

RESTORE Council Planning Framework
Responses to Comments
August 2019

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Introduction

Established by the Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act of 2012 (33 U.S.C. 1321(t) and *note*) (RESTORE Act), the Gulf Coast Ecosystem Restoration Council (Council) plays a key role in developing strategies and implementing projects that help ensure the Gulf’s natural resources are sustainable and available for future generations. With this role in mind, under the Council-Selected Restoration Component of the RESTORE Act, the Council develops Funded Priority Lists (FPLs) that specifically identify and describe the projects and programs it will fund.

On April 26, 2019 the Council released its Planning Framework draft for public review and comment as it continues to advance its vision for “[a] healthy and productive Gulf ecosystem achieved through collaboration on strategic restoration projects and programs”, as articulated in the [2016 Comprehensive Plan Update: Restoring the Gulf Coast’s Ecosystem and Economy](#) (2016 Comprehensive Plan Update). Briefly, the Planning Framework serves as a “bridge” between the Council’s overarching goals and objectives identified in the 2016 Comprehensive Plan Update and the specific restoration projects and programs approved in future FPLs. The Planning Framework identifies five priority approaches and associated techniques, along with their application within specific geographic areas in an effort to give the public and potential funding partners an indication of the types of projects and programs that may be considered for FPL 3 funding consideration. The Council published and requested comments on the draft Planning Framework, and this document addresses responses to all public comments received.

During the 52-day comment period (including a 7-day extension granted by the Council in response to a request from the public) ending at 11:59 pm Mountain Time on June 19, 2019, the Council held five public meetings in the Gulf Coast States, hosted two public webinars, and engaged with stakeholders across the region. The Council accepted written comments via mail, email and through the Planning, Environment and Public Comment website. Comments received after the end of the public comment period were not reviewed or considered. Oral and written comments were accepted during the following public meetings:

Date	Location	Time
April 29, 2019	Webinars	2:00 p.m. and 6:00 Central Time (CT)
April 30, 2019	Spanish Fort Community Center, 7361 Spanish Fort Blvd., Spanish Fort, AL 36527	6:00 p.m. CT
May 6, 2019	Convocation Center Annex, 7800 Washington Ave, New Orleans, LA 70125	6:00 p.m. CT

May 7, 2019	Florida Department of Environmental Protection , Douglas Building (Conference Room A & B), 3900 Commonwealth Blvd., Tallahassee, FL 32399	6:00 p.m. ET
May. 22, 2019	University of Southern Mississippi , 730 Beach Blvd East Long Beach, MS 39560	6:00 p.m. CT
May 30, 2019	Texas A&M College, Harte Institute , 6300 Ocean Dr., Corpus Christi, TX 78412	6:00 p.m. CT

All comments received during the public comment period, including attachments and other supporting materials, are part of the public record and are available on the Council’s website, www.restorethegulf.gov. The Council received a total of 446 unique comments from 2,932 (including 2,861 form letters) private citizens, businesses, other governmental entities (such as state, county and local governments), non-governmental organizations (NGOs), and other Gulf stakeholders. The total number of unique comments also includes those collected from 41 stakeholders who attended and provided comments at the five public meetings and two webinars. The large number of stakeholders engaged during the public comment period demonstrates awareness of Gulf restoration and interest in the actions and decisions being made by the Council, nine years after the *Deepwater Horizon* oil spill.

The ongoing involvement of the stakeholders who live, work, and play in the Gulf region is critical to ensuring oil spill penalty dollars are used effectively. The Council appreciates those who participated in the public review and comment process, as well as those who have supported Gulf restoration activities for many years.

Comment Analysis Process

The Council has carefully analyzed and responded to all verbal and written comments received during the 52-day public comment period. The Council’s consideration of public comments is an important step in finalizing the Planning Framework that will serve as a key component in the Council’s decision-making process for future Funded Priority Lists (FPLs) under the Council-Selected Restoration Component, commonly referred to as “Bucket 2”, of the RESTORE Act. The public comments provided valuable insights that helped inform and improve the final document.

The Council used the Department of the Interior’s Planning, Environment and Public Comment (PEPC) database system to manage and respond to public comments. Below, the Council has summarized all comments received and provided responses. In order to efficiently and effectively

respond to the observations and recommendations provided by Gulf stakeholders, the Council grouped comments and responses by theme. For example, common themes included recommended changes or additions to priority approaches and techniques. Within those themed groupings, individual comments were combined when the topic or recommendation was related. In other cases, the Council responded to individual comments as warranted by the nature of the comment. Many comments received, while not directly reflected in revisions to the Planning Framework, will be carried forward and considered as part of developing FPL 3.

Changes to the Planning Framework in Response to Public Comment

As part of responding to comments, the Council considered necessary revisions to the Planning Framework. Revisions to the document were primarily editorial in nature (e.g., adding citations, revising sentences for clarity), but also included some substantive revisions to specific sections (e.g., revisions to the description for the technique “Decommission unused, orphaned energy facilities”). In all cases, the Council sought to ensure that revisions improved the document’s accuracy and clarity.

Comments/Responses on the Planning Framework Draft

Priority Approach: "Create, restore, and enhance coastal wetlands, islands, shorelines, and headlands"

Comment: The Council received comments to consider implications of material extraction from source areas, emissions generated, and negative ecological consequences during the evaluation of the “Protect natural shorelines” technique to create, restore, and enhance coastal wetlands, islands, shorelines, and headlands. Recommendations were made to refrain from implementing this technique on barrier islands along Gulf-fronting sandy shorelines.

Response: The Council has committed to the use of both internal and external best available science review in evaluating techniques considered to restore natural shorelines or prevent further loss of shorelines for coastal habitat sustainability. This best available science review process will assess the techniques considered for restoration and will serve as a primary mechanism to ensure techniques employed are appropriate and scientifically supported for the areas where they are being considered.

Comment: With respect to the “Sediment placement” technique, one commenter noted that not all sediment placement is “beneficial use of dredged material” and that the Planning Framework draft failed to mention “dedicated dredging.” The commenter also recommended the Council refrain from funding any more dedicated dredging projects that dredge deep holes in estuaries until the risks associated with this process are assessed.

Response: The Council acknowledges the value of discussing dedicated dredging, and has included it in the sediment placement technique. The Council acknowledges that all ecosystem restoration endeavors come with some potential risks that need to be considered. Potential adverse effects of any proposed dredging is analyzed during the U.S. Army Corps of Engineers’ (USACE) permitting process (or the associated civil works project review process) and the proposed design is subject to interagency review and comment during this mandatory coordination process. This review would include many issues, including the potential for dedicated dredging to cause adverse environmental impacts due to low dissolved oxygen in the excavated borrow area or due to geomorphic changes. Revisions have been made to the Planning Framework in Section 2.2.1 to acknowledge that both dedicated dredging and beneficial use are methods that could be used in habitat restoration projects.

Comment: Comments were received recommending the Council consider vegetation planting as a part of habitat restoration generally, along with sand fencing for barrier island and shoreline restoration.

Response: The Council agrees vegetation planting may be effective as part of those restoration types, and sand fencing can increase the effectiveness of barrier island and shoreline restoration. The Planning Framework discusses vegetation planting in association with sediment placement, and reference to sand fencing has been included in Section 2.2.1.

Comment: In reference to beneficial use of dredged materials, one commenter recommended RESTORE funds not be used to meet legally required compensatory mitigation requirements.

Response: The Council appreciates the commenter’s concerns related to the use of RESTORE Funds. The Planning Framework is not intended to address potential mitigation policy considerations. Its purpose is to signal restoration priorities for FPL 3.

Comment: The Council received support for the “Sediment placement” technique. Some comments expressed concerns regarding the potential for use of contaminated dredged material to create or restore wetlands, the potential for dredging to release contaminated sediment into the water column and/or to add to water column turbidity, and the potential to inadvertently replace existing valuable habitats at a proposed project site. Comments requested that the Council carefully consider potential impacts to the environment that could result from this technique.

Response: The Council acknowledges that restoration actions have the potential for unintended adverse impacts. Prior to approving funding for a project involving sediment placement, the Council will consider any information pertaining to potential adverse effects, including the possibility of sediment contamination. To that end, the Council will review and consider any relevant information developed through the regulatory and permit process for such projects.

Priority Approach: “Protect and conserve coastal, estuarine, and riparian habitats”

Comments: The Council received comments in support of habitat conservation through land acquisition, with a number of commenters emphasizing this technique is essential for birds. One commenter recommended budgets for conservation projects include the full range of associated costs, from up-front planning and administrative costs to long-term operations and maintenance. This commenter also emphasized the urgency of conservation and the value of collaboration with other funding partners. Another commenter pointed out that although conservation is not the same as ecosystem restoration, it can be part of a comprehensive coastal management program where habitat is threatened by development, logging, and other land uses.

Response: The Council agrees conservation can be an effective tool to protect coastal habitat in watersheds under pressure from development. Habitat conservation can preserve important avian and terrestrial habitat, while also benefiting community resilience by maintaining natural flood storage and buffer areas. In addition, the Planning Framework notes strategic habitat conservation can help mitigate ecosystem impacts from sea level rise by creating opportunities for habitat and species migration. Habitat conservation is also linked to healthy downstream coastal waters. The Council invested in riparian habitat conservation in the [2015 Initial FPL](#), along with a program to educate the public on the connection between conservation and healthy downstream waters. In FPL 3, the Council will consider additional investments in conservation to protect habitat, improve water quality, and help ecosystems adjust to changing environmental conditions. Proposals for FPL projects and programs will include, where applicable, budget estimates

for planning and administrative costs, as well as any planned long-term operations and maintenance. As a general practice in the Council-Selected Restoration Component (also known as Bucket 2), the Council seeks partnerships with other funding sources and interested stakeholders.

