

**Alabama Coastal Heritage Trust•Alabama Coast United•Alabama Rivers Alliance•Alliance Institute
Apalachicola Riverkeeper•Asian Americans for Change•Atchafalaya Basinkeeper
Bayou Grace Community Services•BISCO•Boat People SOS•Brighter Future Foundation•Earth Ethics
Galveston Baykeeper•Gulf Coast Center for Law and Policy•Gulf Islands Conservancy•Gulf Restoration Network
Louisiana Environmental Action Network•Lower Mississippi Riverkeeper•Mobile Bay Sierra Club
Operation HomeCare•Oxfam America•Pelican Coast Conservancy•Pensacola Community Action Network
Sierra Club - Delta Chapter of Louisiana•Sierra Club Alabama•SouthWings•Steps Coalition•The Corps Network**

28 September 2015

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

RE: Gulf Coast Ecosystem Restoration Council Request for Comments on the Initial Draft Funded
Priorities List

Dear Council Members:

Thank you for the opportunity to provide input on the Gulf Coast Ecosystem Restoration Council's (Council) draft Funded Priorities List (FPL). We appreciate the Council and staff's effort in developing an initial FPL that contains a suite of beneficial projects that leverage funding from other restoration processes, which helps to ensure that the investments made on our Coast are valued and resourced to the fullest extent. The strides made with this FPL represent an important first step as the Council begins to implement comprehensive restoration of the Gulf.

We submit the following recommendations that we believe will strengthen the draft initial FPL. As the need for 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. By addressing the interconnectedness of these environments, and the ecosystem stressors that affects them, the Council can better assure that the FPL process will lead to a robust restoration program. The initial FPL does not exist in a vacuum; our aim is to provide recommendations that will inform future FPL processes as well as updates to the Comprehensive Plan.

The Council's decision to categorize projects by watershed and link them to environmental stressors is encouraging. This approach is scientifically sound and helps to provide a large context for restoration. In its approach to identifying watersheds, we encourage the Council to identify and address any current gaps in its descriptions of environmental stressors. This will not only ensure that

each watershed is properly presented and described, it will also provide clarity as to how additional stressors may impact current and future projects. For example, in Texas, the Council failed to address inadequate flows to estuaries and bays as a significant stressor to the chosen watershed. The Council has done well in looking beyond political boundaries, and many of the projects identified in the proposed FLP appropriately address ecological stressors; however, a broader elaboration of stressors – correctly attributed – in each watershed would be useful for science-based decision-making for future projects, as well as assist in monitoring and evaluation efforts.

We appreciate the Council's approach to monitoring and evaluation, and look forward to seeing greater detail about the Council's approach to long-term monitoring and accountability. Monitoring the success and impact of each project is critical to ensure that we have a record over time of what works, as well as what we've accomplished in strengthening the health of the Gulf. The ability to evaluate our progress in our restoration goals is essential to making good (and better) decisions about our restoration and funding opportunities. Additionally, while monitoring and assessments are important to individual project outcomes, the agencies and organizations receiving monies should also be held to an accountability matrix for their implementation outcomes. This will help ensure that any agency, organization, or contracted individual receiving restoration monies will be responsible for providing scientifically-sound rationales for their outcomes, as well as safeguard against repeated impropriety by those that are tasked to implement these projects.

We are encouraged by the Council's inclusion of the Conservation Corps Program. Education, outreach, and job training of young persons, disadvantaged local residents, and veterans in restoration and conservation activities is significant not only for successful conservation and water quality efforts, but also for our communities and our economy. While supportive of this initiative, we urge the Council to conduct an assessment of the locations, entities, and project types in which the Conservation Corps Program could be utilized. The assessment should ensure that the program coordinates with existing local workforce programs, educational and community organizations, and connects with the economically and socially disadvantaged populations of the Gulf coast region. Additionally, the assessment should evaluate how Conservation Corps projects will 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. Further, we are heartened to see tribal youth as one of the primary populations engaged; however, we advise the Council to broaden their definition of tribes to include those that are state recognized. As all five Gulf States are

home to state-recognized tribes, their official inclusion in this component of the project would provide an important opportunity for these communities.

We also encourage the Council to finalize a strong rule creating the necessary incentives for contractors and grant recipients for Council funded projects and programs to hire local workers, implement on-the-job training, workforce intermediary support services and coordinate and partner with local workforce institutions.

Finally, we appreciate the Council and staff's openness to meeting with us and our partners throughout this process. As the Council finalizes the FPL, we encourage the Council to conduct a formal review of this initial FPL process from cradle to grave. In this evaluation, we encourage the Council to seek assessments of the overall procedure from within their agencies and executive staff, but also to invite the interested public to formally participate in this process. By including the public, particularly those who have been a part of the process from the very beginning, the Council can ensure that a truly 360-degree review and evaluation of the FPL is taken into consideration for the future. As a suggested example, the Council could create a series of questions in survey form that speak to particular public aspects of the initial FPL process, with room for additional comment. This survey could be sent directly to all current and past participants and those that submitted or signed onto comments throughout the FPL process.

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. Allowing the public an opportunity to participate will give decision-makers a better understanding of the environmental, cultural assets, and challenges in a community, and provides a solid foundation for cooperation and support for current and future restoration plans and programs.

In conclusion, this initial FPL represents a significant stride for Gulf restoration – its planning and implementation. We acknowledge and appreciate the substantial amount of work Council members, agency and executive staff, and the public put into the draft FPL. The Council has the opportunity to build on this achievement by updating the Comprehensive Plan, which will serve as a roadmap to guide its work in a direction that will provide the greatest measurable benefit to our natural resources. 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,

Roberta Avila, Steps Coalition
Jackie Antalán, Operation HomeCare
Stephen Bradberry, Alliance Institute
Hank Caddell, Alabama Coastal Heritage Trust
Carol Adams-Davis, Mobile Bay Sierra Club
Meredith Dowling, SouthWings
Walter Ernest, Pelican Coast Conservancy
Sharon Gauthe, BISCO
Mary Gueniot Biegler, Bayou Grace Community Services
Mary Gutierrez, Earth Ethics
Michele Harmon, Alabama Coast United
Rosa Herrin, Oxfam America
John Hosey, The Corps Network
Daniel Le, Boat People SOS
Cindy Lowry, Alabama Rivers Alliance
Woody Martin, Sierra Club - Delta Chapter of Louisiana
Stephanie Montalvo, Brighter Future Foundation
Marylee Orr, Louisiana Environmental Action Network
Paul Orr, Lower Mississippi Riverkeeper
Colette Pichon Battle, Gulf Coast Center for Law and Policy
Cyn Sarthou, Gulf Restoration Network
Louis Skrmetta, Gulf Islands Conservancy
Mickey Sou, Asian Americans for Change
Sharron Stewart, Galveston Baykeeper
Dan Tonsmeire, Apalachicola Riverkeeper
David Underhill, Sierra Club Alabama
Christian Wagley, Pensacola Community Action Network
Dean Wilson, Atchafalaya Basinkeeper