RESTORE Council Proposal Document

General Information

Proposal Sponsor: U.S. Department of the Interior (DOI) - Bureau of Indian Affairs (BIA)

Title:
Tribal Youth Coastal Restoration Program

Project Abstract:
The U.S. Department of the Interior, through the Bureau of Indian Affairs (BIA), is requesting $927K in Council-Selected Restoration Component funding for the proposed Tribal Youth Coastal Restoration Program. This would include $93K in planning and $834K in implementation funds as FPL Category 1. The program will support the primary RESTORE Comprehensive Plan goal to enhance community resilience through planning and implementation activities that will continue the restoration work begun under the Council's 2015 Initial FPL of the following federally-recognized tribes: Chitimacha Tribe, Mississippi Band of Choctaw Indians, Poarch Band of Creek Indians, Seminole Tribe of Florida, and Miccosukee Indian Tribe, and will add the Coushatta Tribe of Louisiana.

Tribes will create projects to protect natural resources and the environment, and maintain a healthy ecosystem, while learning cultural values. These training projects should restore 1,000 acres of habitat on Tribal lands. Program duration is 3 years.

FPL Category: Cat1: Planning/ Cat1: Implementation

Activity Type: Program

Program: Tribal Youth Coastal Restoration Program (DOI/BIA)

Co-sponsoring Agency(ies): N/A

Is this a construction project?:
Yes

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

Priority Criteria Justification:
Through this program, Tribal youth will undertake projects to learn to protect natural resources and the environment through native plant restoration, site cleanup, water and soil sampling, as well as environmental and cultural education of Tribal youth. This project will train youth in long-term stewardship of the Gulf Coast environment. The impact of this education and training should continue for many generations to come.

Tribal leaders designed specific projects, i.e., teaching and experiential learning to prepare students to understand and respect the natural environment. Tribal leadership encourages tribal youth to engage in activities of this program, as well as courses and degree programs that will enable them to

assume future leadership roles in these areas. The activities also provide training to work on restoration throughout the Gulf and engage the Native Gulf community in the larger restoration effort that will continue for decades.

Project Duration (in years): 3

Goals

Primary Comprehensive Plan Goal:
Enhance Community Resilience

Primary Comprehensive Plan Objective:
Promote Natural Resource Stewardship and Environmental Education

Secondary Comprehensive Plan Objectives:
N/A

Secondary Comprehensive Plan Goals:
N/A

PF Restoration Technique(s):
Promote natural resource stewardship and environmental education: Promote natural resource stewardship and environmental education
Protect and conserve coastal, estuarine, and riparian habitats: Habitat management and stewardship

Location

Location:
The map shows the locations of the six Tribal youth projects: two in Louisiana, one in Mississippi, one in Alabama, and two in Florida. (Figure 1)

HUC8 Watershed(s):
South Atlantic-Gulf Region(Choctawhatchee-Escambia) - Florida Panhandle Coastal(Perdido)
South Atlantic-Gulf Region(Southern Florida) - Southern Florida(Everglades)
Lower Mississippi Region(Louisiana Coastal) - Atchafalaya-Vermillion(Bayou Teche)
Lower Mississippi Region(Louisiana Coastal) - Calcasieu-Mermentau(Mermentau)
South Atlantic-Gulf Region(Pascagoula) - Pascagoula(Mississippi Coastal)

State(s):
Alabama
Mississippi
Louisiana
Florida

County/Parish(es):
AL - Escambia
FL - Collier
FL - Glades
FL - Miami-Dade
LA - Cameron
LA - St. Mary
MS - Harrison
MS - Neshoba

Congressional District(s):
FL - 26
FL - 23
LA - 3
MS - 3
AL - 1
FL - 25

Narratives

Introduction and Overview:
The overarching goal of this project is to educate and train tribal youth through Gulf Coastal Zone restoration projects (Fordham and Schwab, 2018). This work builds on the success of the FPL 1 Tribal Youth Conservation Corps, which trained 239 student and restored 995 acres. The Department of the Interior (DOI) submitted a project application to the Council titled "Gulf of Mexico Habitat Restoration via Conservation Corps Partnerships/Youth." The primary objective of the project was to support, promote and create stewardship opportunities for Tribal youth through meaningful training and employment, which includes environmental education. Investing in programs that provide work opportunities for young people has economic and physical benefits while also enhancing the environmental vitality of the area's natural resources directly tied to the Gulf.

The Bureau of Indian Affairs (BIA) worked closely with DOI and the Council on the implementation and awarding of grants to the five Gulf Tribes to host tribal youth conservation camps. These camps were extremely popular and beneficial to the Gulf Tribes. The camps were held in 2016-2018, and they had a total of 239 participants. The camp programs provided meaningful, work-based opportunities in environmental conservation and natural resource management, and strengthened the protection, conservancy, and long-term maintenance of natural resources on tribal lands.

Below are short narratives regarding camp and restoration activities for each Gulf Tribe:

Seminole Tribe of Florida – Tribal youth assisted the Tribe's Environmental Resources Management Department (ERMD) with collecting surface water samples, conducting Spill Prevention Control and Countermeasure Inspections on engines powering pumps near critical water resource areas, and identifying and recording data on gopher tortoise (*Gopherus polyphemus*) burrows and crested caracara (*Caracara cheriway*) nests. The youth also assisted in identifying and removing invasive plants.

2016 - 0 students (unable to hold camp due to lateness of funds arriving)
2017 - 15 students
2018 - 30 students

115 acres - Approximate number of acres youth conducted restoration activities on

Miccosukee Tribe of Indians – Tribal youth worked closely with the Tribe's Fish and Wildlife Department identifying and removing invasive plants. They learned the identifying features of several common invasive plants and their negative impacts in Florida. Once familiarized with the species, the youth assisted in removing Burma reed (*Neyraudia reynaudiana*) and small branches of Brazilian pepper (*Schinus terebinthifolia*) and Australian pine (Casuarina spp.). The youth also assisted in conducting fish, bird and tree-frog surveys within the Old Tamiami canal and helped plant native vegetation on the reservation.

2016 - 25 students
2017 - 35 students
2018 - 27 students

400 acres - Approximate number of acres youth conducted restoration activities on

Poarch Band of Creek Indians – Tribal youth assisted with the identification and eradication of invasive weeds. The youth participated in the planning and implementation of controlled burns on tribal lands to restore natural vegetation. The youth helped plant rivercane on the reservation and

worked on the development of a guidebook for native plants in the area. The youth worked with Alabama Department Conservation and Natural Resources Division of Wildlife and Freshwater Fisheries on gopher tortoise protection measures at the Tribe's Magnolia Branch Wildlife Reserve. The youth received the honor of being invited to and attending the signing of a proclamation with the Governor of Alabama to make April 10th Gopher Tortoise Day in the State of Alabama.

2016 - 0 students (unable to hold camp due to lateness of funds arriving)
2017 – 4 year-long students
2018 – 6 year-long students

370 acres - Approximate number of acres youth conducted restoration activities on

Mississippi Band of Choctaw Indians – Tribal youth worked with the Tribe's Wildlife and Parks Office to restore a 2-mile long woodland trail near the historic Nanih Waiya Mound and Cave area. Nanih Waiya figures prominently in the history, culture, traditions, and legends of the Mississippi Band of Choctaw Indians and is located at the headwaters of the Pearl River. Summer work projects focus on the protection, conservation, rehabilitation, and improvement of the natural, historical, and cultural resources of the Mississippi Band of Choctaw Indians.

2016 - 15 students
2017 - 19 students
2018 – 0 students (MBCI did not have enough savings to hold 3rd camp.)

80 acres - Approximate number of acres youth conducted restoration activities on

Chitimacha Tribe of Louisiana – Tribal youth worked to remove trash throughout the Bayou Teche watershed on the Tribe's reservation. The group also helped establish and maintain a rivercane (*Arundinaria gigantea*) conservation area and removed invasive plants.

2016 - 15 students
2017 - 25 students
2018 – 23 students

30 acres - Approximate number of acres youth conducted restoration activities on

See the following report for more information on the FPL1 accomplishments:
https://www.sciencebase.gov/catalog/item/5d1f513ee4b0941bde64db5b

In FPL3b, Tribal Youth from the Coushatta Tribe will plant coastal vegetation to assist in restoring beaches along Louisiana coastal habitat and reducing coastal erosion. The Coushatta Youth Program will collaborate with the Gulf Coast Soil and Water Conservation District on a plant diversity restoration project. The goal is to support the coastal habitat, including important habitat for shorebirds and threatened species such as Black rails (*Laterallus jamaicensis*) (Roach and Barrett, 2015).

The Chitimacha Tribe proposes the cleanup of the bayou-side of the reservation along Bayou Teche, as well as other areas, such as Lake Fausse Point and Chitimacha village sites (Bernard, 2016). While participants remove trash near these important sites, they will be helping the Tribe preserve important cultural resources and connect natural resource/environmental issues with cultural resource concerns. Also, the Tribe will utilize this opportunity to engage the participants in the Rivercane Restoration Program, which restores a critical species for the Gulf region using

micropropagation (Baldwin et al., 2009).

The Choctaw Youth Conservation Corps will provide hands-on activities in environmental and culturally based curriculum to build stewardship and natural resources conservation for tribal high school youth. The Tribe's broader development plans for Nanih Waiya at the headwaters of the Pearl River include the maintenance of the approximately 2-mile-long woodlands nature trail, construction of pedestrian bridges through wetland areas, creation of observation decks, and ensuring the site's function as an outdoor natural science museum (Akers, 1999). The Tribe will also teach appreciation of their lands, including those in the Gulf Coast.

The Creek Youth Conservation Corp will focus on short-term and long-term restoration and environmental stewardship projects and learning opportunities. These projects will include Native plant reestablishment in the Perdido and Escambia River basins. This project will also focus on educating youth regarding environmental, cultural, and historical knowledge and training them to develop skills to complete projects that will restore Tribal lands that are part of the Gulf Coast area (Clark, 1971).

