



RESPONSE TO PUBLIC COMMENTS ON DRAFT
INITIAL FUNDED PRIOTIES LIST

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Public Comments on the Draft Initial FPL and Responses

Introduction

On August 13, 2015, the Gulf Coast Ecosystem Restoration Council (Council) released the Draft Initial Funded Priorities List (“Initial FPL” or “FPL”) for a forty-five day public comment period. The ongoing involvement of the people who live, work and play in the Gulf of Mexico (Gulf) region is critical to ensuring that oil spill penalty dollars are used wisely and effectively. The Council thanks all those who participated in this public comment process as well as those who have been supporting Gulf restoration activities for many years. During the forty-five day comment period on this draft FPL, the Council held seven public meetings in the five Gulf Coast States, hosted a Tribal Engagement meeting in which seven Federally-Recognized Tribes participated and engaged with stakeholders across the region. The Council accepted written comments provided via mail, email and through our website. Oral comments were accepted during the following public meetings:

State	Location	Date	Time
Texas	Texas A&M University University Center - Lonestar Ballroom 6300 Ocean Drive Corpus Christi, TX	Aug. 20, 2015	6:00 p.m. Central
Florida	FWC Fish & Wildlife Research Institute 100 Eighth Ave. SE St. Petersburg, FL	Aug. 26, 2015	6:00 p.m. Eastern
Florida	Gulf Coast State College 5230 West US Hwy. 98 Panama City, FL	Aug. 27, 2015	6:00 p.m. Central
Alabama	The Battle House Renaissance Mobile Hotel 26 North Royal St. Mobile, AL 36602	Sept. 1, 2015	6:00 p.m. Central
Mississippi	MS Coast Coliseum & Convention Center (Room D) 2350 Beach Blvd. Biloxi, MS	Sept. 10, 2015	5:00 p.m. Central
Louisiana	University of New Orleans Homer L. Hitt Alumni Center 2000 Lakeshore Dr. New Orleans, LA	Sept. 15, 2015	5:30 p.m. Central
Louisiana	Morgan City Municipal Auditorium 728 Myrtle St. Morgan City, LA	Sept. 16, 2015	5:30 p.m. Central

In general, all comments are publicly available on the Council website, www.restorethegulf.gov, including any business or personal information provided, such as names, addresses, email addresses, or telephone numbers. All comments received, including attachments and other supporting materials, are part of the public record and

subject to public disclosure under the protocols established by the Council under the requirements of the Freedom of Information Act.

The number of stakeholders engaged during the public comment period, occurring over five years after the oil spill, reveals clearly that people still care deeply about the Gulf restoration. Approximately 500 people attended the seven public meetings and offered nearly 100 verbal comments. In addition, the Council received approximately 16,500 written comments, including private citizens, business and industry, other government entities (such as state, county and local), non-governmental organizations (NGOs), and others.

Comment Analysis Process

The Council is responding to verbal and written comments received during the public comment period. All comments have been carefully reviewed and analyzed. The Council's review and consideration of public comments is a critical step in the FPL development process. In addition to raising issues pertinent to this FPL, public comments have also provided valuable insights, constructive criticism, and recommendations that will help improve subsequent FPL processes and inform the update of the Council's Comprehensive Plan.

Accurately capturing the large number of comments and the range of topics discussed was a key challenge that the Council took very seriously. The Council used the Department of Interior's Planning, Environment and Public Comment (PEPC) database to help manage public comments. In order to efficiently and effectively respond to the many observations and recommendations provided by the public, the Council decided to group comments and Council responses into general topics or themes, where possible. For example, common topics included the FPL process, use of the watershed approach, and updating the Comprehensive Plan. Within those groupings, individual comments were combined where the topic or recommendation was related. In other cases, such as public comments pertaining directly to specific projects, more specific and direct responses were warranted. The comments and Council responses are thus divided into two sections: overarching and state/watershed/project-specific.

Overarching Comments/Responses on the Draft Initial FPL

Initial Funded Priorities List

Comment: Please extend the public comment period to October 13, 2015. Vietnamese communities in particular need more time to review the FPL because the public comment period overlapped with shrimping season. Additionally, some members of the community request that the entire FPL be translated into Vietnamese and that the Council make special efforts to work with the community to explain the FPL and facilitate full participation the process.

Response: The Council is sensitive to the challenges facing the Vietnamese community and other stakeholders, particularly in underserved and disadvantaged communities, with respect to participation in coastal restoration. For this reason, the Council has translated both its Initial Comprehensive Plan and Initial FPL fact sheets into Vietnamese. In response to public comments on the draft FPL, the Council has sought to meet directly with members of the Vietnamese community to answer any additional questions they may have and to support effective engagement in the FPL process.

The request for an extended public comment period was balanced against the need to expeditiously finalize the FPL and advance coastal restoration. Many stakeholders have told the Council to act with greater urgency. Thus the Council is tasked with fully engaging the public while also not unduly delaying much-needed restoration work. In addition to the translations discussed above, the Council developed an array of public information tools to help facilitate robust public involvement in this FPL process, including printed fact sheets, the FPL narrative and appendices, and a user-friendly on-line FPL mapper. The Council believes that these information tools, the public meetings held across the Gulf, and the 45-day comment period provided robust public engagement opportunities. Looking ahead, the Council will continue to look for ways to further facilitate a full array of public involvement opportunities in coastal restoration.

Comment: The Gulf faces dire ecological threats. We need action, not more studies. Why has the Council proposed to spend so much money on planning, as opposed to actual implementation? Why have funds been reserved in Category 2 when they could be put to use implementing restoration projects? Implementation of the FPL should move forward quickly. Conversely, it was suggested that the FPL should fund technical assistance for critical projects that are not "near term" rather than focusing on "shovel ready" projects.

Response: The Council recognizes the need to act with urgency to restore and protect the Gulf's imperiled natural resources. The Council must also ensure that it is well-positioned to make the most effective use of future restoration monies. The Council is working to balance the need for immediate results with the equally pressing need to conduct the planning and engineering required to advance large-scale projects and programs that are not yet ready for implementation. With this first FPL, the Council is also investing in science, monitoring and other activities to create a strong foundation for future success. The Initial FPL thus contains a range of activities designed to provide substantial near-term environmental benefits, develop large-scale projects and programs, and build upon and contribute to the best available science.

The Initial FPL is divided into two categories. The first (Category 1) contains the projects and programs the Council is approving for funding now. The second (Category 2) lists activities that the Council is prioritizing for further review and potential funding. The Council's primary task was to develop the most effective FPL possible, one that complies most fully with the criteria and intent of the Resources and Ecosystems Sustainability,

Tourist Opportunities, and Revived Economies of the Gulf Coast States Act (RESTORE Act), and one that also complies with all applicable environmental laws. To that end, the Council focused on identifying the best projects and programs for the overall health of Gulf of Mexico ecosystems, without regard to geographic location.

Consistent with this urgency, the Council is including highly-effective implementation-ready projects in Category 1. However, the Council chose not to overlook promising proposals needing further study, analysis and/or environmental compliance. In such cases, the Council is funding the planning activities (in Category 1) needed to advance these projects to a stage where the Council (or another restoration entity) might have sufficient information to make an informed decision regarding whether to implement the project. All activities listed as priorities for further review in Category 2 also have funds approved in Category 1 to support such planning and environmental compliance work.

Comment: Has the Council coordinated its work with other restoration efforts? Has the Council sought to identify complementary projects and programs? How is the Council going to ensure that the benefits of one project are not being undone by another?

Response: The Council places a high priority on coordination with our Gulf restoration partners. Effective coordination with other Gulf restoration programs (including the National Fish and Wildlife Foundation (NFWF) and Natural Resource Damage Assessment (NRDA)) is essential for maximizing ecological and socioeconomic benefits, leveraging resources and avoiding duplication. In developing the Initial FPL, the Council coordinated extensively with a wide variety of public and private restoration partners. This enabled the Council to identify extensive opportunities for leveraging. This Initial FPL, if all proposed activities are fully implemented, leverages approximately \$1.27 billion in Gulf investments by other entities, translating to a leveraging ratio of \$7 for every dollar invested by the FPL. The Council greatly appreciates these partnerships and will continue to forge even stronger partnerships as we move forward.

The Council reviewed proposed projects and programs to ensure that there was no conflict among restoration activities. The Council sought to minimize the chances of such conflicts while maximizing the potential for synergistic interactions among approved activities. In Texas, for example, the Council is conserving valuable coastal habitat while plugging abandoned oil and gas wells that pose a threat to valuable natural resources in the same watershed.

Comment: Many public stakeholders expressed general support of the leveraging and coordination manifested in the Initial FPL.

Response: The Council worked hard to effectively coordinate with other Gulf restoration programs (including NFWF and NRDA). By developing a range of strong and collaborative partnerships, the Council was able to identify extensive opportunities for

leveraging. This Initial FPL, if all proposed activities are fully implemented, leverages approximately \$1.27 billion in Gulf investments by other entities. The Council sincerely appreciates the partnerships behind this impressive number, and intends to build upon this success by forging even stronger partnerships as we move forward.

Comment: The Council focused the Initial FPL on the goals of Habitat and Water Quality, but what about the other goals? Additionally, this and future FPLs should contain activities that benefit the quality of life of human communities.

Response: The Council seeks to meet all five goals outlined in the Initial Comprehensive Plan. Because this first FPL was developed with a limited amount of funding (stemming from the partial civil settlement with Transocean), the Council decided to focus on the first two goals. However, it is important to reiterate that this FPL does not represent a precedent for future FPLs. Moving forward, the Council will consider how to achieve all five goals, including increasing community resilience.

Comment: Why isn't more funding going towards private agricultural and forest landowners to support restoration when over 85% of lands around the Gulf are in private hands?

Response: Estuaries and other coastal waters depend in many ways on the lands around them. This is why the Council focuses much of the FPL on implementing watershed- and/or estuary-based conservation, restoration and management actions. Land-based activities can broadly affect water quality and quantity as well as a variety of aquatic habitats. For this reason private landowners play a critical role in Gulf ecosystem restoration. This FPL contains a number of activities designed to help address ecological needs associated with private lands. In some cases the Council is working with private landowners who want to conserve existing high-quality habitat. The Council is also working with farmers to implement a variety of land use best management practices designed to benefit Gulf water quality and quantity. The Council will build upon these private land programs in the future, as a critical part of comprehensive restoration.

Comment: The Council should include more blue water activities in the FPL. The Council should also identify a strategy for addressing restoration needs in the marine environment, which is left out of the "watershed approach" frame.

Response: Marine (or "blue water") resources were significantly impacted by the *Deepwater Horizon* oil spill. The Council agrees that comprehensive Gulf restoration must address such impacts, along with other ongoing ecological stressors to marine resources. Although the activities selected for this FPL focus on coastal and estuarine restoration, many of these projects and programs will provide indirect benefits to marine resources. For example, restoring and protecting coastal wetlands will improve habitat that marine species and/or their prey rely upon during some stages of their life cycles. Similarly, reducing pollutant loadings to coastal waters also benefit marine

systems. In commenting on the draft FPL, the Marine Mammal Commission noted that the habitat and water quality activities "could benefit certain marine mammals that inhabit the inshore and coastal waters of the northern Gulf, particularly bottlenose dolphins and manatees." In addition, coastal productivity is connected to the blue water environment and food webs offshore are often impacted by coastal conditions. Restoration of coastal watersheds and estuaries also improves the blue waters of the Gulf.

Looking forward, the Council will carefully consider marine resources as it develops subsequent FPLs and updates the Initial Comprehensive Plan. A key challenge will be determining the most effective role for the Council to play relative to other ongoing Gulf restoration efforts, particularly activities undertaken by NRDA and NFWF. The Council will continue to coordinate with these and other programs to help ensure comprehensive restoration, including the essential Gulf marine resources.

Comment: Why aren't there more beneficial use projects on the FPL, especially in the Lower Mississippi River?

Response: The Council recognizes the value of beneficial use (BU) of dredged material for habitat restoration. This FPL contains the Deer Island Beneficial Use project in Mississippi, which has the potential to be a cost-effective way for the Council to support marsh restoration in that estuary. The Council is also supporting planning efforts to advance additional BU projects. Looking forward, the Council commits to working closely with proponents of BU try to identify similar cost-effective and sustainable activities.

Comment: The project descriptions do not include information on how the Council calculated a project's expected lifespan nor do they indicate how sea level rise can be expected to affect a project. If this information was provided in the original proposal, it should be included in the draft. If it was not included, that information should be collected and included.

Response: There are a wide range of projects and programs in the FPL but no one-size-fits-all method for estimating project lifespan. The estimates provided in the activity appendices for each FPL project are based on the project sponsors' experience with such activities, and in some cases took into account factors such as sea level rise and other uncertainties. The Council acknowledges the importance of considering sea level rise and other uncertainties in project planning, to help ensure that coastal restoration investments are sustainable.

Comment: There was a request for more water quality infrastructure projects across the Gulf (similar to the project in Pensacola Bay via Beach Haven).

Response: The Council agrees that water quality infrastructure projects provide substantial and lasting water quality benefits. The Council will consider additional water quality infrastructure projects in the future.

Comment: We would like to see perpetual funding for long-term management of acquired and conserved lands.

Response: The Council agrees that long-term management of conservation areas can be critical for maintaining and enhancing habitat value. In some cases, lands acquired in this FPL will be added to federal or state managed lands, such as parks or refuges. To the extent that monitoring demonstrates that these natural habitats require active management, those expenses may be covered by budgets for these existing managed lands. For the Bayou Greenways project, lands acquired under this FPL would be preserved in perpetuity and maintained by the City of Houston. The Council will continue to consider the important question of long-term maintenance for conserved lands as it monitors activities taken under this FPL and develops future FPLs.

Comment: Some stakeholders provided general support for the land acquisition/conservation in Texas and Mississippi, and would like to see this approach taken across the Gulf. This should be a core Council strategy in future FPLs, including both public and private lands.

Response: The Council agrees that land acquisition/habitat conservation can be an effective approach to address habitat loss and fragmentation due to development and other land use activities. In addition to conservation actions in Texas and Mississippi, the Initial FPL also funds a tool to help identify high-value tracts for future conservation. The Council will consider additional land acquisition/habitat conservation projects in future FPLs.

Comment: The Council needs to evaluate the resources damaged by the oil spill and focus on those first, and should fund projects that have a strong nexus to the oil spill. There are still concerns about the damage to wildlife, habitats and seafood safety.

Response: The Council does not have the statutory authority to spend funds to assess the impacts of the *Deepwater Horizon* oil spill. That important task is being conducted under the provisions of the Oil Pollution Act through the NRDA process (<http://www.gulfspillrestoration.noaa.gov/>). The RESTORE Act does require the Council to prioritize projects that restore long-term resiliency to natural resources damaged by the spill, among other criteria for project selection. In this Initial FPL, the Council is advancing restoration projects in areas that were impacted by the spill. However, the ecological needs of the Gulf extend far beyond recovery from the spill and include long-term challenges relating to water pollution, habitat loss and other stressors. The Council is tasked with advancing the cause of comprehensive Gulf restoration and must focus on the major effects of ecological damage, regardless of their source.

Comment: Priority should be given to projects located in vulnerable/at-risk coastal communities, in addition to rural unincorporated communities.

Response: The Council recognizes that residents in vulnerable and rural unincorporated areas face challenges with respect to engaging in and benefiting from coastal restoration activities. The Council strives to engage all stakeholders in the process of selecting projects and programs, from urban to rural communities. However, the selection of projects and programs is guided first and foremost by the RESTORE Act, which does not set a preference with respect to rural areas and, in fact, mandates that the Council consider projects without regard to geographic location. To the extent that rural areas offer opportunities to advance comprehensive restoration, the Council will fully consider such options.

Comment: Some stakeholders expressed appreciation for the overall public engagement process and transparency, as well as the willingness of the Council and staff to meet with stakeholders both formally and informally. The public outreach materials were viewed by many as helpful (including the on-line StoryMap).

Response: The Council takes seriously our strong commitment to engagement, inclusion and transparency. The Council also recognizes that different types of stakeholder groups digest information in different ways; that is why the Council produced a variety of materials such as printed and on-line project fact sheets in English and Vietnamese, an online FPL with links to tables with additional details, and an on-line StoryMap telling the Council's story in a visual mapping environment. The Council staff remains available to stakeholders for answering questions and meetings when requested.

Comment: The first FPL document represents the first step in an incredible opportunity to engage underserved and disadvantaged individuals in the restoration of the Gulf restoration. This engagement will strengthen our communities by preparing more individuals to become contributing members of the community and by providing employers with a trained and ready workforce.

Response: The Council appreciates this thoughtful comment and the intent it conveys. Consistent with the spirit of this comment, the Council has sought to go above and beyond what is normally required for public engagement by translating materials into Vietnamese, developing the online FPL mapper and StoryMap, and generally tailoring written and verbal communications for a broad range of audiences. The Council has also sought to make its representatives available to engage formally and informally with stakeholders across the region. The Council is committed to continuing to emphasize transparency, inclusivity and public engagement, particularly with those in underserved and disadvantaged communities. The Council believes that the Gulf Coast Conservation Corps has the potential to empower citizens across the Gulf to become directly engaged in coastal restoration and, in doing so, learn skills that can help them find employment in this important and growing sector of the Gulf economy.

Comment: The Council should provide meaningful opportunities for the public to be involved in planning and restoration activities of proposed projects. However, when projects have already undergone extensive public review and input processes, that engagement should be considered in Council decision-making processes.

Response: Public participation is important to both the planning and implementation activities in this FPL. The venues and opportunities for public involvement in FPL activities depends on the type of project or program. A planning project may have engagement opportunities in associated environmental compliance processes. There may also be opportunities for public involvement in the implementation of some projects and programs. For example, the Tampa Bay and Mobile Bay National Estuary Programs (NEP) being supported on this FPL have numerous opportunities for public involvement. In addition, the new Gulf of Mexico Estuary Program (GMEP) in the Florida panhandle will also have opportunities for volunteer and citizen engagement. The Council is also investing in land acquisition in the Bahia Grande area that will expand the Laguna Atascosa National Wildlife Refuge. This refuge has projects and programs that provide opportunities for volunteers and public participation. The Council fully recognizes that some activities on the FPL have already benefited from extensive public involvement. Many Council member submissions reflect histories of strong public support for various projects and programs. The Council appreciates the value the public has added to such projects and would view additional and continuing engagement on those activities as greatly adding to their value.

Future Funded Priorities Lists

Comment: The Council should conduct an independent third party review of the Council's proposal evaluation and submission process to identify successes and lessons learned in order to best adapt the processes for future rounds of funding. Further, the Council committed to a 360 review of this FPL process. How is that going to be done? The public should be a part of that 360 review to ensure a more transparent project selection process in the future.

Response: In early 2016, the Council will review the process used to develop the Initial FPL. This review will consider both the views of Council members and public comments on the draft FPL in order to identify broader lessons learned. The Council will apply this knowledge as it updates the Comprehensive Plan and develops future FPLs. The Council must balance the time and resources spent on such a review with the equally pressing tasks of updating the Comprehensive Plan, preparing for future FPLs and effectively managing current projects and programs. The Council will also consider whether and how additional public input could be incorporated into this review, including a potential survey. The Council will consider lessons learned as it moves from completing this Initial FPL to preparing for future versions.

Comment: The Council should commit to using the information provided by decision-support tools in future project planning, evaluation and selection.

Response: The Council believes that the FPL investment in decision support tools (such as the Strategic Conservation Assessment of Gulf Coast Landscapes) could help improve the effectiveness of future FPLs and will consider the information provided by such tools in future project planning, evaluation and selection.

Comment: The Council should consider funding large-scale projects, which would likely involve larger price tags.

Response: The RESTORE Act directs the Council to prioritize large-scale ecosystem restoration projects. A fundamental component of the FPL is maximizing the health of the Gulf ecosystem, without regard to geographic location, through selection of large-scale projects and programs that maximize the long-term resilience of Gulf Coast ecosystems and communities. As noted in the FPL, the Council anticipates that once the full amount of funds ultimately available under the RESTORE Act is certain, future FPL iterations would include significantly larger projects and project lists that reflect the full amount available to be spent for restoration activities.

