

US EPA ARCHIVE DOCUMENT

Gulf of Mexico Regional Ecosystem Restoration Strategy

Response to Public Input



Gulf Coast Ecosystem Restoration Task Force
December 2011

Nothing in this document is intended to create private rights of action or other enforceable individual legal rights.

Table of Contents

Introduction.....1

Public Feedback Process1

Structure of the Response to Public Input on the Preliminary Strategy3

Restore and Conserve Habitat.....4

Habitat Restoration Priorities and Projects 4

Collaboration on Restoration Knowledge and Efforts 6

Barriers to Habitat Restoration 7

Federal Water Resource Project Principles and Guidelines..... 7

Policy..... 8

Land Acquisition/Protection..... 8

Conservation Coordination With Mexico..... 9

Coastal Restoration and Bird Population Recovery 9

Inclusion of Additional Habitat Restoration Recommendations 10

Barrier Island Restoration and Beach Renourishment..... 10

Restore Water Quality.....11

Replenish Living Coastal and Marine Resources13

Enhance Community Resiliency17

Coastal Improvement Programs 18

Analytical Support Tools for Community Planning, Risk Assessment and Smart Growth..... 18

Environmental Stewardship Through Environmental Education and Outreach..... 19

Science/Adaptive Management.....20

Next Steps21

Implementation Plan 21

Performance Measures and Milestones 22

Science Support of the Implementation Plan 22

Implementation Funding..... 23

Developing and Expanding Partnerships Going Forward 23

State Input24
General 24
Florida 25
Louisiana 30
Mississippi 33

Economic Recovery.....33

Human Health35

Public Engagement and Citizens Advisory Committee.....37

Introduction

On October 5, 2010, President Barack Obama issued Executive Order 13554 establishing the Gulf Coast Ecosystem Restoration Task Force. The Executive Order identifies the Gulf of Mexico as a “national treasure” and establishes the Task Force to “coordinate intergovernmental responsibilities, planning, and exchange of information so as to better implement Gulf Coast ecosystem restoration and to facilitate appropriate accountability and support throughout the restoration process.”

The purpose of the Executive Order is to “...address the longstanding ecological decline ... [of the Gulf Coast ecosystem to] support economic vitality, enhance human health and safety, protect infrastructure, enable communities to better withstand impact from storms and climate change, sustain safe seafood and clean water, provide recreational and cultural opportunities, protect and preserve sites that are of historical and cultural significance, and contribute to the overall resilience of our coastal communities and Nation.”

The Executive Order established the framework for the five Gulf states and the federal government to create a unified strategic approach to restore the Gulf of Mexico regional ecosystem. This framework—the Gulf Coast Ecosystem Restoration Task Force—provides the basis for the partnerships necessary to implement priority actions. The *Gulf of Mexico Regional Ecosystem Restoration Strategy*, delivered to President Obama on December 2, 2011, lays out an overarching vision for ecosystem restoration and serves as the foundation for implementing activities that will advance new and ongoing efforts aimed at restoring the Gulf Coast ecosystem.

In developing the Strategy, the Task Force worked with local partners, scientists, tribes and members of the public to identify four broad goals to facilitate long-term restoration: restore and conserve habitat, restore water quality, replenish and protect living coastal and marine resources, and enhance community resilience. It is the first time ever that the five Gulf states and the federal government have agreed on a unified strategic approach to addressing the problems in the Gulf.

Public Feedback Process

The development of the Strategy relied heavily on public review and input. During the course of a nine-month period, the Task Force met in each of the five Gulf states, beginning in Pensacola, Florida, on November 8, 2010, and ending in Biloxi, Mississippi, on August 30, 2011. Each Task Force meeting included public listening sessions to gather

valuable individual input from those most connected to the Gulf. Initially, the Task Force designed sessions to generate discussion on specific ecosystem restoration focus areas, and to gather individual ideas and opinions from particular stakeholder groups, including local governments, business and industry, academics and nongovernmental organizations (NGOs). Later Task Force meetings focused on specific aspects of the Strategy and included panel presentations by experts in water quality, community resilience, habitat conservation, public engagement, living coastal and marine resources, and science. In addition to the listening sessions that took place during public meetings, the Task Force held multiple listening sessions throughout the Gulf with partner organizations such as the National Estuary Programs, local government leadership and academic institutions. Public meetings and listening sessions were helpful in affirming proposed focus areas of the Strategy and identifying specific areas of work that needed attention. Once the Task Force completed work on drafting a comprehensive Strategy, it again sought public input.