The Seminole Tribe of Florida Heritage and Environmental Resource Office (HERO), Environmental Resource Management Department (ERMD) will train and enlist the services of Seminole Tribe youth to collect environmental data to support the needs of the Tribe. Data collection will be used to protect and restore natural resources, ecosystems, wildlife habitats and wetlands of the greater RESTORE region. Tribal youth will travel to sites on Seminole trust land and conduct on-site water sampling, and then test samples upon return to Seminole-owned laboratories.

Miccosukee Tribal Youth Program Conservation Initiative (TYP-C) will engage Tribal youth in conservation and restoration practices within the sloughs and flow-paths--to help restore connectivity with the downstream wetlands (Larsen et al., 2012). Tribal Departments and Tribal Programs will provide GPS support together with species identification, science, and construction support. Connectivity will be restored by targeting nuisance and invasive species as well as conservation of native flora and fauna. Miccosukee youth will also engage in the NEPA process to identify areas for future restoration. They will also build animal houses to provide habitat for native species.

Proposed Methods:

Cultural, historic preservation and environmental training will include off-site visits for learning and experiencing activities and events. The Tribes will provide transportation for youth to engage in local restoration programs and collaborative events at other Tribal sites.

Restoration Methods: At some sites, Tribal members will donate identified mother plants to transplant, as warranted, to allow youth to place them in appropriate locations. Propagation will be at the identified Tribal sites. Restoring Tribal sites are important educational conservation tools for teaching youth that they are the next generation of stewards of Tribal lands. In several project locations, the primary projects are focused on planting of native plants and trees. At one location (Rutherford Beach), the state plans the construction of breakwaters. The plantings in conjunction with these projects are anticipated to decrease shoreline loss, enhancing the effectiveness of plantings in the restoration process. Planting is both cost effective and easily achievable. The Coushatta project is consistent with the recommendations made in Louisiana's Comprehensive Master Plan for a Sustainable Coast (June 2, 2017), see: (http://coastal.la.gov/wp-content/uploads/2017/04/2017-Coastal-Master-Plan_Web-Single-Page_CFinal-with-Effective-Date-06092017.pdf)

Environmental Benefits:

Anticipated environmental benefits include disrupting the process of shoreline erosion, mitigating the impacts of climate change and associated sea level rise, restoring a critical environmental balance in a threatened area, and building in tribal youth a knowledge and commitment to protecting the environment, and the preliminary skills to work in the restoration field in the future. Climate change and associated sea level rise are also potentially risks to the program as described below, but the completion of the work will help mitigate future risks to the Gulf ecosystem.

Metrics:

Metric Title: PRM004 : Monitoring - # monitoring programs implemented
Target: 1
Narrative: Success will be measured by the submission of youth water monitoring program monitoring report from the Seminole Tribe.

Metric Title: COI007 : Building institutional capacity - # of participants that successfully completed training
Target: 20
Narrative: Success will be measured by the number of student interns successfully completing training by each Tribal youth project.

Metric Title: HR004 : Habitat restoration - Acres restored
Target: 1,000
Narrative: Success will be measured in project acres, with each tribe restoring various acres, ranging from 12 to over 200 per tribe.

Risk and Uncertainties:

Overall the program is low risk as it is a training project for Tribal youth interns. All projects are potentially impacted in the short term by the ongoing Covid-19 pandemic. In areas where the pandemic is severe, work will be delayed until the pandemic subsides due to the need for social distancing and other safety measures. Even in locations where the pandemic is less severe there is a need for proper social distancing and project hygiene measures among youth participants. Another short-term risk potentially affecting all Tribal projects is the weather during the time the work is conducted. If there is excessive rain, thunderstorms, or tropical storm conditions, youth would be impeded from completing the work until the inhibiting weather abates.

Specific Tribal project risks are as follows:

Coushatta: The proposed work would restore trees and other native vegetation lost during Hurricane Rita. If another hurricane of similar or greater strength follows a near-identical path, the trees and vegetation could be lost again (Rodgers et al., 2009). Also, sea level rise and land subsidence could cause the revegetation area to be inundated, in which case the trees and vegetation would be lost. Coastal erosion also is a potential risk if the State does not complete its breakwater construction. However, the presence of restored trees and vegetation would help keep the soil in place more effectively than their absence.

Chitimacha: The area around Bayou Teche is susceptible to saltwater intrusion due to sea level rise. This could negatively impact the viability of restored rivercane plants, which are dependent on fresh water. Southern Pearly-Eye butterflies (*Lethe portlandia*) and multiple bird species (White-eyed vireo [*Vireo griseus*], Swainson's Warbler [*Limnothlypis swainsonii*], Hooded Warbler [*Setophaga citrina*], Kentucky Warbler [*Geothlypis formosa*]) make use of rivercane and would also be negatively impacted by the loss of these plants. (Brown et al., 2009)

Choctaw: Several areas in and around the Mississippi Band of Choctaw Indians' reservations have been impacted by flooding the last few years. Flood damage would negatively impact native plant regeneration work proposed by the Tribe.

Poarch Creek: Climate change negatively impacts native plant species on which gopher tortoises are dependent for food, which might offset benefits from the proposed restoration activities (Diemer, 1986). Additionally, human population increases could lead to habitat loss. Gopher tortoises are dependent on longleaf pine (*Pinus palustris*) habitats, which in turn are dependent on fire and flooding. Any changes in the frequency of fires and floods could negatively offset the proposed restoration activities for both longleaf pines and gopher tortoises. The proposed work also includes rivercane restoration with the risks mentioned in the Chitimacha section.

Seminole: Water quality monitoring is a learning process, so this project would have minimal risks due to the quality checks and assurance steps inherent in teaching the appropriate protocols of this science.

Miccosukee: In recent years, the Everglades have been alternately impacted by droughts/low water levels and floods/high water levels. Both the droughts and floods will negatively impact the wetland connectivity work proposed by the Miccosukee Tribe. Climate change could negatively offset their work to remove nuisance and invasive species, such as melaleuca (Melaleuca spp.) and Brazilian pepper (Morton, 1978).

Monitoring and Adaptive Management:

Monitoring of project sites will be done by participant Tribes at six-month intervals. These inspections will be geared to assessing the success of the vegetation that was added and the natural addition of native plants encouraged by the newly planted areas. BIA will regularly communicate with the Tribes to ensure progress and collect data on participant levels for each Tribal project on an annual basis. Monitoring reports from the Tribes will address the amount of increased connectivity with downstream wetlands.

Data Management:

Each of the participating Tribes will submit to BIA semi-annual reports. Projects will occur on tribal lands and acres restored will be estimated by the project coordinator for each tribe. BIA will use periodic monitoring visits to verify restoration activities. All information will be compiled into a single report (PDF) at the end of the project.

The DOI/BIA data steward will work with each of the six tribes to centralize project data into a unified MS Excel (xlsx) format. Data management costs will be covered (in-kind) by DOI/BIA for the project. Working with data, GIS and metadata experts, the format of the data file will be finalized along with the development of the associated Federal Geographic Data Committee (FGDC) compliant metadata. Upon completion of data collection, the data and metadata will be deposited into the ScienceBASE RESTORE community container which will enable:

- digital object identifier (DOI) acquisition,
- long-term storage and archive in a national science data platform,
- registering the dataset with other national data catalogues like data.gov,
- human discoverability through search engines,
- and machine readability through ScienceBASE service.

Each Tribe has designated a Point of Contact who will provide an annual report on the program, participation and projects. All information will be compiled into a single report (PDF) at the end of the project.

Collaboration:
BIA will be the intertribal coordinator, sharing information among Tribes on successful methods. In addition, the Coushatta Tribe of Louisiana will be collaborating with Gulf Coast Soil and Water Conservation District. The Poarch Band of Creek Indians will work with professional botanists from the University of South Alabama and Mississippi State University to train youth in native plant establishment techniques.

Public Engagement, Outreach, and Education:
Community meetings will raise awareness about the new Tribal Youth Conservation Corps--to share project progress with the Tribal Councils and community and to give Tribal Corps members the opportunity to demonstrate their new knowledge and skills. In addition, the Coushatta Tribe will engage in public outreach—transferring information about the project— which will occur with both the Little Indian School (LIS) and the After-school Program which targets middle- and high-school students. The project will be described in a quarterly newsletter published by the Tribe. Community members will have an opportunity to give input and feedback at the quarterly community meeting held for tribal members. In addition, a press release will be prepared and released by the Tribe to a database of close to 1,000 organizations in the area.

Leveraging:

Funds: $12,000.00
Type: Bldg on Others
Status: Committed
Source Type: Other Federal
Description: BIA will spend $4,000 per year in-kind for the salaries of BIA employees' time spent in monitoring, management, and mandatory compliance activities. BIA's goal is to visit each Tribal project at least twice in the 3 years of work, generating travel and salary expenses beyond the $9,000 per year requested from RESTORE. This program builds upon work previously funded through FPL 1 and the recent amendment. Skills gained by Tribal youth might be applicable to restoration projects across the Gulf, regardless of funding source. Since a portion of the requested funding would be put toward construction, the need for contingency costs will be considered as appropriate when developing project-specific budgets for these activities.

Environmental Compliance:
Updated Categorical Exclusion documents have been created for each of the six Tribal projects. DOI believes these Categorical Exclusions fully cover the proposed activities. In addition to this type of National Environmental Policy Act (NEPA) analysis, this project was also evaluated and found to be in compliance with the following statutes and Executive Orders: Endangered Species Act; National Historic Preservation Act; Magnuson-Stevens Act; Fish and Wildlife Coordination Act; Executive Order 11988; Executive Order 11990; Executive Order 13898; Coastal Zone Management Act; Coastal Barrier Resources Act; Farmland Protection Policy Act; Section 404 of the Clean Water Act; Section 10 of the Rivers and Harbors Act; Marine Protection, Research and Sanctuaries Act; Marine Mammal Protection Act; National Marine Sanctuaries Act; Migratory Bird Treaty Act; Bald and Golden Eagle Protection Act; and Clean Air Act. The Categorical Exclusion and associated documentation for the Choctaw Youth Conservation Corps covers the construction of pedestrian bridges through wetlands areas and creation of observation decks. The Categorical Exclusion and associated documentation for the Miccosukee Tribal Youth Program Conservation Initiative covers the proposed conservation and restoration practices within the sloughs and flow paths to help restore connectivity within the downstream wetlands. The compliance documents are attached.[1]

[1] Environmental Compliance documents available by request (restorecouncil@restorethegulf.gov).

