council Dist. 11
3. 	EVEST VOISIN, III	7342 Grand Sawtooth Road Dulac, LA 70353	
4. 	John J. Silver	100 Justin Ave Houma LA 70363	Dulac Community Center
5. 	TROY M VOISIN	104 EVEST STREET DULAC LA 70353	LPT
6. 		1440 Canal St New Orleans	
7. 		6044 Grand Caillou Rd - Dulac	Holy Family Catholic Church

8.			
9.			
10.			
11.			
12.			
13.			
14.			
15.			

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response:

Yes

No

Areas of debate, concern, discussion, etc.

Not enough time to review the priority criteria to say if they agree or not.

Do not have enough understanding to make a decision.

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response:

Exactly Right

Needs More Definition

Doesn't Apply

Needs to be further defined for benefit of public.

Step forward that the plan is in place and available but too broad.

3. What criteria do you think are good?

Criteria captures important points in evaluating projects that will do most good.

Eco-based projects focus

4. Are there any criteria you disagree with?

no

5. Are there any missing criteria?

(Human factor)
local human input / knowledge i.e. fisherman, oysterman,
crabbers, ~~fishermen~~ tribal leaders, community leaders
consulting local communities affected

III. Funding Objectives

1. Do you agree with the funding objectives?

Yes, for the most part

Community resilience is different in every community.

What's good in one community may not be in another.

2. Which objectives are most important to you, your family and your community?

- Restore, Improve and Protect Water Quality
 - Protect and Restore Living Coastal and marine Resources
 - Restore, Enhance and Protect Habitats
 - Restore and enhance Natural Processes and Shorelines
- All are important.

3. Which objectives are least important to you, your family and your community?

- ~~None~~ None are least important; all are important

4. Are there any objectives that you feel are important and missing from this list?

Fresh water introduction projects but not polluted
fresh water.

Quality of life issues

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

Yes, of course it would be

2. If so what types of Advisory Committees should they set up?

Citizens Advisory Committee

Fisheries Advisory Comm. Hec

Tribal Advisory Committee

3. What role and powers should an Advisory Committee be granted?

Advise on health and well-being of environment

Advise on projects before approved

4. If an Advisory Committee was established, who should serve on such a committee?

Every interested party should ~~have~~ have a seat at the table. ~~table~~ representation.

~~Affected~~ Affected communities of oil spill.

Concerned citizens

Trusted community members,

V. Additional Notes

Extend comment period ; take proper time to receive comments and do due diligence.

Draft plan should have been posted in newspaper and other resources.

Human Factor needs to be addressed in plan.

Meetings need to be ^{better} advertised and given more notice and include context of meeting beforehand.

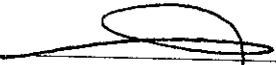
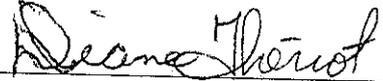
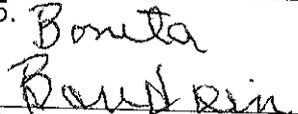
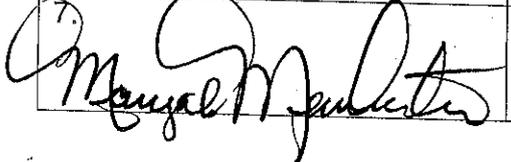
Decisions are being made that affects people that the larger community does not have a clue of what or how it will affect them.

Advisory Board should be of persons that are trusted by community members.

Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan
 Dulac Community Center
 Thursday, June 13, 2013

SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1. 	Philippe Ardou	1340 Poydras ST New Orleans, 70112	French Consulate
2. 	Colette Pichon Battle	620 Oak Harbor Blvd Slidell Bayou LaCambre Centre, USFWS	Gulf Coast Cattle Center U.S. Fish & Wildlife Service
3. 	Chris Pease	61399 Hwy 434, Lacombe, LA 70425	
4. 	DIANE Theriot	756 Vire Road Houma, La 70363	
5. 	Alice Stringer	142 Coast Guard Rd	
6. 	Bonita Boudoin	406 W 2nd ST Thebes, La 70301	BISCO
7. 	Diane Hahn	Po Box 334 Chauvin, LA 70344	Bayou Grace
8. 	Maryal Meaketer	Schriever, LA 70775	BISCO/UHN

8.	Chief Thomas Dardar Jr	Thomas Dardar Jr	217 Millenium Ave Houma La 70364	U H N
9.				
10.				
11.				
12.				
13.				
14.				
15.				

