

September 28, 2015

Gulf Coast Ecosystem Restoration Council
500 Poydras Street
Suite 1117
New Orleans, LA 70130

Dear Council Members:

The undersigned organizations thank you for this opportunity to provide our input on the Gulf Coast Ecosystem Restoration Council's (Council) draft Initial Funded Priorities List (FPL). This letter and the attached Appendix are an effort to streamline and incorporate into one vehicle the comments of a diverse suite of organizations across the five Gulf states, each with its own expertise and focus. While our overarching thoughts are presented in this letter, for ease of reference we reserved for the Appendix more detailed, project-specific comments that emerged from organizational reviews.

Given the limits of the process that the Council created to solicit and select projects for this first Funded Priorities List, we appreciate the Council and staff's effort to develop an FPL that contains a number of beneficial projects and to leverage project funding from other restoration processes, ensuring that the investments the Council makes will pay dividends in increased impact. This FPL is the first step under the provisions of the RESTORE Act toward restoration of the Gulf.

We respectfully offer the following recommendations that we believe will strengthen the draft initial FPL. We believe that it is critical that the Council pursue a holistic approach to restoring the Gulf. That means an approach that recognizes the interlinked nature of coastal and marine resources and understands that ecosystem stressors stem from both land- and ocean-based activities. We submit these comments with the aim of ensuring that this draft initial FPL leads to the development of an effective and enduring restoration program.

We also include recommendations that we hope inform an update of the Comprehensive Plan and future project lists. Now that the parties to the Deepwater Horizon litigation have reached an agreement in principle and the amount and timing for RESTORE funding is clear, we believe that the Council members have an immediate historic opportunity – well beyond the draft FPL – to advance restoration of the Gulf of Mexico and its coast for improved health and lasting resilience.

Again, we thank you for your work thus far in ensuring that the Council lays a foundation for a comprehensive approach to Gulf restoration. We would like to also thank the Council and staff for your responsiveness to the public via public meetings, webinars, and your accessibility in answering questions and incorporating public comments into the process.

Our organizations stand ready to assist you in this important work.

1. Overarching Comments

While the Council has presented a thoughtfully constructed draft FPL from the projects that were submitted, we believe that the submission and evaluation process that provided the structure for this FPL limited the Council's ability to produce a

stronger FPL that prioritizes those projects that would make the greatest contributions toward comprehensive Gulf restoration.

Specifically, the submission guidelines were unclear, the scientific review of projects didn't address the potential synergies among projects, the statutory priorities were used simply to check a box rather than provide a clear vision for what should be prioritized and, based on many overlapping proposals submitted, the Council members did not, in advance of submission, provide for coordinated proposals that jointly pursued opportunities for comprehensive restoration. We recommend that future processes reverse these limitations.

In developing the draft FPL, we appreciate the Council's efforts to consider projects beyond political boundaries. We believe that, in general, the Council's approach of linking projects to environmental stressors by watershed or estuary is scientifically sound. However, we have a few concerns about the way that the Council executed the priority watershed approach in the FPL. Lastly, we believe it is critically important that the FPL link the priority watershed approach to the restoration priorities in the RESTORE Act.

The Council has the opportunity to remedy these challenges in the final FPL and in planning for future funding. We provide recommendations to do both throughout this letter.

2. Comments on Gulf-wide Projects

We are pleased to see the Council invest in a number of projects that lay a scientific and conservation planning foundation for current and future restoration work in the Gulf. Our interpretation of the Council's use of the word "foundational" means an activity represents an important first step on which future activities can be based. Given the extent of restoration needs in the Gulf, future FPLs should also contain or leverage foundational investments in science, planning and design to ensure that restoration proceeds on multiple fronts. We do not interpret an investment in a "foundational" activity to be precedential in nature, meaning that an activity the Council funds today as a foundational investment precludes future investments in other areas.

Also, we appreciate the Council's investment in a broader monitoring and coordination effort that would take advantage of and build on existing programs and establish protocols and standards. Monitoring and coordination among state and federal agencies and universities will lay a foundation for comprehensive restoration, allowing the Council to evaluate progress towards restoration goals and make better decisions about future funding opportunities. It is critical that the Council continue to invest in the science and decision-support tools needed to make sound project investments and to track progress over time. We look forward to details regarding how the Council will approach this important work.

3. Overarching Comments on Priority Watershed Projects

Again, we see potential in the Council's approach to linking projects to stressors in each watershed or estuary. However, we feel that the Council's selection of priority watersheds requires additional explanation and justification. First, it is unclear if the Council selected the priority watersheds based on the location of the projects that were submitted or, instead, through a rigorous scientific analysis. Further, for some projects, it is unclear how each project will mitigate stressors in the watershed or estuary, and a number of key ecosystem stressors are not identified or addressed by the proposals in the first FPL. (For example, in Texas, inadequate inflows of freshwater from rivers into Texas bays and estuaries are an important stressor that the Council did not directly address.) Additionally, project monitoring plans and metrics do not include

sufficient information to track project outcomes. Monitoring data needs to be robust and accessible to allow integration of best-practices across the Gulf and inform the design and implementation of future restoration activities.

Below are recommendations applicable to many of the projects proposed for funding across watersheds. For project specific recommendations, please see Appendix A of this letter.