Bibliography:

Akers, D. L., 1999: Removing the heart of the Choctaw people: Indian removal from a Native American perspective. American Indian Culture and Research Journal, 23 (3), 63-76, https://doi.org/10.17953/aicr.23.3.p52341016666h822.

Baldwin, B. S., Cirtain, M., Horton, D. S., Ouellette, J., Franklin, S. B., Preece, J. E., 2009: Propagation methods for Rivercane (Arundinaria gigantea) L. (Walter) Muhl. Castanea, 74(3), 300-316, https://doi.org/10.2179/08-042R2.1.

Bernard, S. K., 2016: Teche: a history of Louisiana's most famous bayou. University Press of Mississippi, 272 pp.

Brown, J. D., Benson, T. J., Bednarz, J. C., 2009: Vegetation charateristics of Swainson's Warbler habitat at the White River National Wildlife Refuge, Arkansas. Wetlands, 29, 586, https://doi.org/10.1672/08-54.1.

Clark, R., 1971: The woody plants of Alabama. Annals of the Missouri Botanical Garden, 58(2), 99-242, doi:10.2307/2394932.

Diemer, J., 1986: The ecology and management of the Gopher Tortoise in the Southeastern United States. Herpetologica, 42(1), 125-133.

Fordham, A., Schwab, R., 2018: Indigenous youth engagement in natural resource management in Australia and North America: A review. Canberra, ACT: Centre for Aboriginal Economic Policy Research (CAEPR), The Australian National University.

Gulf of Mexico Habitat Restoration via Conservation Corps Partnership, https://www.sciencebase.gov/catalog/item/5d1f513ee4b0941bde64db5b/

Larsen, L. G., Choi, J., Nungesser, M. K., Harvey, J. W., 2012: Directional connectivity in hydrology and ecology. Ecological Applications, 22(8), 2204-2220.

Louisiana Comprehensive Master Plan for a Sustainable Coast, http://coastal.la.gov/wp-content/uploads/2017/04/2017-Coastal-Master-Plan-Web-Single-Page_CFinal-with-Effective-Date-06092017.pdf.

Morton, J. F., 1978: Brazilian Pepper- its impact on people, animals and the environment. Economic Botany, 32, 353-359, https://doi.org/10.1007/BF02907927.

Roach, N.S., Barrett, K., 2015: Managed habitats increase occupancy of Black Rails (Laterallus jamaicensis) and may buffer impacts from sea level rise. Wetlands, 35, 1065-1076, https://doi.org/10.1007/s13157-015-0695-6.

Rodgers, J. C., Murrah, A. W., Cooke, W. H., 2009: The impact of Hurricane Katrina on the coastal vegetation of the Weeks Bay Reserve, Alabama from NDVI data. Estuaries and Coasts, 32, 496-507, https://doi.org/10.1007/s12237-009-9138-z.

Budget

Project Budget Narrative:
Funds will be provided to the six participant Tribes for the planning and implementation of their Tribal youth projects, as well as data management by the Tribes, totaling $50,000 per Tribe for each of three years. The remaining $27,000 will be used by the Bureau of Indian Affairs for monitoring of tribal projects, including site visits, and will also fund the salary time for the BIA data steward to compile individual tribes' project reports into a single Excel spreadsheet for program reporting.

Total FPL 3 Project/Program Budget Request:
$ 927,000.00

Estimated Percent Monitoring and Adaptive Management: 5 %
Estimated Percent Planning: 10 %
Estimated Percent Implementation: 70 %
Estimated Percent Project Management: 10 %
Estimated Percent Data Management: 5 %
Estimated Percent Contingency: 0 %

Is the Project Scalable?:
Yes

If yes, provide a short description regarding scalability.:
The project is scalable by the number of years of activity.

Environmental Compliance[2]

Environmental Requirement	Has the Requirement Been Addressed?	Compliance Notes (e.g.,title and date of document, permit number, weblink etc.)
National Environmental Policy Act	Yes	Each tribal project was reviewed individually in accordance with NEPA and a categorical exclusion review has been completed for each project.
Endangered Species Act	Yes	ESA reviews were completed for each project and supporting documentation has been included with the NEPA categorical exclusion review for each project.
National Historic Preservation Act	Yes	NHPA reviews were completed for each project and supporting documentation has been included with the NEPA categorical exclusion review for each project.
Magnuson-Stevens Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Fish and Wildlife Conservation Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Coastal Zone Management Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Coastal Barrier Resources Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review

[2]Environmental Compliance documents available by request (restorecouncil@restorethegulf.gov).

		conducted by BIA.
Farmland Protection Policy Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Clean Water Act (Section 404)	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
River and Harbors Act (Section 10)	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Marine Protection, Research and Sanctuaries Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Marine Mammal Protection Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
National Marine Sanctuaries Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Migratory Bird Treaty Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Bald and Golden Eagle Protection Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Clean Air Act	Yes	Although determined to not be applicable, the

		requirements of this act were considered as part of the compliance review conducted by BIA.
Other Applicable Environmental Compliance Laws or Regulations	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.

Maps, Charts, Figures

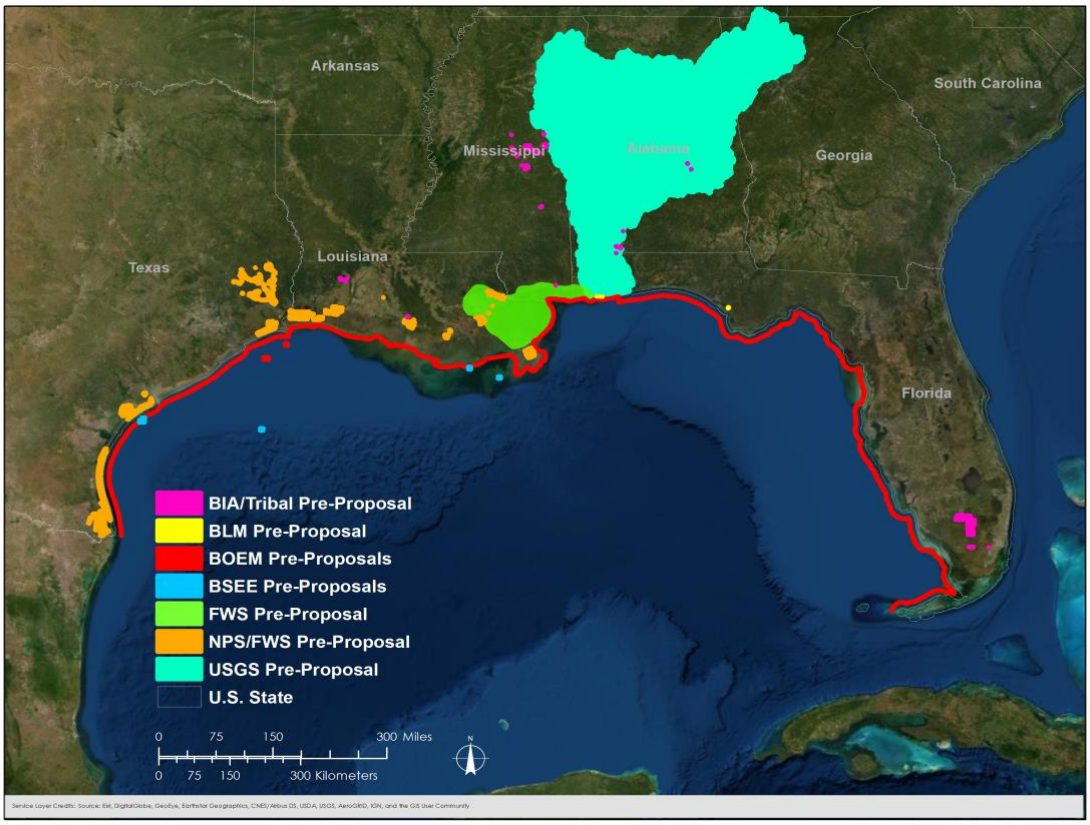

Figure 1: Location map of six Tribal youth projects.

RESTORE Council FPL 3 Proposal Document

General Information

Proposal Sponsor:
U.S. Department of the Interior – Bureau of Indian Affairs

Title:
Tribal Youth Coastal Restoration Program

Project Abstract:
The Tribal Youth Coastal Restoration Program will continue the restoration work begun under FPL1 of the Chitimacha Tribe, Mississippi Band of Choctaw Indians, Poarch Band of Creek Indians, Seminole Tribe of Florida, and Miccosukee Indian Tribe, and add the Coushatta Tribe of Louisiana. Tribes will create projects to protect natural resources and the environment, and maintain a healthy ecosystem, while learning cultural values. These training projects should restore 1000 acres of habitat on Tribal lands

FPL Category: Cat1: Planning/ Cat1: Implementation

Activity Type: Program

Program: Tribal Youth Coastal Restoration Program (DOI/BIA)

Co-sponsoring Agency(ies): N/A

Is this a construction project?
No

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

Priority Criteria Justification:
Through this program, Tribal youth will undertake projects to learn to protect natural resources and the environment through native plant restoration, site cleanup, water and soil sampling, as well as environmental and cultural education of Tribal youth. This project will train youth in long-term stewardship of the Gulf Coast environment. The impact of this education and training should continue for many generations to come.