With the October 2011 release of the Preliminary Gulf of Mexico Ecosystem Restoration Strategy, the Task Force commenced a three-week public feedback period. During this time, the Task Force received more than 300 unique comments from individuals and groups who reviewed the Strategy and provided their input. Overwhelmingly, those who provided feedback were enthusiastic about, and supportive of, the Preliminary Strategy, recognizing the need for such an effort and applauding the commitment that the Task Force's Preliminary Strategy represents. Many supported the four main restoration goals identified by the Task Force in the Preliminary Strategy. The Task Force also received feedback that the Preliminary Strategy needed to include greater detail and specificity, with actionable goals and milestones that can be carried out during implementation. The Task Force heard from life-long residents of the Gulf Coast, as well as individuals who visit the Gulf Coast only on occasion; several discussed the value of the Gulf Coast to them personally, as well as to the nation and world. The Task Force also appreciated the comments from a variety of organizations that work on Gulf issues and from advisory groups, such as the U.S. Environmental Protection Agency's (EPA's) Local Government Advisory Committee, which organized internally to specifically respond to Task Force initiatives. A complete set of the comments received are available via the electronic docket (docket number EPA-HQ-OA-2011-0798) at <http://www.regulations.gov> or EPA's Docket Center in Washington, DC.

The Task Force considered the public feedback provided as it created the final Strategy document. Rather than respond to every individual comment, the Task Force opted to group comments by area of particular significance and to respond collectively to each group of comments. The summary below provides an overview of the types of comments that the Task Force received, as well as responses to key groups of comments.

General Note: Many of the comments received from public input identified incredibly valuable ideas, projects and plans. As the Task Force moves forward in developing an implementation plan for the Strategy, it will turn to these ideas for guidance.

Structure of the Response to Public Input on the Preliminary Strategy

The comments track the structure of the Strategy. Comments are grouped according to four main goals, as follows:

- ◆ **Restore and Conserve Habitat**
- ◆ **Restore Water Quality**
- ◆ **Replenish and Protect Living Coastal and Marine Resources**
- ◆ **Enhance Community Resilience**

Additionally, comments are grouped according to the needs for implementation of Strategy priorities:

- ◆ **Science and Adaptive Management**
- ◆ **Next Steps (Including Funding, Implementation, Decision-Making Body, Milestones and Partnerships)**

Comments were collected for each of the Gulf states:

- ◆ **Alabama**
- ◆ **Florida**
- ◆ **Louisiana**
- ◆ **Mississippi**
- ◆ **Texas**

Other issues include:

- ◆ **Economic Recovery**

- ◆ **Human Health**
- ◆ **Public Engagement and Citizen’s Advisory Committee**

Restore and Conserve Habitat

Habitat Restoration Priorities and Projects

Comment: The Strategy includes habitat restoration as a major goal to restore the Gulf Coast’s ecosystem. The Strategy also supports prioritizing ecosystem restoration by ensuring that social, environmental and economic outcomes are fully considered in all river management decisions by placing these matters on equal footing with other priorities, such as navigation and flood damage risk reduction. The Strategy should further emphasize the importance of what the natural resources of the river bring to the local and state economies, as well as what benefits navigation provides to the local and national economies.

Response: The Strategy recognizes the importance of a healthy, resilient and sustainable Gulf ecosystem; the importance of the habitats supporting this ecosystem; and the threats to the sustainability and resilience of this ecosystem. These challenges include habitat loss from increased development and poor resource management, alterations to hydrology and sediment transport, land subsidence, erosion, sea-level rise, hurricanes, and tropical storms. Unless the anthropogenic (or unnatural) stressors that impact the Gulf’s coastal habitat are halted and reversed, the rapid rate of coastal land and habitat loss in the region will continue, causing this ecosystem to collapse. This collapse would yield negative consequences to marine and terrestrial environments, national commerce, maritime industry, energy security, fisheries and the rich cultural legacy of the Gulf Coast region.