Recommendations

- Explain in more detail how the Council selected its priority watersheds and estuaries and came to a determination on “areas of greatest need,” including the scientific basis for these selections and determinations.
- Identify and address gaps in watershed descriptions to ensure the lists of stressors in the watersheds are accurate and complete. Discuss the extent to which the proposed projects in the FPL will measurably mitigate those watershed and estuary stressors, and how continued stress in the form of development pressure, climate change and other stressors could affect the long-term viability of funded projects in the watershed.
- Guided by the first restoration priority in the RESTORE Act, the FPL should include an explanation of how the suites of projects proposed in each watershed can be expected to work synergistically to address the stressors listed in the watershed description and how the projects contribute to the health of the overall Gulf ecosystem. The project descriptions should also include a description of how each project is addressing one or more of the RESTORE Act restoration priorities.
- The project descriptions do not include information on how the Council calculated a project’s expected lifespan nor does it indicate how sea level rise can be expected to affect the project. If this information was provided in the original proposal, it should be included in the draft. If it was not included, that information should be collected and included.
- Project monitoring plans should provide for collection of baseline data and include metrics to measure ecological outcomes. Monitoring data must be integrated and maintained in a data management system. The Council should identify a publically accessible data repository and develop a formal plan for data sharing.
- There is a strong role for the public in many of the proposed activities, but that role has not been well-defined. The Council should provide meaningful opportunities for the public to be involved in planning and restoration activities of proposed projects. However, when projects have already undergone extensive public review and input processes, that engagement should be considered.

4. Looking forward beyond this FPL

The quality of the FPL and the relative merits of the suites of projects recommended are dependent on the quality of the proposals submitted and the process used to select a suite of complementary projects. In the future, we encourage the Council to provide additional guidance to members before the next FPL process begins, including: clearer submission guidelines, a clear vision and a definition of what the Council means by “comprehensive restoration,” definitions for the restoration priorities from the RESTORE Act, and a focus on science-based decision-making to ensure that the Council improves the natural resources of the Gulf ecosystem at large.

Recommendation: Conduct an independent third party review of the Council’s proposal evaluation and submission process to identify successes and lessons learned in order to best adapt the processes for future rounds of funding.

As the first tranche of available funding is allocated and project implementation begins, now is the time to revisit the Comprehensive Plan and develop a framework that can guide the Council in its future work to restore the Gulf ecosystem. The Plan itself can serve as a roadmap to accomplish decision-making and project selection. Below, we recommend several elements that we believe are important for a strong Comprehensive Plan.

Recommendation: Include the following items in a updated Comprehensive Plan.

- Develop and articulate, with public input, a vision statement for a healthy Gulf of Mexico that is consistent with the Plan’s goals.
- Clarify and further define the four statutory restoration priorities so they can be used effectively with the Plan’s goals and objectives.
- Update and refine Plan objectives using the best available science to make objectives measurable and clearly related to the Council’s defined goals and statutory priorities. Measureable does not necessarily mean adopting numeric restoration targets or benchmarks, nor is it meant to completely eliminate all levels of uncertainty.
- Outline the types of activities, including the major actions in the Task Force Strategy, which will accomplish the updated objectives.

Other Recommendations:

- If watersheds are the biogeographic frame the Council intends to adopt moving forward, the Council should complete a science-based watershed analysis prior to the submission of the next round of proposals. We do not expect that every important watershed across the Gulf will ultimately receive funding but do believe there should be a scientific analysis and basis for classifying priority watersheds. The analysis should ensure that the limited amount of funding is allocated to projects where restoration activities will provide measurable positive benefits to the health of the Gulf ecosystem. Additionally, given that the mission of the Council is to advance comprehensive restoration in the Gulf, the Council must identify a strategy for addressing restoration needs in the marine environment, which is left out of the “watershed approach” frame.
- The Council should establish and formalize channels for proactive coordination, both among Council members and across restoration funding streams, so that projects are strategically selected to build upon and complement one another, achieving the maximum benefit for Gulf wildlife and coastal communities. Where possible, the Council should also leverage monies available outside of Gulf recovery efforts.
- We support the Council’s commitment to monitoring and tracking and believe there is space for shared responsibility through coordination between the Council members and with other on-going Gulf restoration processes, including but not limited to the Natural Resources Damage Assessment process, spending from the National Fish and Wildlife Foundation’s Gulf Environmental Benefit Fund, and National Academies of Science and NOAA Science Program research efforts. We encourage the Council to continually review and adapt its approach – for future planning, evaluation, selection and monitoring – based on the success or failure of other restoration projects and to set the standard for high-quality projects that others will want to leverage as well.

- The Council’s investment in developing tools will only be worthwhile to the extent they are used by restoration planners and implementing agencies in project identification, selection and monitoring. The Council should commit to using the information provided by decision-support tools in future project planning, evaluation and selection.

5. Conclusion

In conclusion, the first FPL document is a credible start in planning for Gulf restoration. We recognize and appreciate the very large amount of work and agency and public input that went into the FPL. We believe that the Council can build on this beginning by:

- Strengthening the relationship of project objectives to documented threats or stressors and clearly articulating how projects address one or more RESTORE Act restoration priorities.
- Improving pre-submission coordination of project plans and designs among the state and federal agencies represented on the Council and with other Deepwater Horizon-related funding entities.
- And, most importantly, by updating the Comprehensive Plan in a manner that is informed by this first round of funding and by the evolving science of Gulf restoration in preparation for the next submission of Council selected projects.

