



February 5th, 2016

Mississippi Department of Environmental Quality
Attn: Ms. Melanie Green
515 E. Amite Street
Jackson, MS 39201
Melanie_Green@deq.state.ms.us

GRN's Addendum Comments to our signature to MEFG comments on Mississippi's Multiyear Implementation Plan (MIP) 2015.

Dear Ms. Green:

Gulf Restoration Network offers these comments as an individual addendum to a group letter our organization signed along with several other conservation groups and NGOs for submission by the Mississippi Environmental Focus Group (MEFG). That letter concentrates on the process and uses our consensus document of 14 Guiding Principles as a reference point. While we agree with the points made in the MEFG group letter, there are some specific points we would like to make that extend beyond that letter's focus on process to some of the current projects detailed in the Multi-year Implementation Plan (MIP) that the State of Mississippi has written for spending Direct Component (Bucket 1) money.

Gulf Restoration Network and other NGO groups have made the point many times and in many settings that restoration money spent on addressing water quality problems on the coast is an investment in the economy. A significant part of the economy of the three Coast Counties is based on tourism and attracting people to see and use beaches, fish, take boat excursions, stay in hotels near the water and patronize casinos and restaurants that make the most of the setting on the Mississippi Sound. Water quality problems that hamper tourism and the viability and safety of coastal seafood, like oysters, should be acknowledged and addressed. Public health advisories, against swimming along Hwy. 90 beaches and other areas, due to bacteria pollution in nearshore and bay water, happen too often. Spending on sewage and storm water treatment infrastructure to address these water quality problems is an investment in the economy at a foundational level. MDEQ and the Restore Council have both heard this from us before in comment letters and in person, but we will continue repeating the message.

When Governor Bryant announced this group of 10 MIP projects slated for Restore Bucket 1 funding in December of 2015, he was reported by Mississippi Public Broadcasting as saying the following about the coastal streams restoration component of the plan: **“What goes into the Gulf Coast begins in the streams north of here; we will make sure to the best of our ability that it is clean and safe. We believe this will reduce the number of times we have to close the beaches. So, in fact, it will positively affect the tourism economy here on the Mississippi Gulf Coast.”** The Governor himself made this connection between the tourism economy and the quality of the water on the beaches. If more than just one project out of ten included in the MIP addressed improving coastal water quality, it would be more convincing to us that he accepts this connection as a basic truth and is willing to work aggressively to improve the situation.

The coastal stream restoration project in this MIP list (Activity #9) only addresses water quality indirectly with Best Management Practices, bank stabilization and streambank protection whether through preservation or by new plantings, and through education efforts. What the coastal counties need in addition to attention to the streams, includes sewer plant upgrades, replacement of failing pipes and leaky lift stations, better treatment processes, excellent plant management, and the continuous inspection and repair of miles and miles of transfer pipes. This isn't glamorous work and most of it isn't on the cutting edge of technology. However, it is necessary and it should be better represented on the lists of economic restoration and infrastructure projects that the state puts forward, especially this first list of Bucket 1 projects.

Taking care of water quality is essential and complementary to the maintenance and restoration of the living resources in the rivers, bays and nearshore waters of the three coastal counties. No example illustrates this point better than Mississippi's oysters. In 2015 the Governor elevated oyster industry restoration to a top priority. The Governor's Oyster Council final report cited water quality as one of the principal concerns for restoring oyster production. New methods of oyster aquaculture in open water, as contemplated by one of the Direct Component projects will simply not succeed if the biological requirements of oysters can't be met due to polluted water.

The \$17 million proposed toward a Mississippi Gulf Coast Aquarium at the end of Highway 49 in Gulfport is the largest amount in the MIP list and stands out when one considers that nothing on the list directly addresses water quality on the beaches in front of the aquarium. These beaches and others are off-limits to human contact several times a year due to fecal coliform pollution when health advisories are published by MDEQ. The beaches south of the aquarium site, across U.S. Hwy 90, could benefit from spending on stormwater and sewer infrastructure from Direct Component (Bucket 1) money. The economic growth that the aquarium proponents hope to infuse into Gulfport would be much better supported if the adjacent beaches were safe for human contact and if parents didn't have to think twice about letting their children wade along those beaches after an aquarium visit. Better water quality will support economic growth and will lay the foundation for the success of ecological restoration work that may come in later spending either from Bucket 1 or from other sources of BP Oil Disaster restoration money.