Comment: The Council should provide additional guidance to members for the next FPL process, including clearer submission and selection guidelines, a clear vision and a definition of what the Council means by “comprehensive restoration,” definitions for the restoration priorities from the RESTORE Act, and a focus on science-based decision-making to ensure that the Council improves the natural resources of the Gulf ecosystem at large.

Response: The submission guidelines used for the Initial FPL were designed to adhere to the RESTORE Act criteria while focusing available resources on water quality and habitat. These guidelines allowed for a broad range of projects and programs to be submitted for possible funding. While this added complexity to the FPL development process, it also provided the members with the flexibility to identify projects and programs suited to the needs of a range of different geographic regions across the Gulf. A more focused set of submission guidelines could help ensure that funds are directed at the highest priority areas and more effectively address the RESTORE Act’s criteria. As part of the review of the FPL process in early 2016, the Council will consider ways to improve the submission process, including revising the guidelines to encourage submissions that are focused or targeted on a more specific set of desired outcomes. The Council will, for example, consider whether further defining the four restoration priorities set forth in the RESTORE Act would offer an opportunity to enhance the effectiveness and transparency of the FPL development process. The Council will also consider ways to enhance the effectiveness of the science review.

Comment: The Council should establish and formalize channels for proactive coordination, both among Council members and across restoration funding streams, so that projects are strategically selected to build upon and complement one another.

Response: The Council agrees that coordination and collaboration among its members and across funding streams is essential. Moving forward, the Council will consider additional ways to enhance internal and external coordination and collaboration as it considers the process for future FPLs and updates the Comprehensive Plan.

Comment: Future FPLs should also contain or leverage foundational investments in science, planning and design to ensure that restoration proceeds on multiple fronts. It is critical that the Council continue to invest in the science and decision-support tools needed to make sound project investments and to track progress over time.

Response: The Council agrees that sustained investments in science and decision-support tools will be critical to sound decision-making and adaptive management. The Council will coordinate with other restoration programs and science efforts and will carefully consider whether and the extent to which such investments would be appropriate in future FPLs.

Watershed/Estuary Approach

Comment: Overall support of the draft FPL and the watershed approach.

Response: The Council appreciates the numerous comments supporting the watershed approach and the linking of projects and programs to ecosystem stressors. The Council endeavored to ensure that the projects met the individual needs of each watershed and/or estuary while working to move the needle towards holistic Gulf restoration. The watershed approach has been used broadly at federal, state and local levels as a sound, science-based method to plan and implement ecological restoration activities.

Comment: The Council's selection of priority watersheds requires additional explanation and justification. Explain in more detail how the Council selected its priority watersheds and estuaries and came to a determination on "areas of greatest need," including the scientific basis for these selections and determinations.

Response: Members have held numerous stakeholder engagement meetings and outreach activities throughout the Gulf since the oil spill. Input from the Gulf Coast Ecosystem Restoration Task Force (Executive Order 13554), as well as other comprehensive restoration efforts (e.g., the Louisiana Master Plan) provided additional sources of public input. Based on input from numerous stakeholders (academics, NGOs, businesses and the general public) and ecosystem needs, Council members submitted proposals in November of 2014. After extensively reviewing the member submissions and mapping the proposed projects and programs, the Council determined that a watershed/estuary approach would be an effective tool for guiding the selection of

projects and programs in a way that advances comprehensive restoration. By identifying and focusing on watersheds, the Council was able to make difficult funding decisions in a way that leverages limited restoration resources for maximum effectiveness.

The Council's selections were based on a variety of factors, including the need to respond to widely-recognized ecological stressors, substantial public input, support for certain high-value areas, and socioeconomic and cultural considerations. The Council thus chose to focus its limited funds on areas broadly recognized as having significant ecological value and urgent conservation and restoration needs. In many cases the watersheds/estuaries have been subject to extensive scientific study and planning; for example the Mississippi River Delta, is recognized as an area of global ecological importance.

Comment: It is unclear how each project will mitigate stressors in the watershed or estuary, and a number of key ecosystem stressors are not identified or addressed by the proposals in the first FPL. Identify and address gaps in watershed descriptions to ensure the lists of stressors in the watersheds are accurate and complete. Discuss the extent to which the proposed projects in the FPL will measurably mitigate those watershed and estuary stressors, and how continued stress in the form of development pressure, climate change and other stressors could affect the long-term viability of funded projects in the watershed.

Response: The Council sought to identify and respond to major known stressors in the watersheds covered by this FPL (e.g., lack of riverine and sediment inputs in the Mississippi River Delta, water quality and quantity challenges in coastal Florida, and habitat loss in various locations). The Council acknowledges that not all stressors can be addressed with this Initial FPL, which is why the Council focused on major stressors with respect to habitat and water quality. It would not have been practical in the context of this Initial FPL to catalogue and rank all stressors in each watershed as this is a time- and resource-intensive exercise. The Council felt there was sufficient available information regarding major stressors (such as land loss in Louisiana and water quality in Florida) to make informed investments at this stage.

Comment: The FPL should include an explanation of how the suites of projects proposed in each watershed can be expected to work synergistically to address the stressors listed in the watershed description and how the projects contribute to the health of the overall Gulf ecosystem.

Response: The Council sought to identify, where possible, FPL activities that would either complement each other or have synergistic effects with other restoration projects. Some of the conservation activities complement other ongoing or existing conservation actions (such as in Bahia Grande where conserving and restoring land next to a National Wildlife Refuge is helping to complete a conservation corridor). Taking a holistic approach recognizes the synergistic and interconnected nature of coastal and marine ecosystems, the organizational principle of watersheds and the importance of

addressing system-wide stressors that reduce ecosystem integrity. Some of the water quality measures in the FPL have the potential to support future coastal restoration measures, for example by helping ensure that water quality and quantity conditions would support future submerged aquatic vegetation (SAV) restoration and/or oyster restoration. By supporting projects in the Louisiana Master Plan, the Council is helping to advance coastal restoration activities that were developed as part of a rigorous scientific process that sought to consider interactions and synergies among projects.

Comment: Why aren't estuaries emphasized in addition to watershed focus in the FPL?

Response: The Initial FPL supports an array of estuary restoration activities, from on-the-ground water quality and habitat restoration to funding for estuary-based planning. The draft FPL focuses on "key watersheds," which include important estuaries across the Gulf. In a number of places, the draft FPL used the term "watershed" to include the associated estuaries in recognition of the interconnected nature of ecosystem restoration. In doing so the Council did not intend to minimize the strong support for estuaries that this FPL represents.

Comment: It is critically important that the FPL link the priority watershed approach to the restoration priorities in the RESTORE Act. The project descriptions should also include a description of how each project is addressing one or more of the RESTORE Act restoration priorities.

Response: The Council agrees that all projects and programs in the FPL must comply with the RESTORE Act restoration priorities. The Council reviewed each member submission to ensure compliance with the RESTORE Act and consistency with the Initial Comprehensive Plan. The information regarding this review is publicly available on the Council's [webpage](#). The Council has reviewed the FPL and made any necessary changes to more effectively describe how activities in it address the priorities set forth in the RESTORE Act.

Comment: The Council should include other watersheds/estuaries in this and/or future FPLs. Examples include, but are not limited to, the Chenier Plain, San Antonio Bay, St. Andrews Bay, areas south of Tampa Bay.

Response: Focusing on key watersheds allows the Council to concentrate limited resources to maximize ecological benefits. The Gulf has numerous valuable watersheds and estuaries in addition to the ten addressed in the Initial FPL. The Council believes that the watersheds/estuaries in this FPL are high priorities with respect to ecosystem values, public interest and science. However, it is important to reiterate that this FPL does not represent a precedent for future FPLs. The Council could focus future FPLs on these and/or other important geographic areas if that would effectively advance comprehensive Gulf restoration. The Council will consider whether to continue with the watershed- and estuary-based approach for future FPLs. The Council and its members

remain open to the public's views with respect to both the efficacy of the overall approach and which particular geographic areas warrant the most attention.

Comment: The Council should complete a science-based watershed analysis prior to the submission of the next round of proposals.

Response: If the Council decides that a watershed/estuary-based approach would have merit for future FPLs, it will consider ways to further incorporate science into the process of selecting watersheds/estuaries. As with the selection of specific projects and programs, the selection of watersheds/estuaries must be informed by the best available science. The ecological value of a watershed and the stressors facing that system are critical considerations in that regard. The relative importance of a watershed can be evaluated in terms of ecological value, ecosystem stressors, socio-economics and community and cultural values, among other factors. The Council recognizes many ecosystems have challenges that originate with harmful alteration of structural characteristics, leading to complications such as habitat degradation and changes in flow regimes. Restoring site morphology and other physical attributes is often an essential step to the success of restoration. The restoration of habitat to support keystone species further returns higher-level ecosystem structure and re-establishes food webs to support biological diversity. Structure and function are closely linked in wetlands, estuaries and other ecosystems. Re-establishing the appropriate natural structure can bring back many beneficial ecosystem functions and services. Reintroducing natural ecological processes, such as natural fire regimes and freshwater inflows, is also essential to restore and maintain ecosystem function and sustain ecosystem integrity.

Comprehensive Plan

Comment Theme: The Council should now focus on updating the Comprehensive Plan in a way that is driven by science. The Comprehensive Plan should be an objective guide for developing future FPLs and advancing comprehensive Gulf restoration. The updated Comprehensive Plan should include a vision statement for a healthy Gulf; define the four statutory restoration priorities; provide measurable goals and objectives; and discuss the types of activities, including the major actions in the *Task Force Strategy*, which will accomplish the updated objectives. The Council should continually review and adapt its approach – for future planning, evaluation, selection and monitoring – based on the success or failure of other restoration projects and to set the standard for high-quality projects that others will want to leverage as well.

Stakeholders also recommended that the Council develop a prioritization tool for selecting projects in the future, and develop a watershed assessment toolbox as well as project costing tools. Some groups recommended the Council more effectively consider socioeconomic considerations into planning and project selection. Finally, some stakeholders recommended that the updated FPL include a comprehensive project list, a

process for funding projects based on the process undertaken for the Initial FPL, and a process for developing a Gulf-wide sediment budget.

Response: Updating the Comprehensive Plan is a critical next step for the Council, to begin in early 2016. This will start with a review of the process used to develop the current FPL and will consider both the views of Council members and public comments on this Initial FPL. The goal will be to identify broader lessons learned and apply these to the task of updating the Comprehensive Plan and developing future FPLs.

Beyond this review, it would be premature to identify a specific path forward for the Comprehensive Plan update. However, public input has made it clear that the planning process should encompass science, transparency, collaboration, coordination, leveraging, large-scale projects, measurable outcomes, socio-economic considerations, project selection and other important matters. Ultimately, the Comprehensive Plan update will need to advance the cause of comprehensive Gulf restoration while continuing coordination with other ongoing restoration programs. The applicability of watershed- and estuary-based approaches to both the updated Comprehensive Plan and future FPLs will also be considered.

Updating the Comprehensive Plan is a complex undertaking. An effective update must consider the views of a diverse array of Gulf stakeholders, address a broad range of ecosystems and stressors, and be effectively coordinated with other ongoing coastal restoration programs, among other challenges. The update will be an iterative process building on and adapting to lessons learned and scientific advances. The Council will continue to make decisions in an ecosystem context that considers competing priorities, best available science and adaptive management principles.

Science

Comment: Monitoring the success of restoration is important. Is the Council going to ensure that they are properly monitoring projects and reporting out to the public? Will the project links to environmental stressors be quantified (i.e., look at measured benefits) and based on sound science? Project monitoring plans should provide for collection of baseline data and include metrics to measure ecological outcomes. Monitoring data must be integrated and maintained in a data management system and an adaptive management system used by the Council to gain an understanding of the Gulf ecosystem and to inform future decision-making. The Council should identify a publically accessible data repository and develop a formal plan for data sharing.

Response: The Council is committed to science-based decision-making, delivering results and measuring impacts. The FPL project “Council Monitoring and Assessment Program Development,” administered jointly by the National Oceanographic and Atmospheric Administration (NOAA) and United States Geological Survey (USGS), will fund the development of basic foundational components for Gulf region-wide monitoring in order to measure beneficial impacts of investments in restoration. The

“Gulf of Mexico Alliance (GOMA) Coordination” project will involve collaboration among the Gulf States, federal and local partners, academia, nongovernmental / non-profit organizations and business and industry, using a Community of Practice in order to leverage existing resources, capacities and expertise and to build on existing monitoring data and programs. The GOMA project will: (1) conduct an inventory and gap analysis of existing data and monitoring systems; (2) develop and provide recommendations to the Council for common standards and protocols; (3) establish metrics needed to measure influence of water quality and habitat restoration; (4) establish baseline conditions; and (5) provide recommendations to the Council on how to address gaps and future needs.

The monitoring and assessment standards will be used to: (1) efficiently evaluate and report on the effectiveness of Council-selected restoration projects and programs, and (2) assess progress towards reaching the Council’s comprehensive ecosystem restoration goals and objectives. Implementation of these two FPL projects will also enable to the Council to better quantify the link between stressors and restoration actions to evaluate benefits based on sound science. The Council strives to improve the delivery of ecosystem science, monitoring and data to report on the overall success of restoration, as well as integrate science into decision-making and facilitate conservation actions.

As a federal entity, the Council will comply with federal policies on data management and sharing: all projects and programs funded by the Council will include requirements for monitoring, data management, and adaptive management planning when and where applicable. The Council plans to publish metrics and outcomes on our website and through various reports, such as the Annual Performance and Accountability Report and the Annual Report to Congress, both of which are available on our website.

In addition, the Council anticipates that responding to major ecosystem stressors will be an important part of future planning processes. Ecosystem service assessments can provide measures of the broad impacts such stressors have on humans, society and the environment. These measures, in turn, can lead to more informed and effective planning processes. The Council will consider how ecosystem service assessments might be incorporated into the Comprehensive Plan and/or future FPLs. This approach is particularly relevant to the Council in light of the October 7, 2015, release of new policy guidance by the White House directing federal agencies to begin incorporating ecosystem services in federal planning and decision making. The Council is accountable to this policy directive, which can be found [here](#).

Comment: Is the Council taking into account climate change, relative sea-level rise, ocean acidification, hurricanes, or other uncertainty in its planning? There’s not much mention of it in the FPL.

Response: Gulf restoration must be based on sound science. Much of the Council’s work will be conducted in areas where there is substantial scientific uncertainty regarding one or more key variables. For example, we do not know with certainty the rate at which

sea-level-rise will accelerate over the life of the typical restoration project. At the same time, however, there is a need to provide near-term solutions to pressing ecosystem needs.

The Council, like many of its partners, must figure out a way to build upon and advance coastal science, while also acting wisely in the face of ongoing uncertainty. The latter can be accomplished with an approach that considers such uncertainties in the planning process, and then incorporates adaptive management to allow for changes over time as more information becomes available. Most of the activities the Council is funding in the Mississippi Delta have, for example, been drawn from a comprehensive planning process that evaluated different sea-level-rise scenarios in the selection of projects. The Council is committed to ensuring that all activities it funds are monitored and that the lessons learned are used, where applicable, to inform the management of the project as well as future planning processes.

Comment: There should be more funding going towards ecosystem research. The Council utilizes the term ecosystem, but we don't really know what that means and how things are interacting.

Response: The Council strives to make decisions and recommendations in an ecosystem context that considers competing priorities, best available science and adaptive management principles. The Council believes that it must act now on Gulf ecosystem restoration, while we continue to learn and adapt as additional information comes to light. The RESTORE Act dedicates five percent of the Trust Fund to a NOAA research program and five Centers of Excellence around the Gulf. These programs are being specifically set up to undertake ecosystem research. The Council will work closely with these research programs to continue to integrate the best available science into its decision-making.

Comment: Some stakeholders expressed appreciation for the science discussions in the FPL and appendices, particularly the response to science reviewers. Many reviewers took a lot of time in reviewing proposals, and the thoughtful responses to those reviews were appreciated.

Response: The Council appreciates the time that the expert science reviewers spent reviewing and evaluating the Council proposals. The feedback from those reviewers was taken seriously in selecting proposals as well as rewriting/rethinking projects and programs. The Council will continue to integrate the best available ecosystem science and data both in this and future FPLs.

Comment: The Council does not address, especially in Texas and Florida, that freshwater inflows are also key to restoration. Why isn't that included as a Council goal or emphasized in this FPL?

Response: The Council agrees that freshwater inflows are important to watershed and estuary restoration. Adequate freshwater flow to rivers and estuaries is both critical to the health and function of those ecosystems and important for the support of a State,

local and coastal economies. The FPL project “Baseline Flow, Gage Analysis & On-Line Tool to Support Restoration” involves the USGS and the Environmental Protection Agency (EPA) collaborating on a comprehensive project to provide information on the timing and delivery of freshwater to the streams, bays, estuaries and wetlands of the Gulf. Additionally, in a focused large watershed study in Mississippi, a tool will be developed to understand how changes in water withdrawals and reservoir operations could minimize streamflow alterations and impacts to freshwater and estuarine ecosystems. The data and information provided through this project will support state and local freshwater flow decisions. The project will also promote resilience in helping Gulf communities adapt to short and long-term changes in flows while improving science-based decision making in targeting and siting restoration work in the future.

Comment: While there is a partially funded NOAA/USGS project on Council Monitoring & Assessment Program, this is only for planning. This project has overall support. Why isn't there more funding going towards this project for actual monitoring on the ground? Such as for oyster, fish, shrimp, marine mammals, etc.? Why isn't the Council funding a long-term Gulf-wide monitoring program?

Response: The Council agrees that monitoring is an important part of restoration; however, there are currently many ongoing monitoring programs. As part of the NOAA/USGS program, the Council is funding an inventory and gap analysis to help identify and prioritize the monitoring needs, and help determine the best indicators (in coordination with other programs) for restoration success. When completed, specific monitoring recommendations will be made.

Environmental Compliance

Comment: Some stakeholders expressed support for the approach the Council has taken with respect to compliance with the National Environmental Policy Act (NEPA). They were pleased to see a streamlined process where the Council may use members' Categorical Exclusions (CEs) for ecosystem restoration in ways that achieve positive results with lower investments of time and money. In particular there was support for using CEs for land acquisition projects.

Response: The Council takes seriously its responsibility for complying with NEPA and all other environmental laws applicable to the Council-Selected Restoration Component. While the projects and programs in the FPL will have net (or solely) beneficial effects on the environment, compliance with these laws helps minimize any chances for unintended adverse impacts while also providing opportunities for additional information, transparency and public engagement. The Council will comply fully with such laws while at the same time developing more efficient and transparent regulatory processes.

The use of member CEs in coordinating interagency project leveraging is an example of how the Council is seeking to enhance the efficiency, effectiveness and transparency of its regulatory compliance. This approach enables the Council to efficiently complete NEPA review of restoration and conservation projects similar to activities that were previously undertaken by member agencies. In such cases the member's past experience provides a high degree of certainty regarding potential environmental outcomes and enables the Council to conclude that additional NEPA review is not needed.

With major federal regulatory agencies among its members, the Council is well-positioned to ensure that its regulatory actions are based on robust analysis. The Council's regulatory policies receive rigorous interagency review. Prior to using member CEs, the Council seeks input from all of its members, particularly those with regulatory responsibilities. The Council thus efficiently addresses potential effects on threatened and endangered species as well as on other resources. This type of internal regulatory coordination and collaboration was essential in enabling the Council to approve implementation funds for a range of activities on this FPL. In addition, the Council is able to continually identify opportunities for efficiencies and make recommendations to Congress in our Annual Report.

The Council is also committed to transparency. Enhancing efficiency is a worthy goal, but it should not come at the expense of transparency and public engagement. Consistent with that philosophy, the Council provided the public with CE documentation during the review of the draft FPL. While this was not legally required, the Council wished to provide the public with as much information as possible. Looking ahead, the Council will continue its efforts to improve regulatory efficiency, effectiveness and transparency.