Tribal leaders designed specific projects, i.e., teaching and experiential learning to prepare students to understand and respect the natural environment. Tribal leadership encourages tribal youth to engage in activities of this program, as well as courses and degree programs that will enable them to assume future leadership roles in these areas. The activities also provide training to work on restoration throughout the Gulf and engage the Native Gulf community in the larger restoration effort that will continue for decades.

Project Duration (in years): 3

Goals

Primary Comprehensive Plan Goal:
Enhance Community Resilience

Primary Comprehensive Plan Objective:
Promote Natural Resource Stewardship and Environmental Education

Secondary Comprehensive Plan Objectives:
N/A

Secondary Comprehensive Plan Goals:
N/A

PF Restoration Technique(s):
Promote natural resource stewardship and environmental education: Promote natural resource stewardship and environmental education
Protect and conserve coastal, estuarine, and riparian habitats: Habitat management and stewardship

Location

Location:
The map shows the locations of the six Tribal youth projects: two in Louisiana, one in Mississippi, one in Alabama, and two in Florida. (Figure 1)

HUC8 Watershed(s):
South Atlantic-Gulf Region(Choctawhatchee-Escambia) - Florida Panhandle Coastal(Perdido)
South Atlantic-Gulf Region(Southern Florida) - Southern Florida(Everglades)
Lower Mississippi Region(Louisiana Coastal) - Atchafalaya-Vermillion(Bayou Teche)
Lower Mississippi Region(Louisiana Coastal) - Calcasieu-Mermentau(Mermentau)
South Atlantic-Gulf Region(Pascagoula) - Pascagoula(Mississippi Coastal)

State(s):
Alabama
Mississippi
Louisiana
Florida

County/Parish(es):
AL - Escambia
FL - Collier
FL - Glades
FL - Miami-Dade
LA - Cameron
LA - St. Mary
MS - Harrison
MS - Neshoba

Congressional District(s):
FL - 26
FL - 23
LA - 3
MS - 3
AL - 1
FL - 25

Narratives

Introduction and Overview:

The overarching goal of this project is to educate and train tribal youth through Gulf Coastal Zone restoration projects. This work builds on the success of the FPL 1 Tribal Youth Conservation Corps, which trained 239 student and restored 995 acres. See the following report: https://www.sciencebase.gov/catalog/item/5d1f513ee4b0941bde64db5b

Tribal Youth from the Coushatta Tribe will plant coastal vegetation to assist in restoring beaches along Louisiana coastal habitat and reducing coastal erosion. The Coushatta Youth Program will collaborate with the Gulf Coast Soil and Water Conservation District on a plant diversity restoration project. The goal is to support the coastal habitat, including important habitat for shorebirds and threatened species such as Black rails (Laterallus jamaicensis (Roach, 2015).

The Chitimacha Tribe proposes the cleanup of the bayou-side of the reservation along Bayou Teche, as well as other areas, such as Lake Fausse Point and Chitimacha village sites. (Bernard) While participants remove trash near these important sites, they will be helping the Tribe preserve important cultural resources and connect natural resource/environmental issues with cultural resource concerns. Also, the Tribe will utilize this opportunity to engage the participants in the Rivercane Restoration Program, which restores a critical species for the Gulf region using micropropagation (Baldwin et. Al, 2009).

The Choctaw Youth Conservation Corps will provide hands-on activities in environmental and culturally based curriculum to build stewardship and natural resources conservation for tribal high school youth. The Tribe's broader development plans for Nanih Waiya at the headwaters of the Pearl River include the maintenance of the approximately 2-mile-long woodlands nature trail, construction of pedestrian bridges through wetland areas, creation of observation decks, and ensuring the site's function as an outdoor natural science museum (Akers, 1999). The Tribe will also teach appreciation of their lands, including those in the Gulf Coast.

The Creek Youth Conservation Corp will focus on short-term and long-term restoration and environmental stewardship projects and learning opportunities. These projects will include Native plant reestablishment in the Perdido and Escambia River basins. This project will also focus on educating youth regarding environmental, cultural, and historical knowledge and training them to develop skills to complete restoration projects that will restore Tribal lands which are part of the Gulf Coast area (Clark, 1971).

The Seminole Tribe of Florida Heritage and Environmental Resource Office (HERO), Environmental Resource Management Department (ERMD) will train and enlist the services of Seminole Tribe youth to collect environmental data to support the needs of the Tribe. Data collection will be used to protect and restore natural resources, ecosystems, wildlife habitats and wetlands of the greater RESTORE region.

Miccosukee Tribal Youth Program Conservation Initiative (TYP-C) will engage Tribal youth in conservation and restoration practices within the sloughs and flow-paths--to help restore connectivity with the downstream wetlands. (Larsen et al) Tribal Departments and Tribal Programs will provide GPS support with species identification, science and construction support.

Proposed Methods:

Cultural, historic preservation and environmental training will include off-site visits for learning and experiencing activities and events. The Tribes will provide transportation for youth to engage in local restoration programs and collaborative events with other Tribal sites.

Restoration Methods: At some sites, Tribal members will donate identified mother plants to transplant, as warranted, to allow youth to place them in appropriate locations. Propagation will be at the identified Tribal sites. Restoring Tribal sites are important educational conservation tools for teaching youth that they are the next generation of stewards of Tribal lands. In several project locations, the primary projects are focused on planting of native plants and trees. At one location (Rutherford Beach), the state plans the construction of breakwaters. The plantings in conjunction with these projects are anticipated to decrease shoreline loss, enhancing the effectiveness of plantings in the restoration process. Planting is both cost effective and easily achievable. The Coushatta project is consistent with the recommendations made in Louisiana's Comprehensive Master Plan for a Sustainable Coast (June 2, 2017), see: (http://coastal.la.gov/wp-content/uploads/2017/04/2017-Coastal-Master-Plan_Web-Single-Page_CFinal-with-Effective-Date-06092017.pdf)

Environmental Benefits:

Anticipated environmental benefits include disrupting the process of shoreline erosion, restoring a critical environmental balance in a threatened area, and building in tribal youth a knowledge and commitment to protecting the environment, and the preliminary skills to work in the restoration field in the future.

Metrics:

Metric Title: PRM004: Monitoring - # monitoring programs implemented : Planning, Research, Monitoring
Target: 1
Narrative: Success will be measured by the submission of youth water monitoring program monitoring report from the Seminole Tribe.

Metric Title: COI007: Building institutional capacity - # of participants that successfully completed training: Capacity, Outreach, Incentives
Target: 20
Narrative: Success will be measured by the number of student interns successfully completing training by each Tribal youth project.

Metric Title: HR004: Habitat restoration - Acres restored: Habitat Restoration
Target: 1,000
Narrative: Each tribe will restore various acres, ranging from 12 to over 200 per tribe.

Risk and Uncertainties:

Overall the program is low risk as it is a training project for Tribal youth interns. Specific Tribal project risks are as follows:

Coushatta: The proposed work would restore trees and other native vegetation lost during Hurricane Rita. If another hurricane of similar or greater strength follows a near-identical path, the trees and vegetation could be lost again. (Rodgers et al) Also, sea level rise and land subsidence could cause the revegetation area to be inundated, in which case the trees and vegetation would be lost. However, the trees and vegetation would help keep the soil in place.

Chitimacha: The area around Bayou Teche is susceptible to salt water intrusion due to sea level rise. This could negatively impact the viability of restored rivercane plants, which are dependent on fresh water. Southern Pearly Eye butterflies and multiple bird species (White-eyed Vireo, Swainson's Warbler, Hooded Warbler, Kentucky Warbler) make use of rivercane and would also be negatively impacted by the loss of these plants. (Brown et. al.)

Choctaw: Several areas in and around the Mississippi Band of Choctaw Indians' reservations have been impacted by flooding the last few years. Flood damage would negatively impact native plant regeneration work proposed by the Tribe.

Poarch Creek: Climate change negatively impacts native plant species on which gopher tortoises are dependent for food, which might offset benefits from the proposed restoration activities. (Diemer) Additionally, human population increases could lead to habitat loss. Gopher tortoises are dependent on longleaf pine habitats, which in turn are dependent on fire and flooding. Any changes in the frequency of fires and floods could negatively offset the proposed restoration activities for both longleaf pines and gopher tortoises. The proposed work also includes rivercane restoration with the risks mentioned in the Chitimacha section.

Seminole: Water quality monitoring is a learning process, and this project would have minimal risks.

Miccosukee: In recent years, the Everglades have been alternately impacted by droughts/low water levels and floods/high water levels. Both of the droughts and floods will negatively impact the wetland connectivity work proposed by the Miccosukee Tribe. Climate change could negatively offset their work to remove nuisance and invasive species, such as melaleuca and Brazilian pepper. (Morton)

Monitoring and Adaptive Management:

Monitoring of project sites will be done by participant Tribes at six month intervals. These inspections will be geared to assessing the success of the vegetation that was added and the natural addition of native plants encouraged by the newly planted areas. BIA will regularly communicate with the Tribes to ensure progress and collect data on participant levels for each Tribal project on an annual basis.

Data Management:

Each of the participating Tribes will submit to BIA semi-annual reports. Projects will occur on tribal lands and acres restored will be estimated by the project coordinator for each tribe. BIA will use periodic monitoring visits to verify restoration activities. All information will be compiled into a single report (PDF) at the end of the project.

The DOI/BIA data steward will work with each of the six tribes to centralize project data into a unified MS Excel (xlsx) format. Data management costs will be covered (in-kind) by DOI/BIA for the project. Working with data, GIS and metadata experts, the format of the data file will be finalized along with the development of the associated Federal Geographic Data Committee (FGDC) compliant metadata. Upon completion of data collection, the data and metadata will be deposited into the ScienceBASE RESTORE community container which will enable: • digital object identifier (DOI) acquisition, • long-term storage and archive in a national science data platform, • registering the dataset with other national data catalogues like data.gov, • human discoverability through search engines, • and machine readability through ScienceBASE service. Each Tribe has designated a Point of Contact who will provide an annual report on the program, participation and projects. All information will be compiled into a single report (PDF) at the end of the project.

