

**Proposed Funded Priorities List (FPL) Amendment for  
Comprehensive Plan Commitment and Planning Support  
*Response to Public Comments*  
Public Comment Period: June 17 - July 2, 2020**

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# Response to Comments

## Introduction

From June 17, 2020 to July 2, 2020, the Gulf Coast Ecosystem Restoration Council (Council) sought public comment on a proposed amendment to its [2017 Funded Priorities List: Comprehensive Plan Commitment and Planning Support](#) (2017 CPS FPL). The proposed amendment would provide staffing for the maintenance of the Gulf of Mexico Long-Term Monitoring Network Inventory (Monitoring Inventory) database and web services. This inventory was developed as part of the Council Monitoring and Assessment Program (CMAP) funded under the [Council's 2015 Initial Funded Priorities List](#), and is sponsored by the U.S. Department of Commerce/National Oceanic and Atmospheric Administration (DOC/NOAA).

The funding for this amendment is available by reallocating funds previously approved in the [2017 CPS FPL](#). The 2017 CPS FPL approved up to \$2.1M over five years to each Council member to conduct planning, partner collaboration, and other related activities in support of meeting commitments made in its [2016 Comprehensive Plan Update: Restoring the Gulf Coast's Ecosystem & Economy \(2016 Comprehensive Plan Update\)](#). The Council realized cost-savings in conducting these activities that may be redirected to provide support for the Monitoring Inventory, thus eliminating the need to apportion new funds from the Gulf Coast Ecosystem Restoration Trust Fund (Trust Fund). Specifically, the Council is proposing to approve providing DOC/NOAA \$125K to continue support for the Monitoring Inventory for 12 months. This amount would be in addition to the existing award of \$2.1M for DOC/NOAA to conduct other activities allowed under the 2017 CPS FPL.

During the public comment period, the Council solicited public comments via posting at [www.restorethegulf.gov](http://www.restorethegulf.gov) as well as via eBlast email notification. The Council accepted written comments digitally via email. The Council has reviewed all comments received by the above deadline. Four individuals submitted comments. 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.

## Summarized Comments and Responses

### Comments in Support of the Proposed Amendment (3 total)

In total, three commenters submitted comments expressing support for the proposed amendment.

**Comment:** Three commenters expressed support for the CPS FPL amendment to provide continued staffing and maintenance of the CMAP Monitoring Inventory database and web services. These commenters highlighted the value of maintaining a current monitoring inventory, network and web interface to provide a foundation for science-based decision-making related to Gulf Restoration. One commenter noted that the monitoring inventory will also help prevent the duplication of monitoring efforts and facilitate collaboration across efforts.

**Response:** The Council appreciates the commenters' expressed support for the proposed amendment, and agrees that maintenance and updating of the monitoring inventory, network and web interface will continue to enhance science-based decision-making and collaborative efforts around Gulf Restoration.

**Comment:** Two commenters provided specific examples of how information from the Monitoring Inventory is already being applied to current restoration programming, while others noted that this information will retain its relevance and utility to such efforts in the future if updated regularly at consistent intervals and accessible in a common location through web-based applications.

**Response:** The Council agrees that this investment in staffing for the maintenance of the Monitoring Inventory database and web services will help to maximize the benefits that the tool currently provides to ongoing restoration efforts and planning, and appreciates these commenters for highlighting examples of successful application of the inventory.

**Comment:** In highlighting the value of Monitoring Inventory data to restoration practitioners and researchers, one commenter offered the recommendation that information in the Monitoring Inventory, as well as monitoring data collected by RESTORE-funded projects and programs, be aligned with similar tools, specifically NOAA's Data Integration Visualization Exploration and Reporting (DIVER), in an effort to standardize and consolidate all data collected from DWH-related restoration efforts. To this end, the commenter encouraged the council to pursue a more coordinated approach to data storage with the NRDA trustee Council.