Comment: Some stakeholders were concerned with the Council's use of a Categorical Exclusion (CE) to comply with NEPA for approval of planning funds for the Upper Mobile Bay Beneficial Use Wetland Creation Site. These stakeholders believe that Council approval of funding for planning and environmental compliance for this project will inevitably lead to its construction. Accordingly, these stakeholders recommend the Council conduct a rigorous NEPA review of the project before approving planning funds. These stakeholders also expressed concern that this activity warrants preparation of an Environmental Impact Statement (EIS).

Response: It must be emphasized at the outset that the Council has only approved planning funds for the Upper Mobile Bay Beneficial Use Wetland Creation Site. The Council has not approved any funds for implementation of this project, and there is no implication that the Council will do so. This point is critical to all instances in which the Council has approved only planning funds for activities in this FPL. As emphasized in the draft FPL and reiterated above, the approval of planning funds for an activity in no way commits the Council or any other entity to funding implementation. In fact, the primary

reason for approving only planning funds is to complete the engineering, design, and environmental compliance necessary to determine whether a project warrants implementation funding.

It is not the case that all coastal restoration projects approved for planning are inevitably funded for construction. Projects approved for planning might not thereafter be implemented due to budgetary considerations, or as a result of feasibility, land rights or environmental issues discovered during the planning and environmental compliance process. For example, the Coastal Wetlands Planning, Protection and Restoration Act program has included a significant number of projects approved for planning but not subsequently implemented due to such factors.

Finally, the Council has made no decision regarding the level of NEPA review that will be required if this project were eventually to be implemented. The question of whether to prepare an Environmental Assessment or an EIS would be addressed during the NEPA process, and the Council encourages all interested stakeholders to be engaged in that process.

Comment: Several of the proposed restoration activities have the potential to adversely affect species that are protected under the Marine Mammal Protection Act (MMPA) and/or the Endangered Species Act (ESA).

Response: The Council appreciates the concern expressed for marine mammals. As noted above, the Council takes seriously its responsibility to comply with all environmental laws applicable to its activities under the Council-Selected Restoration Component. This includes ESA and MMPA. Activities approved for implementation funding in this FPL have been reviewed pursuant to ESA. The Council will not disburse implementation funds for FPL projects until the requirements of the MMPA have been addressed, where applicable. With both the Departments of Interior (DOI) and Commerce (DOC) as members, the Council is well-positioned to ensure that these and other environmental laws are effectively addressed.

Comment: The FPL contains activities that involve dredging of sediments. Dredging of contaminated sediments can temporarily re-suspend pollutants, which can harm aquatic species.

Response: In cases where the Council is proposing to fund implementation activities that involve dredged sediments (e.g., Deer Island Beneficial Use), the chemical and physical properties of the dredged material were evaluated to determine the suitability of the sediments. This information was made available to the public as part of the NEPA documentation for this project, which can be accessed in the project's FPL appendix. Similarly, the Council will ensure that all FPL planning projects that could lead to dredging will address any such concerns as part of the requisite environmental review process.

Comment: An Environmental Impact Statement should be prepared for the Bayou Greenways project because it could lead to the construction of stormwater detention basins, which would harm habitat.

Response: The lands purchased with RESTORE funds will be preserved as City of Houston parkland in perpetuity for passive park use, protection, restoration and preservation of habitat, and not developed as detention basin(s). Moreover, all Council financial awards for habitat conservation projects will include a special condition requiring the acquired lands to be protected in perpetuity. This condition will expressly prohibit activities that are inconsistent with the goal of maintaining or enhancing the natural habitat value of the lands. Given these protections, the Council has determined that this project, which will result in the preservation of 80-100 acres of valuable riparian habitat, will not have significant impacts to the environment. More information on environmental compliance for this activity can be found in the FPL appendix activity on Bayou Greenways.

Other General Comments

Comment: Some stakeholders' expressed strong support for the Gulf Coast Conservation Corps (GCCC).

Response: The Council appreciates the numerous stakeholders that came to the public meetings and supported the Gulf Coast Conservation Corps. The Council believes this program has great potential as an investment in the human capital needed to ensure restoration success.

Comment: I'm still suffering economically from the oil spill, why isn't there funding for doctor's visits and individuals that need this type of help?

Response: Congress has charged the Council with helping restore the ecology and economy of the Gulf Coast region. The Council is not legally authorized to provide direct economic assistance to individuals. However, the Council believes that the activities funded in the FPL will indirectly benefit Gulf economies by restoring the ecosystems upon which so many jobs and other economic and social services depend. For example, by restoring coastal wetlands, the Council is improving habitat that is essential for recreational and commercial fisheries.

Comment: Is the Council going to address the economic benefits of ecosystem restoration?

Response: As noted above, the Council believes that the activities funded in the FPL will indirectly benefit Gulf economies by restoring the ecosystems upon which so many jobs

depend. For example, by restoring coastal wetlands, the Council is improving habitat that is essential for recreational and commercial fisheries.

Comment: Why isn't more funding going to community organizations and disadvantaged populations? The Council should invest in local resiliency and capacity for rural, historically underserved minority coastal locations.

Response: The Council believes that the benefits of Gulf restoration should be shared broadly across Gulf Coast communities. The Council recognizes that ecosystem degradation can be particularly challenging for disadvantaged populations. Restoring habitat and water quality in key watersheds and estuaries across the Gulf will help improve community resilience by supporting the sustainability of the natural resources upon which many coastal populations depend, including disadvantaged populations. The Initial FPL is only a start in that regard; there is much more that must be done to ensure that all Gulf communities can enjoy and benefit from a healthy Gulf ecosystem. The Council looks forward to working with communities from across the Gulf as it continues this work.

There is a strong link between community resilience and economic growth, including job creation and stability. Funds used for coastal restoration will create jobs across the Gulf. The Council heard that the citizens of the Gulf should have a fair shot at getting such jobs, and should be able to participate directly in the Gulf restoration economy. With this first FPL, the Council is funding the Gulf Coast Conservation Corps, which is designed specifically to help provide Gulf workers with the skills and experience needed to pursue careers in ecosystem restoration, including veterans, displaced workers, Tribal youth and others.

Comment: Does the Council plan on working with local fisherman?

Response: The Council has and will continue to consider the needs of the commercial and recreational fishing communities as it selects Gulf restoration projects and programs. The Council has listened to the concerns of these communities as it developed the draft FPL, and subsequently toured the Gulf soliciting public input. While there are needs that the Council is not authorized to address (such as direct assistance to fishermen), the Council believes that restoring coastal habitat and water quality is critical for ensuring thriving fishing communities across the Gulf. Going forward, the Council hopes to learn from and strengthen its relationships with fishing communities.

Comment: Would the Council consider alternative energy sources to be included in the projects? Could the Council mandate their use in restoration projects? Electric and gaseous fuel technologies can provide performance comparable to the use of liquid fuels in equipment and vehicles.

Response: The Council is charged with advancing comprehensive Gulf restoration, but promoting alternative energy is not within the Council's statutory authority. The Council recognizes that energy costs can be a substantial part of the implementation budget for coastal restoration projects. Reducing project costs through advances in energy efficiency and/or alternative sources would allow coastal restoration funds to go further for their intended purposes. To that end, the Council is open to considering such opportunities to enhance the efficiency of its coastal restoration work.

Comment: Some stakeholders expressed general support for the Gulf of Mexico Estuary Program (GMEP). Some would like to see more of such programs across the Gulf of Mexico. There was also a question as to why the GMEP is not a formally designated National Estuary Program.

Response: The Council appreciates the enormous support for the EPA GMEP proposal, which is modeled after the successful EPA National Estuary Programs (NEPs) around the United States. The Council is proposing to fund a GMEP on this FPL; it will serve as a pilot and others could be considered in future FPLs based on the success of this pilot. GMEPs are not the same as formal EPA NEPs as GMEP funding would come directly from the Restoration Trust Fund whereas Congress authorizes NEPs. The Council is excited to invest in this pilot and looks forward to considering future support to estuary programs.

Comment: There was a request for the Department of Homeland Security (DHS) to recommend projects that potentially address national security.

Response: The U.S. Coast Guard (USCG), an agency within DHS, is a member of the Council and played an invaluable role in the *Deepwater Horizon* oil spill response and recovery effort. The USCG has and will continue to play an important leadership role on the Council.

Comment: There was a request to remove invasive tree species and replace them with native trees.

Response: The Council agrees that invasive species are a major risk to fish and wildlife and the habitat upon which such species depend. The current FPL contains projects that include measures to address invasive species; for example, investments in the Mobile Bay and Tampa Bay NEPs include planning dollars to support projects and plans for removal of invasive species. In Jean Lafitte, canals allow for the introduction and spread of invasive species; by backfilling these canals and restoring hydrology we are also reducing the spread of invasives. Moving forward, the Council will continue to consider projects and programs that include such measures.

Comment: The process for awarding specific projects is unclear. This makes it difficult for community organizations to effectively access funding. The Council should clarify this issue before the final approval of the FPL so that companies and community

organizations, especially those that are locally based, can prepare to compete for funding, either directly or through partnerships.

Response: The RESTORE Act requires that only a Council member may carry out a project or program. Thus, only Council members could apply for funding. For all FPL projects and programs, either a grant will be applied for and awarded if the Responsible Council Member is a state, or an Interagency Agreement (IAA) will be awarded if the Responsible Council Member is a federal agency. Each state will utilize their respective processes if they implement all or part of each of their awards through subawards, and each federal agency will use their respective authorities and programs to execute their projects or programs.

Comment: There should be a specific requirement for local hiring and a second requirement that allocates a percentage of the funds for each project to qualified nonprofit and community organizations. The Council should include prescriptive language be placed in all RFPs and solicitations requiring contractors to develop a local Community Outreach Plan identifying how they intend to engage the surrounding community in the design and construction of the proposed restoration project.

Response: On May 22, 2015, the Council published a Notice of Interpretation and Implementation With Request For Comment in the Federal Register to seek comment on its planned implementation of the local contracting preference requirement of the RESTORE Act. The Council is currently reviewing the responses received, and has not yet made a final determination on its implementation of the local contracting preference requirement.

The Council Standard Terms and Conditions, available [here](#), address Council non-discrimination requirements. Additionally, 2 C.F.R. § 200.321(b) states that "When contracting, the non-federal entity must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible."

Comment: The Council should create and fund a robust, Gulf-wide environmental education program in order to ensure long-term sustainability of the investments that are being made.

Response: Environmental education can contribute to Gulf restoration by helping create more informed and engaged stakeholders. Some of the activities on this FPL have environmental education components. For example, the Council is investing in a pilot program in the State of Mississippi for SeaGrant to conduct education and outreach related to land conservation. In this FPL, the Council will also fund education and outreach opportunities through funding NEPs (Mobile Bay and Tampa Bay) and creating a new Estuary Program(s) in the Florida Panhandle. Other projects collocated with

federal or state managed lands also provide for long term education events or programs, such as Padre Island National Seashore where the Council is plugging relict oil and gas wells. The Council will continue to seek such opportunities in the future, to the extent that they can be advanced within the statutory criteria set forth in the RESTORE Act.

State/Watershed/Project Specific Comments/Responses

Texas

Overarching

Comment: Would like more watersheds, like San Antonio Bay, to be included in this or future FPLs.

Response: Council members were asked to submit five projects to the Council for consideration in this Initial FPL that focused on habitat and water quality; thus Texas could not submit every project it had received from applicants. Future FPLs, however, may include projects involving San Antonio Bay or other watersheds and estuaries not included in this Initial FPL.

Comment: Why don't these projects include the successful coastal ecosystem acquisition program that has been in existence for over 21 years? This program, captured in the Austin's Woods Conservation Plan, protects Columbia Bottomlands habitat, which includes coastal hardwood forests along the lower Brazos, San Bernard, and Colorado Rivers in Wharton, Matagorda, Fort Bend, and Brazoria Counties.

Response: The Council can only fund projects or programs submitted by Council members. The State of Texas was limited to submitting five proposals for consideration by the Council in this Initial FPL and could not submit every project that it may have wanted to.

Comment: On the land acquisitions in Bahia Grande and Matagorda Bay, as well as the riparian corridor in the Galveston Bay area, ensure that there are plans for public access and endowment/funding/plan for long-term management and stewardship.

Response: The targeted acquisitions at Bahia Grande will become part of the Bahia Grande Unit of the Laguna Atascosa Refuge. That Unit is already the subject of significant public use planning, with parking areas, roads and trails currently under development to provide access for hiking, nature watching and paddling. Opportunities for fishing and hunting are also being examined. The tracts targeted for acquisition increase highway frontage, and therefore options for public access, in addition to almost three square miles of habitat that may be suitable for expansion of the road or trail system. These tracts will be added to the public use plan once acquired. As part of the Refuge system, additional operating costs will be nominal and will be absorbed by the operating budget for Laguna Atascosa NWR.

The tract proposed for acquisition on Matagorda Bay is very remote, with reliable access currently by boat only. Utilities are unavailable. The adjacent waters and marshes are publicly owned and the site is already a destination for bay anglers. Policies for public

access and use will be developed by the Texas Parks and Wildlife Department (TPWD) and the TPW Commission, but will be geared towards long-term protection of the resource and will be adaptive as impacts are monitored. It is anticipated that these policies will be similar to those on Matagorda Island, a Wildlife Management Area that is also accessible only by water. The island is open year-round to day-use, fishing and primitive camping. Hunting is authorized on a season-by-season basis as conditions warrant. Because of the physiological and biological dynamics of the site, no active management is required. The property will be monitored by the same coastal biologists currently monitoring the rest of the Matagorda Bay system.

Comment: Overall support and encouragement of the projects selected in the FPL for the State of Texas, however it would be good if Texas could develop a statewide master plan for restoration similar to Louisiana.

Response: Such a plan is currently being considered by the State of Texas, and if it goes forward it will be done in conjunction with the Governor's office and other state resource agencies such as the General Land Office and the TPWD.

Laguna Madre

Comment: Tremendous amount of support for all proposed projects in the Bahia Grande/Laguna Madre area—thrilled about the land and ecosystem preservation of the Laguna Madre coastal area (Land Conservation, Well Plugging, Hydrologic Restoration)

Response: The Council appreciates the overwhelming support for these activities, which will help protect and restore migratory birds, support habitat for listed species, and more. The Council believes that by making these investments, the ecological stressors associated with urbanization will be reduced and habitat and species will be conserved and restored.

Bahia Grande Coastal Corridor

Comment: I support the proposal to fund land acquisition and habitat restoration at Laguna Atascosa National Wildlife Refuge.

Response: The Council is pleased to support land conservation in the Bahia Grande/Laguna Madre area and to build upon existing federal and state land conservation efforts.

Plug Abandoned Oil and Gas Wells

Comment: Do not think funding should go towards a project plugging oil and gas wells and cleaning up a mess the oil companies should be responsible for. Why is RESTORE proposing to fund this?

Response: Wells on Padre Island National Seashore (a U.S. National Park) are subject to a highly corrosive environment and will eventually fail without regular routine maintenance. All wells in the park were transferred to an Australian LLC through a bankruptcy court and subsequently became orphaned when the LLC collapsed. There is no action or remedy the federal government can take against the company today. Managing abandoned wells is complicated when it comes to plugging, particularly as it relates to a permanent plug. While wells may be temporarily plugged by an operator whenever a mineral lease is active, these wells are still considered operational. However, when wells have been orphaned and there is no operator or responsible party, the government must aggressively work to have wells permanently plugged to avoid well failure and the resulting environmental impacts.

Mitigation responsibilities on wells related to U.S. National Park Service (NPS) or U.S. Fish and Wildlife Service (FWS) lands around the Gulf of Mexico lies solely with the federal government because either: (1) the operator abandoned the operations before the NPS or FWS areas were created, or (2) it was operating under approved NPS permits and NPS pursued all regulatory/legal actions possible by regulation (i.e., the \$200K performance bond associated with the Padre Island wells described in the FPL, which is the maximum relief NPS will receive at those sites). In the absence of viable principal responsible parties and after exhaustion of all legal remedies, the government is responsible for remaining plugging/cleanup activities.

Additionally, the State of Texas has a plug and abandonment program managed by the Railroad Commission of Texas (RRC), which is the state's regulator of the oil and gas industry. The RRC uses industry fees from the Oil and Gas Regulation and Cleanup Fund to plug more than 1,000 abandoned wells each year. RRC has funded the plugging of some abandoned oil and gas wells in NPS and FWS areas in the past; however, RRC funds are limited and the wells located in NPS and FWS areas in the proposal may not be funded for many years.

For the sites in Texas under consideration in the FPL, the oil and gas wells were permitted on state or private land acquired by the NPS and FWS. They are not Outer Continental Shelf (OCS) federal Oil and Gas (O&G) wells over which the DOI had leasing jurisdiction pre- or post- abandonment. Contrasted with the "shut in" well or temporary closure wells, operations at the wells in the FPL are completely abandoned and all legal avenues for recouping costs of remediation have run their course.

Comment: General support for Oil and Gas Well Plugging in Texas. Funding project in this area would help ensure habitat for numerous bird species found nowhere else in the U.S., and continue to bring ecotourism dollars into the local economy. It would also continue to ensure habitat and ecotourism for our other species such as the Ocelot, and Texas tortoise among many others.

Response: The Council appreciates support for this project, as well as others, in the

Laguna Madre area. By plugging high-risk wells in coastal areas, the Council is protecting and conserving high value habitat and species by restoring the land the wells occupy, as well as reducing the risk for future oil spills.

Bahia Grande Wetland System Restoration

Comment: This project is highly supported, please consider including funding for implementation phase.

Response: The Council shares the interest in expeditiously achieving on-the-ground restoration results. However, the Council cannot approve implementation funds until applicable environmental laws have been addressed. In cases where environmental compliance for promising restoration projects has not yet been completed, the Council is approving planning funds for such activities in Category 1 of the FPL, while also listing these activities in FPL Category 2 as priorities for potential implementation funding. In considering whether to approve implementation funding for Category 2 activities in the future, the Council will review the associated environmental compliance documentation for Bahia Grande Wetland System Restoration, as well as other salient information pertaining to feasibility, effectiveness, cost and other considerations.

Matagorda Bay

Matagorda Bay System Priority Landscape Conservation

Comment: General support for this project, especially because it will protect and conserve habitat.

Response: The Council appreciates the support for this project and agrees regarding the protection and conservation it will provide to habitat and species. The Council is pleased to co-fund this project with the Knobloch Foundation as well as build upon other existing conservation efforts, such as the NFWF investment in Powderhorn Ranch.

Comment: Describe expected benefits to communities from this project, and plans to consult groups in Texas working on freshwater inflow issues in Texas in the future.

Response: Benefits to nearby communities include storm attenuation and storm surge mitigation, and a potential increase in economic activity as more sportsmen and recreationists make the area a travel destination due to public ownership and conservation of more than ten square miles of coastal habitats. The marshes, coves and nearshore seagrass beds on the subject tracts can provide outstanding recreational fishing, bird and nature watching, photography and wilderness recreation opportunities. The tracts targeted for acquisition in this FPL will not contribute significantly to freshwater inflows, however the Council is investing on a Gulf-wide project (Baseline Flow and Gage Analysis) that will help inform future restoration decisions related to freshwater inflows. In future FPLs the Council may consider other tracts that have the

potential to contribute to freshwater inflows, watershed conservation, and ground and surface water quality. The Council, including the State of Texas, will continue to work with coastal conservation partners to identify and leverage these opportunities for maximum conservation benefits, including conservation of freshwater inflows to our estuary systems.

Galveston Bay

Comment: General support for this project.

Response: The Council appreciates the support for this project and agrees that by investing in riparian buffers in urbanized areas, habitat can be conserved and protected, and water quality improved in downstream bays and estuaries.

Comment: Future funding should consider projects that increase the amount of freshwater inflows reaching the bay.