Collaboration:

BIA will be the intertribal coordinator, sharing information among Tribes on successful methods. In addition, the Coushatta Tribe of Louisiana will be collaborating with Gulf Coast Soil and Water Conservation District. The Poarch Band of Creek Indians will work with professional botanists from the University of South Alabama and Mississippi State University to train youth in native plant

establishment techniques.

Public Engagement, Outreach, and Education:
Community meetings will raise awareness about the new Tribal Youth Conservation Corps--to share project progress with the Tribal Councils and community and to give Tribal Corps members the opportunity to demonstrate their new knowledge and skills. In addition, the Coushatta Tribe will engage in public outreach—transferring information about the project— which will occur with both the Little Indian School (LIS) and the After-school Program which targets middle- and high-school students. The project will be described in a quarterly newsletter published by the Tribe. Community members will have an opportunity to give input and feedback at the quarterly community meeting held for tribal members. In addition, a press release will be prepared and released by the Tribe to a database of close to 1,000 organizations in the area.

Leveraging:

Funds: $4,000.00
Type: Building on Others
Status: Committed
Source Type: Other Federal
Narrative: BIA works with Tribal youth, providing in-kind service with BIA employees. BIA will spend $4000 per year for the salaries of BIA employees' time spent in monitoring, management, and mandatory compliance activities. BIA's goal is to visit each Tribal project at least twice in the three years of work, which will generate travel and salary expenses beyond the $9000 per year requested from RESTORE Council. The separate $4000 per year provided by BIA will meet this goal. This program builds upon years of work previously funded through FPL 1 and the recent amendment. Skills gained by Tribal youth might be applicable to restoration projects across the Gulf, regardless of the funding source.

Environmental Compliance:
Updated Categorical Exclusion documents have been created for each of the six Tribal projects. DOI believes these Categorical Exclusions fully cover the proposed activities. In addition to NEPA, this project was also evaluated and found to be in compliance with the following statutes and Executive Orders: Endangered Species Act; National Historic Preservation Act; Magnuson-Stevens Act; Fish and Wildlife Coordination Act; Executive Order 11988; Executive Order 11990; Executive Order 13898; Coastal Zone Management Act; Coastal Barrier Resources Act; Farmland Protection Policy Act; Section 404 of the Clean Water Act; Section 10 of the Rivers and Harbors Act; Marine Protection, Research and Sanctuaries Act; Marine Mammal Protection Act; National Marine Sanctuaries Act; Migratory Bird Treaty Act; Bald and Golden Eagle Protection Act; and Clean Air Act. The compliance documents are attached.

Bibliography:

Akers, D. L., 1999: Removing the heart of the Choctaw people: Indian removal from a Native American perspective. American Indian Culture and Research Journal, 23 (3), 63-76, https://doi.org/10.17953/aicr.23.3.p52341016666h822.

Baldwin, B. S., Cirtain, M., Horton, D. S., Ouellette, J., Franklin, S. B., Preece, J. E., 2009: Propagation methods for Rivercane (Arundinaria gigantea) L. (Walter) Muhl. Castanea, 74(3), 300-316, https://doi.org/10.2179/08-042R2.1.

Berhard, S. K., 2016: Teche: a history of Louisiana's most famous bayou. University Press of Mississippi, 272 pp.

Brown, J. D. Benson, T. J., Bednarz, J. C., 2009: Vegetation charateristics of Swainson's Warbler habitat at the White River National Wildlife Refuge, Arkansas. Wetlands, 29, 586, https://doi.org/10.1672/08-54.1.

Clark, R., 1971: The woody plants of Alabama. Annals of the Missouri Botanical Garden, 58(2), 99-242, doi:10.2307/2394932.

Diemer, J., 1986: The ecology and management of the Gopher Tortoise in the Southeastern United States. Herpetologica, 42(1), 125-133.

Gulf of Mexico Habitat Restoration via Conservation Corps Partnership, https://www.sciencebase.gov/catalog/item/5d1f513ee4b0941bde64db5b/

Larsen, L. G., Choi, J., Nungesser, M. K., Harvey, J. W., 2012: Directional connectivity in hydrology and ecology. Ecological Applications, 22(8), 2204-2220.

Louisiana Comprehensive Master Plan for a Sustainable Coast, http://coastal.la.gov/wp-content/uploads/2017/04/2017-Coastal-Master-Plan-Web-Single-Page_CFinal-with-Effective-Date-06092017.pdf.

Morton, J. F., 1978: Brazilian Pepper- its impact on people, animals and the environment. Economic Botany, 32, 353-359, https://doi.org/10.1007/BF02907927.

Roach, N.S., Barrett, K., 2015: Managed habitats increase occupancy of Black Rails (Laterallus jamaicensis) and may buffer impacts from sea level rise. Wetlands, 35, 1065-1076, https://doi.org/10.1007/s13157-015-0695-6.

Rodgers, J. C., Murrah, A. W., Cooke, W. H., 2009: The impact of Hurricane Katrina on the coastal vegetation of the Weeks Bay Reserve, Alabama from NDVI data. Estuaries and Coasts, 32, 496-507, https://doi.org/10.1007/s12237-009-9138-z.

Budget

Project Budget Narrative:
Funds will be provided to the six participant Tribes for the planning and implementation of their Tribal youth projects, as well as data management by the Tribes, totaling $50,000 per Tribe for each of three years. The remaining $27,000 will be used by the Bureau of Indian Affairs for monitoring of tribal projects, including site visits, and will also fund the salary time for the BIA data steward to compile individual tribes' project reports into a single Excel spreadsheet for program reporting.

Total FPL 3 Project/Program Budget Request:
$ 927,000.00

Estimated Percent Monitoring and Adaptive Management: 5 %
Estimated Percent Planning: 10 %
Estimated Percent Implementation: 70 %
Estimated Percent Project Management: 10 %
Estimated Percent Data Management: 5 %
Estimated Percent Contingency: 0 %

Is the Project Scalable?
Yes

If yes, provide a short description regarding scalability.:
The project is scalable by the number of years of activity.

Environmental Compliance[1]

Environmental Requirement	Has the Requirement Been Addressed?	Compliance Notes (e.g.,title and date of document, permit number, weblink etc.)
National Environmental Policy Act	Yes	Each tribal project was reviewed individually in accordance with NEPA and a categorical exclusion review has been completed for each project.
Endangered Species Act	Yes	ESA reviews were completed for each project and supporting documentation has been included with the NEPA categorical exclusion review for each project.
National Historic Preservation Act	Yes	NHPA reviews were completed for each project and supporting documentation has been included with the NEPA categorical exclusion review for each project.
Magnuson-Stevens Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Fish and Wildlife Conservation Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Coastal Zone Management Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Coastal Barrier Resources Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Farmland Protection Policy Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Clean Water Act (Section 404)	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
River and Harbors Act (Section 10)	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Marine Protection, Research and Sanctuaries Act	Yes	Although determined to not be applicable, the requirements of this act were

[1] Environmental Compliance document uploads available by request (restorecouncil@restorethegulf.gov).

		considered as part of the compliance review conducted by BIA.
Marine Mammal Protection Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
National Marine Sanctuaries Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Migratory Bird Treaty Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Bald and Golden Eagle Protection Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Clean Air Act	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.
Other Applicable Environmental Compliance Laws or Regulations	Yes	Although determined to not be applicable, the requirements of this act were considered as part of the compliance review conducted by BIA.

Maps, Charts, Figures

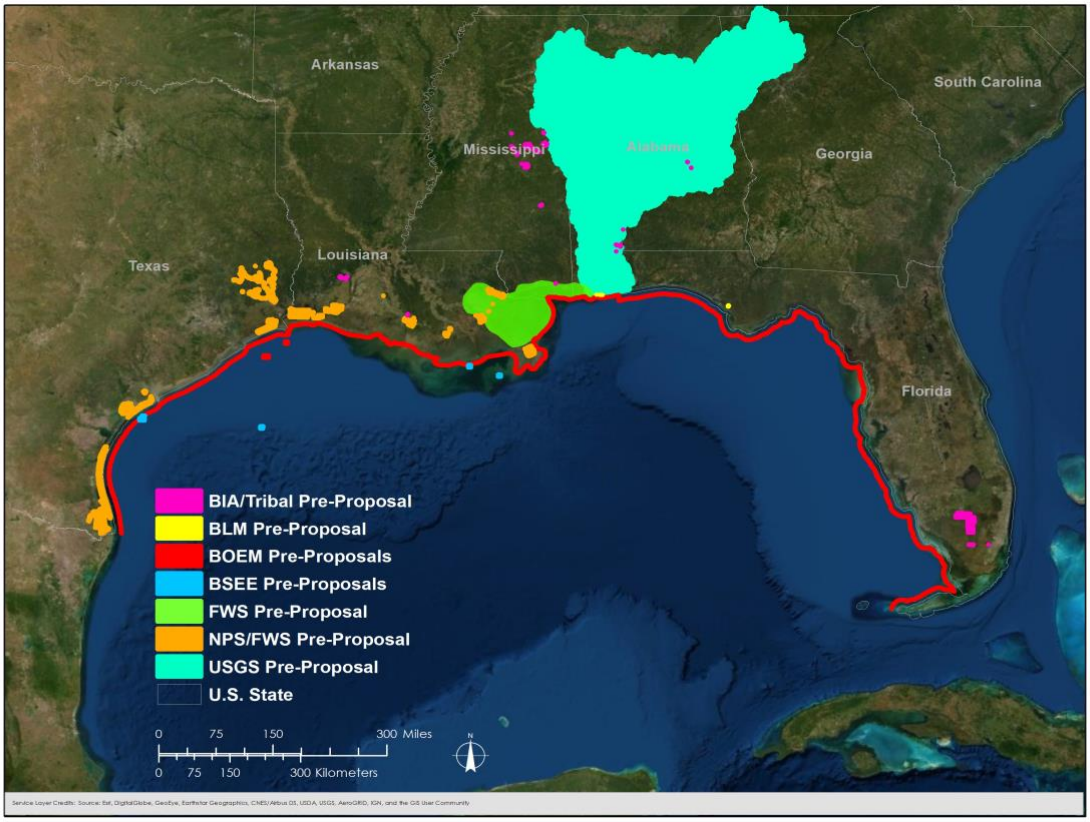

Figure 1: Location map of six Tribal youth projects.