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response:

Yes No

Areas of debate, concern, discussion, etc.

Worried about money going to the wrong places.

Worried about it ^{not} helping the people who live here.

Language is difficult to understand. We need plain English.

How will projects be weighted? Weighting by multiple criteria could give unfair advantage to projects.

Do communities ~~to~~ have recourse if a project injures the community?

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response:

Exactly Right

Needs More Definition

Doesn't Apply

Applied more to the community.

"most impacted" needs further definition - most impacted how?

Economic, natural resources, etc.

3. What criteria do you think are good?

The last goal focused on ^{long-term} resiliency.

4. Are there any criteria you disagree with?

No

5. Are there any missing criteria?

- Giving priority to existing EJ communities.

If ~~they~~^{the project} meets the criteria, a next criteria should be to prioritize by communities that would benefit most from the projects.

III. Funding Objectives

1. Do you agree with the funding objectives?

Yes

2. Which objectives are most important to you, your family and your community?

4. Restore and enhance natural processes... - coastal restoration

5. Promote community resilience

2. Water quality

7. Science-based - foundation for the rest

3. Which objectives are least important to you, your family and your community?

All are important

4. Are there any objectives that you feel are important and missing from this list?

- The people, communities and culture should be considered a living resources. If the people are gone, you'll need to get people to fill those resources that they provide
- Science decision making should include long-term, proven knowledge
- Priority to traditional ^{native} communities.

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council? - Yes

Combination of a CAC and a SAC

2. If so what types of Advisory Committees should they set up?

SAC - including all different types of science - EJ Social Sci

CAC - possibly combined w/SAC - guidance, equal

Local labor employment and training committee - adapted to
needs of community

Culture and communications committee

~~Culture~~

3. What role and powers should an Advisory Committee be granted?

Equalized authority - equal voting

~~Reps from tribal communities, long established communities~~ (Questions)

~~Create + Engage communities~~

Shouldn't be blown off.

Should meet twice a year.

4. If an Advisory Committee was established, who should serve on such a committee?

Local scientists with local knowledge

Outside scientists - science is sometimes used to hurt certain areas and getting a different perspective is good.

Traditional, cultural science

Reps from tribal, long-established (area + cajun)

V. Additional Notes

What's the time limit?

How often will we reassess, re-evaluate by the stakeholders.

Resources for community orgs that are tasked with the education and outreach. Including training

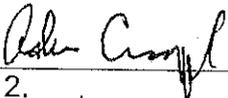
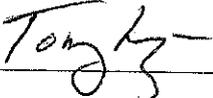
Community orgs need to be brought in in advance

We need consistency.

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SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1. 	Adam Crappel	P.O. Box 309 Patterson, La. 70392	United Houma Nation
2. Liza Kachko	Liza Kachko		none - Student University of
3. Theresa Dardar	Theresa Dardar	3731 Oak Pointe Rd Montegut, La. 70377	Pointe-au-Chien Indian Tribe
4. Rowan Sharp	Rowan Sharp		
5. 	Tommy Lyons	Providence RI Houma LA	
6. SANDRA MAINE	SANDRA MAINE		
7. 	Alura Spaulding	Shriever, LA	

8.	Kathy Verdin	Kathy Verdin	P O Box 275 Dulac 70353	UHN
9.	Jamie Billiot	J B	6789 Shrimpersen Dulac, LA 70353	Bayou Grace
10.	Jordan Macha	J	2359 Laurel St New Orleans, LA 70130	Sierra Club
11.				
12.				
13.				
14.				
15.				

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response: ___ Yes No

Areas of debate, concern, discussion, etc.

When the human factor? not clearly defined // Coastal restoration: how does this affected community sustainability
goals identified → community was not involved in development. Too broadly defined.

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response: ___ Exactly Right Needs More Definition ___ Doesn't Apply

Criteria too broad.

community

3. What criteria do you think are good?

ecosystem prioritization.

broadly appealing — perhaps too broadly

long-term resiliency being considered

4. Are there any criteria you disagree with?

Louisiana should receive more \$\$ from pot 2.

~~and~~ large scale projects should not necessarily be prioritized

criteria + goals don't clearly correlate.

• 1.