Response: The Council agrees that freshwater inflows are important to watershed and estuary restoration. Adequate freshwater flow to the rivers and estuaries is not only critical to the health and function of those ecosystems, but it is also important for the support of a thriving state, local and coastal economy. For these reasons the Council has approved funds to conduct planning for proposed hydrologic restoration projects in other watersheds, such as the “Bahia Grande Wetland System Restoration” project. The Council is also approving funding for the project “Baseline Flow, Gage Analysis & On-Line Tool to Support Restoration.” In this project, the USGS and the EPA are collaborating on a comprehensive, large-scale project to provide vital information on the timing and delivery of freshwater to streams, bays, estuaries and wetlands of the Gulf States, including freshwater inflows into Galveston Bay. In the Galveston Bay watershed, the Council is approving funding for the Bayou Greenways project, which would protect riparian habitat that is linked to downstream water quality and flows. Lastly, future projects funded under RESTORE Act funding allocations other than current or future FPLs (such as the Direct Component or the Spill Impact Component) could address freshwater inflows to bays and estuaries in Texas.

Bayou Greenways

Comment: General concern related to Bayou Greenways and purchase of Clear Creek Riparian Corridor for a greenway and flood control project because Harris County Flood Control District (HCFCD), which has an easement that is dominant over any City of Houston or Houston Parks Board (HPB) plan, project, proposal, or authority, wants to put detention basins within the property that is proposed for greenway, park, wildlife and aquatic habitat, and riparian forest protection purposes. This will result in the damage, degradation, and destruction of wildlife and aquatic habitat and riparian forest along Clear Creek. Please ensure that if funding goes towards

this project, that the purchased corridors are protected and not replaced by human manipulated watercourses.

Response: The lands purchased with RESTORE funds will be preserved in perpetuity as City of Houston parkland for passive park use, protection, restoration, and preservation of habitat and not developed as detention basin(s). RESTORE funding will not be used to acquire land along the entire Clear Creek corridor, just in the target area outlined in the proposal (between Tom Bass Regional Park and El Franco Lee Park). RESTORE funding is being used to target large tracts located south of Beltway 8 and north of Clear Creek. RESTORE funding will be used to acquire as much acreage as possible - entire parcels, not strips - in order to protect them from development and create passive-use/nature parks along the greenway. The Council and the State of Texas will ensure that these parcels continue to absorb, slow, and clean storm water on its way to Clear Creek. A 10 foot wide hike/bike trail for connectivity – tied into the Clear Creek Greenway – is a part of the project, but funded separately. The hike/bike trail is consistent with the Council’s focus on supporting ecosystem restoration projects and programs that also benefit human communities. Moreover, all Council financial awards for habitat conservation projects will include a special condition requiring the acquired lands to be protected in perpetuity. This condition will expressly prohibit activities that are inconsistent with the goal of maintaining or enhancing the natural habitat value of the lands.

Comment: Describe the expected community benefits, and develop a public engagement and education strategy.

Response: The Bayou Greenways initiative addresses several significant challenges of the greater Houston area. The broader target area is uniquely positioned with numerous bayous that cross the urban fabric, connect diverse neighborhoods and represent significant ecological capital. The proposed acquisitions will protect porous land along the bayou corridors and maintain them as permeable surface. Assembling, restoring and connecting these corridors is a wise and sustainable practice to alleviate greenspace, health and storm water runoff challenges.

There are numerous benefits associated with utilizing bayou corridors for greenspace and recreation: slowing storm water runoff due to newly created or protected green spaces; increased water quality due to the simple plantings and protection of existing habitat; increased air quality due to increased CO² sequestration by preserved vegetation and newly planted trees; increased access to recreation opportunities such as walking, running and biking; increased alternative transportation opportunities for commuting along the hike and bike trails; and an attractive recreational asset that could draw more residents to Houston, thus contributing significantly to Houston’s economic prosperity.

The Houston Parks Board has a dedicated communications team with a strategy of proactively engaging community members, stakeholders, elected officials, community

organizations and key partners throughout the lifespan of the Bayou Greenways 2020 project to communicate effectively and consistently about the project.

Comment: Encourage the City of Houston to work with local land trusts on this project, perhaps through an advisory board.

Response: The Houston Parks Board is working with numerous non-profit and public sector partners on various bayou greenways inside and outside the city limits and welcomes opportunities to work with local land trusts. The Clear Creek Bayou Greenway project is one of the projects recommended for the NFWF Gulf Environmental Benefit Fund (GEBF) by a coalition of Texas conservation organizations including Audubon Texas, Coastal Bend Bays & Estuaries Program, Ducks Unlimited, Environmental Defense Fund, Galveston Bay Foundation, Gulf Coast Bird Observatory, Gulf Restoration Network, Houston Audubon, Houston Parks Board, National Wildlife Federation, Ocean Conservancy, Sierra Club - Lone Star Chapter, Texas Conservation Alliance, The Conservation Fund, The Nature Conservancy (TNC), The Student Conservation Association and Turtle Island Restoration Network. The project list was submitted on March 21, 2014 to the State of Texas natural resource agencies by the coalition "Restoring the Texas Gulf Coast, A Strategy for Improving Coastal Habitats, Marine Resources, and Communities After the *Deepwater Horizon* Oil Spill."

Texas Beneficial Use/Marsh Restoration

Comment: Consider ways to balance beneficial use projects with more long-term projects, ensure rigorous sampling and evaluation standards, and develop monitoring plan to address physical and ecological function of beneficial use projects across the Gulf.

Response: The Council recognizes the need for long-term planning for implementation of sediment management, in order to provide for effective use of dredged materials and other sediment resources for habitat conservation and restoration. The State of Texas also actively participates in the Gulf of Mexico sediment planning effort to develop the Gulf Regional Sediment Management Master Plan. The intent of the plan is to provide guidelines for more effective use of materials and establish a technical and scientific framework to guide the decision making process for selection of borrow sites and placement areas. The goal is to understand the sediment dynamics and use science-based information to choose projects that will lead to a more resilient Gulf Coast. In addition, this specific project will engineer and permit several placement areas that will allow for continued wetland restoration over several years as dredge material becomes available.

The Council recognizes that monitoring is essential to capture the beneficial or adverse effects of using dredge materials for habitat restoration. Monitoring plans will be developed to consider the natural dynamics of the habitats; the pace of succession and

the potential influence the project has on physical and ecological functions of the adjacent ecosystems. However, each project varies from site to site and the ecological impacts are dependent on different external drivers. The management plans will capture the site specific influences for each project and recommend adaptive strategies that will acknowledge these factors.

Louisiana

Overarching

Comment: Overall support for all seven Louisiana projects proposed for the Initial FPL and appreciation for the consistency with the Master Plan. Support for seeing these implemented as soon as possible.

Response: The Council is pleased that there is broad overall support for all seven Louisiana projects proposed for the Initial FPL. The State of Louisiana likewise supports implementing these projects as quickly as possible in order to promote the overall ecological recovery of the Gulf Coast region but recognizes the importance of project engineering and design in this unprecedented restoration effort.

Comment: Why isn't there more education and outreach elements related to Louisiana coastal issues, helping people understand erosion, coastal restoration, etc.

Response: The Council is extremely supportive of, and committed to, education and outreach efforts such as those undertaken by the State of Louisiana's Coastal Protection and Restoration Authority that help citizens understand the challenges facing coastal Louisiana. Through ongoing engagement and education initiatives and outreach efforts directly related to the development of the State of Louisiana's Coastal Master Plan, the state is constantly meeting with a broad diversity of stakeholders and developing informational materials and tools to share information with citizens. The Council and the State of Louisiana are always looking for ways to improve these efforts. Information about ongoing efforts and opportunities to learn more about the work in the State of Louisiana can be found at www.coastal.la.gov.

Comment: Has the Council considered working with oil and gas companies that are no longer active in certain areas to potentially get them to donate unused lands for a tax break? The benefit of investment is in public interest and lands are 'donated' by the companies.

Response: Almost all of the companies that the State of Louisiana works with on coastal restoration projects provide the land rights needed to construct and maintain projects at no cost to the state. The Council will continue to look into these issues with the State of Louisiana when feasible.

Comment: Encourages the Council to focus on coastal restoration to reduce erosion and land loss of the ancestral tribal lands of the Biloxi Chitimacha Choctaw Tribe.

Response: The Council and the State of Louisiana appreciate the very significant importance of ancestral tribal lands and remain committed to continued engagement with communities, through community focus groups, to help the State of Louisiana

identify concerns, conflicts and strategies for moving forward with key projects and programs contained in or consistent with the Coastal Master Plan.

Comment: We encourage the Council to consider opportunities where strategic acquisition of land and easements/servitudes directly complement the goals of the state's *Master Plan* and conservation partners' goals along the Louisiana's coast. Acquisition of interests in lands often ensures that those investments are safeguarded and that the land that is protected or created is properly managed.

Response: The Council, in coordination with the State of Louisiana, will continue to look into these issues when and where feasible.

Comment: Questions regarding Louisiana's overall coastal restoration strategy as it relates to structural geology and sound science. As a general principle of sound science, the entire coastal restoration effort needs to carefully consider deeper/structural geology.

Response: The entire coastal restoration effort lead by the State of Louisiana currently does, and always has, considered deeper, structural geology. The Coastal Restoration and Protection Authority's (CPRA) geologists are well aware of the active local and regional fault systems, the interplay between the fault systems, subsurface fluid withdrawal, subsidence and land loss. CPRA's geologists stay abreast of the latest peer-reviewed science related to the deeper, structural geology of Louisiana's coast and incorporate that information into all planning efforts.

Lower MS River Delta

Comment: The Council's proposed projects in the Mississippi River Delta will help to improve the condition of the region, furthering the objectives of the State of Louisiana's Coastal Master Plan. Deeply rooted in science, the Master Plan was designed to address the largest land loss crisis in North America, which has serious implications across the Gulf.

Response: The Council is very pleased with the public's support of the projects in the Mississippi River Delta and believes that focusing on restoring the natural ecosystems in this area, which is the seventh largest Delta in the world, is absolutely essential to restoring and protecting the natural resources and ecosystems of the Gulf Coast region. The State of Louisiana is likewise pleased with the public's support of the state's Coastal Master Plan which was developed using the best available science and engineering, and is designed to focus the state's efforts and guide the actions needed to sustain our coastal ecosystem, safeguard coastal populations, and protect vital economic and cultural resources. The Coastal Master Plan also provides the context needed to evaluate other activities in the coastal zone, including transportation, navigation and port projects; oil and gas development; groundwater management; and land use

planning. It is the guiding document in the state's coastal protection and restoration efforts, and it provides valuable input to the RESTORE Council's Gulf-wide restoration efforts.

Jean Lafitte Canal Backfilling

Comment: General support of canal backfilling as a restoration technique; project is scientifically defensible; backfilling has a proven success record, it cost-effective, and restores well-documented cause-and-effect relationships between stress and land loss.

Response: The Council appreciates the support for this project and the fact that it is a scientifically defensible restoration technique and fully implementable project – both key considerations for including it in the Initial FPL. Substantial scientific information has been published over the years supporting the backfilling of canals as a cost-effective restoration technique that restores the structure and function of wetlands. In addition, restoring wetlands in this location is consistent with the multiple lines of defense strategy, and may contribute to community resilience.

Comment: A commenter opposed the canal backfilling project due to concerns related to mineral rights.

Response: Petroleum development in national parks occurs where entities other than the federal government own the mineral rights. Oil and gas activities associated with nonfederal oil and gas rights are governed by the NPS Nonfederal Oil and Gas Rights Regulations found in 36 C.F.R pt. 9B (2015) ("9B regulations"). These regulations govern the access for exploration and development of subsurface mineral rights, including NPS approval of operation plans and subsequent reclamation requirements (36 C.F.R. § 9.39 (2015)). The 9B regulations balance NPS mandates to preserve the natural and ecological integrity of park resources in perpetuity with the need to provide reasonable access to nonfederal owners of oil and gas rights for exploration and development of oil and gas. This proposed restoration project furthers the primary NPS objective of preserving the park values for future generations while continuing to allow private entities access to explore and develop future oil and gas exploration and development in accordance with the 9B regulations.

When Jean Lafitte National Historic Park and Preserve (Preserve) was established, the United States acquired the surface estate and left the mineral estate in private or state ownership. Oil and gas access canals identified for reclamation under this project have not been utilized in decades, and the owners have not indicated to the Preserve an intent to explore or develop in the near term. Meanwhile, the existing canals continue to stress wetlands and contribute to land loss, harming the ecological integrity of the park. The proposed reclamation project furthers NPS's preservation mandate. However, the project would neither alter property rights or land use designations within the Preserve, nor prevent non-federal owners of oil and gas rights from exercising their

property rights, or from exercising their right to reasonably explore and/or develop oil and gas minerals should they wish to do so in the future.

Comment: General opposition to Jean Lafitte canal backfilling. Thinks we should build more ridges instead of knocking them down. Projects related to backfilling such as Jean Lafitte, need to include a geologic analysis in the decision.

Response: Construction of ridges (or spoil banks) and their associated canals would not fulfill Congress' mandate to leave park resources and values unimpaired for the enjoyment of future generations (54 U.S.C. §100101(a), §§100301 et seq.). In addition, the legislation creating Jean Lafitte National Historic Park and Preserve specifically instructs that freshwater drainage patterns, vegetative cover, integrity of ecological and biological systems, and water quality be preserved and protected within the Barataria Preserve (16 U.S.C. §230a(c)).

Spoil banks and their associated canals alter hydrology by restricting water flow above and below the marsh surface leading to increased flooding or drying of marshes behind them. This hydrologic alteration limits sediment deposition, stresses marsh vegetation, increases subsidence, and leads to marsh deterioration. Additionally, spoil banks and their canals amplify tidal volumes, increase saltwater intrusion, and enhance the presence of exotic species.

Wetlands benefit coastal communities by providing protection from flooding, helping to maintain water quality, and providing habitat for fish and wildlife. Therefore, the alteration or loss of wetland functions due to construction of ridges would not be appropriate because it would adversely affect the Preserve's ability to preserve and protect those resources and values by which the Preserve was established.

West Grand Terre Beach Nourishment and Stabilization

Comment: Overall support of West Grand Terre, as it was greatly impacted by the oil spill, provides valuable habitat, and is an important natural buffer in the multiple lines of defense.

Response: The Council is very pleased with the public support for this project because Louisiana's barrier islands are incredibly important natural buffers which provide key habitat while anchoring Louisiana's multiple lines of defense against storm surge and gulf shoreline erosion. The fact that Louisiana's barrier islands have decreased in land mass by more than 50% over the last 100 years, with the Barataria/Plaquemines region being one of the most rapidly disappearing areas in Louisiana, further underscores the importance of this project.

Golden Triangle Marsh Creation

Comment: Overall support of the Golden Triangle Marsh Creation because Golden Triangle is an important natural buffer in the multiple lines of defense...protecting communities in New Orleans.

Response: The Council is very pleased with the public support for this project, which if implemented, will protect wetland, fish, and wildlife habitat while bolstering the multiple lines of defense protecting geographically and socially vulnerable communities in the city of New Orleans from storm surge. Because of its close proximity to New Orleans and the Bayou Sauvage National Wildlife Refuge, this project also will provide an important opportunity to promote natural resource stewardship and environmental education and outreach.

[Biloxi Marsh Living Shoreline](#)

Comment: Overall support, as project implementation will reduce erosion and provide valuable ecosystem services.

Response: The Council is very pleased with the public support for this project, which if implemented, will provide habitat and ecosystem services while helping to protect, enhance, and restore the Biloxi Marshes, which are an important storm buffer for the New Orleans area. Bioengineered oyster reefs can significantly reduce shoreline recession, support good oyster recruitment and survival, support distinct and diverse aquatic communities, and function as nursery habitat for many fish and shellfish species.

[Mississippi River Reintroduction into Maurepas Swamp](#)

Comment: Overall support for the Maurepas Swamp planning project. Would like to see it implemented as soon as possible.

Response: The Council is pleased to support projects and programs contained in Louisiana's Coastal Master Plan that also contribute to holistic Gulf restoration.

Comment: General questioning of the scientific validity of supporting planning related to the Maurepas Swamp project.

Response: This important project, which meets the overarching goals of the RESTORE Council's Initial Comprehensive Plan to restore and conserve habitat and restore water quality, has been, and continues to be, the focus of intensive scientific study. Key deliverables over the past decade have included a Hydrologic Modeling Report, Cultural Resources Report, Ecosystem Health Report, Flow Nutrient Salinity and Temperature Analysis Report, Water Quality and Ecological Risk Reports, Impact to Fisheries Report, and a draft Environmental Information Document prepared by the EPA. The project was also included in the State/US Army Corps of Engineers (USACE) Louisiana Coastal Area (LCA), Louisiana Ecosystem Restoration Study as the Small Diversion at Hope Canal

Project, which Congress recognized as one of five “Near-Term Critical Restoration Features for Conditional Authorization.” Additional steps needed before this project can be submitted for construction funding include pre-construction monitoring, modeling, and development of an Adaptive Management Plan. Additional technical details for this project will be developed during the engineering and design activities.

Comment: Does not argue against the potential benefits of this project, but questions the financial commitment for additional engineering and design. The project was clearly not in an area impacted by the Deepwater Horizon spill and believes that shovel ready projects are better investments than projects that continue to need duplicative studying to predict their ultimate feasibility.

Response: The RESTORE Act criteria for the Council-Selected Restoration Component extend beyond areas impacted by the spill, and include consideration of large-scale projects and programs that are contained in existing state plans. That is certainly the case for this project. Restoring a large swamp ecosystem through a freshwater diversion off the Mississippi River provides a unique opportunity to restore one of the largest forested wetlands along the Gulf Coast. A significant level of pre-construction monitoring is required to establish baseline ecosystem health and to guide the adaptive management program that will be utilized post-construction.

The RESTORE Council funding is not for planning activities—it is to make the project 100% construction ready. Funding will be utilized for pre-construction monitoring, completion of design (which is currently 95% complete), NEPA compliance, permitting (Section 10/404 as well as Section 408, both through USACE), land title abstract and appraisal work, and preparation of an operations, maintenance, and adaptive management plan. Spending resources wisely prior to construction will help to ensure this ecosystem restoration project ultimately meeting its intended goals.

Lowermost Mississippi River Management

Comment: General concerns about the Lowermost Mississippi River Management project and its potential effects on navigation in the future.

Response: The original project proposal did include a component requiring a new, integrated EIS for all Lowermost Mississippi River management projects (Navigation, Restoration, and Flood Control) and recommended changes to current management practices. These actions would have had a potential impact on navigation in the future. However, the original proposal has been revised and, as such, the currently funded activity will not require any new environmental compliance measures or modification of existing environmental compliance measures. The results of the project will not mandate or recommend any changes to existing Lowermost Mississippi River management activities.

The aim of the current, modified proposal is to increase technical knowledge of key physical processes in the Lowermost Mississippi River and enhance existing numerical models by adding the capability to investigate alternative navigation, restoration and flood control methods. This information is intended to provide decision makers with the most accurate technical information possible for future management activities. The project, currently proposed in the FPL, has been updated to include mechanisms to engage critical stakeholder groups, including the navigation industry, throughout the life of the project.

Bayou Dularge Ridge, Marsh & Hydrologic Restoration

Comment: The Chitimacha Tribe expressed great support and thanks for selecting this project for the draft Initial FPL.

Response: In the September 2015 Tribal meeting held in connection with the draft FPL rollout, the Tribes present were very supportive of the Chitimacha proposal and were glad the proposal made the draft FPL list. The Council understands that the Tribes would like to see more Tribal proposals on the list. The Council, including USDA, also understands that the Tribes felt the relatively short window of opportunity for generation and submission of potential proposals made it challenging for them to compete against others submitting proposals. The Council is grateful for the support of the Chitimacha Tribe and other Tribes for the Bayou Dularge Ridge, Marsh & Hydrologic Restoration project. The Council understands the challenges facing the Tribes and looks forward to additional opportunities to engage Tribes for projects on future FPLs and under other funding venues.

Mississippi

Overarching

Comment: Why aren't there more water quality projects in Mississippi on the FPL? Sewage and runoff needs to be treated as well.