Thank you again for the opportunity to comment.

National Audubon Society
 Environmental Defense Fund
 National Wildlife Federation
 Ocean Conservancy
 The Nature Conservancy
 Alabama Coastal Foundation
 Audubon Florida
 Audubon Louisiana
 Audubon Mississippi
 Audubon Texas
 Birmingham Audubon
 Climb CDC
 Coalition to Restore Coastal Louisiana
 Coastal Bend Bays & Estuaries Program
 Coastal Conservation Association of Mississippi
 Conservation Alabama Foundation
 Florida Wildlife Federation
 Galveston Bay Foundation
 Gulf Coast Bird Observatory

Gulf Islands Conservancy, Inc.
 Gulf Restoration Network
 Houston Audubon
 Houston Wilderness
 Lake Pontchartrain Basin Foundation
 Land Trust for the Mississippi Coastal Plain
 Mississippi Urban Forest Council
 Mississippi Wildlife Federation
 Mobile Baykeeper
 Restore or Retreat
 Sierra Club, Lone Star Chapter
 Student Conservation Association
 The Conservation Fund, Texas
 The Nature Conservancy in Florida
 Turtle Island Restoration Network
 Wildlife Mississippi

Appendix A

Mississippi Sound Watershed

The Mississippi Sound and the estuaries in this watershed are a high priority because of their major importance to the ecology and economies of the coast and to the Gulf of Mexico. The projects proposed for funding address some of the most critical issues in this watershed, however there are some gaps in connecting how projects address stressors and root causes. Those projects that address habitat loss, conservation and long-term habitat management will help to reduce habitat loss and habitat degradation and support a broader effort to restore the Mississippi Sound ecosystem. Education and outreach projects are a vital component of successful land conservation and water quality efforts; however, to be most successful these projects should prioritize outreach to landowners and decision-makers followed by environmental literacy components for the general public and primary school and university students.

Mississippi Sound	
By investing in landscape-scale planning and restoration, the Mississippi Sound will benefit from a holistic approach to restoration. The proposals are a good mix of conservation and restoration to address multiple watershed stressors. Future FPLs should address benthic habitat, water quality and invasive species.	
Deer Island Beneficial Use Site	<ul style="list-style-type: none"> • Provide a scientifically robust assessment of expected project longevity within the framework of established sea-level rise scenarios to formally address the uncertainties of future habitat conditions. • Include a monitoring plan that has metrics for measuring success, incorporate Traditional Ecological Knowledge (TEK) (i.e. from fishermen and frequent users of resource), and develop an education-outreach component. • Address suitability of material and potential contamination of dredged material using rigorous scientific standards.
Strategic Land Protection, Conservation, and Enhancement of Priority Gulf Coast Landscapes in MS	<ul style="list-style-type: none"> • Discuss how this project will avoid duplication and redundancy by coordinating with other conservation efforts, tools and partners (i.e. local/regional land protection groups, state and federal agencies, municipalities or others). • Include water quality as a priority component for acquisition. • Consider creating a land conservation advisory committee to increase coordination and leveraging of resources.
SeaGrant Education and Outreach	<ul style="list-style-type: none"> • Include more details about how the project will achieve the goal of better environmental stewardship. • Initial target audiences should be those groups whose involvement or support will decide the success of a land conservation program (i.e. private landowners, decision-makers, public officials); other components for general public, K-12 and universities should follow. • Describe the roles of PGCLC and others involved.
The Mississippi Sound Estuarine Program	<ul style="list-style-type: none"> • Discuss coordination with Grand Bay NERR, MDMR Coastal Preserves and other Gulf efforts, as well as organizations such as GOMA and EPA-GOMP to avoid duplication, ensure consistency across Gulf watershed planning efforts and leverage resources. • Describe the role of non-profits and community organizations in developing and implementing this program.
Enhancing Opportunities for Beneficial Use of Dredge Sediments	<ul style="list-style-type: none"> • Provide a scientifically robust assessment of expected project longevity within the framework of established sea-level rise scenarios to formally address the uncertainties of future habitat conditions. • Planning should establish metrics to help prioritize future projects and incorporate rigorous scientific standards to address material suitability and potential contamination.

- Include more detail about how this effort will work with NFWF GEBF project *Utilization of Dredge Material for Marsh Restoration in Coastal MS.*

Mobile Bay Watershed

The Mobile Bay watershed description identifies a variety of stressors and this suite of projects begins to lay the foundation for a balanced restoration approach. Notably, all proposals would benefit from a direct assessment of stressor mitigation and a discussion about how the projects will work together to address stressors holistically. This is especially important for the projects that are addressing a broader suite of stressors but at a targeted, specific location; there needs to be a realistic argument made for how the project and the efforts of other projects will address the stressors holistically. Additionally, there are concerns about funding availability for implementing findings from the watershed management planning efforts being proposed, and beneficial use proposals require more thorough monitoring plans and scientifically rigorous assessments for dredged sediments.