The Strategy states that “key ecosystem functions can be protected and enhanced by reconnecting rivers with their deltaic plains and managing or reestablishing freshwater and sediment inflow” and that this approach would “help ensure that these areas are managed for maximum benefit to both the natural and human systems of the region.” This is further emphasized by the Strategy’s recommendation to prioritize ecosystem restoration by ensuring that environmental outcomes are considered in river management decisions and are given equal footing with other priorities.

The Strategy acknowledges the importance of the coastal natural resources to approximately 10 million people who live along the Gulf Coast. These communities also

need to be protected by the impacts of floods and storms. The needs of the Gulf Coast communities are a high priority for the Task Force. Along with recognizing the importance of restoring coastal habitats, the Strategy also understands the importance of navigation to the local and national economy and security and seeks a balance moving forward with ecosystem restoration priorities.

River management decisions must consider ecosystem restoration as well as flood damage reduction, navigation and other water resource needs. This modern approach to the management of rivers systems is critical to ensuring holistic solutions. Reconnecting rivers with their deltaic plains, managing sediment and freshwater inflows while still allowing flood damage risk reduction, and considering navigation and other economic activities when making decisions are all factors in sustainable river management.

As the Strategy is advanced, these factors will be considered; and milestones should be developed and presented in an implementation plan.

Comment: The Strategy needs to better address problems and ecosystem functions associated with the rivers draining into the Gulf. To address many of these issues, the Strategy should emphasize large-scale natural processes.

Response: Sediment is the lifeblood of many of the Gulf's coastal habitats (e.g., wetlands, barrier islands, shorelines). Much of the Gulf's coastline was formed over the course of thousands of years by river processes. However, the Gulf's communities, commerce and ports have long relied on the extensive network of human-made flood damage risk reduction and navigation structures for their existence. Clearly successful in meeting the goals of navigation and flood damage risk reduction, those actions created unintended consequences to the surrounding environment by accelerating wetland and barrier island erosion and restricting the flow of vital sediments that had sustained the Gulf ecosystem.

To achieve ecosystem sustainability and resiliency of these deltaic plains and their habitats, there is a need for freshwater and sediment inflows from the rivers into these habitats. Management of these river systems should incorporate coastal habitats' need to receive sediments and freshwater. Natural river processes of sediment and freshwater distribution should be restored and preserved. In addition, these valuable coastal habitats can be protected and enhanced by reconnecting rivers with their deltaic plains and managing sediment and freshwater inflows, while still allowing flood damage risk reduction, navigation and other economic activities to inform appropriate management actions.

To address the needs of the Gulf’s large-scale natural processes—for example, to restore natural river processes—construction of river reintroduction projects that have been authorized, planned and designed should be expedited.

As the Strategy is advanced, these factors will be considered; and milestones should be developed and presented in an implementation plan.

Comment: Factors such as the effects of climate change; subsidence; past and future development; economic, cultural and subsistence values; and benefits to multiple species should be considered when evaluating longevity of potential and priority of habitat restoration projects. Extensive work has been done to distinguish the sites and resources of central importance, and this work can serve as means for identifying preferred habitat restoration actions. “Legacy projects” throughout the Gulf should be re-evaluated to ensure that these efforts are consistent with the Strategy. Finally, a “design competition” process for an ecosystem restoration project seeking outside input for unique and effective habitat restoration design should be considered.

Response: Foreseeable large-scale environmental changes must be taken into account when making decisions concerning habitat restoration and protection. The effects of climate change, subsidence, and future development are among the stressors that should be considered when evaluating longevity of potential projects. Consideration of these factors is critical when determining habitat restoration investments, particularly when managing a pool of limited resources to maximize benefits to the Gulf’s ecosystem. Developing and implementing projects that may not have a long-term benefit might not be the most effective use of resources. Therefore, these factors should be considered when making project and program investment decisions. “Legacy projects” whose original purpose is no longer relevant, or that are inconsistent with the Strategy’s restoration goals and efforts, should be re-evaluated and analyzed to see if they continue to be economically justified, particularly when they are incompatible with ecosystem restoration efforts. These factors, as well as the suggestion for a design competition, will be considered as the implementation plan for habitat restoration is developed.