5. Are there any missing criteria?

more community based language to address community resilience & sustainability

Accountability

III. Funding Objectives

1. Do you agree with the funding objectives?

In the most part. broad in scope

what how to monitor achievement.

objectives hits everyone/everything

how is science processes laid out? does it go to programs in universities, or science into selected projects.

how does the community influence "science-based decision-making"

2. Which objectives are most important to you, your family and your community?

protecting the habitats, beaches, barrier islands → REBUILD BARRIER ISLANDS

community resiliency

testing seafood → water quality

↳ needs monitoring processes

3. Which objectives are least important to you, your family and your community?

Stewardship + science-based decision making

↳ should be paid for by industry / grants / etc.

@\$\$
should only be used to restore → not to universities or large programs for "education" or "science"

4. Are there any objectives that you feel are important and missing from this list?

needs greater concentration on health of fisheries utilized in commercial production.

Very broadly defined. difficult not to find a way to say something is not included.

Needs Accountability. What type of monitoring programs will be in place?

Narrow in community scope. → does "ecosystem" exclude communities?

Language indicates disconnect w/ community

-housing/insurance? resiliency

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

YES

2. If so what types of Advisory Committees should they set up?

Communities affected should be part of the committees

- Tribal leaders, local community leaders

local / parish government

local / commercial fishermen

3. What role and powers should an Advisory Committee be granted?

Does the Committee should have voting power

- will reps be compensated for attendance participation

reviewing projects selected

↳ monitoring project implementation

"Watch dog" → potential veto power of specific community projects.

agreement between Council / Committee → recommendations taken into account, holds voting weight.

Voice to community to acquire support

4. If an Advisory Committee was established, who should serve on such a committee?

Tribal leaders / Community leaders.

Parish Representatives (local gov't)

fair representation from impacted parishes

impacted residents → fishermen, oystermen, crabbers.

local industries

V. Additional Notes

* Need additional comment period. Longer comment period, another public comment ^{time} on finalized draft plan.

public comment on ~~more~~ 2nd final draft once comments from current comment period incorporated.

60 day extension

* More community meetings → public hearings

* D&S needs to go to local communities

* Better advertising of plan release into the community

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response:

Yes No

→ too broad.

Areas of debate, concern, discussion, etc.

- add community as a consideration with
"fisheries, marine, beaches, etc"

- insure comments in regards to resiliency

→ too short of a public comment time
to make effective decisions

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response:

Exactly Right



Needs More Definition

Doesn't Apply

too broad; clarify more.

3. What criteria do you think are good?

- "good overall - something for everyone"
- long-term resiliency

4. Are there any criteria you disagree with?

- "large-scale projects" leave small projects out as it currently leads.
- "all of it"

5. Are there any missing criteria?

- community factor
- too soon to close public comments
- community/economy is still missing.
- accountability/goals

III. Funding Objectives

1. Do you agree with the funding objectives?

- For the most part but it is very broad of an over

2. Which objectives are most important to you, your family and your community?

- protect habitats (barrier islands) - X 10
- Restore habitats like barrier-islands
- Community Resilience
 - water-quality But human health in response.
 - Science-based decision-making

3. Which objectives are least important to you, your family and your community?

- Stewardship should come from other sources.
-

4. Are there any objectives that you feel are important and missing from this list?

- Community needs to be involved with the "science-based" objectives because they are the best, local experts.
- "Sustainable economic health of fisheries not just physical"
- accountability
- ^{seems} narrow framing of community resilience being tied to ecosystem benefit.

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

- Absolutely; potentially useful if implemented properly
- ^{all} Tribal leaders; communities represented with local government; fisherman
- Fair representation with possible compensation.

2. If so what types of Advisory Committees should they set up?

- ~~committees~~ in conjunction with parish government/leaders
- local community leaders & tribal leaders
- commercial fisherman

3. What role and powers should an Advisory Committee be granted?

- accountability
- an agreement between committee & council
- get more support in local communities
- power to veto

4. If an Advisory Committee was established, who should serve on such a committee?

- Tribal leaders ; Council members ;

Fisherman ;, local small companies

Milk processing plants ;

V. Additional Notes

- Public comment period needs to be longer
at least 60 days.

- ~~After~~ that has been extended; present a
second draft ahead then public comment.

= Reform the permit process for Corp.

- Get the money on the ground.

- Find a way to communicate progress
with communities.

