

***Asian Americans for Change, Atchafalaya Basinkeeper
Calhoun County Resource Watch, Coastal Alabama Heritage Trust, Earth
Ethics, Galveston Baykeeper, Gulf Restoration Network, Louisiana
Environmental Action Network, Lower Mississippi Riverkeeper,
Panhandle Watershed Alliance, Steps Coalition***

June 18, 2015

Nanciann Regalado
U.S. Fish and Wildlife Service
P.O. Box 49567
Atlanta, GA 30345

RE: Draft Phase IV Early Restoration Plan and Environmental Assessments

Dear Ms. Regalado:

The Gulf Restoration Network¹ and the undersigned organizations appreciate the opportunity to comment on the *Deepwater Horizon* Natural Resource Damage Assessment Trustees' (Trustees) Draft Phase IV Early Restoration Plan (ERP) and Environmental Assessments (EA).

The undersigned groups are pleased to see that the Trustees' Phase IV Draft ERP dedicates the majority of its funding to both the marine and coastal environment. With record reports of dolphin deaths, low fish & shrimp counts, dying deep-sea coral reefs, and other marine species under extreme stress, this dedicated spending in the marine environment is welcome and long overdue. Projects like the long-line gear transition program not only help protect and sustain critical open-ocean species, but also support those who make a living in on the Gulf's waters. To comprehensively restore the Gulf, we must focus on the Coast holistically, from our coast to the deep waters of the Gulf of Mexico. This phase of NRDA Early Restoration is a significant step in that direction

I. Insufficient Information

While we believe that most of the Phase IV projects can make a significant difference to the Gulf ecosystem, the Draft Early Restoration Plan and Environmental Assessment, as currently written, does not provide sufficient description and details of how the proposed activities within each of the Phase IV projects will implemented to allow for the public to provide comprehensive, constructive comments. The most significant example of this within Phase IV is the lack of detail regarding the proposed Living Shorelines Projects. The NRDA Trustees must provide the public with the greatest amount of information possible if the opportunity for

¹ The Gulf Restoration Network (GRN) is a diverse coalition of individual citizens and local, regional, and national non-profit organizations committed to uniting and empowering people to protect and restore the resources of the Gulf of Mexico.

public review is to be meaningful. Without more detail it is impossible to fully evaluate and, once implemented, monitor each project's success.

II. *Living Shoreline Projects*

Generally, living shoreline projects that apply best available science and practices are good ecosystem restoration-style projects. However, we are concerned that the two living shoreline projects in Mississippi and Alabama lack the details necessary to evaluate if they meet all of the requirements for long-term success. There are many lingering questions – but with the broad scope of anticipated results, project site areas, etc., these questions are difficult to answer and address.

Our specific questions lie in these subject areas:

Access Channels

The ERP says that channels may not be needed if waters are high, and that every precaution will be taken to minimize channel impact, and channels may not be needed.

Channels, are, in fact, not needed for concrete-based breakwaters such as ReefBLK and Oysterbreak, even in shallow water environs (2 ft MHHW). Concrete-based breakwaters must, then, be considered, as seen in Plats for these projects:

LA Coastal Use Permits

[P20101450](#), MVN 2010 2814 Coastal Improvement Assistance Plan (CIAP), Louisiana Breakwater Project in Vermillion Parish

[P20090290](#) MVN 2009 0112, ReefBLK in St Bernard Parish

Channels are not needed for Air-Cushion Vehicles ("Air Cushion Vehicles for the Transport of Drilling Rigs, Supplies, and Oil Field Exploration Operations in the Coastal Marshes of Louisiana" by Walter B Sikora). ACV use must be considered and evaluated.

Breakwater lifts

The EA must outline the monitoring and maintenance plan. Maintenance for rock breakwaters is traditionally needed, even within 2 or 7 years of project completion. We recommend concrete-based breakwaters, because they do not require access channels and probably require less maintenance cost.

We require a comparison be done, due to the sensitive nature of this area.

Cost-Effectiveness

We question the cost estimate for this project. Cost Estimates should be evaluated in dollars per linear foot compared to CIAP breakwater projects, including [P20101450](#),

MVN 2010 2814 CIAP Louisiana Breakwater Project in Vermillion Parish and the Louisiana early NRDA clutch project.

III. *Pelagic Longline Bycatch Reduction Project*

We are excited by pelagic longline bycatch reduction project. The project strikes a good balance between restoring affected fisheries resources and allowing continuation of fishing with cleaner gear. Specifically the project will mitigate some of the damage to pelagic bluefin tuna caused by the 2010 *Deepwater Horizon* oil disaster by reducing pelagic longline bycatch of spawning western Atlantic bluefin tuna, as well as other deepwater species such as sharks, tuna, mackerel, billfish, sea turtles and marine mammals. At the same time, it will help longline fishermen transition to more selective fishing gears that effectively catch yellowfin tuna and swordfish. The project also commits to monitoring overall performance of the project. The criteria for monitoring are thorough and appropriate.

We would ask the Trustees to ensure that as this project is implemented priority is given to educating (through materials in English, Vietnamese and Lao) and engaging long-line fishermen along the coast. Project success is dependent upon ensuring that the funding for this gear transition is known to and reaches long-line fishermen.

IV. *Sea Turtle Project*

We also commend the Trustees on selection of the Sea Turtle restoration project for Phase IV funding . This project is a good example of a multi-pronged approach to restoration of another species heavily impacted by the 2010 *Deepwater Horizon* oil disaster. This project when combined with other funded or proposed projects represents appropriate comprehensive restoration targeting multiple threats to damaged natural resources. (i.e. reducing disorienting lighting, restoring damaged seagrass habitats and reducing nest predation) However, the Trustees should expand this comprehensive approach by expanding both their consideration of “cumulative impacts” to species (i.e. to include water quality, marine debris, etc. and considering projects) and their consideration of complementary restoration projects that address those broader impacts. We hope that the Trustees will complete this type of threats analysis and design comprehensive restoration plans for other affected resources.

Finally, we commend the Trustees for providing detailed information regarding monitoring plans and for committing to share monitoring data with the public to allow tracking of project success. As we have stated previously, this type of monitoring of project success is essential to better public understanding and evaluation of proposed projects.

Conclusion

We recognize that the Trustees have invested significant time and resources into the development of this Draft Phase IV ERP and EA and are thankful for your effort. While we understand the urgency to fund and implement projects on the ground, we should not implement projects that are incomplete in their full planning process. Let’s ensure that we do

what is right and just for the Gulf Coast.

Thank you for the opportunity to comment. If you have any questions, or if you would like to discuss these comments further, please contact Jordan Macha, Gulf Policy Analyst for the Gulf Restoration Network, at: jordan@healthygulf.org or (504) 525-1528 x209.

Sincerely,

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