Mobile Bay	
The planning activities detailed in the Mobile Bay portion of the FPL provide a basis for broad-scale assessment of restoration need, but only if integrated within a broad, ecosystem scale assessment and tracking framework.	
Coastal Alabama Comprehensive Watershed Restoration Planning Project	<ul style="list-style-type: none"> • Identify risks associated with this project, such as sea-level rise, and develop a mitigation strategy to address those risks. • Planning should include developing metrics for measuring success and include an education and outreach component. • Funding should be included for future project implementation.
Alabama Living Shorelines Program	<ul style="list-style-type: none"> • Provide a scientifically robust assessment of expected project longevity within the framework of established sea-level rise scenarios to formally address the uncertainties of future habitat condition. • Develop a robust monitoring plan and shared data repository is accessible to stakeholders and scientific community. • Describe if and how monitoring activities will be informed by the <i>Comprehensive Living Shoreline Monitoring</i> proposal.
Comprehensive Living Shoreline Monitoring	<ul style="list-style-type: none"> • Describe how this plan will be integrated across the Gulf for all living shoreline restoration projects. • More fully discuss addressing sea-level rise impacts, provide more monitoring specifics, and identify a formal data repository for sharing information across the Gulf.
Alabama Submerged Aquatic Vegetation Restoration and Monitoring Program	<ul style="list-style-type: none"> • Describe how this program will be integrated across the Gulf for SAV restoration projects. • Include a detailed assessment of all possible stressors to SAV in these areas and a mitigation plan. • Identify a formal data repository and how the status and trends of habitat condition derived from monitoring will be presented and shared and made publically available beyond annual project reports.
Marsh Restoration in Fish River, Weeks Bay, Oyster Bay & Meadows Tract	<ul style="list-style-type: none"> • Provide a scientifically robust assessment of expected project longevity within the framework of established sea-level rise scenarios to formally address the uncertainties of future habitat condition. • Metrics of success of this project must measure not only project construction outcomes but also ecological benefits resulting from restoration activities. • Ensure project planning considers the Bon Secour and Fish River watershed management planning efforts currently underway.
Mobile Bay National Estuary Program	<ul style="list-style-type: none"> • This project has included many core partners and is a necessary first step to assess stressors and identify downstream solutions to implement. • Monitoring program must include measurable indicators to gauge the effectiveness of restoration to achieving the intended

<p>Upper Mobile Bay Beneficial Use Wetland Creation Site</p>	<p>environmental benefits, both physical (sediment load reduction, dissolved oxygen increases) and ecological (aquatic habitats).</p> <ul style="list-style-type: none"> • Explain site selection and its expected ecological benefits to the Mobile Bay estuary. • Include short and long-term monitoring plans to determine marsh creation benefits as well as monitoring for invasive species. • Address suitability of material and potential contamination of dredged material using rigorous scientific standards. • Explain site selection and its expected ecological benefits to the Mobile Bay estuary. • Use rigorous sampling, testing, and evaluation standards to ensure quality and suitability of dredge material and develop standardized monitoring to address physical and ecological function of beneficial use projects across the Gulf.
<p>Enhancing Opportunities for Beneficial Use of Dredge Sediments</p>	<ul style="list-style-type: none"> • Planning should include ecological monitoring, establish metrics to help prioritize future projects, and incorporate rigorous scientific standards to address material suitability and potential contamination Include projections of project longevity and expected benefit under current sources of erosion and projected sea level rise. • Include State of Florida as project partner, or at minimum an advisor, to maximize Perdido watershed benefits. • Use rigorous sampling, testing and evaluation standards to ensure quality and suitability of dredge material and develop standardized monitoring to address physical and ecological function of beneficial use projects across the Gulf.

Texas Watersheds

Texas is a drought-prone state with a rapidly growing population and increasing water demands. Without proactive steps to maintain adequate inflows, particularly during dry periods, Texas estuaries are at serious risk. Much of the water that flows in Texas’ rivers has already been permitted for withdrawal through perpetual water-use permits; to address this, affirmative measures, such as purchasing water rights from willing sellers, are needed to ensure that some of that previously permitted water is available for estuary inflows.

The assurance of adequate freshwater inflows is arguably the most critical long-term restoration need on the Texas Coast, which is home to robust commercial and recreational fishing industries that together support 23,000 jobs and generates more than \$4 billion in revenue each year. Tourism along the Texas coast generates almost \$18 billion of spending - over a quarter of all travel dollars spent in the state each year. These industries help drive the state’s economy, making the guarantee of adequate freshwater inflows not only an important ecological restoration issue, but also an economic imperative for the overall long-term health of the Gulf coast and the communities and industries that rely on it.