FPL 3b Internal Staff Review of Proposal Submitted 4/24/2020

Project/Program	Tribal Youth Coastal Restoration Program (DOI/BIA)		
Primary Reviewer	Jean Cowan	Sponsor	DOI
EC Reviewer	John Ettinger	Co-Sponsor	

1. Is/Are the selected Priority Criteria supported by information in the proposal?	Yes
Notes	

2. Does the proposal meet the RESTORE Act geographic eligibility requirement?	Yes
Notes	

3. Are the Comprehensive Plan primary goal and primary objective supported by information in the proposal?	Yes
Notes	

4. Planning Framework: If the proposal is designed to align with the Planning Framework, does the proposal support the selected priority approaches, priority techniques, and/or geographic area?	Yes
Notes	

5. Does the proposal align with the applicable RESTORE Council definition of project or program?	Yes
Notes	

6. Does the budget narrative adequately describe the costs associated with the proposed activity?	More information needed
Notes	Since a portion of the requested funding would be put toward construction (e.g., pedestrian bridges and observation decks), Council staff recommend the sponsor revise the answer to the question "Is this a construction project?", from "no" to "yes". Council staff also recommend including a statement in the budget narrative that the need for contingency costs will be considered as appropriate when developing individual project-specific budgets for activities involving construction.

7. Are there any recommended revisions to the selected leveraged funding categories?			More information needed
Notes	In the "Funds" section you noted $4,000 would be leveraged. However, in the description you indicate that $4,000 per year would be leveraged. Would the total leveraged then my $12,000 ($4,000 per year for 3 years)? If so, please update the "Funds" value to be $12,000. Council staff recommends considering whether this project "builds upon" the programs and restoration work accomplished under FPL1.		

8. Have three external BAS reviews been completed?	More information needed
Notes	Please see the external BAS review comments, and external reviews summary attached with these review comments.

9. Have appropriate metrics been proposed to support all primary and secondary goals?	Yes
Notes	

10. Environmental compliance: If FPL Category 1 has been selected for the implementation component of the project or program, does the proposal include environmental compliance documentation that fully supports the selection of Category 1?	More information needed
Notes	The sponsor should clarify whether the CE and associated environmental compliance documentation proposed for use with the Choctaw Youth Conservation Corps covers the proposed activities, including construction of pedestrian bridges through wetland areas and creation of observation decks. Similarly, the sponsor should clarify whether the CE and associated environmental compliance documentation proposed for use with the Miccosukee Tribal Youth Program Conservation Initiative covers the proposed "conservation and restoration practices within the sloughs and flow-paths--to help restore connectivity with the downstream wetlands".

11. Geospatial Compliance: Have the appropriate geospatial files and associated metadata been submitted along with a map of the proposed project/program area?	More information needed
Notes	Council staff recommends using the the gulfwide location selections (minus Texas) for watersheds, State/Counties, and US congressional districts.

FPL3b BAS Review Summary -- Tribal Youth Coastal Restoration Program

May 2020

Overall the external Best Available Science Reviews for the *Tribal Youth Coastal Restoration Program* (DOI/BIA) proposal are positive. Reviewers believe that the proposal's goals and objectives clearly stated and backed by peer reviewed and publicly available information. Most Reviewers agree that the listed methods in the proposal are detailed, regionally appropriate, and justified by scientific data. Reviewers also concur that the environmental benefits are detailed. All reviewers believe, however, that the proposal could be strengthened by additional discussion of possible risks which could affect program performance.

Both Reviewers 1 and 3 believe that the methods are detailed and appropriate with Reviewer 3 specifically stating that "the methods in the proposal are clearly addressed with necessary detail and the evidence is thoroughly supported and adaptable for each specific geographic area." Reviewer 3 goes on to give some examples of additional literature that could be cited to strengthen the proposal. Reviewer 2 would like a more detailed discussion of all methods included in the proposal (i.e., debris removal, trail maintenance, native vegetation planting, general data collection, and hydrology restoration), descriptions of how methods will be used to support the program's goals, and science used in support of the program's methods. One example they give is that "it is unclear what methods are being conducted and what actions will be taken in the Seminole Tribe of Florida HERO ERMD project and the Miccosukee TYP-C project."

Reviewers 1 and 3 comments that there could be more information related to short-term risks associated with the project. In terms of long-term environmental risks which might affect the outcoming of the program, Reviewer 1 states that "each of the six tribal projects discusses environmental stressors possibly related to their sites. Climate change with flooding and drought cycles as well as sea level rise are considered. Wetland connectivity in the Miccosukee area is a concern as it relates to sea level rise. Appropriate references are cited."

Reviewer 2 raises a concern regarding the breakwater activity mentioned in conjunction with wetland planting at Rutherford Beach, LA, and whether erosion would be a risk to the project success if the State does not complete the breakwater. They also go on to point out that the Coronavirus pandemic might also affect project success and add another element of risk as safety protocols "could interfere with many aspects of the training including training, field work, and transportation to restoration sites." Reviewer 3 states the proposal should include a mitigation plan to address short-term implementation of risks and uncertainties (such as the risks and safety considerations posed by working with minors). However, detailed mitigation plans are not required at the FPL 3b proposal stage.

Reviewer 2 comments that while the proposal describes the anticipated environmental benefits of the project, these benefits are not discussed in reference to a cited environmental stressor.

Reviewer 3 believes that impact to climate change and sea level rise could be included in the environmental benefits section.

In reviewing how the proposal addresses monitoring and data management to support program measures of success, Reviewer 1 emphasizes that “the Bureau of Indian Affairs will use professional data managers to steward the data in this program. They detail multiple data storage sites and [the] methods are standard to [the] ScienceBASE RESTORE community. BIA indicates they will regularly communicate with tribes to ensure progress and collect data on an annual basis.” Reviewer 2, however, would like more information regarding the program’s monitoring program, stating that while it covers tracking the success of vegetation, it “does not cover the other aspects of this project such as connectivity with downstream wetlands as described in the proposal.”

Reviewers 1 and 2 comment that the proposal does not adequately address past successes and failures of similar efforts. Reviewer 3 states that included data shows that “the applicant has demonstrated successful past performance. There is a likelihood this success will continue.”

Reviewer 2 concludes by wondering if the program would benefit from collaboration with the “Gulf of Mexico Coast Conservation Corps (GulfCorps) Program” proposed by the U. S. Department of Commerce, National Oceanic and Atmospheric Administration.

BIA responses to FPL3b BAS review comments on Tribal Youth Coastal Restoration Program

We would like to thank the Gulf Restoration Council and three anonymous reviewers for taking the time to consider our proposal. We were pleased to see the review is overall supportive of the proposed work by the six Gulf Coast Tribes. In the narrative below we describe how we have addressed specific revisions suggested in the item numbers from Council staff, with item 8 being the summary of BAS reviewers.

In Item 6 we agree with the recommended statement and answer to the construction question, and have revised the proposal accordingly (page 1).

In Item 7 the total leveraged is $12,000 over three years, so we have updated the number (page 8). We also added extensively to the project narrative to discuss accomplishments under FPL1, which this proposed work builds upon (page 3-4).

We agree with most of the reviewer comments as referenced in Item 8 and have updated the proposal accordingly. The narrative has been extensively updated to discuss successes from FPL1 (page 3-4 in the narrative, page 8 in Leveraging). A citation for Fordham and Schwab was added at the request of reviewer 2 (page 3), but it did not make sense to add DeAngelis et al as none of the projects involve oyster reef restoration. Additional details about methodology for the Seminole and Miccosukee projects are now provided (page 5). Environmental benefits now include mitigating the impacts of climate change and sea level rise, including a linkage to the project risks due to climate change and sea level rise (page 7). Risks now include impacts from COVID-19, both delays in starting work and slowed work due to hygiene and social distancing, short term risks from weather impacts, and additional coastal erosion if Louisiana does not complete its breakwater construction (page 7). The Monitoring section has been updated to state the Tribes' reports will include information on connectivity with downstream wetlands (page 8). Leveraged funding is updated to $12,000, and there is additional information added about considering the need for contingency costs as appropriate (page 9).

Regarding the NOAA GulfCorps program, it targets an older age group than the middle- to high-school age group for BIA's program. We have made connections to specific GulfCorps programs near Tribal reservations, and graduates of the BIA program will be informed about recruiting opportunities for the GulfCorps program. No update was made to the proposal for this item.

For Item 10, we have added specific comments to the environmental compliance narrative addressing the specific concerns about the Categorical Exclusions for the Choctaw Youth Conservation Corps and the Miccosukee Tribal Youth Program. The existing Categorical Exclusions cover all aspects of the proposed work (page 10).

For Item 11, the selections for watersheds, States/Counties, and US Congressional Districts will be updated upon submission to PIPER.

Gulf Coast Ecosystem Restoration Council

FPL 3b Internal Best Available Science Review Panel Summary

July 2020

Introduction

On Tuesday, June 30, and Wednesday July 1, 2020 the RESTORE Council convened the Funded Priorities List (FPL) 3b Internal Best Available Science (BAS) Review Panel. The purpose of this internal panel was to use Council member-agency expertise to address external BAS review comments provided for FPL 3b submitted project/program proposals, and potentially identify project/program synergies not identified prior to proposal submission. The ultimate goal of the panel was to provide Council members with substantive best available science content to inform their decision-making.

