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C/O Melanie Green
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Via email: mgreen@mdeq.ms.gov

Re: Healthy Gulf Comments on RESTORE Act Direct Component Multiyear Plan

Dear Chris:

In light of the most recent water quality disaster on the Mississippi Coast that happened in the summer of 2019 and kept beaches closed until October, the state of Mississippi should direct as much of its Direct Component project funds as possible to solving water quality problems or researching/repairing the damage to natural resources on the Coast.

The Bonnet Carre Spillway opening for over 120 days was devastating to marine mammals, turtles, oysters, other fisheries and to tourism. For the second time in ten years, the Mississippi Sound and its associated bays and estuaries have proved vulnerable to events with a small probability of occurrence but a very large detrimental impact. And like the environmental effects of the BP oil spill, the Spillway opening was a shock to the economy of the coast and South Mississippi, and inflicted damages on the seafood industry that will take years to repair.

No matter what the rules allow for the various buckets or pots of Restore Act money, (penalties, fines or lawsuit damage proceeds) the state's application of this money to activities that don't either repair the damage to the environment (on which so much of the rest of the local economy depends), or work toward future resilience to environmental damage is bad practice, and deserves criticism.

When there remains so much work to do to improve water quality, evaluate resource damage from the most recent water quality disaster, and try and rebuild the seafood industry, projects like 28, 29,30,32 and 33 look misguided and reveal the state as continuing to suffer from tone-deafness. The state looks particularly irresponsible spending money to build roads with restoration money. Building infrastructure at state parks and marinas is less objectionable, but the state could do better.

There are three projects that support restoration, or research into natural resources, 12(Water Quality), 13 (Oysters), and 31(Seafood safety). Four projects don't do very much for natural resources or are designed to pay for infrastructure 28(State Park), 29(Marina), 30(Moss Point Road building) and 32(Community College Emerging Technologies). One project 33(Ocean Engineering and Entrepreneurship) is described so vaguely that it is impossible to tell whether it will support restoration or not.

The "score", as I see it, is 3 appropriate projects, 4 inappropriate projects and 1 that could go either way. (3:4:1). This is a lower percentage of inappropriate projects than in the last MIP I commented on, but in light of the continuing need for restoration and repair, the vulnerability of our marine resources and seafood industry as illustrated by the huge water quality disaster in the Sound in 2019, the state should focus more on restoration.

This is true even in Bucket 1 and other spending categories where the state has leeway to pursue economic development. Mississippi, the "birthplace of America's music" doesn't mind appearing to be tone deaf when it comes to spending the BP oil spill disaster funds. The poster-child for this proposition remains the Biloxi Shuckers minor league baseball stadium that is as likely to be a fiscal albatross around the City's neck as it is to be an asset. The jury is still out on Governor Bryant spending BP money on this stadium several years after the first pitch was thrown. Minor league baseball teams don't qualify as restoration.

The Planning grant (11) will support MDEQ staff in the Office of Restoration and support other agency work in administering the RESTORE Act funds. This is similar to an "overhead" charge or built in management fee in a grant. I think everyone understands that the Mississippi Legislature has not helped fund MDEQ staff positions and so the use of RESTORE planning funds is acceptable if there is to be an adequately staffed Office of Restoration to administer the BP disaster funds for the state.

Next year, maybe the state can even-up the count to 4:4 on the appropriate projects versus the infrastructure and road-building. We will continue to watch and review the situation.

Thank you for the opportunity to provide comments.

Sincerely,

Andrew Whitehurst, water program director, Healthy Gulf