Collaboration on Restoration Knowledge and Efforts

Comment: Effective use of existing knowledge and efforts in the Gulf, in particular federal efforts, should be efficiently integrated with efforts of local stakeholders.

Response: Overarching goals for restoration include using existing plans and efforts and obtaining public input. Implementation planning should build on ongoing work within the states, local communities, federal partners, academics and NGOs. Improved

collaboration among state and federal agencies is essential, as these partnerships play an integral role in restoring ecosystem functions throughout the Gulf region. It is important to foster an inclusive dialogue and expand on public-private partnerships in order to achieve ecosystem restoration in the Gulf of Mexico. As the Task Force moves ahead with its implementation planning it will focus on integrating capacities of local stakeholders.

Barriers to Habitat Restoration

Comment: The Strategy does not adequately address the implementation barriers of a restoration agenda.

Response: Evaluating barriers that have hindered the implementation and success of past restoration efforts is a significant step in moving forward. During the development of the Strategy, it was noted that the barriers to habitat restoration often were budgetary constraints of federal, state and local governments, as well as inadequate coordination within and among federal and state agencies. It was also noted that certain policies impeded certain ecosystem restoration efforts. A focus of the Strategy's work going forward will be to identify specific policy and procedural barriers complicating progress on protection, conservation and restoration efforts, as well as identifying ways to overcome these barriers.

Federal Water Resource Project Principles and Guidelines

Comment: The Strategy should reference the forthcoming updated Water Resources Planning Principles and Guidelines. It is the expectation that these Principles and Guidelines will ensure that federal water resources projects protect the public, protect and restore the nation's waters, increase the resiliency of human and natural communities to climate change, and address national priorities.

Response: The Principles and Guidelines are currently being revised by the White House Council on Environmental Quality. The Strategy's proposed ecosystem restoration priorities are intended for application in the Gulf region and not at the national level, as envisioned by the Principles and Guidelines. However, once the Principles and Guidelines are completed, the implementation planning and work supporting the Strategy should be appropriately modified, if necessary, to be consistent.

Policy

Comment: Critical coastal and riverine floodplain areas where additional wetland losses should be prohibited need to be identified, and a moratorium on permitting or implementing additional federal projects that adversely impact wetlands should be established. Within the Gulf (but outside areas identified as critical resource areas), Clean Water Act Section 404 general permits should be eliminated and individual permits required.

Response: The Strategy is designed to help authorized entities (federal, state and local) to better assess, identify and address potentially conflicting policy impacts. Clean Water Act Section 404 permits will likely fall into this assessment process.

Land Acquisition/Protection

Comment: Comments from conservation organizations emphasized the need for land acquisition and private lands conservation easements, as well as acquisition of water rights for wetlands management, to ensure that important coastal habitats are restored, protected and enjoyed for the long term. Land acquisition was identified as an important tool for enhancing community resilience. Engagement with the land trust community and other private land conservation organizations on the Gulf Coast was strongly recommended—specifically with the Land Trust Alliance's Gulf of Mexico Land Conservation Partnership. Acquiring wintering waterfowl habitats on the Texas Mid-Coast and in the Laguna Madre area was highlighted as a priority. Greater specificity in coastal land protection goals and priorities was requested in the ongoing planning process.

Response: Land acquisition and conservation easements should be an important part of Strategy implementation. The Task Force acknowledges that habitats that are currently intact and functioning ecologically have great value for conservation protection. It is much more effective to conserve these areas than to restore habitat that has been degraded or lost. This should involve maintaining working landscapes (e.g., commercial timber operations) and acquiring key parcels that have significant biological or ecological significance to ensure long-term sustainability and resiliency of natural systems and the human communities that depend on them. This work should include ongoing ecosystem-scale planning and working with the federal and state land management agencies, conservation organizations, land trusts and coastal communities to establish priorities and develop funding and long-term management mechanisms.

Conservation Coordination With Mexico

Comment: Expanding the conservation lands network on a landscape scale must consider the strategies and ongoing activities between the United States and the Mexican government. It is imperative that there be collaboration and cooperation with Mexican stakeholders, as the environment does not recognize political boundaries.