Community Input Regarding the Gulf Restoration Council Draft Initial Comprehensive Plan
 Dulac Community Center
 Thursday, June 13, 2013

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SMALL WORKGROUP RECOMMENDATIONS AND PUBLIC COMMENT

I. Workgroup Participants

Signature	Print Name	Address	If representing an organization or agency, please list:
1. James Billiot	JAMES BILLIOT	6789 SHRIMPER ROW	
2. Doris Billiot	Doris Billiot	6789 Shrimpers Row ^{Dulac}	
3. Louise Billiot	Louise Billiot	306 L. KIRK DR. Houston, Ca. 70363	
4. Rebecca Templeton	Rebecca Templeton	P.O. Box 238 Chauvin	Bayou Grace
5. NANCY ANN REGALADO		1875 CENTURY BLVD ATL GA 30316	DOI/RESTORE
6. Lauren Penney	Lauren Penney	3020 W Trevi Pl. #100 Tucson AZ 85741	University of Arizona
7.	Lindsay Feldman	836 n queen ave tucson AZ 85705	University of Arizona

II. Input on Priority Criteria

1. Do you agree with the priority criteria used to select projects for funding?

Overall group response:

Yes No

~~Was~~ a good starting point

Areas of debate, concern, discussion, etc.

appreciate long-term resil. goal → projects affect
shrimping, crabbing, etc.

→ barrier island restoration → does that meet long-term
resilience criteria

→ concerned about what will happen in our area
esp when looking at Alaska.

2. Are the criteria too broad or do they need to be further defined?

Overall Group Response:

Exactly Right

Needs More Definition

Doesn't Apply

imp. that fisheries are mentioned → very imp. to
our area.

We have to start somewhere → good starting point
Have to do more than just talk about

3. What criteria do you think are good?

long-term resiliency goal → very good.

* all sounds the same → every goal seems like the same idea stated a diff. way.

4. Are there any criteria you disagree with?

no -

side discussion importance of projects that positively affect shrimping, etc.

- are there projects that would help w/ productivity of oysters, shrimping, etc.

* maybe subsidize industry that is overfished

* pay fishermen to stay home so industry has the chance to rebound

* * idea utilize fishermen, their boats in restoration activities -

5. Are there any missing criteria?

B.P.s money - show me the money.

III. Funding Objectives

1. Do you agree with the funding objectives?

Yes

~~Agree~~ Ranking

① Water Quality - improve ~~no~~ water quality to increase proper matinal function

②

2. Which objectives are most important to you, your family and your community?

- ① water quality - f/c. to ~~to~~ increasing H₂O qual will increase proper mat function;
- ② restore & enhance natural processes & shoreline -
let natural build up of shorelines; ~~at~~

3. Which objectives are least important to you, your family and your community?

science-based decision making - imp. to improve natural processes -

qualify science-based to include not just env. and biology - social science.

nation-wide education - not just local - importance of our env. to the nation;

4. Are there any objectives that you feel are important and missing from this list?

- air quality
- give more emphasis to people left out →
- if people are already ~~not~~ ~~not~~ vulnerable - priority should be given to projects that help them
- down the Bayou people -

IV. Advisory Committees

1. Do you think Advisory Committees would be useful to the work of the Council?

- Yes!! (4)
- (1) representation: fielder shrimpers (wealth of knowledge)
 - (2) community member committed to keeping preserving communities
 - (3) tribal representation
 - (4) people focused on maintaining integrity of existing culture: ^(ex) Cajun, Indians,

2. If so what types of Advisory Committees should they set up?

- ① Shrimping / seafood industry (legacy) bring back things that were important or successful in the past
- ② Committee focused on existing and historical culture (ex/ Indian Mounds, Cemeteries)

3. What role and powers should an Advisory Committee be granted?

- role
- ① provide information that may not otherwise be known or considered
 - ② Adv. Committees should share decision making power; examples: know of many decisions made by government that weren't successful or good decisions - and ^{community groups knew} ~~can~~ better but their ^{opinion/knowledge} considered
ex/ Island Rd.