Comment: A commenter asked how habitat management and stewardship differ, and what stewardship is.

Response: The Planning Framework has been revised to include additional text to clarify the terms “stewardship” and “habitat management” in Section 2.2.2.

Comment: Many comments were received regarding the technique, “Decommission unused, orphaned energy facilities”, which is included in the priority approach, “Protect and conserve coastal, estuarine, and riparian habitats”. Most comments expressed concerns about the lack of detail regarding exactly what is being considered and whether risks posed to the environment by such facilities have been scientifically evaluated. Additionally, some commenters questioned whether such work is an effective or strategic use of RESTORE Act funding, and whether other sources of funding exist to conduct such work (e.g., other revenue sources derived from oil and gas leases). One commenter expressed support for the technique, noting it is consistent with the Texas Railroad Commission’s well plugging program, which seeks to plug orphaned wells to eliminate the threat of a hydrocarbon release to natural resources along the Texas coast.

Response: The Council is considering this technique in two general areas: in coastal habitats including coastal marshes by plugging oil and gas wells; and in the offshore environment by plugging or removing wells, structures (e.g., oil and gas rigs), and pipelines. Work in the coastal environment would build upon a project approved for funding in the Council’s 2015 Initial FPL (“[Plug Abandoned Oil and Gas Wells](#)”, Padre Island, TX). Expanding such work into the offshore environment is being considered as a preventative measure against potential future harm to natural resources. Unaddressed orphaned oil and gas facilities pose risks to human safety, environmental risks to surface and subsurface resources through release of contaminants, and may perpetuate habitat loss. These risks increase with time due to continued deterioration, as does the cost to address them.

Opportunities to conduct this work would be evaluated based upon whether structures pose a threat to the environment or are impeding access to resources needed to conduct restoration (e.g., pipelines that cross sediment resources needed for habitat restoration). All identified facilities would be confirmed as orphaned (i.e. there are no responsible

parties remaining to remove the facilities). RESTORE funds are being considered because other potential funding sources are either inadequate or unavailable for such work except under specific circumstances. For example, commenters pointed to the Oil Spill Liability Trust Fund, managed by the U.S. Coast Guard, as a potential funding source. However, these funds may only be used either when a well is actively leaking, or when the Federal On-scene Coordinator determines that there is a significant threat of a discharge. The Planning Framework has been revised in Section 2.2.2 to reflect these clarifications regarding the Council's consideration of this technique.

Priority Approach: "Restore Hydrology and Natural Processes"

Comment: A commenter offered support of hydrologic restoration and recommended that this section of the Planning Framework include a reference to restoration of anadromous fish runs in the Gulf, noting the former role of such species with respect to the Gulf ecosystem.

Response: As noted in the Planning Framework draft, re-establishing natural hydrologic connections can help to restore and protect fish populations. In some instances, this could include anadromous fish. The Council recognizes the ecological value of reestablishing such species, but will retain the more general language in the document that is consistent with the types of hydrologic restoration activities being considered by members for this FPL. Please note that this general language does not preclude consideration of projects that could benefit anadromous fish, in either FPL 3 or future FPLs.

Comment: A commenter cautioned that restoring hydrologic connections can potentially have unintended adverse environmental impacts, and recommended the Council carefully assess such project proposals in order to avoid and minimize such potential effects.

Response: The Council appreciates this comment and acknowledges that hydrologic restoration and other types of restoration projects have the potential for unintended adverse impacts. Proposals for FPL funding will include, as appropriate, discussion of potential risks associated with the given project or program, including potential unintended adverse environmental or socio-economic impacts. FPL proposals will undergo an external best available science review process which, among other factors, will consider risks such as potential unintended adverse impacts. Finally, such risks may also be addressed in the regulatory process for construction projects. The Council will consider the information pertaining to such risks as it decides whether to approve funding for a given activity.

Priority Approach: "Reduce excess nutrients and other pollutants to watersheds"

Comment: A number of commenters expressed support for the priority approach, "Reduce excess nutrients and other pollutants to watersheds", and agreed that techniques under this approach support the Comprehensive Plan objective, "Restore, improve, and protect water resources". One commenter noted complementary local efforts being undertaken through the Alabama Coastal Foundation's Utilities United program.

Response: The Council appreciates the support expressed for this priority approach, and will consider potential opportunities to leverage existing resources and efforts as it employs this approach.

Comment: There were suggestions to address existing stormwater and wastewater issues, with one commenter raising potential investments in the Pearl River and another commenter highlighting a need in coastal Alabama. The latter emphasized the need to invest in significant and long-term solutions such as backup power systems and sewer spill response technologies.

Response: The Council supports upgrading existing systems and addressing problems that have been determined to be contributors to water quality impairments in coastal watersheds. While supportive of funding for the suggested improvements, the Council underscores the importance of determining which project(s) to fund with limited dollars that will best meet the Council's goals and objectives. The Planning Framework signals the Council's intent to consider the techniques "Stormwater management" and "Wastewater system improvements" in several of the geographic areas.

Comment: One commenter who supported green infrastructure and low-impact development suggested adding protection and restoration of riparian buffers as a "Stormwater management" technique.

Response: The "Stormwater management" technique does describe green infrastructure activities and low-impact development, and recommends traditional high-impact infrastructure be used only when necessary. The Council agrees that restoring riparian buffers can be important for reducing pollutant-carrying runoff. Accordingly, this activity is described as part of the "Agriculture and forest management" technique under the "Reduce excess nutrients and other pollutants to watersheds" approach. Moreover, the Planning Framework also includes acquisition of riparian habitat as part of the "Protect

and conserve coastal, estuarine, and riparian habitats” approach and describes how such projects can benefit water quality.

Comment: There was broad agreement with how the Planning Framework described the causes and consequences of excess nutrients and other pollutants to watersheds, with several commenters placing particular emphasis on the problem of harmful algal blooms. Multiple commenters highlighted the importance of the “Reduce excess nutrients and other pollutants to watersheds” approach to habitats, living coastal and marine resources, human welfare, and the economy.

Response: Regarding harmful algal blooms (HABs), the Council shares concern for this urgent problem and has signaled its intention to address the driving water quality issues by applying the “Reduce excess nutrients and other pollutants to watersheds” priority approach. More generally, the Council also agrees that projects employing this priority approach can provide valuable cascading benefits to habitats, living coastal and marine resources, human welfare, and the economy. The Council will consider these benefits in the development of FPL 3.

Priority Approach: “Restore Oyster Habitat”

Comments: The Council received comments both supporting oyster restoration and questioning whether it should be a priority. Some cautioned that future investments in oyster restoration must be supported by best available science. Specifically, the Council should understand the status, trends, and causes of oyster declines, as well as the relative effectiveness of various restoration techniques before further investing in such projects. Finally, commenters discussed the value of stakeholder engagement and partnerships in advancing oyster restoration, with one offering assistance through the use of an ongoing shell recycling program.

Response: The Council agrees that restoration investments, including oyster restoration, should be based on the best available science. The Council has identified restoration of oyster habitat as a priority approach in the Planning Framework because this important environmental and economic resource has experienced steep declines in some Gulf estuaries. As the Council considers funding for specific oyster restoration projects, it will review the scientific basis for the proposed investment. Member proposals for Council-Selected Restoration Component, commonly referred to as “Bucket 2”, funding will explain the rationale for the investment. This includes information regarding status and trends, underlying stressors (or causes), relevant changes in environmental conditions, rationale for the proposed restoration technique, and potential risks to the given project. As noted

in the Planning Framework, the Council recognizes that successful oyster restoration may require initial investments that address the underlying stressors of oyster decline. For example, the Council may need to first focus on improving water quality and/or quantity conditions in a given estuary in order to create the conditions necessary for oyster restoration to succeed. Proposals will undergo external best available science review and these reviews will be available to the public. The Council will fully consider this information before approving funding for oyster restoration projects. Finally, the Council agrees that partnerships, stakeholder engagement, and leveraging are important for advancing oyster restoration and Gulf restoration in general. The Council members will remain open to considering how to partner with interested stakeholders as specific FPL 3 projects and programs are developed.

"Texas" Geographic Area

Comment: One commenter asked whether there is another classification beyond division of Texas coastal wetlands into two major ecosystems: the Chenier Plain ecosystem (Texas-Louisiana border to East Galveston Bay) and the Texas Barrier Island ecosystem (East Galveston Bay to the Texas-Mexico border) as they felt further division may be more meaningful for describing the actual differences as one travels along the coast.

Response: Consistent with the editor's note within the cited Texas Conservation Action Plan reference in Section 2.3.1, the Council recognizes that most conservation partners split the Texas Gulf Coast Prairies and Marshes ecoregion into three subregions (Upper, Middle, and Lower) based on bay systems. The Council has decided to look at the Texas coast statewide as a priority geographic area for the current Planning Framework. The Council recognizes there are differences in habitats and stressors along the Texas coast and will take those differences into consideration when identifying potential FPL projects.

Comment: Comments were received supporting investments in oyster restoration, restoring natural hydrology and freshwater inflows to bays, land acquisition and protection, shoreline protection and restoration, septic to sewer conversions, agricultural improvements to protect and conserve water, and living shorelines.

Response: The Council appreciates support for these priority restoration approaches and techniques as elements of the Planning Framework. All of these types of investments could be considered under future FPLs.