Laguna Madre	
Hydrologic restoration of the Bahia Grande unit is essential to the success of the area’s restoration and for the future of the Port Isabel community, and these three projects provide a crucial first step. While the projects identified will appropriately address ecological stressors to the watershed, a broader elaboration of the stressors to this watershed would be useful for science-based decision-making for future projects in this region, as well as to assist in monitoring efforts.	
Bahia Grande Wetland System Restoration	<ul style="list-style-type: none"> Consider including funding in this FPL for the implementation phase of the Wetland System Restoration program as listed in category 2.
Bahia Grande Coastal Corridor	<ul style="list-style-type: none"> We are pleased to see that in addition to the Bahia Grande Coastal Corridor the Council is proposing to fund planning and design activities necessary for future wetland restoration in the Laguna Madre watershed.
Plug Abandoned Oil and Gas Wells	<ul style="list-style-type: none"> No comments.
Matagorda Bay	
One of the critical stressors in Matagorda Bay is the continued lack of freshwater inflows. Funding for acquisition and conservation activities in this region that protect water quality and preserve local freshwater inflows in the bay is addressing part of the problem, but the lack of inflow is arguably the biggest stressor here.	
Matagorda Bay System Priority Landscape Conservation	<ul style="list-style-type: none"> This project provides an important benefit to wildlife, such as whooping cranes, by protecting habitat from future development. However, the whooping cranes not only need protected habitat, but also secure food supplies like the blue crab, which can only thrive in this and other bays if adequate inflows keep salinity levels from getting too high. Consider emphasizing the importance of projects that could not only preserve local freshwater inflows, but also could go a step further and actually increase the amount of freshwater inflows reaching this important estuarine habitat. Moving forward, the Council should consult with groups in Texas that are working on the issues of freshwater inflows. Include additional information about the expected benefits to communities from this project (i.e. protected land would provide a natural storm surge break and provide natural buffer zones for developed communities).
Galveston Bay	
Galveston Bay is one of the most productive estuaries in the nation, as well as the home one of the largest cities in the United States, and the proposed projects offer a great opportunity to further protect our marshes and provide important community benefits. Future funding should strongly consider projects that would increase the amount of freshwater inflows reaching the bay. Given the bay’s importance to wildlife, our communities and our state’s economy, we must address	

the bay's inflow issues if we expect it to continue to serve as Texas' most productive bay.

Texas Beneficial Use/Marsh Restoration

- Consider ways to balance the approach of utilizing BUDM with other projects that may prove to be more beneficial in the long-term.
- Use rigorous sampling, testing, and evaluation standards to ensure quality and suitability of dredge material and develop standardized monitoring to address physical and ecological function of beneficial use projects across the Gulf.

Bayou Greenways

- Include additional information about the expected benefits to communities from this project, such as recreational opportunities for communities in the Houston area. Project benefits that are more clearly defined and tailored to the project will help the Council monitor and measure its long-term success.
- Include a public engagement and education strategy to highlight the complexity of urban runoff management, highlighting the multiple goals of ensuring adequate freshwater inflows, controlling water quality in urban runoff, and managing flooding. This is important given that urban runoff from the Houston area is ranked as the second-most important priority problem to the Bay.
- Involve young people in the developing and maintaining the Bayou Greenways project, developing the next generation of conservation leaders in Houston and creating conservation service projects as community learning opportunities.

Mississippi River Delta

The Mississippi River Delta is one of the largest and most productive coastal ecosystems in North America. In south Louisiana, the Mississippi River which has the 3rd largest drainage basin in the world, meets the Gulf of Mexico, supporting a vast estuarine complex with rich biological diversity and bounty. Within the last 80 years, over 1,800 square miles, roughly a quarter of the delta, have been lost due to a combination of anthropogenic and natural causes. Stressors to the landscape include storms, subsidence and sea level rise, compounded by a history of oil and gas canal dredging and the leveeing of the Mississippi River leaving the deteriorating delta in desperate need of ecosystem restoration actions.

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

These projects are expected to mitigate several specific stressors in this ecosystem including saltwater intrusion and altered hydrology that cause wetland loss and reduced biological productivity. This suite of projects addresses these stressors by restoring ridge and marsh, backfilling canals, removing spoil banks, reconnecting the river to its cypress-tupelo swamp floodplain, and restoring beach and marsh habitats still recovering from the oil spill. Combined, these activities will improve ecosystem health and increase the resiliency of wetlands, barrier islands, and the larger coastal landscape. These projects complement other nearby constructed or planned restoration projects, which leverage other funding streams and maximize the benefits to the Gulf of Mexico ecosystem.

A significant amount of planning and/or engineering has already been conducted for many of these projects over the past several years, making them ripe candidates for the first FPL. These projects are all outside the levee system; therefore, they are part of a broad coastal buffer that reduces risk from hurricanes, which is beneficial for the overall protection and restoration of the deltaic region and critical port cities like New Orleans. In addition, these projects reflect integration of restoration and other river management needs, including waterborne commerce, flood control and other navigation needs, which are critical to the long-term viability of the Delta’s habitat, communities and nationally significant economies.

Mississippi River Delta, LA	
Jean Lafitte Canal Backfilling	<ul style="list-style-type: none"> • This project will mitigate ecosystem stressors, specifically altered hydrology from canal construction, by restoring natural hydrological flows to this valuable wetland complex. • Backfilling these canals will not only address the direct loss of wetlands from canal and spoil bank construction, but will have a larger reaching impact by reducing saltwater intrusion into adjacent wetland, improving ecosystem health and resiliency.
West Grand Terre Beach Nourishment and Stabilization	<ul style="list-style-type: none"> • This project will mitigate land loss by restoring beach and marsh impacted by the oil spill and strengthening the barrier island chain and surrounding ecosystems. • Barrier islands help slow the exchange of water in and out of estuaries, serving as an important feature that separates the estuary from the Gulf of Mexico and supports floral and faunal health. • The effort will also add to the multiple lines of defense for the greater New Orleans region and add to the longevity of the down-drift inhabited island of Grand Isle.
Golden Triangle Marsh Creation	<ul style="list-style-type: none"> • This project will restore habitat badly damaged by saltwater intrusion and erosion associated with the construction of the MRGO channel.