Response: The restoration of the Gulf of Mexico should include engagement across international boundaries. The Strategy recommends international engagement and cooperation with Mexico in the Water Quality section. However, the near-term focus of the Strategy was regional in scope, working within the combined authorities of the U.S. government and the five U.S. Gulf states. The coordination with Mexico on shared issues affecting the Gulf should expand as plans and projects are developed that have an international scope and require bi-national engagement for their success. It is further contemplated that a larger international effort involving Cuba and the Caribbean countries would advance addressing the blue water issues that are inexorably connected by these two great marine systems.

Coastal Restoration and Bird Population Recovery

Comment: Bird species along the coast have suffered significant declines and are the icons of the *Deepwater Horizon* oil disaster. The next version of this report needs to include more specific recommendations related to supporting and improving the success of the large number of birds that depend on those same habitats for breeding and wintering.

Response: Bird populations on the Gulf Coast were impacted by the *Deepwater Horizon* oil spill in 2010. This is in addition to the observed decline in migratory bird species over time as habitats have been fragmented, degraded or converted. An important focus of the Strategy is to restore and protect habitats such as coastal forests, prairies, marshes, tidal flats and beaches that are key to the survival of resident and migratory birds. After completion of the Strategy, implementation planning and work should be pursued with specific recommendations and actions to conserve Gulf Coast ecosystems. Bird populations relying on these resources should benefit from enhanced wintering, breeding and stopover habitat as restoration is implemented.

Inclusion of Additional Habitat Restoration Recommendations

Comment: Specific recommendations were offered on barrier island restoration. These included the following: enhance bird use and sea turtle nesting; support hydrologic restoration for forested wetlands, cypress swamps, mangroves and natural sediment recruitment; provide greater buffer areas; reinstate natural sand budget processes for barrier islands; enhance landowners' capability to implement living shorelines; and prevent further wetland losses through stricter Section 404 enforcement.

Response: The comments offer very specific recommendations associated with restoring important coastal habitats and greater protection measures for these areas. The Strategy addresses these comments in the Restore and Conserve Habitat goal section and provides the recommended agenda for moving forward with restoration. With the completion of the Strategy, implementation planning and work should be pursued with recommendations and actions to conserve Gulf Coast ecosystems. Recommendations should include those dealing with restoring barrier islands to benefit birds and other wildlife, protecting and enhancing wetlands, and maintaining natural processes.

Barrier Island Restoration and Beach Renourishment

Comment: Preserving and restoring coastal processes and dynamism is fundamental to restoration; barrier island restoration and beach renourishment must have both economic and ecological benefits. A Gulf municipality requested that beach renourishment and barrier island restoration be elevated to a more prominent level within the Strategy.

Response: The Strategy recognizes the significance of Gulf barrier islands for coastal protection, wildlife habitat and recreation. It is understood that barrier islands migrate, accrete and erode in a dynamic fashion, given the forces of wind, waves and currents. However, barrier islands are eroding at a greater rate than they are accreting. To reverse this trend, the Strategy includes a full set of potential approaches to aid in the protection and restoration of barrier islands, ranging from restoring hydrologic processes so that sediment is available near-shore; supplementing the near-shore sand budget with appropriate material from navigation dredging; and, where practicable, mining sands offshore to renourish Gulf beaches. Barrier island restoration actions should be featured in implementation planning and work to maximize ecological benefits while providing complementary benefits to the communities that make their livelihood from the Gulf.

Restore Water Quality

Comment: Hypoxia is a critical water quality problem, but the Strategy should define the scope of the problem to include the upper watershed and restoration actions that address nutrient inputs from Midwestern states.

Response: The Strategy identifies the control and reduction of hypoxia in the Gulf of Mexico waters as a priority need and recognizes the scope and scale of the issue, including the input of nutrients from the upper basin. The Strategy specifically notes that “...nutrients are carried to the Gulf of Mexico from throughout the entire watershed and upper basin states via the Mississippi and Atchafalaya Rivers.” The Strategy recognizes the significance of effectively managing pollutant loads and specifically calls for building on state water quality programs through the accelerated development of effective state nutrient-reduction frameworks in the Mississippi Atchafalaya River Basin (MARB). The Strategy also outlines actions to increase partnerships throughout the Gulf of Mexico Watershed to address the source of the problem and focus effective restoration solutions. The Gulf of Mexico Hypoxia Task Force is specifically charged with addressing nutrient inputs from the upper watershed, and its membership includes the Midwestern states. As part of this Strategy, the Task Force intends to coordinate with the Hypoxia Task Force as well as the Gulf of Mexico Alliance (GOMA) to integrate technical and resource support, including support for the accelerated development of state nutrient reduction frameworks throughout the watershed.