Comment: One commenter asked why there has not been any emphasis on restoring seagrasses in Texas in the Planning Framework.

Response: The Council acknowledges that seagrasses are an important habitat along the Texas coast. The Planning Framework is not intended to be a comprehensive plan for restoration in the Gulf. Rather, it is intended to signal restoration priorities for FPL 3 funding. In developing the Planning Framework, the state of Texas utilized input collected from a survey made available to the public, nongovernmental organizations, and state and federal natural resource agencies to help determine priority stressors and restoration needs to include in this geographic area. Seagrass restoration was not determined to be a top priority approach within Texas for FPL 3. However, the state of Texas recognizes the importance of seagrass to Texas coastal waters and retains the option to utilize this approach in the future.

Comment: One comment was received stating Texas has not demonstrated, or at least not presented, information in the Planning Framework draft that oyster reefs have been degraded.

Response: Oyster reefs have been degraded in Texas by past shell dredging, oyster harvest pressure and practices, droughts, floods, sedimentation and reef burial from events such as Hurricane Ike that decimated oysters in East Galveston Bay. The Council agrees that restoration investments, including oyster restoration, should be based on the best available science and demonstrated need. As mentioned in previous comments, member proposals for FPL funding will explain the rationale for the proposed investment, including information such as restoration needs, relevant resource status and trends, underlying stressors causing degradation or loss and how the proposed investment will address the restoration need.

Comment: One comment was received recommending that proposed approaches and techniques be further prioritized according to their relative importance with the Texas geographic area. Another comment encouraged the Council to prioritize approaches for specific watersheds according to differences in restoration needs and stressors among these watersheds.

Response: The Council recognizes the need to make the most of Gulf restoration funding and will carefully select priority projects that meet one or more priority criteria consistent with the RESTORE Act. While the state of Texas does not wish to further prioritize among restoration approaches or according to specific watersheds within the Planning Framework document at this time, Texas does recognize that some restoration approaches might be a priority state-wide whereas others might only be priority within

specific watersheds. This variation will be reflected in the proposals developed for FPL funding consideration.

Comment: A comment was received regarding increasing industrial development as one of the most important stressors on the Texas coast.

Response: The Planning Framework Section 2.3.1 has been revised to mention industry-related development.

Comment: One comment stated that forest management will provide very little, if any, benefit to Texas coastal waters in support of reducing nutrients or pollutant loads.

Response: FPL proposals submitted for consideration for FPL 3 will provide supporting information that will include, as appropriate, a discussion of the stressors the proposal is intended to address. Proposals will also undergo a best available science review.

Comment: One comment stated that the restore hydrology and natural processes approach under the Texas geographic area should not include “structural marsh management” due to its serious side effects.

Response: The Council appreciates this comment and recognizes that structural marsh management can have unintended negative effects. The Council is not considering structural marsh management for FPL funding at this time. Project proposals undergo thorough interagency review by Council member states and agencies, are subject to public comment, and undergo best available science reviews. Furthermore, projects involving structures may also be subject to authorization by the U.S. Army Corps of Engineers that involve regulatory review and comment by both state and federal natural resource agencies. The Council believes these processes will ensure that projects funded under the FPL will be designed to minimize adverse environmental effects.

Comment: Comments were received regarding a lack of substantive scientific evaluation or assessments of the risks posed by unused, orphaned energy facilities and requested evidence that abandoned wells and pipelines are significant stressors be included in the Planning Framework. If such evidence is lacking, then the Council should reconsider whether this technique should truly be a coastal protection/restoration priority for Texas.

Response: Please see the comment response on page 6-7 of this document regarding the “Decommission unused, orphaned energy facilities” technique. Clarifications have been

made in the Planning Framework Section 2.2.2 regarding the intended purpose of this technique.

Comment: One comment supported the Council’s reference to ecosystem restoration measures and projects included in the Coastal Texas Study and the Texas Coastal Resiliency Master Plan, encouraging a high level of coordination with both of these processes to ensure efficiency in restoration planning and implementation.

Response: The Council and the State of Texas appreciate this comment and will continue to consider both of these efforts and potential opportunities to leverage resources during planning and implementation of RESTORE actions within Texas.

Comment: One commenter suggested the Council utilize Audubon's recently released Gulf conservation plan, "[Audubon's Vision: Restoring the Gulf of Mexico for Birds and People](#)", as one tool for project selection as the Council prepares FPL 3. Further, the Council should consider potential Texas projects benefiting birds, other wildlife, beaches, and the economy.

Response: The Council recognizes the value of such existing plans and how they could be useful in the development of restoration proposals. While not a formal part of the review process, individual members may consult such plans, as appropriate, during the FPL development process.

"Chenier Plain, Texas-Louisiana" Geographic Area

Comment: One commenter recommended including mention of Rollover Pass in the list of channels that have altered the hydrology of the Chenier Plain. Another comment indicated that there are other environmental stressors in this area that are not listed in the Planning Framework draft, including increased connectivity between wetlands, estuaries, and the Gulf of Mexico.

Response: As noted in the Planning Framework, the Council supports restoring natural hydrologic and salinity regimes and will consider relevant projects in the development of FPL 3. State legislative appropriations have been secured to fund the closure of Rollover Pass. The Planning Framework Section 2.3.2 has been revised to include a broader array of stressors to this geographic area.

Comment: Comments were received recommending that the “Protect and conserve coastal, estuarine, and riparian habitats” approach be added to the Chenier Plain

geographic region in Texas to allow for potential acquisition and habitat management projects to address development as a stressor.

Response: The Council has added “Protect and conserve coastal, estuarine, and riparian habitats” as a priority approach in the Chenier Plain of Texas (see Section 2.3.2). While not all areas of the Chenier Plain in Texas are under pressure from development, the Council may consider acquisition and/or habitat management projects to conserve high quality habitat, which if not protected may be subject to future development pressure.

Comment: One comment questioned whether nutrients are a known cause of water quality impairment in the Chenier Plain.

Response: The Planning Framework includes agriculture and forest management as a potential technique to address water quality issues in the Chenier Plain, possibly including nutrients or other pollutants. By including this potential technique, the Council considered potential sources of water quality impairment in waters across the Chenier Plain, including but not limited to near-shore coastal waters. Proposed projects and programs addressing water quality in the Chenier Plain, or elsewhere, will provide the appropriate supporting information, including a discussion of the stressors the proposal is intended to address. Proposals will also undergo a best available science review.

"Pontchartrain Basin, Louisiana - Mississippi" Geographic Area

Comment: General support was received for the priority approaches identified for this geographic area. Additionally, the Council was encouraged to invest in implementation of projects that are sufficiently large and complex to address the large-scale stressors in this area. This includes those that received engineering and design funding through the 2015 Initial FPL, such as the [Mississippi River reintroduction into Maurepas Swamp](#). Another commenter acknowledged that this engineering and design work, while being completed with the 2015 Initial FPL funds, was initiated through funds received under the [Coastal Wetlands Planning, Protection, and Restoration Act](#) (CWPPRA), and felt that this information should be acknowledged in the Planning Framework.

Response: The Council appreciates the support for the priority approaches identified for this geographic area and will consider options for continued investments in development of FPL 3. Additionally, the Council strives to maximize collaboration and leveraging opportunities with applicable funding streams. To that point, the Planning Framework Section 2.3.3 has been revised to acknowledge the previous work supported through other funding sources.

Comment: Several additional techniques, as well as cautions about how to implement techniques, were provided. For example, it was suggested that the Council consider habitat protection and conservation (i.e. acquisition projects and invasive species control), and additional oyster restoration techniques. The Council was also cautioned against investing in hardened shoreline protection and nutrient reduction techniques for this geographic area.

Response: The Council recognizes that more approaches and techniques could be utilized to address the needs of this geographic area. The Planning Framework is intended primarily to help guide FPL 3 investments using approaches and techniques suitable for a given geographic area at this point in time, as opposed to a comprehensive list of all approaches and techniques. The Council will consider whether to add other approaches and techniques in future iterations of the Planning Framework, based on an assessment of the most pressing needs and stressors at that time. Regarding cautions about using some identified techniques, the Council will take such recommendations into consideration as it evaluates proposals for FPL 3 funding consideration.

Comment: Comments were received that encouraged the Council to consider the Pontchartrain Basin and Mississippi Sound as one geographic area because of the hydrologic connection between these two systems.

Response: The Council acknowledges the hydrologic connection between these two geographic areas, and illustrates this in the map for the Pontchartrain Geographic Area (Section 2.3.3) which highlights an area from the Mississippi River to the Chandeleur Islands and Mississippi Sound. The issues, stressors, and restoration opportunities in Mississippi Sound extend beyond the hydrologic influences of the region. Therefore, the Council has chosen to consider this area separately, in addition to the acknowledged influence from and interactions with the Pontchartrain Basin.

"Mississippi Sound, Mississippi" Geographic Area

Comment: Some commenters requested that additional studies be conducted in the Mississippi Sound and lower Pearl River to better understand the impacts of water flow, water quality, and salinity on oyster reefs in the region before investing in additional oyster restoration in this area.

Response: The Council agrees that enhanced understanding of hydrologic flow in Mississippi Sound would be beneficial for oyster restoration planning. Through multiple

fundings, the state of Mississippi is investing in hydrologic modeling for the Mississippi Sound to better understand water quality and freshwater flow impacts to oysters and other marine resources. The state of Mississippi is also investing funding to improve water quality in the Mississippi Sound, which will support oyster restoration activities as well.