	<ul style="list-style-type: none"> • Restoration in this area will benefit fish and wildlife species in the Pontchartrain Basin by restoring land and protecting existing marsh. • This key wetland complex enhances storm surge protection and will help buffer key features of the Hurricane and Storm Damage Risk Reduction System surrounding the greater New Orleans area.
Biloxi Marsh Living Shoreline	<ul style="list-style-type: none"> • This project will protect against wave action, reducing erosion and shoreline retreat. • Once constructed, these self-maintaining reefs can provide a myriad of ecosystem services, including improving water quality and benefitting fish and bird populations. • In addition, re-establishment of vertical oyster reefs in Biloxi Marsh in conjunction with planned projects to reintroduce small amounts of river water (River Reintroduction into Maurepas Swamp and Central Wetlands diversions) will help slow marsh deterioration..
Mississippi River Reintroduction into Maurepas Swamp	<ul style="list-style-type: none"> • This project will mitigate land loss that has resulted from the severed connection between the Mississippi River and its floodplain and benefit 45,000 acres of swamp. • The diversion is designed to deliver fresh water which is important for improving water quality, delivering nutrients and some sediment to the Maurepas swamp, increasing primary production and tempering rising salinities throughout the Pontchartrain Basin.
Bayou Dularge Ridge, Marsh & Hydrologic Restoration	<ul style="list-style-type: none"> • This project will mitigate ecosystem stressors, such as altered hydrology and saltwater intrusion, by restoring the integrity of the ridge and marsh land bridge that serves as a critical barrier separating the freshwater to brackish marshes north of Lake Mechant from saltwater marshes surrounding Caillou Lake. • Additionally, this project would narrow the cross-section of Grand Pass, an artificial channel, reducing saltwater intrusion from the Gulf into Central Terrebonne marshes and enhance the influence of the Atchafalaya River in the area.
Lowermost Mississippi River Management	<ul style="list-style-type: none"> • Integration of the diverse management activities affecting the LMR is essential to the health of the Mississippi River Delta, whose wetlands, hydrology, and other vital natural systems are in turn central to the health of the Gulf ecosystem at large. • The LMR Management Program is a key step towards a new lower river management plan whose equal emphasis on navigation, flood control and delta restoration will set the stage for the holistic approach to future project engineering and design work, operating regimes, and investments needed to provide the greatest benefits to – and to preclude further losses to – deltaic and Gulf resources. • The LMR program will build on cooperative efforts already underway, including the Mississippi River Hydrodynamic and Delta Management (MRHDM) Study. Expanding on extensive data and advanced models now being developed under the MRHDM and additional flood control and navigation studies, the LMR Management Program can provide needed integration among navigation, flood control and restoration activities on the LMR, recognizing the impacts of sea level rise, subsidence, and continued wetland land loss in this extremely dynamic system. • The LMR Management Program provides a unique and urgently needed opportunity to establish a unified plan for management of the lower river, in which delta restoration is optimized and prioritized, and an opportunity to preclude future conflicts that could jeopardize progress to restore this key Gulf resource. We look forward to working with the participants as they further refine the specific scope and implementation of this proposal.

Florida Watersheds

Florida has appropriately taken a phased approach to overall watershed restoration by addressing stressors upstream to provide the best chance of success for future projects in coastal and near shore waters. However, it is important that the benefits of projects be placed in the context of their watershed, so that their impact is not overstated and their relative importance to addressing stressors is clear to the public. NFWF, through its Gulf Environmental Benefit Fund, is making critical investments in SWIM planning efforts in northwest Florida and Suwannee watersheds. These plans should identify the most important water quality parameters and projects critical to estuary restoration and inform future water quality project submitted for funding. The Council must also consider that the success of hydrological restoration projects will always be influenced by water supply management (and CUP issuance rates) and thus projects must be measured relative to ongoing water supply planning to ensure an accurate assessment of their effectiveness. The Council has missed an opportunity to invest in habitat protection through land acquisition which is an essential part of restoration in Florida. Strategic land conservation must be included in future project portfolios.

Finally, meaningful Gulf Restoration will necessarily require more projects to be implemented in peninsular Florida; focus to-date has largely been on the disproportionately affected Panhandle. We believe that restoration in peninsular watersheds would provide measurable positive benefits to the health of the overall Gulf ecosystem, and suggest future FPLs could include additional peninsular watersheds.

Pensacola Bay	
The proposal uses a strategic approach that aims to address several sources of water quality impairment in a targeted area. More information is needed to understand how stressors targeted by these projects were prioritized and how much impact these projects will ultimately have on these stressors. Additionally, more information is needed to understand how the projects will work together and what the combined expected benefits are. Future investments in the Pensacola Bay watershed should include upstream projects, projects addressing sedimentation, habitat conservation and management, wildlife protection and air traffic control between projects.	
Pensacola Bay Living Shoreline - Phase I	<ul style="list-style-type: none"> This project builds on prior projects that have performed as designed elsewhere on the Pensacola waterfront.
Beach Haven - Joint Stormwater & Wastewater Improvement Project - Phase II	<ul style="list-style-type: none"> Implementation of this project would make a contribution to improving water quality in the direct impact area of the living shoreline projects proposed.
Bayou Chico Contaminated Sediment Removal- Planning, Design, and Permitting	<ul style="list-style-type: none"> Include more information about the placement or use of dredge materials obtained from sediment removal. Metrics of success of this project must measure pollutant load reduction of sediment removal.