Comment: The Strategy effectively captures the multiple and interrelated causes of water quality problems in the Gulf, but more emphasis should be placed on problems other than nutrients, such as structural changes to the river system; geophysical changes; pathogens and pollutants carried by stormwater and wastewater; and toxics, including mercury.

Response: The Task Force has received extensive input on the various views on the significance of particular water quality problems. The Strategy details the numerous water quality problems and causes of impairment and notes the interrelated nature of many of these issues: “The condition of the Gulf’s waters reflects alterations in natural hydrology and pollution from urban development, industry, agricultural runoff, atmospheric deposition, and other sources throughout the Gulf watershed.” The Task Force’s next steps should include developing implementation planning and work to prioritize and focus restoration actions to address the multiple problems impacting water quality.

Comment: Recommended actions in the Strategy should explore developing numerical nutrient criteria for each state or a Total Maximum Daily Load (TMDL) for the lower Mississippi River.

Response: The Task Force Strategy recognizes the significance of effectively managing pollutant loads and specifically calls for building on state water quality programs through the development of effective nutrient reduction frameworks. The effective and sustainable way to address such excess nutrient impacts is to collaboratively build on ongoing state and federal efforts and work with states and tribes to strengthen nutrient management programs. The Strategy specifies key elements of such programs, including setting watershed load reduction goals based on the best available water quality information, prioritizing watersheds on a statewide basis for nitrogen and phosphorous loading reductions, ensuring effectiveness of point source permits in targeted/priority watersheds, and conducting annual reporting on load reductions and impacts on targeted watersheds.

Comment: The Strategy should focus more on actions to address the quality and quantity of freshwater flow into estuaries. There is a need to specifically identify the problems resulting from restricted tidal flow. Some of the commenters recommended additional tools to address the problem and pointed to the success of such hydrological restoration projects described in the National Oceanic and Atmospheric Administration (NOAA) document, "Returning the Tide."

Response: The quality and quantity of freshwater flow has been identified as a major action area. The Task Force will consider the recommendations for specific tools to combat this problem and will take them into account when developing the Strategy implementation plans and future work.

Comment: The Strategy includes water quality restoration as a major goal in restoring the Gulf Coast's ecosystem. The Strategy also supports prioritizing ecosystem restoration by ensuring that social, environmental and economic outcomes are fully considered in all implementation efforts.

To be effective, nutrient management efforts must target specific Mississippi River Basin subwatersheds and have locally led input driving them. Even with this targeted approach, such efforts might not be able to achieve the desired result of Gulf

restoration without bolder efforts to fundamentally change agricultural production practices in the Mississippi River Basin and subwatersheds.

Furthermore, any efforts to reduce nonpoint source pollution and nutrient loading must be a part of a comprehensive strategy that includes agriculture production, land use, urban and rural development, and natural changes in ecosystems.

Response: The Strategy recognizes the importance of managing the factors contributing nutrient loads from the Mississippi River Basin into the Gulf of Mexico. The federal government is committed to assisting landowners as they apply the appropriate conservation practices at the right locations to reduce or eliminate agricultural nonpoint source pollution from entering surface and ground water. Through the Mississippi River Basin Healthy Watershed Initiative (MRBI) and other targeted efforts, USDA’s Natural Resources Conservation Service (NRCS) has accelerated voluntary implementation of conservation practices that avoid, control and trap nutrient runoff on private lands. In addition, NRCS and other federal agencies are working to implement a watershed-scale monitoring and evaluation approach to assess conservation effects at the edge-of-field, in-stream, and watershed levels. Additionally, cooperation among federal agencies—NRCS, EPA (319 and National Estuary Programs), NOAA, U.S. Fish and Wildlife Service, U.S. Geological Survey, and the Army Corps of Engineers—will leverage resources for use in targeted watersheds to benefit impaired waters. Continued collaboration with federal, state and local partners will improve water quality, increase wildlife habitat, and maintain the agricultural productivity of working lands in the Mississippi River Basin while improving ecosystem health in the Gulf of Mexico.