Comment: Comments were received that highlighted the impacts to oyster populations in Mississippi Sound as a result of the historic Mississippi River flooding of 2019 and the opening of the Bonnet Carre Spillway. It was suggested that the Council incorporate current environmental stressors to inform future restoration efforts and mitigate damage to oyster populations.

Response: The Council acknowledges that extreme weather-related events (e.g., flooding, hurricanes) will occur periodically and that there is a need to consider such past events into its future planning and selection of projects for funding. To some extent, the Council can build in measures to reduce risk from such events, although it may not always be possible or advisable. The Council has and will continue to consider such factors in its selection, design, and implementation of restoration projects.

Comment: Support was received for priority restoration techniques that utilize land acquisition and address stormwater runoff issues in the Mississippi Sound geographic region.

Response: The Council appreciates the commenter for their support for these restoration techniques and agrees that both land acquisition and stormwater runoff restoration activities in Mississippi can provide scalable benefits to its coastal environment.

Comment: Some commenters asked to add hydrologic restoration to the restoration approaches that will be considered in the Mississippi Sound geographic region, including the lower Pearl River.

Response: The State of Mississippi acknowledges that hydrologic restoration opportunities exist within its coast. The Planning Framework is not intended to be a comprehensive plan for restoration in the Gulf. Rather, it is intended to signal restoration priorities for FPL 3 funding. Given the extensive needs relative to funding available in the Council-Selected Restoration Component (Bucket 2), Mississippi is considering addressing other needs (such as water quality improvement) with these funds while continuing to strategically consider funding from sources to address other needs along the coast. In addition, Mississippi acknowledges that hydrologic restoration could be a component of other activities that are

pursued for Bucket 2 funding, such as part of habitat conservation. The State of Mississippi will continue to consider utilizing the hydrologic restoration approach in the future and strategically using available funding streams to meet the needs of coastal Mississippi.

"Mobile Bay and Mobile-Tensaw Delta, Alabama" Geographic Area

Comment: Comments were received suggesting the addition of restoration approaches to this geographic area to broaden the suite of options used to achieve the Comprehensive Plan Objectives. There were also recommendations to apply more of the approaches to additional Comprehensive Plan Objectives, given how the additional approaches can provide benefits to more Comprehensive Plan Goals than indicated for this geographic area. Requests were also made to add "Protect and conserve coastal, estuarine and riparian habitats" as an additional approach to Comprehensive Plan Objectives "Restore, enhance and protect habitats" and "Restore and enhance natural processes and shorelines". These requests highlighted the view that this conservation technique is beneficial to achieve restoration goals of improving water quality while also protecting upland habitats and reducing stressors of habitat fragmentation.

Response: While this priority approach could be utilized within this geographic area, the Planning Framework is not intended to be a comprehensive plan for restoration in the Gulf. Rather, it is intended to signal restoration priorities for FPL 3 funding. The state of Alabama retains the option to utilize this approach and the techniques described within it in the future.

Comment: There were comments regarding the need for management and improvements to wastewater infrastructure for reducing pollution discharges to the bay. There is support for upgrading and fixing existing problems to the extent they result in significant, long-term solutions in pollution reduction, but opposition to expanding treatment capacity that could subsidize continued development. The concern is that expansion costs should come from structured fees within the treatment area and not reduce the available restoration budget for fixing existing problems. There was appreciation for the partnership model between the Mobile Bay National Estuary Program and the state as an effective model to consider in developing strategies to address these concerns, and requests to continue utilizing similar partnerships into the future.

Response: The Council supports the need for wastewater infrastructure improvements to address water quality issues along Coastal Alabama by addressing existing problems in a manner that results in significant, long-term solutions. For example, converting outdated septic systems in marshy, low lying coastal areas to sanitary sewer treatment is a proven

and highly encouraged water quality improvement technique. The strategy for managing this implementation is addressed through several coordination and outreach venues such as the Mobile Bay National Estuary Program advisory committees, as well as meetings between state restoration staff and public utilities leadership. In addition, the State of Alabama is actively engaged in the U.S. Army Corps of Engineers development of the Alabama Coastal Comprehensive Plan (ACCP), which considers risk and resilience of infrastructure. Additionally, Alabama will develop a project prioritization and selection process that will include considerations of needs, potential for environmental benefits, opportunities for leveraging, and resilience considerations. The State is also working in coordination with the Alabama Gulf Coast Recovery Council to determine needs and identify opportunities for coordination and collaboration. With respect to the concern regarding RESTORE funds being applied to expansion of wastewater infrastructure that would typically be funded through fees within the service area, the Council will consider the appropriate funding strategy for projects that may overlap with other customary sources of wastewater infrastructure financing. Projects proposed for FPL3 will be subject to external best available science reviews, and these proposals and associated reviews will be made available to the public prior to release of the draft FPL. Through the proposal review process, concerns about the appropriateness of projects funded relative to project objectives and unintended consequences can be raised and addressed.

Comment: Comments were made in support of the inclusion of the priority approach “Restore hydrology and natural processes” in this area, and that associated restoration plans need to be based on best available science to help prevent inadvertent impacts when restoring hydrologic connections.

Response: The Council appreciates this input and agrees that thorough studies that rely upon best available science must precede any restoration effort in order to avoid unintended consequences of such actions.

Comment: Comments were made that request research into the status and trends of oyster populations and causes of decline in this geographic area be conducted prior to any additional investments to recover oysters in this area.

Response: The Council agrees that all restoration investments, including oyster restoration, should be based on best available science. The Council has identified oysters as a priority approach in Mobile Bay because this important environmental and economic resource has experienced steep declines in this estuary. As the Council considers funding for specific oyster restoration projects, it will review the scientific basis for the proposed investment.

Member proposals for Council-Selected Restoration Component funding will explain the rationale for the investment. This includes information regarding status and trends, underlying stressors (or causes), relevant changes in environmental conditions, rationale for the proposed restoration technique, and potential risks to the given project. The Council recognizes that successful oyster restoration may require initial investments that address the underlying stressors of the oyster decline. For example, the Council may need to focus first on improving water quality and/or quantity conditions in order to create the conditions necessary for oyster restoration to succeed. Proposals will undergo external best available science review and the reviews will be available to the public. The Council will fully consider this information before approving funding for oyster restoration projects.

"Perdido River and Bay, Alabama-Florida" Geographic Area

Comment: Comments were received in support of the approaches “Reduce excess nutrients/pollutants to watersheds” and “Protect and conserve coastal, estuarine and riparian habitats” in this area. The cross-border strategy for Alabama and Florida coordination was highlighted to improve this shared watershed.

Response: The Council appreciates this input and agrees that more effective pollution reduction is possible with coordination between the two states working together in this shared border watershed.

Comment: Comments were provided in support of the approach to “Restore oyster habitat”. Another commenter requested that scientific studies be conducted to document the status and trends of oyster populations. There was also related support for substrate placement and living shoreline techniques to be applied in this area.

Response: The Council appreciates this input and agrees that thorough studies that rely upon best available science must precede any restoration effort in order to ensure the appropriate sequence of actions are taken to overcome the original causes of resource decline prior to attempting to recover a resource like oysters. Please note that the “substrate placement” and “living shorelines” techniques were indicated for Perdido (Section 2.3.6), in recognition that extensive oyster reefs have not historically been a prominent component of the bay ecosystem. These techniques will serve to recover benthic habitats, including oysters, and protect shoreline habitats. Oyster restoration to create reefs or to enhance spawning reserves (another technique included in the “Restore oyster habitat” priority approach) is not the highest priority for this area.

Comment: A commenter requested the addition of two priority approaches not currently included in the Planning Framework. These priority approaches support project recommendations included in the Perdido River and Bay Surface Water Improvement and Management Plan.

Response: While these priority approaches could be utilized within this geographic area, the Planning Framework is not intended to be a comprehensive plan for restoration in the Gulf. Rather, it is intended to signal restoration priorities for FPL 3 funding. The Council retains the option to utilize these approaches, and the techniques described within them, in the future.

"Florida" Geographic Area

Comment: One commenter questioned whether restoring longleaf pine ecosystems has coastal benefits, and therefore should be considered for funding under the Council-Selected Restoration Component (Bucket 2).

Response: To be eligible for RESTORE Act funding, an FPL activity must be carried out in the "Gulf Coast Region", including any adjacent land, water, and watersheds that are within 25 miles of the coastal zone as that term is defined in the Coastal Zone Management Act. Moreover, according to applicable Treasury regulations, an activity selected by the Council is carried out in the Gulf Coast Region when "each severable part of the activity is primarily designed to restore or protect that geographic area." The Council recognizes that effective coastal restoration requires a holistic approach to coastal watersheds including, where appropriate, wetlands, waters, and terrestrial habitats that are not immediately adjacent to tidal or estuarine areas. Longleaf pine ecosystems can provide a range of functions and values important to coastal watersheds. In addition to supporting diverse plant and animal communities, such systems also provide water quality and stormwater attenuation benefits. There has been a significant decline in this type of Gulf ecosystem. Accordingly, the Council recognizes that restoring longleaf pine may be an important component of a coastal watershed restoration for a given area.

Comment: One commenter offered support for the approaches and techniques listed for this geographic area, but emphasized that the Planning Framework should more clearly connect these approaches and techniques to the needs of the watershed and/or estuary where they are most relevant. Another commenter recommended the Council prioritize restoration in estuaries located in the eight disproportionately affected counties.