The internal panel was convened via webinar with representatives from each of the Council's eleven member agencies present. Each BAS Panel member was provided the following:

1) Full FPL 3b proposals
2) 3 external BAS reviews for each proposal
3) Summary of external BAS reviews for each proposal
4) Proposal Sponsor's response to the BAS reviews summary
5) Any proposed revisions to the proposal

Proposal sponsors provided a brief synopsis of their proposal to the panel, a summary of comments made in external reviews, and discussed their proposed response to the external reviews. Council staff then solicited feedback from the panel on the proposal sponsor's presentation of comments and responses to those comments, and any additional BAS concerns. Council staff also solicited feedback on any existing or future synergies with other Gulf restoration activities. The proceedings of the meeting for this proposal are summarized below.

Department of the Interior

Tribal Youth Coastal Restoration Program (DOI/BIA)

Feedback from the panel on the proposal sponsor's presentation of comments and responses to those comments, and any additional BAS concerns:

Coordination: Can activities be combined with NOAA Gulfcorps?

- The BAS panel agrees that DOI has appropriately addressed this comment.

Environmental compliance: Update NEPA for Choctaw and Miccosukee programs

- The BAS panel agrees that DOI has appropriately addressed this comment.

Environmental benefits and risks: Expand information about environmental benefits and risks

- A panelist raises that the presentation may have more clearly presented this information than the revised proposal.
- DOI response: DOI will revisit the proposal to make further revisions as possible to increase clarity.

Leveraging: Update information on leveraged funds

- The BAS panel agrees that DOI has appropriately addressed this comment.

Lessons learned: Update the narrative to discuss successes from tribal FPL1 projects

- The BAS panel agrees that DOI has appropriately addressed this comment.

Panel comments on existing or future synergies with proposed activity:
Panelists raise the potential for students within the proposed program to act as ambassadors to existing tribal youth programs. DOI concurs that the program would seek to coordinate with existing programs when possible, and notes that enhanced capacity-building also occurs through the program by encouraging students to pursue STEM.

SCIENCE EVALUATION

Bucket 2: Comprehensive Plan Component

Proposal Title: Tribal Youth Coastal Restoration Program
Location (If Applicable): Gulf-wide
Council Member Bureau or Agency: U.S. Department of the Interior, Bureau of Indian Affairs
Type of Funding Requested: Planning / Implementation

Reviewed by: Reviewer 1
Date of Review: May 6, 2020

Best Available Science:

These 4 factors/elements help frame the reviewer's answers to A, B and C found in next section:

Question 1.	
Have the proposal objectives, including proposed methods, been justified using peer reviewed and/or publicly available information?	Yes
Comments:	
Listed 12 sources from various peer reviewed reports dated from 1971-2016. The 3 early-dated resources related to native and invasive plant species, which seem relevant.	

Question 2.	
If information supporting the proposal does not directly pertain to the Gulf Coast region, are the proposal's methods reasonably supported and adaptable to that geographic area?	Yes
Comments:	
8 of 12 references were directly related to the Gulf of Mexico. Others were applicable to projects.	

Question 3.	
Are the literature sources used to support the proposal accurately and completely cited? Are the literature sources represented in a fair and unbiased manner?	Yes
Comments:	
Literature cited in appropriate areas of the proposal.	

Question 4.	
Does the proposal evaluate uncertainties and risks in achieving its objectives over time? (e.g., is there an uncertainty or risk in the near- and/or long-term that the project/program will be obsolete or not function as planned?)	Yes
Comments:	
Risks were assessed based on time for each tribal project.	

Based on the answers to the previous 4 questions, and *giving deference to the sponsor to provide within reason the use of best available science,* the following three questions can be answered:

Question A	
Has the applicant provided reasonable justification that the proposal is based on science that uses peer- reviewed and publicly available data?	Yes
Comments:	
All listed items are peer-reviewed and/or publicly available.	

Question B	
Has the applicant provided reasonable justification that the proposal is based on science that maximizes the quality, objectivity, and integrity of information (including, as applicable, statistical information)?	Yes
Comments:	
Cited references to both science and cultural resources. Utilizing partnership with BIA to assist with reporting.	

Question C	
Has the applicant provided reasonable justification that the proposal is based on science that clearly documents and communicates risks and uncertainties in the scientific basis for such projects/programs?	Yes
Comments:	
References are clearly linked in the risks and uncertainties section. (Rogers et al – Hurricane Rita), (Brown et al – Swainson's Warbler, Arkansas), (Larsen et al – hydrologic sampling) for example.	

Science Context Evaluation:

Question A	
Has the project/program sponsor or project partners demonstrated experience in implementing a project/program similar to the one being proposed?	Yes
Comments:	
Yes. The report on the previously successful Indian Tribal Youth Conservation program was included in the reference material.	

Question B	
Does the project/program have clearly defined goals objectives?	Yes
Comments:	
Yes. The six tribes have various programs, but goals and objectives relate directly to acres restored and number of participants. Community resilience and natural resource stewardship will be achieved through youth education.	

Question C	
Has the proposal provided a clear description of the methods proposed, and appropriate justification for why the method is being selected (e.g., scientifically sound; cost-effectiveness)?	Yes
Comments:	
The programs vary. Restoration methods were discussed relative to planting, exotic removal and breakwater construction. The Louisiana programs are directly related to their State Master Plan for Sustainable Coast.	

Question D	
Does the project/program identify the likely environmental benefits of the proposed activity? Where applicable, does the application discuss those benefits in reference to one or more underlying environmental stressors identified by best available science and/or regional plans?	Yes
Comments:	
Yes. Each of the six tribal projects discusses the environmental benefits as they relate to stressors. Appropriate references are cited.	

Question E	
Does the project/program have measures of success (i.e., metrics) that align with the primary Comprehensive Plan goal(s)/objectives? (Captures the statistical information requirement as defined by RESTORE Act)	Yes
Comments:	
Yes. The six tribes have various programs, but relate directly to acres restored and number of participants. Seminole Tribe will also monitor water quality which is listed as a metric.	

Question F	
Does the proposal discuss the project/program's vulnerability to potential long-term environmental risks (i.e., climate, pollution, changing land use)? (Captures risk measures as defined under best available science by the RESTORE Act)	Yes
Comments:	
Yes. Each of the six tribal projects discusses environmental stressors possible related to their sites. Climate change with flooding and drought cycles as well as sea level rise are considered. Wetlands connectivity in the Miccosukee area is a concern as it relates to sea level rise. Appropriate references are cited.	

Question G	
Does the project/program consider other applicable short-term implementation risks and scientific uncertainties? Such risks may include the potential for unanticipated adverse environmental and/or socio-economic impacts from project implementation. Is there a mitigation plan in place to address these risks? Any relevant scientific uncertainties and/or data gaps should also be discussed. (Captures risk measures as defined under best available science by the RESTORE Act)	No
Comments:	
As this is a youth education program, the projects are very basic. They do mention working with BIA under their Adaptive Management section to ensure progress is ongoing.	

Question H	
Does the project/program consider recent and/or relevant information in discussing the elements above?	Yes
Comments:	
The references cited are recent and/or relevant to the various projects discussed throughout the Gulf Coast region among the six tribes. Specifically the Coushatta Tribe will work with the local Soil and Conservation District and the Poarch Band of Creek Indians will work with botanists from the University of South Alabama and Mississippi State University.	

Question I	
Has the project/program evaluated past successes and failures of similar efforts? (Captures the communication of risks and uncertainties in the scientific basis for such projects as defined by the RESTORE Act)	No
Comments:	
Narrative states that the overall program is low risk. The discussion of potential risks does not include past successes or failures.	

Question J	
Has the project/program identified a monitoring and data management strategy that will support project measures of success (i.e., metrics). If so, is appropriate best available science justification provided? If applicable, how is adaptive management informed by the performance criteria? (Captures statistical information requirement a defined by the RESTORE Act)	Yes
Comments:	
The Bureau of Indian Affairs will use professional data managers to steward the data in this program. They detail multiple data storage sites and methods are standard to ScienceBASE RESTORE community. BIA indicates they will regularly communicate with tribes to ensure progress and collect data on an annual basis.	

Please summarize any additional information needed below:
Click here to enter text.

SCIENCE EVALUATION

Bucket 2: Comprehensive Plan Component

Proposal Title: Tribal Youth Coastal Restoration Program
Location (If Applicable): Gulf-wide
Council Member Bureau or Agency: U.S. Department of the Interior, Bureau of Indian Affairs
Type of Funding Requested: Planning / Implementation

Reviewed by: Reviewer 2
Date of Review: May 10, 2020

Best Available Science:

These 4 factors/elements help frame the reviewer's answers to A, B and C found in next section:

Question 1.	
Have the proposal objectives, including proposed methods, been justified using peer reviewed and/or publicly available information?	Need more information
Comments:	
The proposal objectives are supported with reviewed information. It appears that debris removal, trail maintenance, native vegetation planting, general data collection, and hdryology restoration are all proposed in the narrative. Some of the methods are not discussed in detail in the methods section and it would be helpful to better understand what specific methods will be used and how these support the project goals.	

Question 2.	
If information supporting the proposal does not directly pertain to the Gulf Coast region, are the proposal's methods reasonably supported and adaptable to that geographic area?	Yes
Comments:	
Click here to enter text.	

Question 3.	
Are the literature sources used to support the proposal accurately and completely cited? Are the literature sources represented in a fair and unbiased manner?	Yes
Comments:	
Click here to enter text.	

Question 4.	
Does the proposal evaluate uncertainties and risks in achieving its objectives over time? (e.g., is there an uncertainty or risk in the near- and/or long-term that the project/program will be obsolete or not function as planned?)	Need more information
Comments:	
In the “Restoration Methods” section a breakwater at Rutherford Beach is mentioned in conjunction with the planting. If the state does not complete this breakwater, will erosion be a risk to the project success?	

Based on the answers to the previous 4 questions, and *giving deference to the sponsor to provide within reason the use of best available science,* the following three questions can be answered:

Question A	
Has the applicant provided reasonable justification that the proposal is based on science that uses peer- reviewed and publicly available data?	Yes
Comments:	
The proposal does justify the need for the projects and the goal to educate and train youth.	

