



7 October 2016

Gulf Coast Ecosystem Restoration Council
Hale Boggs Federal Building
500 Poydras Street
Suite 1117
New Orleans, LA 70130

RE: Gulf Coast Ecosystem Restoration Council Request for Comments on the Draft Comprehensive Plan Update

Dear Council Members:

Thank you for the opportunity to comment on the Gulf Coast Ecosystem Restoration Council's (Council) draft Comprehensive Plan (Plan) update. We appreciate the Council and staff's effort in providing an update that meaningfully builds upon the foundation of the Initial Comprehensive Plan, ensuring that the investments made on our Coast are valued and resourced to the fullest extent. The strides made with this update represent an important step as the Council begins to implement comprehensive restoration of the Gulf.

We submit the following comments that emphasize the Plan's strengths, as well as provide recommendations that we believe will strengthen this draft update. A comprehensive approach to restoration is critical - attention should be focused on short and long-term solutions for restoring both coastal and marine environments, as well as creating resilience in coastal communities. As the Council recognizes the interconnectedness of these environments, and the ecosystem stressors that affects them, we can better assure that these foundational processes will lead to a robust restoration program.

Commitment to Public Participation & Transparency

Community engagement in all phases of the decision-making process, regarding recovery, reconstruction, and restoration activities is as important as the physical outcomes of planning. We

appreciate the Council's outlined commitment to public engagement, inclusion, and transparency. Allowing the public an opportunity to meaningfully participate during these critical stages will give decision-makers a better understanding of the cultural and environmental assets within coastal communities, the challenges faced these communities, as well as provide a solid foundation for cooperation and support for current and future restoration plans and programs.

In advance of any collaborative workshops and community meetings, a deep assessment of Gulf Coast communities – particularly those who felt the brunt of the socio-economic and environmental impacts of the BP disaster – should be conducted. Talking directly with community leaders, their constituents, and community-based organizations will provide an important perspective that highlights the social, cultural, environmental and economic needs of the area. Public meetings to date, while mandatory and valued, do not reach the least-served communities. Our coastal communities rely on the health of the environment not only for their livelihood, but also the life of their family. By prioritizing a socio-economic assessment, the Council will have the necessary information to better conduct future workshops/meetings that assess projects and programs to meet the needs of communities Gulf-wide.

We are encouraged that Council staff has pledged to foster better partnerships between all stakeholders (e.g. the public, NGO, private, intergovernmental), particularly through facilitating diverse public participation processes. However, it is equally important that each of the state-members within the Council also formally commit to the same level of participation and facilitation in their own communities and respective watersheds. Without the involvement and leadership by state decision-makers - particularly the Council-member designees - and their federal counterparts, a comprehensive restoration vision cannot be truly achieved. To this end, in line with the Council's proposed 3-year cycle for future Funded Priority Lists (FPL), we urge Council staff and each state-represented Councilmember to conduct formalized public review and scoping after each FPL cycle. A review of the former FPL round will assist the Council in improving future selection and implementation processes. Additionally, each Gulf State Councilmember should conduct formal public scoping meetings in the interim years to gain input on recommendations for further restoration initiatives as they solicit their own Request for Proposals in their state. In these interim years, we have an opportunity to formally commit to robust public participation and transparency that fully updates the public, and seeks meaningful input for future restoration processes.

Finally, we are pleased to see that the Council released a full Vietnamese translation of the draft Plan alongside the English version. This is a welcome improvement, and we appreciate your efforts to ensure our diverse populations across the Gulf were included in this important update. As restoration efforts continue, relevant documents are released (e.g. Funded Priority List project descriptions) and public meetings held, the commitment to language inclusiveness should continue. In addition to language inclusiveness, the Council should include state-recognized Tribes when formally developing Tribal policy.¹ As all five Gulf States are home to state-recognized Tribes, their official inclusion in any Tribal policy development would enhance coordination and effective consultation with their communities.

Restoration Coordination and Collaboration

We support the Council's intention to embrace a holistic approach before, during, and after project development, review, and selection processes. This particularly includes the Council's recognition of the importance of coordination and consistency throughout all relevant restoration programs. As projects across funding streams can compliment one another, convening and facilitating collaboration between RESTORE, Natural Resource Damage Trustees, National Fish and Wildlife Foundation, and other relevant state and federal agencies will greatly benefit the overall success of each restoration program – encouraging large-scale project development and implementation. This level of coordination is vital to the success of comprehensive, gulf-wide restoration.

We recommend that the Council reinforce this commitment by developing and sharing concrete next steps to ensure that proposed coordination workshops and meetings are a success for decision-makers, as well as the participating public. Additionally, we advise that that Council share, and encourage sharing of, project evaluations to further consistency amongst the selection processes. As recommended in the previous section, we encourage the Council to conduct a thorough assessment of impacted coastal communities, so that their needs and hopes for the future of the Gulf environment is an integral component of the workshop outcomes.

The Council's commitment and continued efforts to update and improve the process for applying best available science to the FPL proposals is to be commended. As the updated plan acknowledges, a holistic approach to restoration appreciates and underscores the interconnectedness of coastal and marine ecosystems, as well as the importance of addressing system-wide stressors that reduce ecosystem

¹ Public Review Draft Comprehensive Plan Update 2016: Restoring the Gulf Coast's Ecosystem and Economy, 81 FR 57582. (23 Aug 2016)

integrity. The Gulf Coast environment does not recognize our political boundaries – the Council’s watershed-based approach, and other complementary planning methods, respects the scale and complexity of Gulf restoration.