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Apalachicola Bay	
Apalachicola Bay Watershed supports largest oyster-harvesting industry in FL. Changes in freshwater flow from upstream dams and the use of river water for municipal, industrial and agricultural purposes have contributed to impairments. The proposed approach to ecosystem restoration that integrates upland watersheds and bay systems is scientifically sound and a superior approach than restoring the two systems separately.	
Apalachicola Watershed Agriculture	<ul style="list-style-type: none"> Collect baseline information about nutrient loads, fertilizer application, water used for irrigation, etc.; and

Water Quality Improvements	<ul style="list-style-type: none"> • Include metrics for nutrient load and water use in monitoring plan to measure reductions; and • Explain how reductions relate to the Northwest Florida Water Management District's water supply planning and implementation, and what the absolute and relative benefits will be.
Tate's Hell Strategy 1	<ul style="list-style-type: none"> • More information is needed about the removal of the component from the original proposal that addresses management activities on private forestlands (FPL acknowledges that 80% of Gulf's acreage is in forests and farmlands).
Money Bayou Wetlands Restoration	<ul style="list-style-type: none"> • Describe how this project is connected to the others in the Bay Area. • Include critical habitat designation for Gulf sturgeon in the project description and describe how activities will improve or avoid adverse impacts to this habitat.
Apalachicola Bay Oyster Restoration	<ul style="list-style-type: none"> • Ensure monitoring activities will be coordinated with NRDA and NFWF projects in this area. • An oyster management plan would help ensure restoration is sustainable and achieves both ecological and commercial objectives. Such a plan would direct the long-term identification and implementation of projects to ensure they are strategic and effective.
Suwannee Watershed	
Suwannee Watershed includes a large agricultural basin and the proposal aims to address a primary stressor - agriculture-based nutrient loading. The program will build on existing efforts and implement cost-share and technical assistance which are needed for successful implementation. However, the proposal does not adequately explain or predict the contribution this project would have on the watershed.	
Suwannee River Partnership Irrigation Water Enhancement Program	<ul style="list-style-type: none"> • Proposal should include targets for number of enrollees in the program and outline the criteria for prioritizing land where implementing these BMPs would make the most significant impact. • Include metrics to measure water quality improvements, nutrient reduction or water and energy conservation.
Tampa Bay	
Tampa Bay is the largest open-water estuary in Florida. The stressors identified in the draft FPL match those identified by the Tampa Bay SWIM program. Considering the limitations of the activities proposed for this watershed, this is a good approach because several sources of water quality impairment in the watershed are addressed. However, the Council should provide more information about how these projects will work together including how they will avoid negative interactions, how planning efforts will inform one another (i.e. pre-monitoring activities by Tampa NEP for Palm River and Robinson projects should inform planning efforts of NOAA, FDEP & SWFWMD) and how implementation should be coordinated to ensure highest likelihood of success.	
Palm River Restoration Project Phase II, East McKay Bay	<ul style="list-style-type: none"> • Include metrics to measure water quality improvements and expected benefits of removing exotics and replanting natives. • Provide additional information regarding the effectiveness of stormwater ponds in water quality treatment.
Robinson Preserve Wetlands Restoration	<ul style="list-style-type: none"> • Planning should consider implementation funding from other sources beyond RESTORE. • Planning should identify risks associated with this project, such as sea-level rise, and develop a mitigation strategy to address those risks. • The public access/visibility of this project is especially meaningful-- making Gulf Restoration tangible to the public at large.
Tampa Bay National Estuary Program	<ul style="list-style-type: none"> • Great work including adequate baseline monitoring data to measure results following implementation. • Include more information about the expected contribution of these 7 proposed projects to mitigate stressors in Tampa Bay.

Gulf-wide Projects	
Council Monitoring & Assessment Program Development	<ul style="list-style-type: none"> • We are pleased to see a more tailored, programmatic and systemic approach to developing monitoring and adaptive management needs. • We support the idea of a Monitoring and Assessment Working Group, and we agree that the Gulf of Mexico Alliance (GOMA) should facilitate broad input for this evaluation. The Council should provide more detailed information about program coordination with GOMA. • We agree that all of the tasks can and should be completed within three years. • Program should not just measure beneficial impacts, but also shortfalls in project performance, to enhance adaptive management. • Program should ensure monitoring data is publically available, include an education component and involve TEK in the data collection (specifically, hiring fisher folk to monitor and collect data). • Include explicit authorization for a habitat mapping community of practice.
GOMA Coordination	<ul style="list-style-type: none"> • We agree with the need for broad input in developing the monitoring program and that GOMA is an appropriate entity to facilitate that input. • Project activities are appropriate, but should be more clearly integrated with the overall monitoring project (DOC_RESTORE_002_001_Cat1). Confusion might be eliminated by combining the two proposals into one. • Include more details about how monitoring needs and indicators will be identified. • Minimum monitoring standards and protocols should change as there are technological and scientific advancements rather than be deemed “accurate and appropriate indefinitely.” • Describe who the users will be for these protocols and how they will adopted throughout the region.
Strategic Conservation Assessment Framework	<ul style="list-style-type: none"> • By integrating the large number of land conservation plans already in existence across the Gulf and constructing decision support tools the proposal would help to ensure the most cost-effective land conservation investments with RESTORE and other dollars including those from funding sources not directly connected to the Deepwater Horizon Oil Spill. • The prioritization system for this project should be constructed in a way that is functional beyond the use of the RESTORE Council. It should also be done in close coordination with existing programs to avoid duplication. We would not want RESTORE funds spent to duplicate ecological assessment work that has already been conducted. • We recommend that past stakeholder input on this topic should be considered. • We also recommend that the Council provide more detail on how this tool would actually be adopted by the relevant state and federal entities involved on whether it will play a role in the implementation of the Conservation Reserve and Grant Programs. • We are concerned the working group may be too large to be effective. • We believe the proposal should include a description of how the LCCs will coordinate with each other and what the role of the PGCLC is.
Baseline Flow, Gage Analysis & On- Line Tool to Support Restoration	<ul style="list-style-type: none"> • Describe how this project will be integrated within the restoration and management community. • Describe who the users will be for this information, how it will be made as user-friendly as possible, and how it will be used in planning. • Consider shortening duration of the project to make information and tools available earlier in restoration process.