**Response:** The Council appreciates this commenter for highlighting the importance of coordinated and collaborative approaches to data storage and management. The Council strives to continually meet its commitments to monitoring and adaptive management, and the use of Best Available Science, and in doing so, approved the Council Monitoring and Adaptive Management Guidelines in December 2019. In line with these guidelines, the Council approved the Council Monitoring and Assessment Work Group (CMAWG) to continue efforts that will encourage the compatibility of monitoring and data management procedures through Fiscal

Year 2020-21. The CMAWG will also serve as a forum for the Council to collectively address monitoring and adaptive management topics relevant to the Council's Gulf restoration funding partners, including the NRDA Trustee Council.

## **Comments Opposing the Proposed Amendment (2 total)**

One commenter submitted comments that shared concerns about approving the amendment to the 2017 CPS FPL to provide staffing for the maintenance of the Gulf of Mexico Long-Term Monitoring Network Inventory (Monitoring Inventory) database and web services.

**Comment:** One commenter expressed opposition to the proposed amendment, citing concerns around a lack of data to quantifiably justify such an expenditure.

**Response:** Developed as part of the larger CMAP, the Monitoring Inventory is one element of a collaborative effort to leverage existing resources, capacities, and expertise and build on existing monitoring data and programs. The inventory includes information about existing habitat and water quality monitoring programs, data, protocols, and standards. Maintenance of the inventory is critical to the overall utility of this information to Council members and their ability to take advantage of existing data and future data collection efforts of other programs at multiple scales.

Because the Council realized cost-savings in conducting activities funded under its 2017 CPS FPL, the proposed amendment seeks to redirect these savings to provide continued support for the maintenance of the Monitoring Inventory, maximizing benefits of these tools for use in restoration efforts.

**Comment:** One commenter recommended that a comprehensive financial assessment of this and other FPLs be conducted before any amendments to reallocate said funding. Further, the commenter felt that unused allocated funds should be returned to the Treasury and used in historically underserved communities for planning and technical assistance as intended to ensure inclusion of directly impacted Black historically disenfranchised individuals, families and communities of the Gulf region.

**Response:** While the purpose of this amendment is to maximize the benefits that the Monitoring Inventory tool currently provides to ongoing, collaborative restoration and planning efforts, the Council appreciates this commenter for highlighting the importance of including historically Black, disenfranchised communities in such efforts. To date, the Council has made other investments in capacity-building for communities under the Council-selected restoration component. Programs such as the Gulf Coast Conservation Corps, which was initially funded under the 2015 Initial FPL and recently approved for additional funding under an FPL amendment approved in May 2020, have provided positive ecosystem benefits and supported increased capacity-building through jobs training. However, the Council recognizes that highlighting such efforts does not fully address the commenters' concerns regarding the

inclusion of historically Black, disenfranchised communities. The Council regularly reviews its processes and will consider additional mechanisms to cultivate greater inclusion in its activities.

## **Comments Regarding the FPL Amendment Process (2 total)**

Two commenters submitted comments with feedback regarding the Council's FPL amendment process and public comment period.

**Comment:** One commenter expressed concern the 15-day comment period provided for the proposed amendment was insufficient to ensure meaningful engagement, transparency, and accountability.

**Response:** The Council appreciates this commenter's feedback on the public comment process. The Monitoring Inventory activities previously underwent a full 45-day public comment period as part of the approval process for the Council Monitoring and Assessment Program under the Council's 2015 Initial FPL. Because of this, a 15-day public comment period is consistent with the Council's Standard Operating Procedures for public comment on proposed FPL amendments. That being said, the Council acknowledges the commenters' concerns regarding the 15-day timeframe, and will take into consideration the suggestion to extend the public comment period for future proposed amendments.

**Comment:** Another commenter expressed support for the amendment itself, they also felt that the Council website ([www.restorethegulf.gov](http://www.restorethegulf.gov)) should utilize a more transparent, accessible method for advertising availability of FPL amendments for public comment.

**Response:** The Council appreciates this commenter's recommendations for CPS FPL amendment and is working to revise how comments are posted on the website to improve upon transparency and accessibility.