Response: The Council agrees the techniques and approaches applied in a given watershed and/or estuary must reflect the stressors and other factors specific to a given geographic area. Proposals for FPL funding will, as appropriate to the scale of the proposed project or program, provide watershed- and/or estuary-specific information to support application of the given approach and technique, including discussion of relevant stressors and other relevant conditions within the geographic area. As directed by the RESTORE Act, the Council will give highest priority to projects and programs that meet one of the four priority criteria listed in the Act, one of which is “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.

Comment: One commenter cautioned against using hard shoreline protection approaches on Gulf shorelines.

Response: The Council concurs with this statement. The Planning Framework technique applicable to the protection of natural shorelines was not intended to include hard shoreline armoring, such as seawalls. Rather, it is meant to embrace techniques that incorporate natural vegetation or other living, natural soft elements alone or in combination with some type of harder shoreline structure, such as oyster reefs, rock sills, or anchored large wood for added stability. In addition, all proposed shoreline protection projects will undergo best available science review and public comment, which provides additional opportunities to review whether a proposed technique is appropriate for a given shoreline project.

"Gulfwide" Geographic Area

Comment: One commenter suggested that the Council invest in Gulfwide scientific efforts to document the current status and trends of oyster habitats in the Gulf.

Response: The Council agrees that investment in Gulfwide scientific efforts can be an important step in funding science-based coastal restoration activities. Several recent efforts have worked to identify oyster habitats and priorities in the Gulf. To highlight these efforts, the Council has added additional references to scientific studies and reports on Gulf oyster habitats throughout the Planning Framework.

Comment: Several comments were received in support of Gulfwide environmental education and training opportunities, such as the one provided by the [GulfCorps project](#) funded under the 2015 Initial FPL.

Response: The Council appreciates commenters for their support of Gulfwide environmental stewardship and training, and more specifically for the positive support of the GulfCorps program. The Council will consider the success of the GulfCorps and other Gulfwide programs when making future investments in projects and programs.

Comment: Support was received for investments that support science-based decision-making and/or improve the Council's ability to plan for acute events, such as hurricanes or potential oil spills.

Response: The Council appreciates the commenters for their support of Gulfwide science investments that will support the Council in meeting its commitments to best available science and measuring outcomes, both of which are foundational elements to its Comprehensive Plan. The Council will continue to build upon its 2015 Initial FPL investments in science and decision-support tools through ongoing investments in activities can help the Council plan for and adapt to future events.

Editorial Comments

Comment: The Council received a number of comments that can be characterized as editorial in nature.

Response: The Council has reviewed the recommended edits and incorporated many throughout the document. The Council also received comments that were personal opinions on subjects related to the Planning Framework, but did not recommend specific changes to the document itself. While these editorial comments did not recommend changes to the Planning Framework, they nevertheless expressed important views for the Council to consider as it moves forward. The Council appreciates both the edits and editorial opinions of those who commented on this document.

Other Restoration Approaches

Comment: Requests were made to elaborate on the "other" category of techniques included in each of the priority approaches.

Response: The Council recognizes that, during the planning process for program or project development by members, additional techniques could be identified that would best achieve the stated priority restoration approaches with specific watersheds or restoration projects. Therefore, the "other" technique has been included in each of the priority approaches to allow for this necessary flexibility. As some commenters noted, this could

include activities such as adding vegetation plantings to a beach dune restoration project or strategically acquiring a tract of land that could address the water quality goal of watershed protection.

Comment: One commenter raised several activities as potential approaches and techniques for funding consideration: seagrass restoration, filling artificial tidal passes, and oil and gas canal backfilling for consideration in Texas and Louisiana.

Response: The Council agrees that submerged aquatic vegetation (SAV) including seagrasses provide critical habitat in the Gulf that is sensitive to water quality issues, and language has been added to this effect in the Glossary of Terms (Appendix I). The Planning Framework also notes that projects to improve water quality are important for restoring and protecting SAV habitat. The Council will consider projects to reduce excess nutrients and other pollutants to watersheds in the development of FPL 3. The Council also may support activities such as filling tidal passes, as described under the Planning Framework techniques “Restore hydrologic connectivity” and “Restore natural salinity regimes”. The Council may consider projects employing these techniques in the development of FPL 3, including projects in Texas and Louisiana. The Council agrees the oil and gas canal backfilling is also an important restoration technique in certain areas of the Gulf, and funded a project in the 2015 Initial FPL to do this work in [Jean Lafitte National Park, LA](#). The Planning Framework is not intended to be a comprehensive plan for restoration, but rather a signal of priorities for FPL 3. Therefore, the Council has elected not to include this as part of the technique “Decommission unused, orphaned energy facilities” in Section 2.2.2 of the Planning Framework.

Comment: One commenter suggested revising the approach “Create, restore, and enhance coastal wetlands, islands, shorelines, and headlands” to include “barrier islands” instead of “islands.”

Response: Broader terminology has been used in this instance to reflect the inclusiveness of projects the Council will consider in the development of FPL 3. For example, the Council may consider rookery islands and, more broadly, barrier islands for FPL funding.

Overall Restoration Approaches

Comment: One commenter suggested adding a general statement supporting the use of "natural infrastructure" and the restoration of natural processes to accomplish coastal restoration and management.

Response: The Council appreciates the value and need for natural infrastructure and the restoration of natural processes. To this end, the Comprehensive Plan lays out “Restore and Enhance Natural Processes and Shorelines” as one of the Council’s Objectives. The Planning Framework indicates approaches and techniques that are being considered to support this objective, ranging from green infrastructure to the restoration of natural riverine inputs using controlled diversions. Language addressing the use of natural infrastructure has been added to the Planning Framework as part of the approach “Create, restore, and enhance coastal wetlands, islands, shorelines, and headlands” (Section 2.2.1).

Stressors Not Yet Addressed

Comment: Some commenters recommended that the Council consider how climate change could impact the long-term success of its restoration projects, as well as how restoration projects might mitigate the impacts of climate change.

Response: The Council addresses climate risks in guidance to its members on the content of FPL 3 funding proposals. Specifically, proposals for Council funding should discuss whether the project or program is vulnerable to climate risks such as sea level rise, changes in rainfall patterns, and/or potential increases in hurricane intensity. In particular, proposals should discuss how such risks might affect the benefits and duration of the project or program. Where applicable, proposals should also discuss how the project or program might mitigate future risks associated with sea level rise, subsidence, and/or storms. This guidance, titled “Council-Selected Restoration Component Funded Priorities List 3 Proposal Submission Guidelines and Review Process,” will be available on the Council’s website (www.restorethegulf.gov) prior to the proposal submission period.

Comment: Comments were received requesting that the Council incorporate current environmental stressors to inform future restoration efforts.

Response: The Council acknowledges that extreme weather-related events (e.g., flooding, hurricanes) will occur periodically and that there is a need to consider past events into its future planning and selection of projects for funding. To some extent, the Council can build-in measures to reduce risk from these events. The Council has and will continue to consider these factors in its selection, design, and implementation of restoration projects.

Funded Priorities Lists

Comment: Many commenters provided thoughtful input and questions regarding selection of projects and programs for inclusion in future Funded Priorities Lists (FPLs). This input

included ensuring that: implementation (as opposed to solely planning) projects be funded; investments in the 2015 FPL are built-upon; education is included as a component of projects' implementation; and an ecosystem-wide focus is maintained, as intended by the RESTORE Act. Additional comments emphasized the importance of investing wisely in habitat restoration in a way that is sustainable for humans and wildlife.

Response: The Council appreciates this input and will consider it throughout the process of vetting and selecting projects and programs for FPL 3 funding. This could include funding implementation projects that achieve or contribute to an ecosystem-level impact, as well as investing in the long-term benefits provided by meaningful environmental education and continued investments in projects and programs with proven success.

Comment: Crew members of the project "[Gulf of Mexico Habitat Restoration via Conservation Corps Partnerships](#)", which was included in the 2015 Initial FPL, attended and provided comments at four of the five public meetings on the Planning Framework draft. All spoke to their support of the project, their favorite activity, the invaluable training and education they received as crew members, personal successes, and support for continued funding.

Response: The Council appreciates the dedicated work of these crews. The successful implementation of restoration projects as well as the opportunities for future employment beyond the life of this project are invaluable. The Council will take this input into consideration as it considers future investments in projects and programs.

Public Engagement

Comment: One commenter complimented the Council's proactive engagement with stakeholders across the Gulf and requested the Council to consider a bilingual liaison to interact with the underserved/underrepresented Vietnamese fishing communities across the Gulf. The commenter expressed concern regarding the inaccuracy of both the Vietnamese fact sheet and the Vietnamese interpretation services provided at a public meeting. Other commenters requested that the Council provide advance public notice, hold open meetings, and have smaller focus group meetings to allow greater public engagement during the planning stages. One commenter noted more one-on-one outreach will assist the Council in understanding the community's priorities, concerns and how the community can benefit economically. The commenter suggested scheduling more convenient dates or times for public meeting to accommodate the fishing community and allocate additional time for attendees to comment at public meetings. One commenter noted the importance of messaging the need for everyone to take ownership in protecting

the environment and the impact of this action. Another commenter requested the Council utilize technology to communicate the status of restoration project.

Response: The Council intends to continue offering public engagement opportunities that reflect the richness and diversity of the Gulf Coast communities to ensure ongoing public participation in the Council's restoration efforts. Engagement with all stakeholders, including the underserved/under-represented Gulf Coast communities is critical. The Council recognizes the value of not only proactivity engaging stakeholders such as the Vietnamese fishing communities, but also providing accurately translated materials and interpretation services at public meetings. Based on the translation and interpretation lessons learned during Planning Framework draft public meetings, the Council began working to identify additional sources to provide more accurate materials and interpretations for future meetings. The Council will continue to seek ways to strengthen its ability to communicate with underserved and underrepresented communities, including the Vietnamese fishing community, to ensure awareness and transparency of restoration activities.