Question B	
Has the applicant provided reasonable justification that the proposal is based on science that maximizes the quality, objectivity, and integrity of information (including, as applicable, statistical information)?	Need more information
Comments:	
It is unclear exactly what will be done in some aspects of the proposal. For example, it is unclear what methods are being conducted and what actions will be taken in the Seminole Tribe of Florida HERO ERMD project and the Miccosukeee TYP-C project.	

Question C	
Has the applicant provided reasonable justification that the proposal is based on science that clearly documents and communicates risks and uncertainties in the scientific basis for such projects/programs?	Need more information
Comments:	
Need more information specifically about how science supports the selected methods.	

Science Context Evaluation:

Question A	
Has the project/program sponsor or project partners demonstrated experience in implementing a project/program similar to the one being proposed?	Yes
Comments:	
Click here to enter text.	

Question B	
Does the project/program have clearly defined goals objectives?	Yes
Comments:	
Click here to enter text.	

Question C	
Has the proposal provided a clear description of the methods proposed, and appropriate justification for why the method is being selected (e.g., scientifically sound; cost-effectiveness)?	No
Comments:	
The native planting aspect of the proposal is well defined and was selected because it was cost effective. The other project components, specifically the Seminole Tribe of Florida HERO ERMD project and the Miccosukeee TYP-C project are not clearly described.	

Question D	
Does the project/program identify the likely environmental benefits of the proposed activity? Where applicable, does the application discuss those benefits in reference to one or more underlying environmental stressors identified by best available science and/or regional plans?	Need more information
Comments:	
The project does describe an environmental benefit. Those benefits are not discussed in reference to a cited environmental stressor.	

Question E	
Does the project/program have measures of success (i.e., metrics) that align with the primary Comprehensive Plan goal(s)/objectives? (Captures the statistical information requirement as defined by RESTORE Act)	Yes
Comments:	
Click here to enter text.	

Question F	
Does the proposal discuss the project/program's vulnerability to potential long-term environmental risks (i.e., climate, pollution, changing land use)? (Captures risk measures as defined under best available science by the RESTORE Act)	Yes
Comments:	
Click here to enter text.	

Question G	
Does the project/program consider other applicable short-term implementation risks and scientific uncertainties? Such risks may include the potential for unanticipated adverse environmental and/or socio-economic impacts from project implementation. Is there a mitigation plan in place to address these risks? Any relevant scientific uncertainties and/or data gaps should also be discussed. (Captures risk measures as defined under best available science by the RESTORE Act)	Need more information
Comments:	
The unforeseen circumstances created by the Coronavirus, and likely not present at the time this proposal was written, could affect the ability of GulfCorps to complete it's work. Safe protocols for Coronavirus prohibit groups which could interfere with many aspects of the training including training, field work, and transportation to restoration sites.	

Question H	
Does the project/program consider recent and/or relevant information in discussing the elements above?	Yes
Comments:	
Click here to enter text.	

Question I	
Has the project/program evaluated past successes and failures of similar efforts? (Captures the communication of risks and uncertainties in the scientific basis for such projects as defined by the RESTORE Act)	No
Comments:	
Click here to enter text.	

Question J	
Has the project/program identified a monitoring and data management strategy that will support project measures of success (i.e., metrics). If so, is appropriate best available science justification provided? If applicable, how is adaptive management informed by the performance criteria? (Captures statistical information requirement a defined by the RESTORE Act)	Need more information

Comments:

The monitoring plan describes tracking the success of vegetation. This does not cover the other aspects of this project such as connectivity with downstream wetlands as described in the proposal. It would be helpful to understand how all aspects of the project will be tracked.

Please summarize any additional information needed below:

How will this program collaborate with the "Gulf of Mexico Coast Conservation Corps (GulfCorps) Program" proposed by the U. S. Department of Commerce, National Oceanic and Atmospheric Administration?

SCIENCE EVALUATION

Bucket 2: Comprehensive Plan Component

Proposal Title: Tribal Youth Coastal Restoration Program
Location (If Applicable): Gulf-wide
Council Member Bureau or Agency: U.S. Department of the Interior, Bureau of Indian Affairs
Type of Funding Requested: Planning / Implementation

Reviewed by: Reviewer 3
Date of Review: 05/10/2020

Best Available Science:

These 4 factors/elements help frame the reviewer's answers to A, B and C found in next section:

Question 1.	
Have the proposal objectives, including proposed methods, been justified using peer reviewed and/or publicly available information?	Yes
Comments:	
All elements of Question1 are clearly addressed, well-conceived, thoroughly developed, and well supported. Documentation and required information are specific and comprehensive. Question 1 has no major deficiencies or weaknesses. As this is a new continuing project, current evidence will be critical in 5 years.	

Question 2.	
If information supporting the proposal does not directly pertain to the Gulf Coast region, are the proposal's methods reasonably supported and adaptable to that geographic area?	Yes
Comments:	
The methods in the proposal are clearly addressed with necessary detail and the evidence is thoroughly supported and adaptable for each specific geographic area.	

Question 3.	
Are the literature sources used to support the proposal accurately and completely cited? Are the literature sources represented in a fair and unbiased manner?	Yes
Comments:	
All requirements are met for Question 3 with no significant weaknesses. Literature sources are fair and unbiased. Recommendation of sources to strengthen need for program. DeAngelis, B., Birch, A., Malinowski, P., Abel, S., DeQuattro, J., Peabody, B., & Dinnel, P. (2019). A variety of approaches for incorporating community outreach and education in oyster reef restoration projects: examples from the United States. In Goods and Services of Marine Bivalves (pp. 335-354). Springer, Cham. Fordham, A., & Schwab, R. (2018). Indigenous youth engagement in natural resource management in Australia and North America: A review. Canberra, ACT: Centre for Aboriginal Economic Policy Research (CAEPR), The Australian National University.	

Question 4.	
Does the proposal evaluate uncertainties and risks in achieving its objectives over time? (e.g., is there an uncertainty or risk in the near- and/or long-term that the project/program will be obsolete or not function as planned?)	Yes
Comments:	

The applicant effectively addresses Question 4.

Based on the answers to the previous 4 questions, and *giving deference to the sponsor to provide within reason the use of best available science,* the following three questions can be answered:

Question A	
Has the applicant provided reasonable justification that the proposal is based on science that uses peer- reviewed and publicly available data?	Yes
Comments:	
No addititonal comments.	

Question B	
Has the applicant provided reasonable justification that the proposal is based on science that maximizes the quality, objectivity, and integrity of information (including, as applicable, statistical information)?	Yes
Comments:	
Based on the science provided and the initial success of the program, it is likely this organization will be sustainable.	

Question C

Has the applicant provided reasonable justification that the proposal is based on science that clearly documents and communicates risks and uncertainties in the scientific basis for such projects/programs?	Yes
Comments:	
The potential benefits and risks outlined, for the specific geographic areas, in this application will be critical to propelling the continued success of the program.	

Science Context Evaluation:

Question A	
Has the project/program sponsor or project partners demonstrated experience in implementing a project/program similar to the one being proposed?	Yes
Comments:	
The applicant has demonstrated successful past performance. There is a likelihood this success will continue.	

Question B	
Does the project/program have clearly defined goals objectives?	Yes
Comments:	

The applicant has clear and succinct goals and objectives.

Question C	
Has the proposal provided a clear description of the methods proposed, and appropriate justification for why the method is being selected (e.g., scientifically sound; cost-effectiveness)?	Yes
Comments:	
No additional comments. The proposal is well presented.	

Question D	
Does the project/program identify the likely environmental benefits of the proposed activity? Where applicable, does the application discuss those benefits in reference to one or more underlying environmental stressors identified by best available science and/or regional plans?	Yes
Comments:	
The applicant identifies four environmental benefits. An impact to climate change and sea level rise can be included in the environmental benefits.	

Question E	
Does the project/program have measures of success (i.e., metrics) that align with the primary Comprehensive Plan goal(s)/objectives? (Captures the statistical information requirement as defined by RESTORE Act)	Yes
Comments:	

The measures of success are clear from past performance with the project.

Question F	
Does the proposal discuss the project/program's vulnerability to potential long-term environmental risks (i.e., climate, pollution, changing land use)? (Captures risk measures as defined under best available science by the RESTORE Act)	Yes
Comments:	
No additional comments. The applicant identified long-term stewardship and learning opportunities as potential long-term environmental risks.	

Question G	
Does the project/program consider other applicable short-term implementation risks and scientific uncertainties? Such risks may include the potential for unanticipated adverse environmental and/or socio-economic impacts from project implementation. Is there a mitigation plan in place to address these risks? Any relevant scientific uncertainties and/or data gaps should also be discussed. (Captures risk measures as defined under best available science by the RESTORE Act)	Need more information
Comments:	
There is no evidence in the proposal of a mitigation plan in place to address short-term implementation of risks and uncertainties.	

Question H	
Does the project/program consider recent and/or relevant information in discussing the elements above?	Need more information
Comments:	
The applicant indicates there is a low risk in the program. The interactions that youth have with adults can promote safety, or create risk for abuse or other negative outcomes. The surroundings that youth are in must be considered for developmentally appropriateness and safety, or create inherent risks that need to be addressed.	

Question I	
Has the project/program evaluated past successes and failures of similar efforts? (Captures the communication of risks and uncertainties in the scientific basis for such projects as defined by the RESTORE Act)	Yes
Comments:	
No additional comments. The applicant has been successful in the past with the initial start of the project, as indicated in the data.	

Question J	
Has the project/program identified a monitoring and data management strategy that will support project measures of success (i.e., metrics). If so, is appropriate best available science justification provided? If applicable, how is adaptive management informed by the performance criteria? (Captures statistical information requirement a defined by the RESTORE Act)	Yes
Comments:	
No additional comments.	

Please summarize any additional information needed below:
This continuing project has proven to be successful in the past with low risk. There is no evidence to indicated that it will not continue on a successful trajectory.