Response: In following the RESTORE Council's emphasis on implementing projects that are foundational in nature (see call for proposals on the FPL at www.RestoreTheGulf.gov) the State of Mississippi focused on strategic land protection to improve habitat for coastal species affected by the Deepwater Horizon oil spill, as well as begin to improve water quality. The conservation of habitat and its restoration will directly improve water quality through mitigating runoff of sediment and nutrients, and improve water resources to the priority bays and estuaries of Mississippi, and the Mississippi Sound. This restoration technique also secures these water resource improvements in perpetuity.

Comment: There was a desire to see more projects in Mississippi that address resilience.

Response: The Council decided to focus on two focus areas for this round of funding: habitat and water quality. Though ecosystem and community resilience is a goal of the RESTORE Act, it was not a focus area on this first FPL. However, all the projects that were submitted by the State of Mississippi are intended to be resilient by providing ecosystem service benefits in the future.

Comment: There was a desire to see more projects in Mississippi that address forestlands and working with private landowners. Why wasn't the U.S. Department of Agriculture (USDA) project supported (that included these activities)? The Council should consider at least partial funding for the Mississippi Gulf Coast Forest Restoration and Conservation Initiative. This project did not make the draft Initial FPL, but will provide many environmental benefits.

Response: The selection process was a difficult decision for the Council. The State of Mississippi has a private lands project embedded into the original Strategic Land proposal submitted that is intended to work with forestlands and private landowners. This activity is being funded on this FPL through the USDA project (in the Gulf-wide Appendix on the FPL) and will establish the Gulf Coast Conservation Reserve Program where private landowners can receive incentives for water quality and habitat improvements. The State of Mississippi is actively working to see how additional components of the USDA projects may be funded through other funding streams.

Comment: We reluctantly must say the final product underwhelms us after so much time and effort. The Priorities List for Mississippi is long on planning, development and

other administrative funding and critically short on definitive "on the ground" conservation, enhancement, protection, and/or restoration results for the Mississippi Gulf Coast.

Response: Over half of the \$21 million going to the State of Mississippi from this FPL, will be spent on implementation of on-the-ground restoration. It is true that planning and development costs are also considered; however, those planning and development costs will allow the state to receive significant implementation funds in the future.

Comment: Overall general support for the State of Mississippi submitting a Gulf-wide project and encouragement for all Council members to do the same in the future.

Response: The Council will continue to look for ways to enhance internal collaboration in order to identify and implement the most effective projects and programs in future FPLs.

Comment: General support for many of the projects in Mississippi on the FPL such as the Mississippi Sound Estuary Program (MSEP), Deer Island Beneficial Use of Dredge Material, and outreach and education. There was also support for the Baseline Flow and Gage Analysis, given that Mississippi is the focal area for the pilot within this Gulf-wide project.

Response: The Council greatly appreciates the support for these activities.

Comment: Please consider Graveline Bayou on this or future FPLs. The restoration of waters could help reestablish oyster beds. The oysters have been destroyed and ones that are there, and filter the bayou waters, are not edible because of septic tank leakage.

Response: The Council and the State of Mississippi will take this comment into consideration for restoration planning involving all funding sources available for such activities.

Mississippi Sound Watershed

Deer Island Beneficial Use Site

Comment: Ensure this is a scientifically robust project, includes a monitoring plan that incorporates traditional ecological knowledge, education and outreach, and addresses suitability and potential contamination of dredged material.

Response: This project is a continuation of restoration activities at Deer Island through the Mississippi Beneficial Use of Dredged Material Program (MSBU). This program has codified the importance of dredged materials for ecological restoration through

legislation that requires participation in the MSBU for most significant dredging projects. Decision making for the MSBU is guided by an interagency review team (IRT) which forms the steering committee for the Mississippi Beneficial Use Group (MSBUG).

The MSBUG, which is jointly led by the Mississippi Department of Marine Resources (MDMR) and the USACE Mobile District, is a true public/private partnership that engages in robust outreach through regularly scheduled monthly MSBU meetings. These meetings are open to the public in person and via WebEx. This organizational structure helps ensure that appropriate restoration targets are prioritized and that operational necessities such as ensuring the suitability of materials are handled systematically.

The location of the island, less than 0.25 miles from the mainland shoreline, has resulted in tremendous outreach and educational opportunities and has been used as a laboratory for a number of studies at both K-12 and higher education levels since the program started in early 2000.

The full proposal discussed the development of a monitoring and adaptive management program prior to the initiation of construction. The program will include project goals, objectives, performance criteria, monitoring methods and schedule, and potential adaptive management measures. A monitoring program will enhance natural resource stewardship with MDMR and include educational outreach with the public. Such a plan would describe the monitoring design proposed to evaluate progress towards meeting project goals and objectives, describe the organizational structure of the monitoring process, identify uncertainties and identify potential adaptive management actions. Additionally the monitoring plan will be developed so as to provide lessons learned that can be called upon for implementation of other similar restorations actions in the region.

Suitability of dredged material for placement in waters of the US and for the establishment of wetlands is a critical feature of the MSBU. Existing accepted protocols are followed prior to the decision to use any specific dredged material and is under the purview of the USACE, the Mississippi Department of Environmental Quality (MDEQ) and the MDMR as part of the permitting program. Regular material testing over the life of the MSBU has revealed that the majority of materials are suitable to re-use in our coastal environments. The material proposed for use in the immediate instance consists of riverine sand/gravel that is naturally occurring and following testing has been determined to be free of contamination.

[Strategic Land Protection, Conservation, and Enhancement of Priority Gulf Coast Landscapes in MS](#)

Comment: In the Mississippi Land Conservation proposal, we would like to see land acquisition considered in the Pearl River area, as well as the Pascagoula River area. In the Pearl River area, for example, the Council could leverage significant funds from the

NEPA-compliant program funded through the U.S. Navy Department of Defense Readiness and Environmental Protection Integration (REPI) Program. In addition, both watersheds are significant from a conservation perspective, have a history of successful land protection, and there are willing landowners with quality properties for sale.

Response: For funding to be eligible for implementation, those restoration projects would have to be covered under a NEPA document for land acquisition. At the date of publication of this Initial FPL such a NEPA-compliant document did not exist. Therefore, land acquisition by the State of Mississippi was limited to those tracts covered through existing NEPA and respective environmental compliance mechanisms. These areas were southeast De Soto National Forest, the Grand Bay Complex and the Gulf Islands National Seashore. The Council and the State of Mississippi will continue to identify new opportunities for land acquisition (i.e., the NEPA REPI) to understand how this area could be considered in future FPLs.

Comment: Discuss how this project will coordinate with other conservation efforts, tools and partners, especially the MDMR, Secretary of State and the Mississippi Department of Wildlife, Fisheries and Parks and non-profit land trusts.

Response: The MDEQ serves as the state's lead agency for Deepwater Horizon restoration and funding. MDEQ and other state agencies coordinate regularly on oil spill restoration efforts, including land protection priorities for the coastal counties. This coordination will continue to strengthen as various funding opportunities and efforts get underway. This proposal will also coordinate with other projects being funded on this FPL such as the DOI-led Strategic Land Assessment tool, the USDA-led Gulf Coast Conservation Reserve Program, and coordinated with and leveraged against the \$3.6 million NFWF GEBF Mississippi Comprehensive Restoration Plan to maximize land protection in the state and to ensure efforts are complementary of each other.

Comment: Suggest including water quality as a guiding factor for acquisition and creating a land conservation advisory committee.

Response: As stated in the original proposal, land acquisition will have 6 guiding principles as outlined in the FPL activity. One of those six principles includes habitat quality and ecological services, which includes water quality.

SeaGrant Education and Outreach

Comment: General support for SeaGrant outreach and education, would like to see more projects like this.

Response: The Council will monitor the effectiveness of SeaGrant activities and is open to considering further outreach and education investments in the future.

Comment: Include more details on the roles of the Partnership for Gulf Coast Land Conservation and others involved, and on how the project, through a broader environmental education program, will achieve better environmental stewardship, sustainability and awareness.

Response: The State of Mississippi will work with all applicable organizations to inform and create the framework for the education, outreach, and extension deliverables that best showcase how land conservation provides Gulf benefits.

Comment: Initial target audiences should be those groups whose involvement or support will decide the success of a land conservation program (i.e., private landowner, decision-makers).

Response: The Council and the State of Mississippi appreciates this input and will consider it in identifying initial target audiences.

The Mississippi Sound Estuarine Program

Comment: Discuss coordination with Gulf Coast Natural Estuarine reserves and coastal preserves and other Gulf entities to avoid duplications and leverage resources, and describe the role of non-profits and community organizations in developing and implementing this program.

Response: The Council is aware that MDEQ maintains regular coordination with other state agencies and stakeholders involved in coastal restoration through Deepwater Horizon funding. MDEQ has already had multiple meetings with sister agencies around the Mississippi Sound Estuarine Program (MSEP) priorities for the coastal counties. The Council and MSEP will look at other successful estuarine-like programs across the Gulf and adopt the best practices to forge a new program. Discussions with adjacent states as well as the Mobile Bay NEP, Grand Bay National Estuarine Research Reserve (NERR) and the Lake Pontchartrain Basin Foundation, will occur once the grant is funded. This coordination is critical for success.

Enhancing Opportunities for Beneficial Use of Dredge Sediments

Comment: Ensure this is a scientifically robust project, includes a monitoring plan and addresses suitability and potential contamination of dredged material. Include more detail of how this effort will work with the NFWF GEBF project.

Response: The enhancing beneficial use (BU) proposal is a planning, engineering/design, and permitting effort to create construction ready sites to receive BU in the future. These projects upon implementation will be scientifically robust, will address suitability of sediments, contamination, etc., and will include monitoring to showcase trajectories of project outcomes. This planning effort will complement the NFWF GEBF project by

creating permitted, engineered containment sites available for implementation funding through NFWF GEBF as appropriate.

Alabama

Overarching

Comment: Why isn't Dauphin Island being funded for restoration on this FPL? It was affected by the spill and is important for coastal protection against erosion and will aid in the sustainability/protection of inland restoration projects such as SAV and living shorelines.

Response: The Council agrees that Dauphin Island is an important resource for the Gulf and the State of Alabama, providing valuable habitat and coastal protection. There are several planning efforts underway for Dauphin Island. For example, Dauphin Island is one of the 19 priority watersheds in the Coastal Alabama Comprehensive Watershed Restoration Project in the FPL. Previously, in November 2014, the NFWF authorized \$4.2M in funding to conduct the Alabama Barrier Island Restoration Assessment to assess the current and future function of Dauphin Island, develop potential options for restoration, and evaluate the feasibility and cost associated with restoration actions. The Council believes the results of these studies will inform future funding decisions related to the restoration of Dauphin Island. Additionally, outside of *Deepwater Horizon* funding mechanisms, the State of Alabama has committed approximately \$7.2 million in funding to construct a nearly one mile long shoreline restoration project on the East end of Dauphin Island that will include up to 300,000 cubic yards of sand to widen and elevate the existing beach. Along with the beach restoration, the project will also reposition the existing offshore groins into three breakwaters, further stabilizing the East end.

Comment: Overall support and encouragement of the projects selected in the FPL for the State of Alabama. The FPL contains projects that range from restoration to monitoring and planning. But it would be good for Alabama to create a state master plan similar to Louisiana.

Response: The Council agrees that robust planning is important, which is why the Council is funding watershed planning around Mobile Bay and building upon other watershed planning being funded by NFWF GEBF. In combination, detailed watershed restoration planning is being completed around Mobile Bay. Outside of *Deepwater Horizon* funding mechanisms, the State of Alabama is also currently developing the Alabama Coastal Comprehensive Plan (ACCP; please see: www.sam.usace.army.mil/Missions/ProgramandProjectManagement/AlabamaCoastalComprehensivePlan.aspx). Facilitated by the USACE, Mobile District and modeled after similar efforts in Mississippi (such as the Mississippi Coastal Improvements Program-MsCIP), the ACCP's primary purpose is to develop a constituent informed, science-based coastal comprehensive plan to strengthen the economic, environmental, and social resilience of coastal Alabama.

Comment: Why isn't there more land acquisition in Alabama such as in Mississippi and Texas?

Response: The Council and State of Alabama recognize the importance of land acquisition as a conservation and restoration tool. While it does not include specific land acquisition efforts in Alabama, this first FPL does include planning initiatives intended to help inform future land acquisition in Alabama and beyond. The Comprehensive Watershed Planning effort in Alabama will include identification of priority habitats for restoration and conservation. The FPL also includes funding for the DOI-led effort to create a Gulf-wide strategic conservation assessment framework to assist in decisions related to future land conservation. In addition, outside of *Deepwater Horizon* funding mechanisms, the State of Alabama will continue the evaluation and acquisition of priority tracts through its Forever Wild Land Trust program.

Comment: Would like to see more long-term monitoring in Alabama as well as foundational work to set the stage for future success

Response: The Council and State of Alabama fully acknowledge the need for monitoring of restoration projects and support long-term monitoring. In Alabama specifically the FPL includes funding to continue long-term, statewide SAV mapping and monitoring. The FPL also includes a pilot project to establish a monitoring program for living shorelines projects in Coastal Alabama, which, if successful, could be implemented Gulf-wide and assist with development of best practices for living shoreline techniques. Alabama will also be participating in the Gulf-wide Council Monitoring and Assessment Program led by the Departments of Commerce (NOAA) and Interior (USGS). This planning effort is intended to develop common standards, protocols, and recommendations for the Council to consider Gulf-wide as future long-term monitoring efforts are proposed for implementation. Additionally, leveraged NOAA funds will be used to develop a pilot application to demonstrate how the Alabama Submerged Aquatic Vegetation (SAV) Restoration and Monitoring Project can be scaled to the entire Gulf region using Gulf-wide standards developed under the NOAA-USGS Council Monitoring and Assessment Program. This application will also result in the development of a SAV Restoration Handbook that will illustrate best practices and lessons learned.

Comment: Some stakeholders expressed an interest in seeing more implementation projects in Alabama, such as living shoreline and hydrologic and marsh restoration. They asked why these projects are funded for planning, but why not implementation?

Response: The Council shares the interest in expeditiously achieving on-the-ground restoration results. However, the Council cannot approve implementation funds until applicable environmental laws have been addressed. In cases where environmental compliance for promising restoration projects has not yet been completed, the Council is approving planning funds for such activities in Category 1 of the FPL, while also listing

these activities in FPL Category 2 as priorities for potential implementation funding. In considering whether to approve implementation funding for Category 2 activities, the Council will review the associated environmental compliance documentation, as well as other salient information pertaining to feasibility, effectiveness, cost and other considerations.

Comment: The Alabama Gulf Coast Recovery Council was changed from a State Entity (subject to Alabama’s Open Meetings Law) to a Non-Profit Association. Why is that? It seems that it could be so they could meet behind closed doors and hinder the disclosure of monies being spent.

Response: Both the Alabama Gulf Coast Recovery Council (AGCRC) and the Gulf Coast Ecosystem Restoration Council (Council) were created with the passage of the RESTORE Act (Act) in 2012. Accordingly, as the AGCRC was established pursuant to federal legislation, it was never a state entity. The Act does not set forth any duties for the AGCRC related to the development of FPLs, as this is the responsibility of the Council. Any questions regarding the AGCRC are outside the scope of this FPL and should be directed to the AGCRC.

Mobile Bay

[Coastal Alabama Comprehensive Watershed Restoration Planning Project](#)

Comment: Appreciates the Mobile Bay planning and watershed approach with Mobile Bay as a centerpiece.

Response: The Council appreciates the support for Mobile Bay planning and the watershed approach. The Council endeavored to ensure that the projects met the individual needs of each watersheds and/or estuary, including Mobile Bay, while working towards holistic Gulf restoration.

Comment: Would like to see land protection projects proposed in future rounds, and recommend they include land trusts in the development of this planning project. Request the state, and Council prioritizes immediately actionable land acquisition projects already identified within critical protection areas.

Response: The primary RESTORE goal for the comprehensive watershed planning effort is restoration of water quality. The protocols for watershed plan development used by the Mobile Bay NEP are modeled after standards developed by the EPA to improve water quality. While these management plans are not specifically focused on land acquisition, land protection is one of the many available restoration tools that will be considered.

The FPL includes the DOI-led project, the “Strategic Conservation Assessment of Priority Gulf Coast Landscapes” that intends to develop a suite of tools that Council Members

can use in considering land conservation opportunities in the Gulf Coast region that offer the greatest potential ecosystem benefits.

Comment: Ensure this is a scientifically robust project, includes metrics for success and an education and outreach component. Suggest funding should be included for future project implementation.

Response: Each watershed management plan is produced in a standard format that is science based and stakeholder driven. Contractors will conduct a thorough assessment of existing data to develop a detailed watershed description including hydrology, soils, demographics, land uses and cover, existing water quality conditions, biological data and condition. The plan will document and where feasible, fill gaps in existing data. Community stakeholders will be engaged to review the data and develop strategies for restoration within the watershed. The final plan will include implementation strategies, cost estimates, measures for success, and monitoring components. The FPL includes funding for plan development only. However, the Council supports funding of this foundational planning effort as it will inform development of future implementation projects.

[Alabama Living Shorelines Program and Comprehensive Monitoring](#)

Comment: From a conceptual standpoint, Alabama’s “Living Shoreline Program” to construct biologically productive shallow offshore breakwaters to reduce erosion of salt marsh dominated shorelines is good. However, the following locations within Mississippi Sound: Coffee Island, Point aux Pins, Grand Batture Islands, Marsh Island, and Isle aux Dames should be delayed. No provisions are included in any of the proposed projects to address the fundamental increase in wave energy that has occurred within Mississippi Sound in relatively recent history and appears to be a primary cause behind the erosion. As a result, these restoration projects have an unacceptable high risk potential for failure. Another commenter recommends that the Council ensure the Living Shoreline Project(s) are scientifically robust. Commenter also asked that the Council include data-sharing plans and monitoring plans informed by the Comprehensive Living Shoreline Monitoring proposal.

Response: The FPL includes planning, engineering and design of living shoreline techniques for portions of Coffee Island and Point aux Pins that would, if ultimately constructed, augment existing shoreline restoration and stabilization efforts at both locations. The proposed planning effort will include assessment of local wave climate, hydrological processes, sediment transport, and other site specific conditions that could affect project success. These factors will be carefully considered when developing project alternatives to insure that final plans and specifications are scientifically sound and properly designed for current and anticipated future site conditions.

Marsh Island, Grand Batture Islands, and Isle aux Dames will be part of a study to determine the feasibility of beneficial re-use of dredged materials for restoring these back-barrier island systems. This is a planning and feasibility determination that shares the commenter's concern about future success. The Council recognizes that these island habitats are being lost and the funding provided will conduct field investigations, bathymetric and topographic surveys, geotechnical investigations, and hydrologic and sediment transport modeling to determine if restoration of these sites is feasible. Preliminary designs and order of magnitude cost estimates will also be generated.

With respect to living shorelines monitoring, the Category 1 component of the FPL has as its only deliverable the development of a comprehensive living shoreline monitoring protocol for coastal Alabama. If implementation of this protocol (the Category 2 component) is ultimately funded, standardized collection of data at each location will commence. All data generated by this program will be made available to the public. Where feasible, data gathered will be made available through existing online portals.

Alabama Submerged Aquatic Vegetation (SAV) Restoration and Monitoring Program

Comment: Address possible stressors to SAV in planning areas and a mitigation plan. Describe monitoring and data sharing plan and how this plan will be integrated across the Gulf for SAV restoration projects.

Response: As identified in the Lower Perdido Bay SAV project proposal, the stressors to be addressed in the project are mainly prop scarring and similar human impacts. As such, addressing these stressors, through direct restoration, signage and education & outreach, is the primary objective of the project. In regard to the Upper Mobile Bay/Lower Mobile-Tensaw River Delta SAV project proposal, stressors that caused the loss of *Vallisneria* in the area appear to be a combination of the intensive 2004 and 2005 tropical storm seasons followed by two years of severe drought. Restoration of *Vallisneria* will take place where this species was historically found before these stressor events. Further, during the development of the project's restoration plan, literature and water quality and quantity data will be reviewed to insure that long term change in local conditions has not taken place that would jeopardize project success.