4. If an Advisory Committee was established, who should serve on such a committee?

See #1

V. Additional Notes

- organizations who reach out to people in the communities are important
- community outreach, so more people attend meetings like these; responsible to reach out to other community members.
- model outreach like Supperware parties - recruit others to - pyramid scheme - but in a good way



Restore the Gulf * Defend our communities * Create a clean future



Photo:Gulf Restoration Network

Gulf Future Guidance for Sustainable Restoration

RESTORE Act funds constitute a unique opportunity to the Gulf States and our nation to create a legacy for conservation, and this is our best chance to meaningfully kick-start restoration of critical shared natural resources in the Gulf region. Ecological restoration of the Gulf of Mexico marine and coastal environment must be our first priority. The Gulf marine and coastal ecosystem has suffered damage over the past 100 plus years that threatens its very existence. Unless we do what is necessary to stop the continuing damage, restore what has been lost, and protect the Gulf, we will have failed to achieve the primary purpose of the RESTORE Act.

Communities from across the Gulf have come together to establish our priorities in how we restore this place we call home. These guidelines build on the Weeks Bay Principles for Gulf Recovery, established in October 2010, by conservation, community and faith-based organizations, working together to build a vision for recovery from the BP Deepwater Horizon Disaster. With that vision, we set forth in this document to provide guidance for how funds should be allocated through the RESTORE Act. **Members of the Gulf Coast Ecosystem Restoration Council and Gulf States should consider these as they begin to direct the significant RESTORE Act dollars to projects that restore the ecosystem and the coastal communities and economy that depend on the Gulf.**

Fundamental Guidelines

In all of our work together we will be guided by the following axioms:

- Be inclusive
- Build confidence and trust
- Act and communicate with full transparency
- Ground decisions in social and physical science

Restoring the Gulf Ecosystem

The BP Deepwater Horizon disaster is only the latest, most visible evidence of environmental destruction that has been ongoing in the Gulf for decades.

Agencies responsible for both repair and restoration of oiled areas must be coordinated to ensure adequate clean up and mitigation that could impact the success of the projects and the long-term health of natural resources.

The Gulf Coast Ecosystem Restoration Council and Gulf States must develop and carry out a comprehensive, integrated restoration program that addresses restoration needs in coastal and marine habitats—this means addressing everything from freshwater inflows to our estuaries and offshore marine environment. This program must coordinate with all other ecosystem restoration efforts in the region to ensure the maximum benefit from funding decisions and to prevent duplicative or ineffective efforts.

To maximize funding, projects that conserve high quality habitats (i.e. through voluntary land acquisition) should be considered in addition to projects that are restorative in nature.

The comprehensive plan must be supported by a restoration science and monitoring program, which will provide information to support the design and selection of ecosystem restoration projects, evaluate the effectiveness of those projects and the overall program, and facilitate adaptive management going forward. The implementing agencies must commit to monitor and rigorously evaluate the performance of restoration activities while soliciting community input and making adjustments as needed. Results of monitoring must be made publically available.



Photo: 100-1000



Economic Benefits of Ecosystem Restoration for Local Communities

Restoring the Environment Restores the Economy

A sustainable Gulf is crucial to storm protection, fishing, recreation, seafood and tourism – the cornerstones of Gulf culture and economy. Gulf residents recognize that the future of their livelihoods depends on Gulf restoration. The Gulf economy and environment are intrinsically linked, so that a productive economy is dependent on a healthy environment. Restoring our ecosystem delivers a triple bottom-line: benefiting our natural resources, benefiting our economy and making our communities more resilient.

Implementing ecosystem restoration will create thousands of new jobs on the Gulf Coast. This new economy should provide ecologically sustainable economic opportunities to local communities, including disadvantaged and distressed communities.

Restoration policies and programs must foster innovative collaborations for economic diversification, equitable and sustainable economic growth and new career pathways connected to Gulf Coast restoration, science and monitoring.

Restoration planning and funding must ensure local communities can compete for jobs in this new economy by providing education, training and workforce development and giving preference to utilizing local workers, businesses and institutions.

Investment in the development of high school, post-secondary vocational and college level curriculums about coastal engineering, coastal restoration, and Gulf environmental issues will provide opportunities for the next generation to sustain the Gulf ecosystem.

The development of innovative programs to provide assistance to subsistence and other vulnerable communities is critical to ensuring that restoration benefits those who rely most closely on our natural resources.

Ecosystem restoration must be the priority in distribution of RESTORE funds. However, any decisions to fund projects for economic development should first consider the potential environmental and social impacts and must ensure projects avoid any additional environmental harm to the Gulf's fragile ecosystem.

A preference should be given for community economic development that significantly invests in distressed communities.