Beginning at the proposed aquarium site and moving three miles north up Highway 49 in North Gulfport, one can find the Mississippi Coastal Improvement Program (MsCIP) levee repair project protecting the Forest Heights subdivision. This is an infrastructure project to prevent

flooding during storm surges and fits several of the requirements for spending Direct Component funds.

According to the MIP, the Restore Act is supposed to revive the economic health of the communities affected by the oil spill, and to restore the natural resources of the Gulf Coast States. Under eligible activities for the MIP money, listed in 32 CFR Sec. 34.201, are two subparagraphs: (C) “Implementation of a federally approved marine, coastal or comprehensive conservation management plan”, and (G) “coastal flood protection and related infrastructure”. In addition, one of Mississippi’s GO Coast 2020 Eco- Restoration Work Group priorities is “resilient coastal communities.”

The Forest Heights levee project helps build resiliency to future storms and flooding (flood protection) , and is on a list of vetted and approved federal spending projects in the Mississippi Coastal Improvement Program (MsCIP) that was created cooperatively by the state and the U.S.Army Corps of Engineers to improve resiliency in the face of storms and climate change. This levee project will improve the economic outlook for an entire neighborhood. The non – federal match for this project is \$4.9 million. The Federal share is \$9.1 million. A group of MsCIP projects including the Forest Heights levee were authorized in the 2014 Congressional Water Resources Development Act (WRDA).

For less than one third of the aquarium’s cost to the state, this infrastructure project that meets several of the Multiyear Implementation Plan’s criteria could get its required state match funding and help Mississippi citizens with resiliency to flooding and future storms. Addressing levees and pumps to protect a neighborhood is a very basic way to revive the economic health of the people there.

The U.S. Treasury spending rules don’t seem to exclude projects like those on the MsCIP list, as long as the timing for the state funding meshes with U.S. Congress’ appropriations process. MsCIP projects can be part of the state’s MIP list, and we think some should be on it. The Forest Heights levee is not the only one. How did the Governor’s office and MDEQ consider and rank the MsCIP projects when they made this first MIP list?

This levee update and improvement project would help the City of Gulfport with a recurring flooding problem and has support among elected County Supervisors who represent the affected area and have worked for years to address street and home flooding, especially during storm surges. All of the Congressionally-authorized MsCIP projects have non-federal shares that could be completed with money from the state’s Direct Component or Restore Bucket 1 funds. A match amount can be considered as leveraging other money sources when the match accounts for 35% of the total cost of a project. State spending on MsCIP projects can provide this leverage, and opens the door for federal spending on badly needed infrastructure improvements providing resiliency and flood protection.

The Corps of Engineers Chief's Report¹ includes the various MsCIP projects and is easy to find and read. All MsCIP projects share the themes of resiliency to storms and flooding – a perennial concern on the Mississippi Coast – and they all need non-federal share (match) money.

The examples covered in this comment letter illustrate opportunities to directly address water quality and needed flood resiliency. Economic development depends on cleaner water, usable beaches and healthy seafood. Infrastructure for flood protection, stormwater and improved water treatment is an investment in economic recovery and supports the economy in Harrison, Hancock and Jackson Counties.

It would be good to see water infrastructure and MsCIP projects prioritized on the Multiyear Implementation Plan as it develops. Furthermore Gulf Restoration Network would like to ask Mr. Wyatt at MDEQ's RestoreMs section for a meeting, preferably on the Mississippi Coast, to talk about this and ideas we have after seeing the first iteration of Multiyear Implementation Projects. Community members and leaders from North Gulfport, their elected officials and Supervisors would be eager for such a meeting.

Sincerely,

Andrew E. Whitehurst
Water Program Director
Gulf Restoration Network

¹ http://www.sam.usace.army.mil/Portals/46/docs/program_management/mscip/docs/MSCIP%20Chief%20Report.pdf