We applaud the Council’s acknowledgement that coordination must extend to project monitoring and adaptive management phases of restoration. Consistency and coordination are fundamental when developing monitoring protocols, and we suggest the Council consult with relevant experts, including local expertise, and interested stakeholders in developing data management and adaptive management plans. While encouraged by the formation of the Council Monitoring and Assessment Program and the Gulf of Mexico Alliance Monitoring Community of Practice, the final Plan update should include additional details regarding the next steps for these new entities. Finally, we value the Council’s continued commitment to ensuring that regulatory review, best available science, and overall efficiency in their project-by-project analysis.

As the Council values environmental and engineering science when assessing the potential success of any given project, we encourage the Council to adopt criteria that reinforces the value of social science in its project review process. Tools such as the Social Vulnerability Index² and other social science data can help target restoration and protection efforts in the most vulnerable communities. Engaging frontline communities in the design and implementation of restoration strategies is critical to the success of the overall program, helping to avoid “random acts of restoration.” While there is no one-size-fits all tool or implementation strategy to build resilience among vulnerable and disadvantaged members of a community - a successful, comprehensive restoration strategy must include criteria that incorporates social science data and meaningful input from impacted communities with a clear goal of achieving environmental and social justice. In doing so, we will enable Gulf communities to become more resilient.

Large-Scale Restoration

We appreciate the Council’s adherence to the RESTORE Act’s directive to give precedence to large-scale restoration. By exploring varied financing approaches to support the scale of projects it seeks to implement, such as accruing payments each cycle before disbursement and leveraging multiple

² The Social Vulnerability Index (SOVI) measures the social vulnerability of U.S. counties to environmental hazards. The index is a comparative metric that helps users examine differences in social vulnerability among counties. <http://www.csc.noaa.gov/digitalcoast/data/sovi>

funding sources, the types of projects needed to see cross-state benefits and landscape-scale restoration can be more easily achieved.

Highlighting the importance of moving the Gulf Coast towards a just transition, we recommend the taking advantage of these once-in-a-lifetime funding resources by encouraging hybrid, large-scale projects that foster a clean energy³ future. One way to achieve this crosscutting use of funds could be to include this as positive criteria during project selection to create incentives for the innovative technology, research, and development needed not only restoring our coast, but also transforming our energy economy.

To further advance comprehensive restoration across all funding streams, we recommend that the Council strategically coordinate future FPLs with the Natural Resource Damage Trustee Implementation Groups (TIGs) and other restoration processes to allow timely consideration of projects and programs that may benefit from combined resource funding and/or the accumulation of funding that can expand the impact of the overall project.

Proposal Development

With the commitment to revise submission guidelines for future FPLs, we are encouraged that the Council has begun to incorporate lessons learned in 2015. Improved submission guidelines, proposal development, and review practices will better demonstrate lasting ecosystem benefits, as well as fulfill the Plan's goals and objectives. To fully realize the potential for improvement, the public should have ample opportunity to provide formal input on the development of these guidelines.

In order to promote transparency and accountability, we ask that Council members document the process used for proposal development. This would allow for better public understanding of how individual members reached their decisions regarding proposed project sponsorship and project selection, including an assessment of each proposal's benefits. The assessment should be released for formal public review before any proposed project suites are put forth during FPL selection cycles.

Lastly, while we acknowledge the inherent benefits of ecosystem restoration for local and regional economies, it is critically important that the Council affirm in the final update that Council-selected

³ Clean energy particularly defined as solar, wind, and tidal energy sources.

restoration component will be spent exclusively on ecosystem restoration projects. It should be clear that economic benefits will not be a basis upon which projects are selected.

Conclusion

This update to the Comprehensive Plan represents a significant stride for Gulf restoration – both in its planning and implementation. We acknowledge and appreciate the work Council members, agency and executive staff put into the draft update. We also appreciate your consideration of our comments and recommendations, and look forward to working with you. 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 512.675.0076.

Thank you for this opportunity to comment.

Sincerely,

Alabama Coast United	Orange Beach, AL
Alliance Institute	New Orleans, LA
ArtSpot Productions	New Orleans, LA
Beyond Extreme Energy	
BOLD Louisiana	Rayne, LA
Delta Chapter of the Sierra Club	Lafayette, LA
Earth Ethics	Pensacola, FL
Galveston Bay Foundation	Galveston, TX
Galveston Baykeeper	Galveston, TX
Gulf Coast Center for Law and Policy	Slidell, LA
Gulf Island Conservancy, Inc.	Gulfport, MS
Gulf Restoration Network	New Orleans, LA
Interfaith Sponsoring Committee (BISCO)	Thibodaux, LA
Isle de Jean Charles Band of Biloxi-Chitimacha- Choctaw Indians	Isle de Jean Charles, LA
Louisiana Environmental Action Network	Baton Rouge, LA
Lower Mississippi Riverkeeper	Baton Rouge, LA
Mobile Bay Group of the Sierra Club	Mobile, AL
Mobile Baykeeper	Mobile, AL

Mondo Bizzaro	New Orleans, LA
Operation HomeCare, Inc.	York, AL
Panhandle Watershed Alliance	Pensacola, FL
On Wings of Care	New Orleans, LA
Radical Arts and Healing Collective	New Orleans, LA
STEPS Coalition	Biloxi, MS
T.e.j.a.s.	Houston, TX
Vanishing Earth	New Orleans, LA