The Council appreciates the importance of strong, productive, and predictable public engagement and of maintaining transparency throughout its operations and decision-making. In September 2018, the Council launched RESTORE Education Opportunities Series (REOs), an initiative to not only increase opportunities to engage the public, but also to provide these opportunities at the public's convenience. One component of REOs is a collection of webinars aimed to provide education related to the path forward towards the next Funded Priorities List, as well as return to the *Deepwater Horizon* oil spill to explain how the RESTORE Council and similar restoration efforts are working to restore the Gulf. These webinars can be accessed at www.restorethegulf.gov. In addition to accessing webinars, stakeholders can request small group meetings with Council staff to discuss ongoing activities. The Council is looking forward to scheduling these meetings to learn of the various concerns of communities across the Gulf. The Council will continue to explore the use of webinars and other creative tools to increase transparency and opportunities for public participation.

The Council plans to offer additional time at public meetings for Limited English Proficiency stakeholders to provide oral comments and have those comments translated into English for other attendees. In addition, the Council is exploring methods to communicate to Gulf stakeholders the benefits of protecting the preserving the valuable Gulf resources in their daily lives.

Comment: The Council received compliments from several commenters on the ability to review and comment on the Planning Framework draft, noting this document supports the Council's commitment to transparency and collaboration as well as the advancement and use of best available science in decision making processes. One commenter was appreciative of the Council's commitment to remain transparent and informative throughout the decision-making process. Another commenter was appreciative of the public meetings and noted their organization would distribute information about the public comment and review period. Other commenters expressed gratitude to the Council for being responsive to questions during the live public webinars.

One commenter requested detailed information outlining the Council's accomplishments and outstanding activities, and also highlighted the importance of educating stakeholders using simple terms. The Council received a suggestion to use additional methods to provide the public notice of future public meetings. Some commenters noted the public meeting presentation was too broad and did not articulate next steps. Commenters requested that the Council provide information related to the status of state-specific projects, Council members' project portal selection processes, and transparency throughout the FPL 3 process. One commenter commended the Council's efforts on providing translations of fact sheets and requested a 15-day extension of the public comment period, due to the unavailability of the Vietnamese translation of the Planning Framework draft.

Response: The Council appreciates Gulf stakeholders not only for their comments on the Planning Framework draft, but also their participation in both the live public webinar and Gulfwide public meetings. The Council remains committed to inclusion and transparency throughout the Funded Priorities List process. The Council will continue to explore and implement additional opportunities to inform and engage the public such as social media, expanding the list of subscribers for automatic updates, and working with other restoration focused organizations to reach additional stakeholders. In implementing additional methods to inform the public, the Council will seek to revise public materials to provide state-specific materials and simple information on the next steps in the FPL process. In recognition of the challenges the Council experience in providing the Vietnamese translation of the Planning Framework draft, the Council provided a 7-day extension to public review and comment period. The Council will continue to work with the Vietnamese community and other Gulf stakeholders to provide information and incorporate public input.

Comment: Several commenters requested an independent review panel or a citizens advisory council be established, consisting of representatives from diverse backgrounds, including but not limited to social science researchers, natural/physical scientists, community representatives, fisher folks, and commercial fishermen. The commenters noted this group would review projects and identify the impacts of those projects. Another commenter suggested the group have a charter and by-laws modeled after similar Citizen Advisory Councils.

Response: The Council values the input from Gulf stakeholders from diverse backgrounds on the ultimate selection and funding of ecosystem restoration activities. The Council utilizes external, independent, science reviewers as well as a technical staff review panel to consider the application of best available science for Council Selected Restoration Component projects.

In the [2016 Comprehensive Plan Update](#), the Council committed to engagement, inclusion and transparency. One of those commitments was to refine the processes for considering public input on draft Funded Priorities Lists (FPLs) before finalizing changes to the final FPL. Another commitment specifies conducting project evaluation and selection in the most open manner feasible. With these commitments in mind, the Council will post the draft FPL proposed projects, including the outcome of the proposed project evaluations, for Gulf stakeholders review. This will allow stakeholders the opportunity to provide feedback on the impacts of proposed projects prior to the Council finalizing the FPL. Recognizing the importance of engaging stakeholders who are familiar with local ecological stressors, each Gulf Coast state continues to engage their stakeholders in the process of submitting and vetting projects.

While a citizens advisory committee can be effective in some scenarios, it is not clear that such a tool is appropriate in light of the Gulf-wide nature of the Council's work. An effective citizens' committee must represent a broad and diverse range of stakeholders, yet should not be so large as to hamper logistics, dialogue, and internal consensus-building. The Council's work is relevant to a wide array of stakeholders representing businesses, fishing communities, environmental organizations, advocates of good government, scientists, members of academia, and a diverse group of citizens. It is unclear how a reasonably-sized citizens advisory committee could effectively represent such a broad array of stakeholders while not being so large as to be ineffective. In fact, the selection of the members of such a committee could result in the exclusion of others, possibly working at cross purposes with the intent of increased transparency and

inclusiveness. The Council remains open to considering other ways to improve transparency in all that it does.

Economic Ties

Comment: Several commenters highlighted connections between ecosystem restoration and local, regional, and national economies. Some voiced concerns around the impact of restoration activities on fishers who live and work in the Gulf Coast. Others noted the importance of healthy ecosystems on ecotourism industries. Several commenters also identified potential restoration activities as opportunities for stakeholders to engage in industry/corporate partnerships, support minority-owned businesses and community-led initiatives, and monitor socioeconomic outcomes -- especially for those whose livelihoods depend on renewable natural resources.

Response: The Council values these concerns, as they speak to the multifaceted impacts of ecosystem degradation on Gulf economies, and especially the fishing industry. The Council seeks to develop and implement ecosystem restoration projects and programs that will help ensure the Gulf's natural resources are sustainable and available for future generations, with the understanding that these activities can have both environmental and human effects, including socioeconomic effects. The Planning Framework will assist the Council in selecting projects and programs for FPL 3 that meet RESTORE Act priority criteria, including those that will restore long-term resiliency of the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands. Proposals for FPL funding will include, as appropriate, a discussion of potential risks and benefits associated with the project or programs, and this includes potential socioeconomic impacts. With this in mind, the Council appreciates that these comments highlight both place-specific and Gulfwide socioeconomic needs, and will consider this input as it plans future investments in projects and programs that will restore long-term resiliency of the natural resources that support our vital Gulf economies.

Coordination with other Projects and Programs

Comment: Many comments were received appreciating the Council for its commitment to collaboration and coordination in developing the Planning Framework. Commenters encouraged the Council to continue to coordinate and collaborate with funding partners (especially DWH NRDA, other RESTORE funding streams, and NFWF), local authorities, and the public as it develops FPL 3 in order to ensure synergy with other efforts throughout the Gulf. One commenter also encouraged the Council to consider working with non-

governmental organizations (NGOs) to help educate the public, as well as implement restoration.

Response: The Council is pleased that its efforts to increase collaboration with others have been recognized and appreciated. This commitment will continue to be a part of how the Council conducts its work to select and implement restoration projects and programs. As part of implementing the 2015 Initial FPL, the Council worked directly with some members of the NGO community as well as other government programs to implement specific restoration projects. Although it is not yet known what projects will be selected for FPL 3 funding, the Council will continue to seek opportunities to work with experts in the community, both formally and informally, to ensure these future investments reap the greatest benefits possible.

Specific Projects for Future Consideration

Comment: Some commenters recommended that the Council consider specific projects, including projects that could have ecological and community resilience benefits. One commenter recommended against certain projects and types of projects (including marsh management).

Response: The Council appreciates the interest and advocacy for specific restoration projects. The Planning Framework is not intended to list or promote specific restoration projects. The comments received as part of the Planning Framework draft public comment period will be considered in the development of FPL 3. The Council encourages stakeholders interested in advancing certain projects to remain engaged in the FPL development process. Similarly, the Council encourages those who might have concerns with certain restoration approaches to remain engaged in the FPL process.

General Comments on Program Documents

Comment: Many comments were received commending the Council for developing the Planning Framework, recognizing it as another step toward its commitments to collaboration, transparency, and application of best available science. Others noted that the Planning Framework can be an important tool to identify priorities and sharpen future investments, and appreciated the Council for thinking beyond political and jurisdictional bounds when considering the restoration needs of the Gulf of Mexico ecosystem. One commenter cautioned the Council to be less focused on the bigger picture of the needs of the Gulf, as to avoid becoming blind to near-term or more regional needs. Another commenter noted that the Planning Framework needs to be adaptable enough to handle

surprises, and the Council members need to be open to adaptation when the need arises. One commenter also stated that the [2016 Comprehensive Plan Update](#) helped inform how their city council is moving forward with its county plans.

Response: The Council appreciates the positive reception many had for both the 2016 Comprehensive Plan Update and the Planning Framework draft and for the recognition that it was created to support the selection of restoration investments. As stated in the Planning Framework draft, the Council recognizes the need to be flexible in its decision-making in order to be responsive to changing conditions. To underscore that need, the Council has added language to Section 1.1 of the Planning Framework to emphasize the importance of adaptation, including being responsive to episodic events such as hurricanes and major river flooding events (such as the 2019 Mississippi River flood).