The SAV monitoring effort described in the FPL is specific to Coastal Alabama, and builds upon nearly two decades of SAV monitoring effort. Like all of Alabama's previous SAV monitoring events, future data collection will be made publicly available.

This project is leveraging funding from NOAA, where Department of Commerce (DOC)-NOAA has allocated \$75K to develop a Gulf-wide SAV monitoring handbook that is based on the best practices and lessons learned used in Alabama and throughout the Gulf. It is anticipated that these collaborative efforts will set the foundation for a Gulf-wide approach to SAV monitoring.

Marsh Restoration in Fish River, Weeks Bay, Oyster Bay & Meadows Tract

Comment: Ensure this is a scientifically robust project that includes ecological metrics for success and considers the Bon Secour and Fish River watershed management planning efforts currently underway.

Response: The Council is committed to the best available science on all projects being funded on this FPL. For this specific NOAA-led project, NOAA will work closely with the Alabama Department of Conservation and Natural Resources (ADCNR), Mobile Bay NEP, and other local entities managing the Fish River and Bon Secour River watershed management plans to leverage data collection efforts and to identify future opportunities within these watersheds. As described in the activity in the FPL appendix, project-specific monitoring and adaptive management plans with scientifically-based performance standards and ecological metrics will be developed during the design phase of each project. NOAA agrees that a scientifically robust monitoring approach is critical to ensuring successful implementation and documenting the performance of these projects.

Mobile Bay National Estuary Program

Comment: Ensure the monitoring program includes measurable indicators that gauge both physical (sediment load reduction, dissolved oxygen increases) and ecological benefits (aquatic habitats).

Response: These suggested monitoring indicators will be considered during the development phase. As currently proposed, the metrics being contemplated to measure success include, if fully implemented: up to 1,000 linear feet of stream and stream-bank restored; up to 7.5 acres of wet bank restored/protected from invasive/nuisance species; up to 100 acres of water surface area restored/protected from invasive/nuisance species; number of pounds of sediment removed from downstream transport (75% reduction in total suspended solids); percent increase in dissolved oxygen over a three year period (50%); and acres of wet bank with at least a 70% reduction in presence of apple snail within target area over a three year period.

Upper Mobile Bay Beneficial Use Wetland Creation Site

Comment: Overall concern for this project. Shouldn't the Port Authority be paying for it? There really isn't much public information on this project. This does not appear to be a true habitat "restoration" project but driven by financial considerations related to maintenance and expansion of Mobile Harbor. In addition, the project states it would restore estuarine tidal marsh, however there is no information on the historical loss of tidal marsh in this area to be restored. Project appears inconsistent with goals of the other projects on FPL: Mobile Bay NEP and Coastal Alabama Comprehensive Watershed Restoration. We have projects proposing to reduce sediment delivery to Mobile Bay as a

“pollutant” and one that intentionally brings it. Concern over size (1,200 Acres). Project states it will provide appropriate spawning grounds for native estuarine species; what species?

Response: A statewide summary of wetlands loss and restoration efforts in the Mobile Bay system (prepared by the USGS Wetland and Aquatic Research Center (WARC) and the Geological Survey of Alabama) indicates that the 10,000 acre loss of emergent wetlands in the northern portion of the bay was more than four times greater than the national and southeastern average between the mid-1950s and the late 1970s. One of the causes identified with this loss was the reduction in upstream sediment input to the bay. From the early 1800s to 1986 sediments dredged during the maintenance of the Mobile Ship Channel were placed in adjacent waters in Mobile Bay. In 1986 the practice was changed in response to Congressional legislation and all material dredged from the bay channel was transported to an ocean site for disposal. Since 1986 approximately four million cubic yards of sediment have been removed from the system annually, leading to concerns about shoreline erosion and recession of wetlands in the north and west portions of Mobile Bay.

In late 2011 an Interagency Working Group (IWG) comprised of state and federal agencies, Dauphin Island Sea Lab and NGOs such as the Mobile Bay NEP, TNC, and Mobile Baykeeper was formed to discuss alternate sediment management opportunities and strategies for the beneficial use of dredged material from the upper Mobile Bay and River channels. Recognizing that sediment is a natural resource, the IWG recommended the investigation of three opportunities for the beneficial use of dredged material to benefit the ecosystem of the bay: 1) the filling of the Brookley and Airport Holes; 2) resumption of thin-layer disposal of dredged material within the bay; and 3) the creation of an upper Mobile Bay emergent tidal marsh along with the continued placement of a portion of the maintenance material in the ocean site. Partial restoration of depths in the Brookley Hole has occurred and monitoring results have shown a significant increase in benthic diversity and abundance though still subpar to natural bay bottom. The continued use of the Brookley Hole and subsequent filling of the Airport Hole have been recommended by the IWG based on the overall benefit to bay resources. The concept identified by the IWG for emergent wetland would result in a semi-confined site with a sacrificial berm. The sacrificial berm would be constructed either from material within the footprint of the site or from sand/gravel material dredged during maintenance of the Black Warrior-Tombigbee River (drains into the Mobile River) and placed in upland disposal sites. This riverine material is removed from sources of pollution and was tested prior to use in a demonstration project on the use of this sand on Dauphin Island. Over time suitable maintenance material dredged from the Upper Bay and River Channels would be placed within the berm, allowed to consolidate, and then planted with wetland vegetation as necessary. Material could come from the federal channel, Alabama State Port Authority (ASPA) or private facilities abutting these channels. The ASPA was identified by the IWG as the appropriate party to manage the

site in coordination with the USACE and State regulatory agencies. In addition the ASPA would be responsible for maintenance of the site in the future.

The ultimate goal of this project is to create an extensive emergent wetland that would serve as nursery habitat for those species utilizing this habitat in Mobile Bay including shrimp, crabs, mullet, trout, and other finfish species. The goal of this phase of the project, however, is to complete engineering and environmental studies necessary to design the feature and develop the permit application and appropriate environmental compliance documentation. To date, surveys have been initiated by the ASPA to determine the presence of cultural resources, oyster and SAV. This information was used to narrow the site selection from the original 3 areas identified by the IWG to the current area under consideration.

Comment: Explain site selection, ensure rigorous sampling and evaluation standards, and develop monitoring plan to address physical and ecological function of beneficial use projects across the Gulf.

Response: With regard to the upper Mobile Bay emergent tidal marsh the IWG recommended three potential locations within the upper bay that merited further investigation. Initial screening criteria used to prioritize these sites included:

- Proximity to source of dredged material
- Potential to alter river and/or bay hydrodynamics
- Potential real estate or riparian rights issues
- Proximity to airfield approaches and runways at Brookley Aeroplex
- Size
- Cost of construction
- Cultural resources
- Marine resources – SAVs, oysters etc.
- Water depth
- Type of containment needed
- Acceptability to all agencies participating in the IWG

To address the most critical criteria, the ASPA moved forward with a Phase I cultural resources survey and surveys for SAV and oyster resources of the three potential sites. In addition coordination was undertaken with the Federal Aviation Administration (FAA) concerning conflicts that might arise from use of the facilities at Brookley Aeroplex which is on the western shore of Mobile Bay. Based on this initial information, the site assigned highest priority by the IWG was the eastern-most site due to its distance from the Brookley airfield and possibly lower occurrence of cultural resources. The IWG identified additional studies that remained to be completed including bird usage, benthic//hydraulic modeling, geotechnical investigations, and bathymetric surveys. Once the final design is complete, appropriate environmental documentation including

the preparation of a monitoring and adaptive management plan will be prepared and submitted to USACE and Alabama Department of Environmental Management (ADEM) for approval and permit issuance. The IWG will continue to direct the activities associated with the development of this wetland creation project.

Enhancing Opportunities for Beneficial Use of Dredge Sediments

Comment: Planning should include the State of Florida as a project partner or advisor, and the development of a monitoring plan to address physical and ecological function of beneficial use projects across the Gulf.

Response: In addition to participation as Council Members, all Gulf States and federal agencies are active partners in Gulf of Mexico Alliance Habitat Teams' Regional Sediment Management Subcommittee. This Subcommittee provides a venue to keep all Gulf States informed of ongoing Regional Sediment Management (RSM) and BU projects and studies taking place around the Gulf, while also providing an opportunity for interagency and interstate collaboration on these efforts.

Florida

Overarching

Comment: The restoration effort in Florida would benefit by a plan that looks at the entire Florida Gulf as part of one Gulf ecosystem by developing a Florida State Master Plan.

Response: Restoration efforts in Florida are informed by existing information from numerous state, federal and NGO programs as well as through planning that is being conducted as appropriate for spill-related opportunities. While there is no Florida-specific master plan, the Council will take into account the best available information to guide its decisions.

Comment: Overall support of the water quality infrastructure projects in FL (such as wastewater/stormwater treatment). Would like more stormwater/wastewater treatment projects in other watersheds.

Response: The Council appreciates support for the water quality infrastructure project included in this FPL. As restoring water quality in the Gulf is one of the Council's primary goals, the Council will carefully consider additional water quality improvement projects as it develops subsequent FPLs.

Comment: Overall support of Florida's efforts and Mimi Drew's work, including support for all the projects on the FPL in the State of Florida.

Response: The Council has been honored to have Mimi Drew work with the Governor of Florida and the Council to help get the best projects and programs into the Initial FPL.

Comment: The Council should include other watersheds (and more projects) in Florida, such as south of Tampa Bay, West Bay, St. Andrews Bay, Perdido Bay, Chocohatchee Bay, etc.

Response: This FPL is not precedent setting and additional watersheds may be included in future FPLs. The decisions by members to recommend spending funds in this Initial FPL within certain watersheds were based on consideration of a variety of factors, including the need to respond to ecological stressors; histories of public input and support for high-value areas; and socio-economic and cultural considerations, including whether projects were being supported through other funding sources. The Council members share an interest in providing future funding to additional priority watersheds in Florida as the members identify the most pressing needs throughout the Gulf.

Comment: The Council should include more Land Acquisition/Conservation/Habitat Restoration in the State of Florida that also protect and support a diversity of wildlife.

Response: The Council supports land acquisition, conservation, and habitat restoration that protects and supports a diversity of wildlife. It is anticipated that future iterations of the FPL will fund a greater variety of activities in Florida that meet the goals and objectives of the Comprehensive Plan, such as those mentioned.

In this Initial FPL, the Council included the Strategic Conservation Assessment Framework that will identify land conservation opportunities across the Gulf based upon shared Council member goals and other factors.

Comment: The Bay County Audubon Society would like to propose purchase of the property in Bay County on the north side of St. Andrews Bay known as the West Bay Sector Plan Conservational Lands. This is several thousand acres and contributes to the water quality of our bay.

Response: The Council encourages submitting project ideas to Council members for consideration in future iterations of the FPL. The State of Florida has a project portal that can be accessed at: <http://www.dep.state.fl.us/deepwaterhorizon/default.htm>

Comment: Why aren't there more Category 1 projects in the State of Florida?

Response: The Council shares the interest in expeditiously achieving on-the-ground restoration results. However, the Council can't approve implementation funds until applicable environmental laws have been addressed. In cases where environmental compliance for promising restoration projects has not yet been completed, the Council is approving planning funds for such activities in Category 1 of the FPL, while also listing these activities in FPL Category 2 as priorities for potential implementation funding. In considering whether to approve implementation funding for Category 2 activities, the Council will review the associated environmental compliance documentation, as well as other salient information pertaining to feasibility, effectiveness, cost and other considerations.

Comment: The need to fund research and education on the estuaries of the Florida panhandle is imperative.

Response: The Council agrees there is a need to fund research and education on estuaries in Florida, as well as in other parts of the Gulf. The RESTORE Act allocates funding specifically for the purpose of research in two of the five components, the NOAA Gulf Coast Ecosystem Restoration Science component and the Centers of Excellence Research Grants component. In this FPL, the Council will fund education and outreach opportunities through the funding of National Estuary Programs and by creating a new Estuary Program(s) in the Florida Panhandle. Additionally, several projects, such as Tampa Bay's Robinson Preserve, will provide for long term education events or programs following implementation of the projects.

Comment: Why are private landowners getting funding in Florida for restoration?

Response: With over 85% of lands around the Gulf of Mexico in the hands of private landowners, it is nearly impossible to restore the Gulf of Mexico without working with private landowners to improve water quality and quantity and habitats. Land-based activities can have a broad range of effects on water quality and quantity, as well as the habitat for a variety of aquatic species. For this reason, private landowners play a critical role in Gulf-wide ecosystem integrity. This FPL contains activities designed to help address ecological needs associated with private lands in Florida. In some cases, the Council is working with private landowners who wish to conserve existing, high-quality habitat. The Council is also working with farmers to implement a variety of land use best management practices (BMPs) designed to benefit Gulf water quality and quantity.

Comment: Support for the Northwest (NW) Florida Estuaries and Watersheds Project that will establish Estuary Programs for the Comprehensive Management, Restoration, and Protection of Seven Northwest Florida Estuaries.

Response: The Council agrees that NW Florida and Florida Panhandle are important places to focus restoration efforts which is why EPA is being funded to start a Gulf of Mexico Estuary Program (GMEP) in a Florida panhandle estuary. Additionally, it was brought to the Council's attention that the initial task to conduct comprehensive updates to the watershed management plans in the Panhandle has been funded through a grant from the NFWF GEBF. Priority projects identified as part of those watershed plan updates may be proposed for funding in future FPLs.

Pensacola Bay

Pensacola Bay Living Shoreline – Phase I

Comment: General support by local residents and local naval air station for Pensacola Bay Living Shoreline project. Believes it will succeed and provides protection and additional community resilience. And would like Phases 2 & 3 funded.

Response: The Council appreciates the support for the Pensacola Bay Living Shoreline project. The Council shares the interest in expeditiously achieving on-the-ground restoration results in this watershed. This FPL will fund the planning for all three phases of the project, and considers construction of the first phase as a Category 2 priority activity to be considered for future funding. Following the completion of the planning and design of all three phases, the other two phases may be considered for future funding.

Comment: Question on the viability and purpose of this project, for example will oyster reefs be able to survive in this environment? In addition, this area has not been prone to

erosion. While this project looks good on paper, it is not needed, and others with restoration experience and data to support project sustainability are not considered.

Response: This project is funded for FPL Category 1 planning. If there are issues identified in planning, they will be addressed before it is potentially funded in the future. The implementation phase is listed in Category 2 for future Council funding consideration. According to Escambia County all areas included in the Pensacola Bay Living Shoreline Project have experienced documented erosion. This project was conceptually designed after aerial photographs for the past 20 years were examined to document the erosion at these sites.

Reducing shoreline erosion is not the only benefit of the Pensacola Bay Living Shoreline Project. Loss of emergent marsh habitat in Pensacola Bay has been identified by EPA, USFWS, Florida Department of Environmental Protection (FDEP), and Florida Fish and Wildlife Conservation Commission (FWC) as a major concern for the health and sustainability of the recreational and commercial fisheries. The Pensacola Bay Living Shoreline Project will restore emergent marsh and SAV habitat in Pensacola Bay.

Oyster reefs will survive in this area of Pensacola Bay. Live oysters are currently found in the immediate vicinity on rocks, and the rock/oyster reef built 15 years ago at nearby Project Greenshores is thriving. This project's conceptual design was prepared by a marine biologist with over 30 years of experience successfully designing and constructing emergent marsh, oyster reef, and living shoreline projects in Northwest Florida, Alabama, and the Chesapeake Bay.

[Beach Haven - Joint Stormwater & Wastewater Improvement Project - Phase II](#)

Comment: Overall support of this project and stormwater/wastewater infrastructure improvement projects in Florida.

Response: The Council is pleased to support projects that will improve holistic Gulf ecosystem restoration, which includes infrastructure projects that have proven ecosystem benefits. This project in particular will build on past investments made from local, state, and federal governments, along with NRDA and NFWF funding in order to provide large scale and comprehensive restoration to the Pensacola Bay Watershed.

[Bayou Chico Contaminated Sediment Removal- Planning, Design, and Permitting](#)

Comment: Overall support of restoration activities in Bayou Chico.

Response: The Council is proud to support projects that will improve holistic Gulf ecosystem restoration, including projects such as this that have ecosystem benefits. Bayou Chico in particular has experienced severe environmental degradation due to historic impacts, including industrial and domestic wastewater discharges, shipyard-

related pollution and long-term untreated stormwater runoff. This project will make large scale investments with leveraged funds from sources including local, state and federal funds, along with NFWF GEBF funds.

Comment: Please include more information about the placement or use of dredge materials obtained from sediment removal. Metrics of success of this project should also include measuring pollutant load reduction of sediment removal.

Response: This project is funded for Category 1 planning. As part of the planning, pre-dredge sediment characterization will require sediment core sampling and laboratory analysis to determine the quality of sediment to be dredged and sediment disposal options.

Monitoring efforts for the planning, design, and permitting tasks will focus on the baseline conditions and pre-dredging environment. Monitoring events during the future dredging project, if proposed and funded, will include monitoring during dredging activities and post-dredging conditions. The baseline, and post-dredging monitoring will enable comparisons to determine the project's success in meeting its goals. Monitoring during dredging activities will ensure that the project is being conducted according to plans and regulatory permit conditions.

Apalachicola Bay

Comment: Consider at least partial funding now, or in the near future, for the private lands components of the Apalachicola Bay Project. Engaging private landowners in forest restoration and management is essential for the Gulfs future resiliency. Encourage the Council to seek land conservation opportunities in this and other key Florida watersheds in future rounds.

Response: Although no funding is included in this FPL for private land components of the Apalachicola Bay Project, this FPL contains a number of activities designed to help address ecological needs associated with private lands, including the Apalachicola Watershed Agriculture Water Quality Improvement project. The Council recognizes that privately owned agriculture and forestry lands make up over 85% of the landscape in the Gulf region and are an important part of the overall restoration effort to restore the Gulf ecosystem. The Council will work to build upon these private land programs in the future, as doing so is a critical part of comprehensive restoration. This FPL is not a precedent for future FPLs, and other types and locations of restoration associated with private lands will be considered in the future.

Apalachicola Watershed Agriculture Water Quality Improvement

Comment: Ensure collection of baseline information on nutrient loads, fertilizer application, water used for irrigation, etc., include monitoring plan to measure

reductions, and explain how these reductions related to the NW Florida Water Management Districts water supply planning and implementation.

Response: The Council shares an interest in ensuring that the most appropriate and accurate monitoring is conducted as a component of the projects and programs it funds. For the Apalachicola Watershed Agriculture Water Quality Improvement program, the number of participating farmers, acres enrolled in the best management practices (BMP) program, BMP tools adopted, irrigation systems retrofitted, and the amount of nutrient load reductions, and water saved will all be monitored and used to determine the success and benefit of the program.

The Council agrees that coordination with local entities and partners is vital to the ultimate success of the program and the achieved benefits to the region as a whole. This program will work jointly with the Northwest Water Management District as well as the National Resource Conservation Service to assist landowners in increase irrigation efficiency and conserve water resources while reducing operating costs as part of the region's water supply planning.

[Tate's Hell Strategy 1](#)

Comment: General support for Forest Restoration in the Apalachicola area, especially Tate's Hell State Forest project. Please fund both Category 1 and 2.

Response: The Council shares the interest in expeditiously achieving on-the-ground restoration results. More specifically, USDA and the State of Florida recognize the ecosystem benefits of the Forest Restoration project in the Apalachicola area and worked closely together to complete the necessary environmental readiness documentation to support funding elements in Category 1 and 2. Consequently, the Council is pleased to report that the implementation portions of Tate's Hell (previously proposed for FPL Category 2) is now being approved for full funding in Category 1 of this FPL, as all applicable environmental requirements have been addressed.

Comment: Provide more information about the removal of the component from the original proposal that addresses management activities on private forestlands.

Response: Although no funding is included in this FPL for the private land components of the Apalachicola Bay Project, this FPL contains a number of activities designed to help address ecological needs associated with private lands. The Council recognizes that privately owned agriculture and forestry lands make up over 85% of the landscape in the Gulf region and are an important part of the overall effort to restore the Gulf ecosystem. The Council will work to build upon these private land programs in the future, as doing so is a critical part of comprehensive restoration. This FPL does not set a precedent for future FPLs, and other types and locations of restoration associated with private lands will be considered in the future.