# Record of Comments Received

## Comments Received via Digital Submission

### 1. David Muth, National Wildlife Federation, Gulf of Mexico Restoration Program

Re: Proposed Funded Priorities List (FPL) Amendment for Comprehensive Plan Commitment and Planning Support (CPS)

Thank you for the opportunity to comment on the proposed amendment to the 2017 Funded Priorities List: Comprehensive Plan Commitment and Planning Support (CPS FPL) regarding the Council Monitoring and Assessment Program (CMAP) Gulf of Mexico Long-Term Monitoring Network Inventory (Monitoring Inventory) database and web services.

The National Wildlife Federation (NWF) has a long history of advocacy in the Gulf of Mexico region. In the wake of the Deepwater Horizon oil disaster and after the passage of the RESTORE Act, we have worked to support the recovery and restoration of the Gulf environment. We continue to advance coordinated, strategic, and science-based investments of funds resulting from the spill, with an emphasis on the health of the Gulf's estuaries. We have been following the Council's work and we applaud this next step to advance ecosystem restoration. On behalf of our more than six million members and supporters across the country, we write you in support of the CPS FPL amendment to provide continued staffing and maintenance of the CMAP Monitoring Inventory database and web services.

The CMAP has developed a comprehensive inventory of existing water quality and habitat monitoring databases and mapping programs across the Gulf of Mexico. The CMAP and the Monitoring Inventory provides baseline information that can be used as the foundation for science-based decisions regarding Gulf of Mexico restoration. The inventory of quantitative information is essential for accessing data to measure baseline conditions, as well as the results of restoration efforts underway across the Gulf.

As an example of the utility of the CMAP Monitoring Inventory, consider how the information assembled by the program is being applied to multiple Northwest Florida programs. Three new Estuary Programs are being established along the Florida panhandle; soon they will be developing Comprehensive Conservation and Management Plans (CCMPs). In addition, the Florida RESTORE Act Centers of Excellence Program (FLRACEP) is conducting a Florida panhandle estuary system assessment. Both the development of CCMPs as well as the estuary system assessments will require the

cataloging of baseline information on water quality and habitat in the region. In addition, the estuary programs will likely be seeking to identify parameters which they could monitor over time to assess changes to the health of their respective estuaries. The CMAP Monitoring Inventory provides necessary data and information for these efforts to be successful. The data will be most useful to restoration practitioners and researchers if it is updated regularly at consistent intervals and accessible in a common location through web-based applications such as geo-referenced web tools.

We strongly recommend that the CMAP Monitoring Inventory, and any monitoring data collected from specific RESTORE-funded restoration projects, be incorporated and aligned with other similar tools, specifically NOAA's Data Integration Visualization Exploration and Reporting (DIVER). Standardizing and consolidating all data collected from Deepwater Horizon-related restoration efforts in one central portal may require some additional upfront work and resources, but would pay dividends on the back end for assessing restoration impact and demonstrating restoration outcomes with BP funds. We strongly encourage the RESTORE Council to pursue a more coordinated approach to data storage with the NRDA Trustee Council.

While we support the amendment itself, we have concerns about the publication, advertising, and dissemination of information regarding this amendment. Whereas we were notified of the amendment via the RESTORE Council E-Blasts, the main Council website (<https://www.restorethegulf.gov/>) did not publicize the availability of the announcement. In addition, the Council website page with information on the FPL CPS (<https://www.restorethegulf.gov/2017-fpl-comprehensive-plan-commitment-and-planningsupport>) did not adequately explain the proposed amendment; it merely indicated in the middle of the page that the Council was seeking public comment. The only source of information on the content of the proposed amendment was through hyper-linked text: "*Learn more about how to comment.*"<sup>4</sup> Considering the likelihood of many more FPL amendments in the future, it is imperative that the Council develop a more transparent and accessible method for advertising availability of FPL amendments.