Adaptive Management and Monitoring

Comment: Several comments were received regarding support for meeting the Council's Comprehensive Plan commitments to best available science, measuring and delivering results, and adaptive management. These comments highlighted a desire for a continuation of the Council's Monitoring and Assessment Workgroup (CMAWG), the need for the Council to adopt consistent monitoring metrics and protocols for the FPL 3 projects and programs that will allow for the Council to track restoration success, and review and revise future restoration priorities as needed. It was also suggested that the Council adopt, to the extent possible, the protocols described in Appendix E of the [Deepwater Horizon Natural Resources Damage Assessment \(NRDA\) Monitoring and Adaptive Management Procedures and Guidelines Manual](#) to help increase coordination across restoration programs.

Response: The Council agrees that consistent metrics, monitoring protocols, and data management across Council funded projects and programs is needed to help the Council meet its Comprehensive Plan commitments to delivering results and measuring impacts and adaptively manage its investments. The Council plans to continue its support of the CMAWG moving forward, and will work with the CMAWG to identify consistent metrics and monitoring protocols for FPL 3 project techniques ahead of project implementation. To limit redundancy and increase coordination across restoration programs, the CMAWG will also coordinate and build off of the NRDA Cross-Trustee Implementation Group Monitoring and Adaptive Management activities and guidance documents, as appropriate, including the NRDA Monitoring and Adaptive Management Procedures and Guidelines Manual.

Comment: One commenter suggested the Planning Framework should also include a monitoring plan with metrics and adaptive management strategies.

Response: While the Council recognizes the Planning Framework has not yet identified activities to the level of detail required to include metrics and specific adaptive management strategies, the Council and CMAWG plan to use the priorities identified in the Planning Framework as a path to guide the development of monitoring metrics, data and adaptive management protocols.

Project Selection Process

Comment: One commenter asked whether the Council recommends that stakeholders work with specific Council members to advance restoration projects for FPL funding.

Response: The Council members welcome public input throughout the FPL development process. The method in which individual Council members engage the public in coastal restoration varies from member to member. In some states, recommendations for specific projects may be sought through a public portal. In other areas, project proposals are vetted and evaluated through a comprehensive planning process. The Council encourages stakeholders wishing to advance specific projects to engage with the member(s) that may consider such a project within their state boundary and/or mission.

Comment: One commenter asked for a summary of the FPL development process. Another commenter recommended the Council develop a publicly-articulated, transparent, and science-based project selection process.

Response: The FPL development process is based on collaboration among Council members and with interested stakeholders. The Council developed the Planning Framework to help guide the development of specific project and program proposals. Next, Council members will develop and discuss preliminary concepts for FPL funding. These member discussions are expected to help refine concepts, further identify opportunities for partnering and leveraging, and possibly remove from consideration concepts that are not viable at this time. Council members will continue to consider the best way to move toward FPL development, as further informed by the preliminary concepts collaboration process. Based on this continued collaboration, members will then develop and submit proposals to the Council for inclusion in FPL 3. Proposals will be posted on the Council's website. Council staff will review each proposal for compliance with the RESTORE Act priority criteria, conformity with the Comprehensive Plan, and compliance with applicable environmental laws. Proposals will also be evaluated for best available

science requirements by three external scientists, as well as an internal panel of Council member technical experts (see response below). A summary of these reviews will be made available to the public on the Council's website. Using this information, the Council will then develop a draft FPL, which will be provided to the public for review and comment. The Council will consider and respond to public comments, making changes to the draft FPL, as appropriate. The Council will then hold a vote to determine whether to approve the FPL. For an FPL to be approved, it must receive an affirmative vote from at least three state members and the Council Chair (currently the U.S. Environmental Protection Agency), who casts one vote on behalf of all six federal agencies. If approved by the Council, the final FPL will be available on the Council's website.

Comment: There were a number of comments pertaining to Council priorities. One asked: What are the priorities? Other commenters recommended that the Council improve the way in which FPL proposals are evaluated relative to priority criteria set forth in the RESTORE Act, as well as the Council's goals and objectives. These commenters recommended that this be included in the Council's guidelines for FPL proposals.

Response: The RESTORE Act sets forth four priority criteria for project and programs under Bucket 2, and requires the Council develop a Comprehensive Plan to strategically guide its Bucket 2 funding decisions. The Council's Comprehensive Plan sets forth goals, objectives, and commitments for Gulf restoration. The Council's overarching priorities for Gulf restoration are the RESTORE Act priority criteria and Comprehensive Plan goals, objectives, and commitments. The Planning Framework serves as a bridge between these overarching priorities and specific projects and programs contained in an FPL. The Planning Framework helps focus on restoration approaches, techniques, and geographic areas that the Council believes are most appropriate to advance its priorities for a specific FPL. The Council provides its members with guidance to help ensure that proposals for FPL funding align with the aforementioned priorities. This guidance is provided in a document called the "Council Member Proposal Submission Guidelines For Comprehensive Plan Funded Priorities List of Projects and Programs" (or "Submission Guidelines"). In 2019, the Council updated the Submission Guidelines based on lessons learned from the 2015 Initial FPL. The updated Submission Guidelines provide additional guidance to Council members on addressing the RESTORE Act priority criteria, along with other information to support the development and evaluation FPL proposals relative to the Council's restoration goals, objectives, and commitments. These updated Submission Guidelines will be available on the Council's website (www.restorethegulf.gov) prior to the Bucket 2 application period.

Comment: Some commenters recommended that the Council utilize habitat suitability modeling for project evaluation and selection in conjunction with other project selection tools and other approaches. Other commenters recommended that the Council utilize Audubon's recently released Gulf conservation plan, "[Audubon's Vision: Restoring the Gulf of Mexico for Birds and People](#)", as one tool for project selection as the Council prepares FPL 3 for addressing Gulf birds and stakeholders.

Response: The Council recognizes the potential value of such tools in developing and assessing restoration proposals. The Council's current process for evaluating FPL proposals is summarized in the preceding response. While such models are not a formal part of the proposal review process, individual members may, as appropriate, use such tools in developing proposals for FPL funding.

Comment: One commenter recommended that the public should be able to comment on proposed projects prior to their selection for the draft FPL, and encouraged the individual Council members to engage the public as they develop projects.

Response: In developing the 2015 Initial FPL, the Council provided the public with an opportunity to provide comments on the draft FPL. The FPL development process now involves two opportunities for public review and comment: once during the development of the Planning Framework, then again on the draft FPL. In addition, FPL proposals will be made available to the public for review on www.restorethegulf.gov as the Council solicits input on the draft FPL. The FPL public input opportunities are in addition to public engagement that occurs at the member level during the project development process, such as through portals, planning processes, and others. While adding a third public input opportunity to the FPL process would further increase public engagement, the Council must balance such process considerations with the equally important public interest in achieving timely on-the-ground restoration results.

Comment: The Council received support for the proposed linkages between stressors and restoration approaches and techniques in the Mobile Bay watershed. Other commenters encouraged the Council to go further in identifying primary stressors within priority watersheds and geographies, and more clearly tie restoration approaches to known stressors within priority geographies.

Response: The Council agrees the techniques and approaches applied in a given watershed and/or estuary must reflect the stressors and other factors specific to a given geographic area. Proposals for FPL funding will, as appropriate to the scale of the proposed project or

program, provide watershed- and/or estuary-specific information to support application of the given approach and technique, including discussion of relevant stressors and other conditions within the geographic area.

Comment: Some commenters emphasized the need for a science-based selection process.

Response: Under the RESTORE Act, approved FPL projects/programs must be based on and conducted according to best available science. The Council's [2016 Comprehensive Plan Update](#) made explicit commitments to application of best available science in the selection of programs and projects funded in Bucket 2. Council members will consider existing scientific tools and information in developing and evaluating proposals. In addition, FPL proposals will be independently reviewed by at least three external expert science reviewers. In this case, "external" refers to reviewers outside of the Council member agencies sponsoring the specific projects and programs under review. In general, one of these reviewers will be from the Gulf state most directly linked to the proposal (e.g., a reviewer from the state in which the proposed activity will take place), and the other two reviewers will be from another state in the Gulf of Mexico region (the states of Alabama, Florida, Louisiana, Mississippi, and Texas), or from outside of the Gulf of Mexico region. For proposals that cross state boundaries, reviewers will be identified based on familiarity with the appropriate watershed or gulf-wide perspective. In addition to the use of three external best available science reviewers, the FPL 3 review process will also include an internal best available science proposal review panel. The best available science proposal review panel will be composed of Council member agency technical staff, and facilitated by Council staff. The purpose of this panel will be to use Council member-agency expertise to address external best available science review concerns, and potentially identify project and program synergies not identified prior to proposal submission. The ultimate goal of this process is to provide Council members with substantive best available science content to inform their decision-making.

Comment: One commenter recommended against approving broad or overarching programs in the FPL unless specific projects or groups of projects are articulated within those programs that are fully developed and held to the same standards as other project-level proposals.