Economic and community development that includes investment in green infrastructure and clean, renewable sources of energy will create a healthy environment and more sustainable communities.



Public Participation and Transparency

A robust and meaningful public participation model should guide decision-making for restoration.

Public meetings and hearings should be held in locations that are easily accessible for all community members, and appropriate notice must be given for these meetings to ensure broad participation. Information should come from the public and should be communicated frequently to the public as funding decisions are being made.

The process should aim to increase the number of participants including those from distressed, disadvantaged, and/or minority communities by engaging them where they live and in the language they speak.

The emphasis should be on what can be learned from community members as they have traditional environmental knowledge, a vitally important component in understanding the Gulf ecosystem's problems and potential solutions.

The people of the Gulf Coast whose way of life and livelihood has been most affected by the BP Deepwater Horizon disaster must have a seat at the decision-making table. The Gulf Coast Ecosystem Restoration Council should create a formal community advisory mechanism that will contribute toward building resilient Gulf communities and a sustainable ecosystem and economy.

Communities must have easy access to all science and data that drives restoration decision-making. The Council and Gulf States must work with community leaders to empower residents to be engaged in Gulf ecosystem restoration and support citizen science, research and monitoring.



Creating Safe, Healthy and Just Communities

Restoration must aim to improve and protect the net environmental health of Gulf communities, including distressed, underserved and/or minority communities. Any restoration funding decisions must avoid economic development projects that will threaten the health of coastal communities.

The Gulf Coast Ecosystem Restoration Council and Gulf States must support community efforts to create a shared resilience strategy that will sustain the Gulf's status as a Working Coast while protecting the health and livelihoods of the people who live and work on the Coast.



Implementation of ecosystem, community and economic restoration must be fair and just and prioritize the value added to Gulf communities, including distressed, underserved and/or minority communities.

Restoration and protection must create resiliency, prevent the erosion of the unique cultures found only on the Gulf Coast and must ensure that future generations inherit a strong, healthy, resilient Gulf.



In Conclusion

Any sustainable restoration strategies should promote the concept that coastal communities and residents have interests and expectations that go beyond pure concepts of environmental and economic sustainability. Although more difficult to quantify, concepts such as family and community cohesion, respect for cultures and way of life, public health, equity and justice, should not be excluded or minimized in planning for the future of the Gulf Coast.

In this, the Gulf Coast Ecosystem Restoration Council must develop a comprehensive, integrated restoration program that addresses needs in coastal and marine habitats and communities across the Gulf region. The culture of the Gulf – from our rich food traditions to hunting and fishing, from tourism to our busy ports, all rely first and foremost on healthy natural resources. RESTORE Act funds provide a once-in-a-lifetime opportunity to restore this national treasure for the Gulf region and the nation.



Photo: Dick Dixon

The Gulf Future groups present this unified vision that will guide our work towards restored and healthy natural resources in the Gulf of Mexico region that support Gulf communities and wildlife, the region's unique cultures, and the nation.

Action Communication and Education Reform, Inc.
Alabama Chapter of Sierra Club
Alabama Coastal Heritage Trust
Alabama Rivers Alliance
Alliance Institute
Apalachicola Riverkeeper
Asian Americans for Change
Atchafalaya Basinkeeper
Atlantic Coast Conservancy
Bayou Grace Community Services
Biloxi Branch NAACP
BISCO (Bayou Interfaith Shared Community Organizing)
Boat People SOS
Build a Better Planet
Calhoun County Resource Watch
Clean Water Network of FL
Coastal Women For Change
Delta Chapter of Sierra Club
First Presbyterian Church of Bayou Blue (PCUSA)
Florida Democratic Party
Florida State Conference of NAACP
Galveston Baykeeper
Global Green USA
Grand Bayou Atakapas-Ishak Tribe
Grand Caillou-Dulac Band of Biloxi-Chitimacha-Choctaw
Gulf Island Conservancy
Gulf Restoration Network
Hijra House
Institute for Sustainability Education & Development, Inc.
Isle de Jean Charles Band of Biloxi-Chitimacha-Choctaw Indians
Louisiana Bucket Brigade
Louisiana Environmental Action Network
Louisiana Interchurch Conference
Lower Mississippi Riverkeeper
Mercy Housing & Human Development
Mississippi Chapter of Sierra Club
Mobile Baykeeper
MS Coalition for Vietnamese-American Fisher Folks and Families
Ocean Conservancy
On Wings of Care
Operation HomeCare, Inc.
Oxfam America
Pelican Coast Conservancy
Public Laboratory for Open Technology and Science
San Antonio Bay Waterkeeper
Sierra Club
SouthWings
Steps Coalition
The Mississippi Center for Justice
The Mother's Project - Gulf Coast Mothers for Sustainability
Turkey Creek Community Initiatives
Waterkeeper Alliance