Money Bayou Wetlands Restoration

Comment: Connect project to others in the Bay Area, include critical habitat designation for Gulf sturgeon in the project description, and describe how activities will improve or avoid adverse impacts to this habitat.

Response: The St. Joseph Bay Buffer Preserve is located within two major watersheds, the Apalachicola River Basin and St. Andrews Bay. It also contains nearly the entire drainage basin of Money Bayou, a tidal creek that flows directly in the Gulf of Mexico. Therefore, this project will benefit from the ecological outcomes of the other proposed FPL projects while also furthering watershed restoration goals. This project will result in the restoration of wetlands that are hydrologically connected to Apalachicola Bay and directly to the Gulf of Mexico at the mouth of Money Bayou. In addition to restoring biologically diverse habitats, restoring a more natural flow of water through Buffer Preserve wetlands will, over time, improve both the quality and quantity of water reaching Apalachicola Bay and the Gulf of Mexico. This will benefit species such as oysters and the federally endangered Gulf Sturgeon. Gulf of Mexico nearshore waters near Money Bayou are designated as critical habitat for the Gulf Sturgeon. Gulf Sturgeon use nearshore Gulf waters during the winter months for migration and feeding in sandy nearshore habitats that support a variety of prey organisms. This project will improve freshwater flow and reduce the amount of sediments transported to nearshore waters from the Money Bayou watershed, improving habitat quality for both the Gulf Sturgeon and its prey. Early coordination with NOAA's Protected Resources Division will be conducted under this project to evaluate any potential impacts to Gulf Sturgeon or its critical habitat protected under the ESA. However, no adverse effects are anticipated because activities that would be conducted under Category 2, if approved in the future, are land-based. In addition, conservation measures to mitigate any potential for short-term increases in sedimentation during implementation will also be developed as part of this project's Engineering and Design and Monitoring and Evaluation Plan.

Apalachicola Bay Oyster Restoration

Comment: Ensure monitoring activities will be coordinated with NRDA and NFWF; suggest development of oyster management plan.

Response: Monitoring activities, including those utilizing funding from NRDA and NFWF, will be coordinated to the maximum extent possible to enhance the effectiveness and efficiencies of all funding streams. In addition, the Florida Department of Agriculture and Consumer Services (FDACS), the Florida Fish and Wildlife Research Institute (FWRI), and the Apalachicola NERR are or will play a pivotal role in each of the oyster restoration projects located in the Apalachicola Bay. These same entities are instrumental in the management of oyster reefs in the Apalachicola Bay.

Suwannee Watershed

Comment: Why only one project in Suwannee? Two other excellent projects were proposed related to land conservation and oyster restoration, why weren't those selected? We encourage the state and full Council to prioritize complementary land acquisition projects within the Suwannee River Basin and other key Florida watersheds in future rounds.

Response: The Council agrees there were other excellent projects submitted not only in the Suwannee River Watershed, but also throughout the Gulf Coast, that did not receive funding as part of this Initial FPL. The Council received over \$780 million in proposed projects during this initial call for projects. Due to the large volume of projects, not all could be funded at this time.

It is the intent of the Council to lay the foundation for future success as part of this FPL. To that end, the Council will fund Gulf-wide projects to ensure that future projects and programs funded will be successful, strategic and provide the greatest benefit to the Gulf. One example of this is the Strategic Conservation Assessment Framework for future land acquisition. This Framework will identify and evaluate land conservation opportunities in the Gulf Coast region that offer the greatest potential for shared economic and ecosystem benefits.

Suwannee River Partnership Irrigation Water Enhancement Program

Comment: Include targets for number of enrollees, outline criteria for prioritizing land, and include metrics to measure water quality improvements, nutrient reduction or water and energy conservation.

Response: The target number of enrollees is estimated at approximately 112; however, there are several variables (number of acres, number of BMPs installed, etc.) that will influence the final number of enrollees.

Landowners applications will be ranked using a scoring system that includes whether the landowner has retrofitted the overhead irrigation system within the last 5 years with drop nozzles and upgraded nozzle packages to improve irrigation system efficiency, whether the landowner is participating in an FDACS BMP program or has a USDA Natural Resources Conservation Service (NRCS) Conservation Plan with the irrigated acreage under application, the degree to which the landowner agrees to improve irrigation system efficiency by reducing overall system pressure, and whether the landowner upgrades an older diesel power unit to a Tier III or newer unit or to a new electric system, to improve fuel efficiency and/or reduce air emissions.

The number of landowners participating in BMPs, acres enrolled in the BMP program, irrigation systems retrofitted, nutrient load reductions, water savings, and energy savings are expected to be the project's measures of success.

Tampa Bay Watershed

Comment: Appreciates the projects in Tampa Bay being supported, however they will suffer from invasive species and relative sea-level rise. Would like to see more land acquisition in the future for the uplands in the Tampa Bay area, as well as on Egmont Key.

Response: The Council agrees that invasive species and potential sea-level rise are a risk to fish and wildlife and the habitat upon which such species depend. Project partners will incorporate specific considerations into the long-term sustainability of the project through site design factors. Moving forward, the Council will continue to consider projects and programs that include such measures, and consider projects in more upland habitats.

Palm River Restoration Project Phase II, East McKay Bay

Comment: Ensure this is a scientifically robust project, and describe plans for public engagement. Planning should consider implementation funding from other sources beyond RESTORE.

Response: The Council shares an interest in making sure that this project is a scientifically robust project. Project partners will incorporate best available science into the design, maintenance and the long-term sustainability of the project through site design and maintenance plans.

The Palm River Restoration Project Phase II, East McKay Bay is a high priority project in the watershed with a diversity of partners engaged. Project partners have demonstrated a history of utilizing a variety of funding sources to leverage project planning and implementation. In addition to RESTORE funding, sources include local tax dollars, Southwest Water Management District and Florida Department of Transportation funding.

The Council agrees that the accessibility and visibility of this project is a strong benefit to the public. This project is adjacent to the McKay Bay Bike Trail and will provide opportunities for public education concerning exotic vegetation and water quality improvement, as well as technology transfer to restoration practitioners.

Robinson Preserve Wetlands Restoration

Comment: Support of Tampa Bay projects in general, especially Robinson Preserve.

Response: The Council appreciates the support of the Tampa Bay projects and the Robinson Preserve. This project would leverage past investments in the Robinson Preserve, and would be an important component of ecosystem restoration within the Tampa Bay watershed.

Comment: Planning should consider implementation funding from other sources beyond RESTORE. Planning should identify risks associated with this project, such as sea-level rise, and develop a mitigation strategy to address those risks. The public access/visibility of this project is especially meaningful -- making Gulf Restoration tangible to the public at large.

Response: The Robinson Preserve Wetlands Restoration Project is a high priority project in the watershed with a diversity of partners engaged. Project partners have demonstrated a history of utilizing a variety of funding sources to leverage acquisition and restoration of Preserve lands. Sources include a combination of local tax dollars, federal and state grants, foundations and Water Management District funding, etc. Using RESTORE funds for the planning and implementation of this new component of the Robinson Preserve will allow for greater leveraging of existing funds and resources, as well as complement ongoing restoration efforts to allow for increased restoration.

The Council shares interest in making sure that this project can adapt to possible project risks, such as sea-level rise. Project partners will incorporate specific considerations into the long-term sustainability of the project through site design factors. The Council agrees that the accessibility and visibility of this project is a strong benefit to the public. This project includes a public education and outreach component as well as technology transfer to restoration practitioners.

[Tampa Bay National Estuary Program](#)

Comment: General support for the Tampa Bay NEP and appreciates the project selection.

Response: The Council appreciates the support for this project. The EPA's NEPs have been very successful in establishing and implementing a science-based approach to assessing the stressors of their estuaries, as well as developing Comprehensive Plans and implementing projects/programs that address those stressors.

Comment: Include more information about the expected contribution of these seven proposed projects to mitigate stressors in Tampa Bay.

Response: Once implemented, the seven proposed projects would reduce impacts from the following stressors: 1) water quality degradation due to excess nutrient loadings, and 2) estuarine habitat loss due to shoreline development and other land use changes, and invasive plant species. Collectively, implementation of the seven proposed projects

is expected to result in 16.5 tons of excess nutrient loading reduced per year; 268 acres of coastal habitat restored and 200 acres of seagrass created. Habitat restoration elements include saltmarsh, mangrove, coastal uplands, shallow water estuarine habitat and seagrass. Water quality benefits result from stormwater treatment in urban basins, restoring tidal exchange, and greenhouse gas emission reductions.

Gulf-wide Project Comments/Responses

Comment: Additional funding should go to Conservation Enhancement Grant Program, Gulf of Mexico Estuary Program, Gulf Coast Conservation Reserve Program, and Strategic Conservation Assistance Framework.

Response: The Council appreciates the support for these Gulf-wide projects and considers them foundational in long-term ecosystem restoration of the Gulf. That is why they are being approved for funding on this FPL. The Council views many of these as initial pilot projects, which if proven successful, would be considered for additional funding on future FPLs.

Council Monitoring and Assessment Program Development

Comment: Strong support for this program. Would like for it to be utilized as a foundation towards comprehensive Gulf monitoring and adaptive management. Would like for it to be considered for additional funding.

Response: The Council appreciates the support for this program and is committed to science-based decision-making, delivering results and measuring impacts. The monitoring and assessment program, administered jointly by NOAA and USGS, will fund the development of basic foundational components for Gulf region-wide monitoring in order to measure beneficial impacts of investments in restoration. The Council agrees that monitoring is a critical component of the restoration and resource management process. While many monitoring programs are underway in the Gulf, the Council has a unique opportunity to coordinate these programs and build a network that will gather data to measure the effectiveness of restoration projects and progress toward reaching comprehensive ecosystem restoration goals. As part of this program, the Council will conduct an inventory and gap analysis to help identify and prioritize monitoring needs, and help determine the best indicators (in coordination with other programs) for restoration success. After this is complete, specific recommendations will be provided to the Council on what needs to be monitored and costs involved.

Comment: Program should include a data-sharing plan, a robust public outreach and education component and involve Traditional Ecological Knowledge (TEK; i.e., from fishermen and frequent users of resource) in data collection. Program should also measure shortfalls in project performance to enhance adaptive management, and include explicit authorization for a habitat mapping community of practice.

Response: This initial three-year monitoring and assessment program is intended to inventory and coordinate existing habitat and water quality monitoring activities, data and programs. Although no new data collection is included in this initial phase, the program will compile habitat mapping and water quality data and information that will be broadly shared through data management and visualization tools. Additionally, through collaboration with the Gulf States, federal and local partners, academia, nongovernmental/ non-profit organizations, and business and industry, the program will utilize a Community of Practice (CoP, administered by the “GOMA Coordination” project). This CoP will leverage existing resources, capacities, and expertise, build on existing monitoring data and programs, and serve as a vehicle for public outreach and education. This CoP includes expertise from the habitat mapping community, which will capture the needs of this community without explicit authorization for a separate CoP. This project will also utilize a Council Monitoring and Assessment Work Group, represented by all Council members, that will be developing guidance on monitoring and adaptive management plans, including the appropriate types of data to collect (including TEK), establishment of performance measures and processes for evaluating outcomes, whether positive or negative.

Comment: Include Gulf Partnership in your stakeholder groups and coordinate closely with GOMA.

Response: Through collaboration with the Gulf States, federal and local partners, academia, nongovernmental/ non-profit organizations, and business and industry, the program will utilize a Community of Practice (CoP, administered by the “GOMA Coordination” project) to leverage existing resources, capacities, and expertise and build on existing monitoring data and programs. The Gulf Partnership can be included within this CoP.

Gulf of Mexico Alliance (GOMA) Coordination

Comment: Describe how monitoring needs and indicators will be identified, how adaptive management will be implemented for monitoring standards and protocols, who the users will be for these protocols, and how they will be adopted throughout the region. Project should be more clearly integrated with the overall monitoring project.

Response: The monitoring needs and indicators will be identified by a Monitoring Community of Practice (CoP) that will be established by two FPL-funded projects: (1) Council Monitoring & Assessment Program Development and (2) GOMA Coordination. The CoP includes those organizations that conduct monitoring throughout the region, including state and federal agencies, as well as local and regional NGOs. Most are already active members of GOMA, but project managers will seek out others that may not have been previously engaged. The GOMA coordination of the Monitoring CoP is integrated into the Council Monitoring & Assessment Program Development FPL project jointly administered by NOAA and USGS.

A component of the Council Monitoring & Assessment Program will be the assembly of a Monitoring & Assessment Work Group, representative of all Council members, to develop recommendations for monitoring and adaptive management plan formats and monitoring and data standards and protocols for use on Council projects. The Monitoring CoP serves an important role by providing feedback on those standards and protocols, through the utilization of workshops and other outreach tools. Also, GOMA will encourage the adoption of the standards and protocols throughout the region in applicable habitat restoration and water quality projects.

In short, by bringing together a diverse group of monitoring stakeholders, this project will establish a standardized path forward for habitat and water quality monitoring through broad engagement rather than mandated by any one entity.

Strategic Conservation Assessment Framework

Comment: Please involve the Gulf Partnership and its 34-member land trusts in the development of this project and as an advisor to the Core Working Group.

Response: As referenced in the original proposal submitted by the DOI (available at www.RestoreTheGulf.gov) that is fully funded on this FPL, DOI will rely on the existing work of the Partnership for Gulf Coast Land Conservation in development of the Strategic Conservation Assessment (page 6) and will include a representative from the Partnership on the Core Working Group (page 10).

Comment: Ensure coordination with existing programs (such as Landscape Conservation Cooperatives (LCCs) and the Partnership for Gulf Coast Land Conservation (PGCLC)) and consider past stakeholder input. Describe how this tool will be adopted by relevant state and federal entities, what role the tool would play in the implementation of the Conservation Reserve and Grant Programs, and its applicability beyond the RESTORE Council. There is concern that the working group is too large to be effective.

Response: As stated in the original proposal (page 6), the Strategic Conservation Assessment relies on the “established conservation targets identified through the Gulf of Mexico Alliance (GOMA), Landscape Conservation Cooperatives (LCCs), Joint Ventures (JVs), State Wildlife Action Plans (SWAPs), the Partnership for Gulf Coast Land Conservation (PGCLC), and the National Estuary Programs (NEPs),” among others. The four LCCs located on the Gulf (Gulf Coast Prairie; Gulf Coastal Plains and Ozarks; South Atlantic; Peninsular Florida) are engaged in this work and will provide science and technical capacity in support of the Strategic Conservation Assessment. Because the Strategic Conservation Assessment integrates the existing priorities of the various state and federal agencies in the Gulf (including USDA NRCS Conservation Reserve and Grant Programs), the tools emanating from this proposed work can be easily adopted into existing programs. Nevertheless, the use of these tools is entirely voluntary and is not

intended to set any agency's priorities. When used, these tools offer insight into land conservation activities (e.g., easements and fee simple acquisition) that will have high resource value relative to overall Gulf Coast restoration.

By informing land conservation decisions with the best available science, these tools help facilitate a strategic approach to land conservation, thereby ensuring the efficient use of available funding. A dedicated Extension and Outreach Specialist will be brought on in the second and third year of the project to serve as dedicated support to stakeholders looking to use and refine the tools for specific and individual purposes. This outreach extends beyond Council members to ensure broad buy-in from across the entire Gulf conservation community. The Council recognizes that Core Working Group size can compromise effectiveness; however, individuals associated with this project have experience coordinating working groups comprised of diverse partners. The Council will also rely on subsets of working group members working on task-oriented teams to balance the need for a large number of individuals to ensure inclusiveness against the realities of managing group size to ensure effectiveness.

[Baseline Flow, Gage Analysis & On-Line Tool to Support Restoration](#)

Comment: Describe how the project will be integrated within the restoration and management community and how it will be made user-friendly. Include more information to explain the budget set for planning (total leveraged funds through USGS seem to more accurately reflect resources needed). Consider making the tool available earlier in the restoration process (shorten project duration), and examining multiple watersheds more closely once the project moves forward to achieve Gulf-wide benefits.

Response: A Technical Advisory Committee of local, state, federal, and non-profit interest groups, with representatives from resource management and regulatory agencies, will provide input on interim findings. This will ensure that final project deliverables contain information to inform restoration and management strategies and that an online web tool that is informative and user-friendly. Project timelines and budget were based on comprehensive, spatial data compilation efforts needed to develop robust, scientifically-credible information on flow alteration across the Gulf States.

[Gulf Coast Conservation Reserve Program \(GCCRP\)](#)

Comment: Fund both Category 1 and 2 of the Gulf Coast Conservation Reserve Program.

Response: Along with many stakeholders, the Council is interested in providing on-the-ground environmental results as quickly as possible. When the Council published the draft FPL it indicated that it would review any additional environmental compliance documentation that became available prior to completion of the final FPL, in order to determine whether the new information would allow the Council to move a given

activity into Category 1. By collaborating among its membership, the Council has completed the environmental review of the Gulf Coast Conservation Reserve Program activities listed in Category 2 of the draft FPL. This has enabled the Council to move these activities into Category 1 and approve them for implementation funding. The appendix for this activity has been updated accordingly and includes information pertaining to environmental compliance, along with links to the supporting documentation.

Comment: Coordination with existing Farm Bill Programs is important. This project should be closely coordinated with projects MS_RESTORE_001_009_Cat1 (Strategic Conservation Assessment Framework) and MS_RESTORE_001-005_Cat1 (Gulf of Mexico conservation Enhancement Grant Program), to create a foundation for comprehensive watershed restoration.

Response: The Council understands the value in leveraging resources as a means to optimize outcomes. In addition, this is a USDA-led effort and USDA has worked very closely with all the Gulf States as well as other partners (including federal colleagues) to address conservation needs on privately owned agriculture and forestry landscapes. The Council and USDA will continue to work closely with partners to effectively and efficiently address conservation needs around the Gulf of Mexico. USDA will coordinate on the DOI-led Strategic Conservation Assessment Framework and EPA-led Gulf of Mexico Conservation Enhancement Grant Program to create a foundation for comprehensive watershed restoration. Some examples of past or current partnerships between USDA and Mississippi are described below:

- Mississippi Department of Environmental Quality (MDEQ) – NRCS and MDEQ share a common goal of protecting water quality. As part of the National Water Quality Initiative, NRCS funds contracts in Mississippi through the Environmental Quality Incentives Program (EQIP) with MDEQ reimbursing NRCS for a portion of those funds to help cover the technical assistance needed to develop and implement the contracts. MDEQ also monitors the watershed and provides the data to NRCS thus showing the impact of the conservation systems that were implemented. This is done through a cooperative agreement between the two agencies.
- Delta Wildlife, Inc. and the Mississippi Fish and Wildlife Foundation - NRCS has partnered in MS with each of these organizations through the Regional Conservation Partnership Program (RCPP). Both partners submitted proposals that were funded in FY 2015 with each providing significant financial and technical assistance to compliment the amount requested through NRCS. In addition, administrative costs and services are provided by each partner.
- Mississippi Soil and Water Conservation Commission (MSWCC) – NRCS has a cooperative agreement with MSWCC to provide clerical and outreach assistance

to NRCS Field Office personnel and clients. This agreement has helped NRCS get more conservation on the ground by leveraging resources to implement conservation practices on private lands. The MSWCC provides equipment such as no till drills and terrace plows to facilitate conservation of the ground and demonstrate conservation measures to private land owners. Publications, including brochures, guidelines, posters and manuals, are also provided to private land owners by MSWCC.

Comment: Expand funding in future rounds for this and other private land conservation projects.

Response: The Council is aware that more than 85% of the landscape in the five Gulf States is comprised of privately owned agriculture and forestry land. Consequently, the Council fully appreciates that the Gulf cannot be restored without working with private lands as part of the overall restoration effort. If successful, this project would be considered for additional funding or expansion on future FPLs.

Comment: Include Louisiana as an eligible location for this project, and use the USDA Categorical Exclusion.

Response: The Council appreciates the support for the GCCRP and will considering adding it to future FPLs if this grant program continues.