Response: The RESTORE Act allows for funding of both projects and programs in Bucket 2. As defined in the Council's [2016 Comprehensive Plan Update](#), programs must consist of intrinsically-linked restoration and/or conservation activities that must be implemented together in order to achieve the desired outcome. A program should also have a common

set of performance measures to effectively assess and measure outcomes. Given these considerations, programs can be an effective restoration approach in some situations. For example, programmatic restoration approaches are suitable where a stressor is dispersed across a broad area, requiring a systematic approach to identifying and implementing the most effective restoration actions to address that stressor. In some cases, such as a land acquisition and habitat conservation program, specific tracts might not be identified in the FPL proposal. Similarly, a water quality program using agricultural best management practices might not identify specific agricultural tracts at the FPL stage. The Council Member Proposal Submission Guidelines For Comprehensive Plan Funded Priorities List of Projects and Programs, which was updated in 2019 and will be available at www.restorethegulf.gov, describes the information content and review process for FPL proposals. In addition, for proposed programs where specific projects are not specified at the FPL stage, the Council will consider including information such as the criteria and processes that will be used to develop and approve such projects. Doing so could enable the Council and members to understand and evaluate the specific actions that will be carried out under a proposed program.

Planning Framework Scope

Comment: Questions were raised regarding the scope of the Planning Framework, with one commenter questioning whether it is too broad and flexible, while another questioned whether it should be expanded to be a “comprehensive plan” for Gulf restoration. Additionally, some comments noted that the Council should use the Planning Framework as a guide to ensure future projects build on past projects, incorporate adaptive management, complement projects funded through other DWH funding streams, and make strategic investments in projects that will provide comprehensive benefits to the overall Gulf ecosystem.

Response: The Council recognizes the important role it plays in developing strategies and implementing projects that ensure the Gulf’s natural resources are sustainable and available for future generations. As part of its commitment to increasing collaboration, transparency, and application of best available science in its decision-making process, the Council decided to develop the Planning Framework in advance of selecting projects and programs that would be funded in FPL 3. The Planning Framework represents an element of the FPL development process and is being used for the first time. Because it is new, the Council carefully considered the purpose and scope of this document. Ultimately, it was decided not to develop an additional comprehensive plan for the Gulf because of the diverse issues and priorities that exist. The Council chose to develop a document that is specific to its work and serves as a “bridge” between the current Comprehensive Plan and

FPLs, and from one FPL to the next. Also because this is the first time the Council has developed such a document, it recognized that flexibility would be needed in developing FPL 3. While the Council will consider this Planning Framework as it determines funding priorities for FPL 3, it is retaining the option to fund some projects that may not be reflected in the Planning Framework. The Council views the Planning Framework as a “living document” that will support the Council’s continued efforts to build upon prior restoration investments during the project or program selection process. As part of the development process for future FPLs (e.g., FPL 4, FPL 5, etc.), this Planning Framework will be reviewed, revised, and potentially broadened or narrowed, as needed.

Comment: Some commenters believe the geographic areas included in the Planning Framework are too broad. These commenters generally recommend narrowing the geographic scope of the Planning Framework in order to focus more closely on high priority watersheds and estuaries. Other commenters offered support for the specific watersheds identified in the Planning Framework. One commenter questioned why certain geographic areas were not included in the Planning Framework.

Response: The Planning Framework is considered to be a “bridge” between the Council’s broad goals and objectives and the specific FPL projects and programs. The degree of geographic specificity in the Planning Framework reflects the balance between the Gulfwide focus of the Council’s Comprehensive Plan and the specific watershed and/or estuary locations of projects and programs in an FPL. The geographic scope of the Planning Framework varies in different parts of the Gulf; in some areas it is state-wide, whereas a specific watershed or basin is identified elsewhere. This variation reflects a number of factors, including the state of restoration planning for a given area and the geographic extent of stressors the Council seeks to address in other parts of the Gulf. In some areas, Council members might have existing plans with specific projects, thus enabling a higher level of geographic focus for FPL funding consideration. In other areas, pressing environmental problems that are being considered for FPL funding may be statewide, and further planning and assessment may be needed to identify the most effective projects and locations to address that broad environmental concern. The current Planning Framework is the first iteration of a restoration strategy that will likely change and mature as the Council learns from ongoing and proposed restoration efforts, and in response to enhanced scientific understanding of environmental stressors and other factors. The geographic scope of the Planning Framework may become more focused, while representing a strategic bridge between the Comprehensive Plan and specific restoration actions in an FPL. Finally, it is important to note that areas not included in the Planning Framework may be priorities for investments from other funding sources. The exclusion of an area from the

Planning Framework does not indicate that the given area is not a priority for coastal restoration investments in general and may be the focus of other funding sources. To that end, the Council’s collaborative focus seeks to optimize its efforts with other ongoing work funded by NRDA, NFWF, and other restoration efforts.

Comment: In discussing the geographic scope of the Planning Framework, some commenters specifically emphasized the value of using a watershed approach in restoration planning, and encouraged the Council to more effectively employ this approach within the Planning Framework.

Response: The Council remains committed to using a watershed and/or estuary approach in restoration planning, which is a foundational element of its [2016 Comprehensive Plan Update](#). The geographic scope of the Planning Framework varies due to different factors. In some areas, the Council is able to identify specific watersheds, whereas other areas have a broader geographic scope. Under any scenario, the Council will consider and, where appropriate, use watershed- and estuary-level planning to guide the development, assessment, and selection of proposed FPL projects and programs.

Use of Comprehensive Plan Goals and Objectives

Comment: Several commenters suggested expanding the list of potential primary objectives that could be accomplished using particular priority approaches and techniques.

Response: The priority approaches identified in the Planning Framework can be employed to support many different restoration objectives, including the RESTORE Council objectives identified in the Comprehensive Plan. The Planning Framework distinguishes direct benefits of a priority approach as the primary objective being supported, while indirect benefits support secondary objective(s). The distinction between primary and secondary objectives is intended to be useful as the Council develops guidance around tracking and monitoring the benefits of its projects and programs. For example, “Land acquisition” or “Habitat management and stewardship” techniques employed as part of the approach “Protect and conserve coastal, estuarine, and riparian habitats” can greatly benefit water resources, supporting the Comprehensive Plan Objective “Restore, improve, and protect water resources”. These benefits occur through the direct benefits provided to habitat. In other words, by acquiring and successfully managing habitat area, water quality impairments may be reduced to the watershed. To track the success of these projects it will be important to track benefits to habitat. Benefits to water resources may then also be tracked. For this reason, the primary objective of techniques under the

“Protect and conserve coastal, estuarine, and riparian habitats approach” is “Restore, enhance, and protect habitats”.

Comment: Several commenters suggested that the Council should narrow the objectives from how they were defined in the Comprehensive Plan.

Response: The objectives laid out in the Council’s [2013 Initial Comprehensive Plan](#) and restated in its [2016 Comprehensive Plan Update](#) were extensively reviewed and available for public comment as part of finalizing these documents. As comments indicated, the Comprehensive Plan Objectives are expansive in scope. With the Planning Framework, the Council has sought to provide more specificity regarding how it may consider meeting these objectives. To that end, this Planning Framework signals potential priorities for projects and programs that may be included in FPL 3. By providing a bridge between the Comprehensive Plan and FPLs and from one FPL to the next, the Planning Framework will be reviewed, revised, and potentially narrowed, as needed as part of developing future FPLs (beyond FPL 3).

General comments related to ecosystem restoration for wildlife health (e.g., birds, fish)

Comment: Many commenters expressed a desire for coastal habitat restoration that would benefit wildlife. In particular, commenters stressed the importance of the Gulf Coast to birds, emphasizing the need to address the damage done to avian species as a result of the *Deepwater Horizon* oil spill.

Response: The Council recognizes the value of Gulf ecosystems to a wide array of migratory, resident and endangered species of birds. The Council also acknowledges that habitat degradation, including effects from the *Deepwater Horizon* oil spill, have and continue to impact avian species in the Gulf of Mexico. While other funding partners have a specific goal of restoring bird populations in the Gulf (e.g., the NRDA Trustee Council) the Planning Framework approaches and techniques prioritize actions that would benefit avian species through multiple habitat conservation and restoration actions. For example, the restoration approach of “Protect and conserve coastal, estuarine and riparian habitat” can reduce the loss and degradation of habitats critical for birds during both the migratory and breeding seasons.

Other

Comments: A total of 2861 members of the Audubon Society submitted a form letter. In some instances, individual members edited the form letter with their own unique comments. Additionally, one commenter submitted their correspondence multiple times.

Response: The content of the duplicate correspondence, including the unique comments added by individuals, has been addressed in other comment summaries and associated responses.

Comments: Many comments while related to the *Deepwater Horizon* Oil spill or other restoration and protection efforts in the Gulf of Mexico, did not specifically address this Planning Framework. Additional comments were received that did not pertain to the Gulf of Mexico or ecosystem restoration.

Response: The Council acknowledges and appreciates these additional comments. To the extent that they may inform selection of projects and programs for FPL funding, the Council will take them into consideration in the future.

Comments: Several clarifying questions on process and statements of intent to attend in-person public meetings were made during two public webinars that the Council hosted at the start of the public comment period on the Planning Framework Draft.

Response: During these webinars, the Council provided answers to process-related questions and posted those responses to the Council's website. Those responses may be found here: <https://www.restorethegulf.gov/outreach/restore-education-series>.

Comment: Many comments were received expressing concern about oil and gas industry regulations with respect to the potential impacts of oil spills on Gulf of Mexico habitats and the health of residents.

Response: The Council acknowledges the concerns expressed regarding both the impacts of the *Deepwater Horizon* oil spill and impacts from potential future spills. The Council's authority is to provide for ecosystem restoration, and it has no regulatory authority with respect to the oil and gas industry. The Council acknowledges that acute events (e.g., hurricanes, major river floods, or oil spills) may occur throughout the lifetime of this program, and it intends to be adaptive to addressing those events to the extent that they impact the Council's mission of ecosystem restoration.