GULF RESTORATION COUNCIL *INITIAL COMPREHENSIVE RESTORATION PLAN*

PUBLIC COMMENTS

SUBMITTED 7/8/13 TO RestoreCouncil@doc.gov

SUBMITTED BY:

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We welcome this opportunity to provide input to inform the Council's development of the Initial Comprehensive Restoration Plan as accessed on-line at <http://www.restorethegulf.gov/sites/default/files/Gulf%20Restoration%20Council%20Draft%20Initial%20Comprehensive%20Plan%205.23.15.pdf> on 7/8/13. The Plan includes the following priorities for Council-funded projects, which we address:

- p. 11-- Restore, Enhance, and Protect Habitats – Restore, enhance and protect the extent, functionality, resiliency, and sustainability of coastal, freshwater, estuarine, wildlife, and marine habitats. These include barrier islands, beaches, dunes, coastal wetlands, coastal forests, pine savannahs, coastal prairies, submerged aquatic vegetation, oyster reefs, and shallow and **deepwater corals**.
- P. 12-- Protect and Restore Living Coastal and Marine Resources – Restore and protect healthy, diverse, and sustainable living coastal and marine resources including finfish, shellfish, birds, mammals, reptiles, **coral, and deep benthic communities**.
- P. 13-- Promote Natural Resource Stewardship and Environmental Education – Promote and enhance natural resource stewardship through **environmental education efforts** that include formal and informal educational opportunities, professional development and training, communication, and actions for all ages.
- P. 13-- Improve Science-Based Decision-Making Processes – **Improve science-based decision-making processes** used by the Council.

OUR RECOMMENDATIONS:

Restoration programs should not only support infrastructure for coastal zones, but should also build the science capacity to support the Council's required research and monitoring efforts in deeper water (below scuba depths). Providing the best available science for shallow water habitats and resources is routine and supported by many research facilities across the Gulf of Mexico (GOM). This is not the case for depths beyond 40 meters and especially for areas like the Macondo well site and vicinity, where the oil plume extended from 1200 to 1500 meters depth. A fully supported and scientifically equipped underwater vehicle, based in the GOM region, is required to facilitate ocean restoration, monitoring and research, as well as support for ecosystem-based management, to promote sustainable, resilient resources in the GOM, and rapid response to future events.

Human activities are reaching further into the oceans, into deeper waters in search of unexploited resources, such as seafood, minerals and energy. New ultra-deep oil and gas lease blocks are now being considered south of the FL – AL border. Wide-scale funding cuts in recent years have resulted in the loss of science assets for monitoring and research below scuba depths. For the first time in over 35 years, there are no science class human occupied vehicles (HOVs) available in the GOM or southeastern US. There are also very few remotely operated vehicles (ROVs) in the USA that are capable of conducting research in deep waters (> 200 m) and are available to the science and management communities. Consequently, regulatory agencies are tasked with managing ocean resources without the information needed to do so effectively. In the aftermath of the Deepwater Horizon explosion, the

lack of information on deep water ecosystems in the GOM created a great deal of uncertainty about effects of different spill management options, and many decisions were made with no information on potential impacts to the deep benthic or pelagic zones. Three years later, research and management efforts are still hindered by a lack of funding, and appropriate research tools. This is especially critical considering the near-future expansion of oil exploration.

Proposed Asset for Gulf Science:

An ideal underwater vehicle would be a HOV capable of survey and sampling operations to at least 2000 m, the realm of ultra-deep OCS activities. Required science capabilities include: high resolution video and still cameras, instruments to measure environmental variables and multi-function manipulator arm(s) and sampling containers for specimen collections.