Comment: Proposal should include a description of how this project might work with the SeaGrant outreach proposal in Mississippi.

Response: The education/outreach/extension (EOE) program supports the opportunity to fund EOE deliverables that will help private land owners. This proposal will potentially help leverage Council, and USDA, investments in Mississippi and show how land conservation and protection help benefit downstream ecosystems in the Gulf of Mexico from a water resources perspective, thus guiding restoration decisions and building on potential benefits to the Gulf ecosystem.

[Gulf of Mexico Conservation Enhancement Grant Program \(GMCEP\)](#)

Comment: This project should have more than a one-year duration to leverage funding from other Deepwater Horizon and non-Deepwater Horizon related sources, and allow funds to be used for land acquisition, conservation easements, and long-term management/stewardship in addition to the uses described in the proposal.

Response: The estimated project duration for the implementation phase (the period of time during which the funds would be expended and the project scope of work is completed) would be 1-3 years from funds award date. The Gulf of Mexico Conservation

Enhancement Grant Program (GMCEGP) can be used to assist land conservation organizations to conduct necessary due diligence and conservation baseline assessments; restore or enhance previously preserved conservation lands (e.g. Invasive species removal, hydrologic restoration); conduct regional assessments of conservation effectiveness; conduct economic evaluation of land conservation and restoration; and/or conduct economic evaluation of ecological services provided by the restored conservation land. The GMCEGP cannot allow funds to be used for land acquisition, conservation easements, and long-term management/stewardship.

Comment: Increase the amount of money in the grant fund. \$2,125,000 is not sufficient to address the land conservation needs in the 10 watersheds identified by the Council.

Response: The Council appreciates the support for this project and considers it foundational in long-term ecosystem restoration of the Gulf. If successful, this project would be considered for additional funding or expansion on future FPLs. At this time it is viewed as a pilot project and thus may not be able to address all of the land conservation needs in the ten watersheds; but this project, in combination with many others, can help move forward toward holistic Gulf restoration.

Comment: Suggest this project be coordinated with the Strategic Conservation Assessment Project.

Response: The GMCEGP will coordinate with the Strategic Conservation Assessment Project.

Comment: Concerned the 1:1 matching requirement will limit some conservation opportunities.

Response: The GMCEGP was designed to leverage conservation resources in the Gulf Coast region. The Council will consider these matching concerns in future funding.

[Gulf of Mexico Habitat Restoration via Conservation Corps Partnerships \(GCCC\)](#)

Comment: While supportive of this initiative, we urge the Council to conduct an assessment of the locations, entities, and project types in which the Conservation Corps Program could be utilized. The assessment should ensure that the program coordinates with existing local workforce programs, educational and community organizations, and connects with the economically and socially disadvantaged populations of the Gulf Coast region ensuring that the project is utilized as a way to employ young and disadvantaged local residents as well as veterans in restoration and conservation activities. In addition, the assessment should explain the relationship with other programs and eventual transition out of the corps to higher education and/or private employment as applicable. The assessment should also evaluate how Conservation

Corps projects will be integrated with other Gulf restoration projects funded through RESTORE and other programs. The assessment should include a definition of how conservation results will be measured. Following a review and comment period on the project assessment, the Council should approve the allocation and expenditure of the funds for Corps implementation at strategic locations that aids in the implementation of RESTORE Act priorities.

Response: NOAA will complete an evaluation of leveraging opportunities (ELO) as part of a thorough program planning activity over the course of the first year of the project. This evaluation will identify existing efforts and capacity in the region, restoration priorities, and opportunities for continued training and education. In preparing the proposal, NOAA staff within the Gulf region has coordinated with many of the NGOs, existing grass-root corps groups, and appropriate federal and state agencies, including the economic and labor bureaus within the DOC, to establish the objectives of the GCCC program. This regional evaluation complements the proof of concept that NOAA has conducted in establishing like programs in other regions, which as a model is largely transferable to the Gulf. As such, NOAA understands the existing restoration and labor capacity, as well as the need to leverage opportunities to help transition GCCC members into longer-termed vocations and training that support restoration labor needs. Given the space limitation, NOAA was able to only touch on these topics in the draft FPL; however, the project proposal does show some of the labor statistics and restoration project types conducive for corps labor that will, in part, help inform the restoration and recruitment planning that was also discussed in the proposal.

DOC/NOAA will complete thorough program planning - prior to mobilization of crew members - that will lay out several of the suggestions offered by the reviewer. NOAA is planning to contract out portions of the project to knowledgeable local or regional organization(s) to assist in the administration and operational development of this program. Such activities will include developing and conducting recruitment strategies, managing and overseeing corps members, facilitating training, and conducting education and outreach. This will be done through a competitive bidding process. Program planning efforts, described in more detail below, will help to shape the competitive Federal Funding Opportunity (FFO) solicitation.

Program planning for this project includes, but is not limited to:

1) Partnering with the RESTORE Council to identify restoration priorities for GCCC labor to support implementation of FPL projects

Through the Council, DOC/NOAA will partner with the other RESTORE members to prioritize restoration needs that are appropriate for Corps labor, so that training can be tailored to best serve those needs. An inherent element of this project is integration with RESTORE projects, as well as potentially other regional restoration opportunities to which their training qualifies. Applying criteria discussed in the proposal, discrete restoration project sites and tasks will be

selected from the FPL that are similar in nature to the restoration activities considered in the GCCC proposal. These tasks will then serve as the basis from which to estimate labor hours, develop project-specific metrics, and focus recruiting and training in underserved coastal communities.

2) Recruitment, Training, and Evaluation of Leveraging Opportunities (ELO)

DOC/NOAA are in close collaboration and are already utilizing national data systems through the DOC's Economic Development Administration (EDA) and Minority Business Development Agency (MBDA) to identify economically depressed coastal communities and underserved sectors of their respective labor forces. Working in collaboration with these bureaus, the Department of Labor, and state counterparts, DOC/NOAA will also complete an ELO. After evaluating and identifying leveraging opportunities, they will work with the selected contracting entities to focus corps recruitment within those sectors as appropriate to meet the restoration objectives of the selected projects and near-term restoration priorities within each state. DOC/NOAA envisions contracting with local or regional conservation groups experienced in corps education and training to assist in program development as scoped and overseen by DOC/NOAA.

Training will be orchestrated by DOC/NOAA, in collaboration with their contractors and state partners, to focus on those skill sets required of the restoration tasks selected. Training logistics will be established to provide efficiencies across corps member groups, where knowledge and experience can be leveraged throughout the region.

3) Crew Scheduling and Mobilization

Once crews are developed and trained, DOC/NOAA will work with their contractors and state partners to establish construction schedules and timeframes for mobilizing trained crews to project sites. Schedules will be established for each calendar year in accordance with anticipated construction activities within each state.

4) Continuing Education and Training

It is fully the intent of the GCCC to serve as a springboard to other restoration-based vocational training that is already present across the Gulf coast. Part of the up-front planning process will include leveraging existing vocational programs and continuing education, through coordination with the Departments of Commerce and Labor, state labor offices, and community colleges, to continue to provide opportunity to corps members after the life of this project. DOC/NOAA have already been identifying regional programs that the GCCC intends to collaborate with to help prepare corps graduates for a transition into environmental vocations.

Throughout the life of the program, DOC/NOAA commits to performance monitoring of both the restoration activities conducted by the GCCC, as well as performance metrics related to member recruitment goals, retention, labor hours, and job skills gained. This

planning process is paramount to a successful program, and is expected to require the majority of the first year of activities.

Comment: Can NOAA compensatively bid the project to an outside entity to operate and manage it based on regional experience? The organization(s) will coordinate with local corps organization in addition to NOAA, federal, state, and NGO project partners to implement the corps and they would also monitoring performance.

Response: NOAA is anticipating the need to contract out portions of the project to knowledgeable local or regional organization(s) to assist in the administration and operational development of this program. Such activities are likely to include developing and conducting recruitment strategies, managing and overseeing corps members, facilitating training, and conducting education and outreach. Program planning efforts will help to shape the competitive Federal Funding Opportunity (FFO) solicitation. DOC/NOAA will oversee such contract(s), which will be competitively bid subject to the Federal Acquisition Regulation (FAR).

Comment: Regarding the proposed Gulf of Mexico Habitat Restoration via Conservation Corps Partnership, we request that the Council members partner with local community based-organizations, such as MSCVAFF (Mississippi Coalition for Vietnamese-American Fisher Folks & Families), for targeted outreach, training curriculum development, fisher folks enrollment in training programs, and addressing Language Access needs.

Response: In coordination with our state partners, the Conservation Corps program will reach out to local community-based organizations for recruitment as well as promotion of educational opportunities. Please see the response to the related to program planning.

Comment: Where did the numbers come from on the Conservation Corps? Such as the 500 acres estimated to restore. How do you know those numbers if you don't know what projects are being worked on yet? And, what about the numbers related to the amount of funding for the program (\$8M) and the estimated Tribal component?

Response: The original acreage estimate was based on known available projects and the labor hours likely needed to complete those projects. Although other projects on the FPL may vary in project specifics from the ones NOAA based the estimate, NOAA felt that they were an adequate proxy for assuming benefits. As part of the planning process, the estimated number of acres benefited from corps member restoration activities will be determined once the exact restoration projects and tasks are identified. The point is noted, however, that the exact projects to be selected for this program are not final, and as such, reference to benefited acreage has been removed from the project activity description in the FPL.

Regarding the tribal component, the amount determined for the tribal youth conservation corps was determined based on the desire to designate sufficient funding to support a strong pilot program and to help prepare tribes for future funding opportunities. The amount is based on successful tribal pilot programs located in other parts of the country. For this pilot program, DOI will focus on engaging with tribal youth from Federally Recognized Tribes in the Gulf Coast region, defined as within 25 miles of the Gulf States' coastal zones

Comment: We are heartened to see tribal youth as one of the primary populations engaged; however, we advise the Council to broaden their definition of tribes to include those that are state recognized. As all five Gulf States are home to state-recognized tribes, their official inclusion in this component of the project would provide an important opportunity for these communities.

Response: We understand the desire to broaden the definition of tribes, however the tribal conservation corps grants that will be administered through the DOI Bureau of Indian Affairs will only be available to federally recognized tribes in this first FPL.

Comment: Could a Restore the Gulf Talent Pool be started in each state? Allowing sponsoring agencies to provide ongoing support to beneficiaries by working with employers and placing workers in employment positions over the long-term and between restoration projects based on skills sets and needs.

Response: This will be considered as it relates to the objectives of this funding. We understand that funds are limited and expansion to longer-termed employment is based on capacity, coalition building, and additional investment.

Comment: It is strongly suggested that modifications to the Conservation Corps project as it is currently proposed. The Council should begin identifying appropriate ecosystem restoration projects in the coastal region of each Gulf Coast state, whether those projects be funded by the Council and states under the RESTORE Act, NRDA, NFWF or other sources, which are headed towards implementation during the timeframe of the proposed Conservation Corps Partnerships program. While the language in the draft FPL is somewhat flexible, if the final program isn't driven by and directly connected to ecosystem restoration projects, it will lack the focus to be effective and open the door to a wider range of project proposals with tenuous connections to restoration. Once appropriate segments of restoration projects are identified, sponsor agencies of those projects should help identify relevant skills sets attached to the identified field learning opportunities, and when possible related private and public sector occupations tied to those skills. Such work will likely require input from additional stakeholders, including private industry, in fact creating a pool of general labor for small-scale projects will not equate to meaningful coastal restoration in the Gulf, which must remain the goal of this program: with restoration work competing with oil and gas for a number of job profiles—from engineers to welders—specificity in training and hiring is critical.

Response: The Conservation Corps program is wholly driven by ecosystem restoration projects. Intentionally flexible, NOAA understands the need to collaborate with Council members to agree on priority restoration elements for Corps labor, once the suite of FPL projects are finalized. The project description discussed categorical project and skill types that are both available and conducive for Corps labor, which are already being paired with near-term projects. Additionally, NOAA agrees that skill specificity and connection to long-term career opportunities are critical to sustaining a local labor force for restoration, which is needed given the volume of forthcoming projects. Although that is the long-term objective of this program, the pilot funds provided will be sufficient only to “open the door” for local constituents to receive practical experience in this field that they may then parlay into a restoration vocation.

Comment: The Conservation Corps is one of the most important projects the Council is supporting, why isn't more funding going towards this program? Can it be expanded to ensure that it covers the life of the Gulf Restoration Projects?

Response: The Council appreciates the support numerous stakeholders have shown in the Conservation Corps. The Council strongly believes in the importance of supporting the Gulf, its residents, tribes, youth and veterans, which is why this important investment is being made. The Council is charged with holistic ecosystem restoration; therefore investments in projects and programs that also directly restore Gulf resources, such as habitat and water quality restoration projects and programs, are also being made. Looking forward, the Council will carefully consider additional investments in the Conservation Corps and other direct restoration projects as it develops subsequent FPLs and updates the Initial Comprehensive Plan.

Comment: Council-Selected Restoration Component funds should remain dedicated solely to addressing ecosystem restoration needs, as required by the RESTORE Act. As such, any Conservation Corps activities should be closely linked to specific projects that address the restoration priorities in the Act.

Response: Conservation Corps activities will be directly connected and support, appropriate elements of the other selected Council projects. This is in addition to training participants for other ecosystem restoration projects across the region that are consistent with the restoration priorities of the Act.

[Gulf of Mexico Estuary Program \(GMEP\)](#)

Comment: Describe opportunities for long-term funding for the estuary selected and for adding additional estuaries and their watersheds to make this a Gulf-wide project.

Response: The Council appreciates the support for the GMEP and considers it foundational to long-term ecosystem restoration of the Gulf. If successful, this project

would be considered for additional funding or expansion in future FPLs. Other potential funding sources are RESTORE Act Direct Component and Spill Impact Component funding, other federal and state grant programs, and county and municipality funding. Having the strong support of the state, counties, municipalities and businesses have proven to be a key element and indicator to the success of place-based estuary programs.

Comment: Overall support for GMEP in NW Florida. Why aren't there more estuary programs be started or supported in Florida? In NW Florida, it would be good to have more than one Estuary Program initiated-strong support to start five proposed estuary programs in NW Florida. NW Florida has high development stress that needs to be addressed.

Response: The Council appreciates the strong support for establishing the GMEP in the NW Florida panhandle region. EPA, in collaboration with Florida, will be requesting proposals to establish or to identify an existing host organization to develop and stand-up the estuary program encompassing one or more of the bays in Florida's NW panhandle region. The Council considers this to be foundational to long-term ecosystem restoration of the region. If successful, this project would be considered for additional funding or expansion. Having the strong support of the State, counties, municipalities and businesses have proven to be a key element and indicator of success for place-based estuary programs.

Comment: Strong support for St. Andrews Bay to be selected for the GMEP. There is strong local support and existing infrastructure to get it started (St. Andrew Bay Resource Management Association-RMA), etc. It is a unique area and more projects should be considered here in the future-potentially seen as a key watershed for the next FPL.

Response: The Council appreciates the strong support for establishing the GMEP in the St. Andrews Bay area. Having the strong support (financial, in-kind services and volunteer) of the counties, municipalities and businesses have proven to be a key element and indicator of success for place-based estuary programs. The Council considers establishing the GMEP in NW Florida foundational to long-term ecosystem restoration of the region. If successful, this project would be considered for additional funding or expansion. EPA, in collaboration with Florida, will be requesting proposals to establish or to identify an existing host organization to develop and stand-up the estuary program encompassing one or more of the bays in Florida's NW panhandle region.

Comment: Strong support for Indian Pass Lagoon and St. Joe Bay on the FPL to be considered for the GMEP.

Response: The Council appreciates the strong support for establishing the GMEP in the Indian Pass Lagoon and St. Joe's Bay area. Having the strong support (financial, in-kind

services and volunteer) of the counties, municipalities and businesses have proven to be a key element and indicator of success for place-based estuary programs. The Council considers establishing the GMEP in NW Florida foundational to long-term ecosystem restoration of the region. If successful, this project would be considered for additional funding or expansion. EPA, in collaboration with Florida, will be requesting proposals to establish (or identify existing) a host organization to develop and stand-up the estuary program encompassing one or more of the bays in Florida's NW panhandle region.

Comment: Would really like to see the GMEP be designated in both Pensacola Bay and in Perdido Bay, which crosses the FL-AL state line. Because Perdido Bay crosses the state line it often gets "lost" in restoration efforts.

Response: The Council is open to further discussions with Perdido and Pensacola Bay stakeholders to see if such a multi-watershed, multi-state GMEP has strong support for future FPLs. In addition, EPA, in collaboration with Florida, will be requesting proposals to establish or to identify an existing host organization to develop and stand-up an estuary program encompassing one or more of the bays in Florida's NW panhandle region.

Table of Acronyms used in Response to Public Comments on Draft Initial FPL

ACCP	Alabama Coastal Comprehensive Plan
ADCNR	Alabama Department of Conservation and Natural Resources
ADEM	Alabama Department of Environmental Management
AGCRC	Alabama Gulf Coast Recovery Council
ASPA	Alabama State Port Authority
BMP	best management practices
BU	beneficial use
CE	Categorical Exclusion
CoP	Community of Practice
CPRA	Coastal Protection and Restoration Authority
DHS	Department of Homeland Security
DOC	Department of Commerce
DOI	Department of the Interior
EIS	Environmental Impact Statement
ELO	evaluation of leveraging opportunities
EPA	Environmental Protection Agency
EQIP	Environmental Quality Incentives Program
ESA	Endangered Species Act
FAA	Federal Aviation Administration
FDACS	Florida Department of Agriculture and Consumer Services
FPL	Funded Priorities List
FWRI	Florida Fish and Wildlife Research Institute
FWS	U.S. Fish and Wildlife Service
GCCC	Gulf of Mexico Habitat Restoration via Conservation Corps Partnerships
GCERC	Gulf Coast Ecosystem Restoration Council
GEBF	Gulf Environmental Benefit Fund
GMCEG	Gulf of Mexico Conservation Enhancement Grant Program
GMEP	Gulf of Mexico Estuary Program
GOMA	Gulf of Mexico Alliance
GoMRI	Gulf of Mexico Research Initiative
HCFCDD	Harris County Flood Control District
HPB	Houston Parks Board
IAA	Interagency Agreement
IRT	Interagency review team
IWG	Interagency Working Group
JV	Joint Ventures
LCA	Louisiana Coastal Area
LLC	Landscape Conservation Cooperative
MDEQ	Mississippi Department of Environmental Quality

MDMR	Mississippi Department of Marine Resources
MMPA	Marine Mammal Protection Act
MSBU	Mississippi Beneficial Use of Dredged Material Program
MSBUG	Mississippi Beneficial Use of Dredged Material Program Group
MsCIP	Mississippi Coastal Improvement Program
MSEP	Mississippi Sound Estuarine Program
MSWCC	Mississippi Soil and Water Conservation Commission
NEP	National Estuary Program
NEPA	National Environmental Policy Act
NERR	Grand Bay National Estuarine Research Reserve
NFWF	National Fish and Wildlife Foundation
NFWF GEBF	National Fish and Wildlife Foundation Gulf Environmental Benefit Fund
NGO	Non-governmental Organization
NOAA	National Oceanographic and Atmospheric Administration
NPS	U.S. National Park Service
NRCS	Natural Resources Conservation Service
NRDA	Natural Resource Damage Assessment
O&G	Oil and Gas
OCS	Outer Continental Shelf
PEPC	DOI's Planning, Environment and Public Comment database
PGCLC	Partnership for Gulf Coast Land Conservation
RCCP	Regional Conservation Partnership Program
REPI	Readiness and Environmental Protection Integration
RESTORE Act	Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act
RRC	Railroad Commission of Texas
RSM	Regional Sediment Management
SAV	submerged aquatic vegetation
SWAP	State Wildlife Action Plan
TEK	Traditional Ecological Knowledge
TNC	The Nature Conservancy
TPWD	Texas Parks and Wildlife Department
USACE	U.S. Army Corps of Engineers
USCG	U.S. Coast Guard
USDA	U.S. Department of Agriculture
USGS	U.S. Geological Survey