We encourage the RESTORE Council to approve this CPS FPL amendment and continue to maintain the CMAP Monitoring Inventory database and web services. This program provides a mechanism to quantify the tangible ecosystem benefits provided from the investments in Gulf of Mexico restoration projects. Thank you very much for considering our input.

Sincerely,

David Muth, Director, Gulf of Mexico Restoration Program

## 2. Kara (Lankford) Fox, National Audubon Society

Dear Council Members:

The National Audubon Society (Audubon) is a nonprofit conservation organization whose mission is to protect birds and the places they need, today and tomorrow, throughout the Americas. Audubon has had a presence on the Gulf Coast for nearly a century and is invested thoroughly in the region. Audubon staff are working to advance restoration, conservation, and stewardship with the goal of having healthy and resilient coastal and marine ecosystems that support populations of birds, fish, wildlife, and people throughout the Gulf's five coastal states. On behalf of our over 1.7 million members, Audubon appreciates the opportunity to comment on the proposed amendment to the 2017 Funded Priorities List (FPL) Comprehensive Plan Commitment and Planning Support (2017 CPS FPL) to provide staffing for the maintenance of the Gulf of Mexico Long-Term Monitoring Network Inventory (Monitoring Inventory) database and web services.

Audubon is highly supportive of this proposed amendment. Maintaining a Gulf-wide monitoring inventory, network and web interface will provide benefits to scientists, restoration planners and resource managers around the Gulf. Long-term monitoring is critical to measure restoration effectiveness. Beyond collecting data, restoration project data should be analyzed to evaluate progress and metadata should be cataloged and readily available. The Monitoring Inventory is a critical component of cataloging and sharing monitoring metadata across the Gulf. In addition, the Monitoring Inventory is a tool to identify existing data sets that can be used to determine reference conditions, inform project goals and measure ecosystem trends. The long-term monitoring inventory and network will also help prevent duplication of monitoring efforts and identify opportunities for collaboration across monitoring efforts. All of which have the potential to create efficiencies, cost savings and a deeper understanding of restoration techniques and environmental processes. One of the challenges when creating an inventory is the necessity to update information so that it stays current as monitoring programs come on and offline. Therefore, we are encouraged to see the Council investing in staff to maintain the Monitoring Inventory which will help keep it relevant. As a whole, Audubon sees great benefit in the continuation of this program and the Monitoring Inventory and we strongly encourage the Council to commit to regularly updating the Monitoring Inventory.

Please feel free to reach out if we can be of any assistance.

Sincerely,  
Kara (Lankford) Fox  
Director, Gulf Coast Restoration  
National Audubon Society

### **3. Jim Muller, Bay County, Florida**

I fully support the Council's proposed amendment to continue funding for the Long-Term Monitoring Network Inventory. This will allow the Council's investment in the Inventory to maintain its value over time. Bay County is establishing the St. Andrew/St. Joe Bays Estuary Program, and the type of accurate, up-to-date information provided by the Inventory is essential to help set priorities both for improvement of our watershed and for future water quality monitoring efforts.

Jim Muller  
Bay County RESTORE Act Coordinator

### **4. Jackie Antalan, Operation Homecare**

We oppose the proposed amendment of its 2017 Funded Priorities List: Comprehensive Plan Commitment and Planning Support(2017 CPS FPL) to provide staffing for the maintenance of the Gulf of Mexico Long-Term Monitoring Network Inventory (Monitoring Inventory) database and web services due to the lack of actual data which quantifiable justify the expenditure.

The current lack of involvement of the stakeholders who live, work, and play in the Gulf region directly reflect the Council's failure to ensure meaningful input/engagement, transparency and accountability by providing less than a 30 day comment period.

Consistent with past comments, we recommend that a comprehensive financial assessment of this and other FPL be conducted before any amendments to reallocate said funding. Further, unused allocated funds should be returned to Treasury and used in historically underserved communities for planning and technical assistance as intended to ensure inclusion of directly impacted Black historically disenfranchised individuals, families and communities of the Gulf region.

Sincerely,  
Jackie Antalan  
Dir. of Outreach & Programs