The Task Force recognizes that a holistic approach to ecosystem restoration is needed for nutrient management planning for agricultural production in the Gulf area. As the Strategy is advanced, these factors will be considered; and milestones should be developed as part of implementation planning and future work.

Replenish Living Coastal and Marine Resources

Comment: The recommended actions under the Replenish and Protect Living Coastal and Marine Resources goal do not go far enough to restore the overall health of the ecosystem and fishing communities. The Strategy should be more specific in recommending actions to address longstanding management problems.

Response: As with all the goals listed in the Strategy, the Replenish and Protect Living Coastal and Marine Resources section identifies actions that support overall ecosystem restoration. Next, the Task Force will undertake implementation planning and work that should present more specific actions, and milestones for restoration priorities. Also, the Strategy contemplates addressing bycatch and regulatory discards.

Comment: While an ecosystem approach to resource management is a good idea, it will require significant funding. Marine wildlife agencies throughout the Gulf area are often lacking essential biological and ecological information for many wildlife species, hampering efforts to take informed and coordinated conservation actions to restore vulnerable, rare or threatened populations on a Gulf-wide scale. Sustained tracking of indicator species and building long-term datasets are essential to helping resource managers recognize and understand current and future trends and impacts to the ecosystem.

Response: The Science-Based Adaptive Management section of the Strategy discusses the importance of establishing a science-based framework for long-term ecosystem restoration. Identifying the best available science and scientific practices for ecosystem restoration will require significant resources. To that end, the Strategy reiterates recommendations made by Secretary of the Navy Ray Mabus in *America's Gulf Coast: A Long Term Recovery Plan after the Deepwater Horizon Oil Spill* (September 2010) to dedicate a significant portion of the eventual Clean Water Act civil penalties resulting from the *Deepwater Horizon* oil spill, in addition to current funding for Gulf programs, to Gulf recovery.

Comment: The total damage to the Gulf of Mexico ecosystem from the oil spill and response efforts is not yet known. Therefore, the Task Force should continue to study the effects of the oil spill and response on the Gulf ecosystem and wildlife and remain flexible in implementing measures to address these impacts.

Response: The Strategy is founded on the principle of taking a holistic, ecosystem approach to restoring the Gulf of Mexico, including considering the consequences of the *Deepwater Horizon* oil spill and the effects on biology and the communities that rely on these resources. In addition to the 10-year independent science effort initiated by BP in 2010 (i.e., Gulf Research Initiative), there are many study efforts supported by the major resource and science agencies to help determine the long-term effects of the oil spill. The Strategy implementation will be informed by these efforts over time to ensure close and effective integration with the adaptive management science program that will support ongoing restoration efforts.

Comment: The Strategy needs to more fully reflect the economic impact from eco-tourism activities like bird watching as an impetus to restore and protect living coastal and marine resources.

Response: The Task Force recognizes the relationship between restoring the Gulf of Mexico ecosystem and enhancing local and regional economic opportunities. By restoring the ecosystem, the region will see increased opportunities for ecotourism activities and increase the cultural and social values and benefits of recovering wildlife.

Comment: The Task Force should support reactivating the Site Evaluation List, repealing the de facto moratorium on new national marine sanctuary sites, and creating a network of Marine Protected Areas (MPAs) throughout the Gulf, as appropriate and essential components of the overall restoration strategy for the Gulf of Mexico. A network of MPAs will mitigate the impact of oil, sediment and nutrient pollution and will accelerate the restoration of ecosystem health by fostering resilience in the Gulf of Mexico's marine ecosystems and enabling them to better withstand and recover from disturbance over time.

Response: By making "conserve and protect offshore environments" a major action, the Task Force clearly highlighted that "protecting and managing a network of ecologically significant offshore sites will be important to the Gulf's overall biological productivity and resilience." Implementation planning and future actions will consider and prioritize actions to address the significant issues in this area.