	<ul style="list-style-type: none"> • Consider examining multiple watersheds more closely once the project moves past early stages, to better achieve Gulf-wide long-term benefits. • Include more information to explain the budget set for planning. Although budget requested seeks to deliver too much for too little money, the total leveraged funds through USGS seem to more accurately reflect the resources needed.
Gulf Coast Conservation Reserve Program	<ul style="list-style-type: none"> • We support working with state and local conservation partners in planning efforts to identify tracts of land that could benefit from conservation measures including prioritizing land by watershed. • We agree that NRCS and the Forest Service have the existing delivery systems to make this project cost-effective. • We believe that coordination with existing Farm Bill Programs is important. • We believe the proposal should include a description of how this project might work with the SeaGrant outreach proposal in MS • We believe the proposal should include a description of how this program will work with and avoid duplication with the NFWF funding for outreach from the GCC Grants
Gulf of Mexico Conservation Enhancement Grant Program	<ul style="list-style-type: none"> • This project should be useful in leveraging funding from other Deepwater Horizon and non-Deepwater Horizon-related sources and in helping to strengthen non-profit organizations and state agencies that can build the constituency for and carry on long-term Gulf restoration. Toward that end, this project should have more than a one-year duration. • We are concerned the 1:1 matching requirement may limit some of the conservation opportunities. • We recommend that this project be coordinated with the Strategic Conservation Assessment of Gulf Coast Landscapes to assist in making grants that advance conservation at the highest priority locations.
Gulf of Mexico Habitat Restoration via Conservation Corps Partnerships	<ul style="list-style-type: none"> • We support using Conservation Corps to accomplish specific Gulf restoration projects at multiple locations as a way to employ tribal youth, young and disadvantaged local residents and veterans in high-priority environmental restoration and conservation activities. • We believe that Council-selected project funding should be used to fund crews to work on projects funded through Bucket 2, NFWF GEBF, NRDA and other programs that significantly advance the RESTORE Act Bucket 2 statutory restoration priorities. The proposed funding should be made available for a Conservation Corps project of the scale proposed. In Florida work at the NERRS sites should be specifically considered. • However, we do not believe that the project as described in DOC_RESTORE_003_007_Cat1 is sufficiently clear and well enough defined to allow immediate implementation of the project in the field. • To ensure that these Bucket 2 funds make the best possible contribution to communities and to statutory goals for the Council-selected restoration component, we recommend that a small portion of these funds be used for an assessment of the Conservation Corps opportunities associated with identified restoration priorities, including locations, entities, and project types in which the conservation Corps program could be utilized--this should be done in consultation with other federal, state and local agencies and with organizations experienced in conservation Corps administration. • The assessment should ensure that the program integrates with existing local workforces, educational and community organizations, and connects with the economically and socially disadvantaged populations of the Gulf coast region. The assessment should also explain the relationship between the training of Corps members through experience in the field and eventual transition to higher education and/or private employment if applicable, in consultation with restoration companies and should evaluate how corps projects can be integrated with other Gulf restoration projects funded through RESTORE and other programs. The assessment should include a definition of how conservation results will be measured. • Following a review and comment period on the project assessment, the Council should approve the allocation and expenditure of the funds for Corps implementation at strategic locations for Gulf restoration that contributes to

	implementation of RESTORE Act priorities.
Gulf of Mexico Estuary Program	<ul style="list-style-type: none"> • The NEP model and its various components and processes have proven to be both useful and durable in improving the condition of the nation’s estuaries. The creation of an estuary program is foundational and the establishment of management and technical committees will identify and develop a Comprehensive Plan that identifies strategies and projects to address stressors and restoration needs. • While we recognize that estuary restoration is often a lengthy and difficult process, the creation of a framework for addressing threats and problems is critical to success. • We understand that this project enjoys strong support among Northwest Florida counties and other local governments. • Describe opportunities for long term funding for the estuary selected and for adding additional estuaries and their watersheds to this initiative with future funding from RESTORE or other sources. • Proposal raises question about whether this is still a Gulf-wide project since it has been confined to one pilot estuary in NW Florida; however, it is our understanding that this pilot is to be considered a prototype for implementation of the project at multiple sites.