Although ROVs have been used successfully in many scientific and monitoring efforts, HOVs have several advantages over ROVs, particularly in the complex habitats common in the GOM, such as the cold seep and authigenic carbonate substrates where development activities occur. Advantages of HOVs include:

- HOVs can operate in strong currents much better than ROVs, as they are not dragged by a tether connected to a surface vessel.
- HOVs have much better maneuverability than ROVs in complex habitats and high currents, which results in more efficient use of bottom time.
- HOVs are generally more sophisticated and have higher payloads and collection capacity than ROVs.
- HOVs enable human presence and intervention. Greater visual and intuitive perspective on the environment provides more contextual information to judge dive operations and allow for better interpretations of data.
- ROV operations require the support ship to have dynamic positioning as the connection between ship and vehicle is critical. This is not necessary for HOV operations.
- HOVs can be more precisely placed than ROVs on targets of interest due to greater maneuverability, more rapid descent, lack of tether, and broader view of work area.
- HOV launch and recovery is often faster and less complex than with ROVs as there is no tether or tether management system to manipulate.
- HOVs capture the public's imagination and create valuable opportunities for education and outreach; for example past HOV cruises have resulted in imagery for ocean documentaries and the creation of a museum exhibit.

Given the limited availability and capacity of underwater vehicles, the addition of at least one 2000-m HOV (and/or 2000-m ROV) operation in the GOM region is necessary to support the Council's priority objectives, as well as the other restoration programs' objectives for the next 30 years (Table 1). There are existing assets and vendors available. Based on our experience (over 80 years combined in HOV and ROV operations and science), initial capitalization for the HOV and handling system would be \$10 million and annual operating costs would run about \$2 million per year. This annual cost is close to the investment now made in one of the Gulf of Mexico Research Initiative's research consortia. We anticipate such an asset would have a high demand from the scientific community, as well as other potential users (industry, agencies, education, media), which would generate auxiliary funding to support the operation.

Table 1. Potential program sponsors receiving restoration funding for ecosystem research and technology development. Sponsors: RAxxxx = RESTORE Act section number in PL112-141. Shaded rows focused on coastal habitats and resources.

Program	Fisheries Ecosystem Objectives	Funding (as of Mar2013)	\$ Source
GOMRI-- Gulf of Mexico Research Initiative (GOMRI)	Damage assessment and restoration science and technology	\$500M	BP
NAS-- National Academy of Science	Strategies and technologies for protecting human and environmental health	\$500M	BP and Transocean criminal settlements
NAWCF--North American Wetlands Conservation Fund	Wetlands restoration and conservation projects located in States bordering the Gulf of Mexico or otherwise designed to benefit migratory bird species and other wildlife and habitat affected by DHOS; pursuant to Migratory Bird Treaty Act [16 U.S.C. §§ 703,707 and 4406(b)] and Alternate Fines Statute [18 U.S.C. § 3571(d)]	\$100M	BP criminal settlement
NFWF-- National Fish and Wildlife Foundation	Promote resilient coastal ecosystems; barrier island restoration and creation	\$2.6B	BP and Transocean criminal settlements
RA1603—Gulf coast restoration	Ecosystem and economic recovery based on Comprehensive Plan with five overarching Strategy goals: (1) Restore and Conserve Habitat; (2) Restore Water Quality; (3) Replenish and Protect Living Coastal and Marine Resources; (4) Enhance Community Resilience; and (5) Restore and Revitalize the Gulf Economy.	\$760M	Transocean settlement
RA1604—Gulf Coast Ecosystem Restoration Science, Observation, Monitoring, and Technology Program	Research, observation, and monitoring to support the long-term sustainability of the ecosystem, fish stocks, fish habitat, and the recreational, commercial, and charter fishing industry in the Gulf of Mexico	\$20M	Transocean settlement
RA1605—Centers of Excellence	Competitive grants from 5 Gulf states to nongovernmental entities and consortia in the Gulf Coast region (including public and private institutions of higher education) for the establishment of centers of excellence; conduct science, technology, and monitoring in at least 1 of the following disciplines: (1) Coastal and deltaic sustainability, restoration and protection, including solutions and technology that allow citizens to live in a safe and sustainable manner in a coastal delta in the Gulf Coast Region; (2) Coastal fisheries and wildlife ecosystem research and monitoring in the Gulf Coast Region; (3) Offshore energy development, including research and technology to improve the sustainable and safe development of energy resources in the Gulf of Mexico; (4) Sustainable and resilient growth, economic and commercial development in the Gulf Coast Region; (5) Comprehensive observation, monitoring, and mapping of the Gulf of Mexico.	\$20M	Transocean settlement