Comment: MPAs such as national marine sanctuaries have been conclusively shown to improve the health of ocean ecosystems both within and beyond their boundaries. The establishment of properly designed and managed MPAs is wholly consistent with the Task Force's foundational elements and will help achieve its overarching restoration goals. Further, individual MPA sites linked in an ecological network and managed at multiple spatial scales will enhance ecological resilience across far broader areas.

Response: Through the Conserve and Protect Offshore Environments action, the Task Force clearly highlighted that "protecting and managing a network of ecologically significant offshore sites will be important to the Gulf's overall biological productivity and resilience." The Strategy is founded on the restoration of the Gulf of Mexico ecosystem, which, by definition, incorporates the concept of system interconnectivity.

Comment: The Strategy has not given appropriate attention to restoring and protecting offshore habitats. Locations of many of the Gulf’s ecologically significant, hard-bottom structures have been known for almost 30 years, and specific candidates for offshore conservation and protection have been clearly identified by the Task Force itself. It is counterintuitive for the Task Force to identify candidate areas while simultaneously recommending a resource-intensive mapping and exploration enterprise that could take years to complete. A comprehensive analysis is not necessary to identify candidate locations for offshore protection in the Gulf of Mexico—many are already well known to scientists, fishermen and state and federal authorities.

Response: The Next Steps section of the Strategy discusses how the Task Force intends to establish mechanisms in the near term to facilitate more efficient development and implementation of restoration projects. These efforts should enhance coordination, prioritize ecosystem restoration actions, facilitate leveraging of funds, and improve restoration permitting and regulatory review of the programs supporting the Strategy.

Comment: The restoration of the oyster reefs as a “living shoreline” may need to be demonstrated. Recent efforts to do this in the Barataria region of Louisiana have met with limited success. Selecting the appropriate location is as important to ecological success as the effort and expense of placing the reefs.

Response: Part of the Task Force recommendation concerning using living shorelines for shoreline stabilization acknowledges that efforts should focus on areas where success is likely.

Comment: Artificial reefs can provide a valuable addition to the suite of restoration tools used by the Strategy. While some programs have a proven value (e.g., “Rigs-to-Reefs”), the Strategy should emphasize a purposeful examination of artificial reef design, deployment and implementation specifically directed toward providing managers with the information needed to include artificial reefs in fishery management.

Response: The Strategy contemplates the use of artificial reef constructs as a means to restore and protect coastal environments and resources, where determined appropriate with the supporting science. Implementation planning should consider a variety of actions related to artificial reef design, deployment and implementation, being mindful of the need to provide resource managers with the information necessary for including artificial reefs in fishery management strategies.

Comment: Aquaculture of key coastal and marine species can be employed to restore fisheries through restocking, and to restore economic vitality through technology transfer and stimulation of small businesses, resulting in job creation. This effort should be highly collaborative, involving institutions in all five Gulf states, as well as other national and international institutions (both public and private) with significant hatchery technologies.

Response: The Task Force recognizes the use of aquaculture capabilities in the Gulf of Mexico as a potential mechanism to help recover coastal living resources; however, given the current state of knowledge, replenishment of living offshore resources through the use of aquaculture and hatcheries needs further scientific evaluation to validate the efficacy as a stock enhancement protocol. Implementation planning should address specific actions to accomplish these restoration goals.

Enhance Community Resiliency

Comment(s): Several comments noted the interconnectivity between the ecological health of the Gulf and the viability of coastal communities, both in terms of resilience and economic prosperity. In this regard, there was support expressed for Strategy recommendations to consider ecological benefits on an equal footing with navigation and flood control as well as protecting fish and wildlife as important factors that benefit human communities and support regional (and national) economies. Several comments spoke to growth and development along the coast and the need to ensure that growth is compatible with ecosystem restoration.

Response: The Strategy recognizes that specific decisions about community development are determined at the local level. The Strategy contemplates making decision-support tools available to help communities make decisions that allow growth while supporting ecosystem integrity, and that reduce risks associated with storms and sea-level rise. As the Task Force moves into Strategy implementation, it will be looking for opportunities to partner with nonprofit organizations, private sector representatives and academic institutions to develop and support improved decision-support tools for local governments and their communities, building on existing efforts throughout the Gulf region.

Coastal Improvement Programs

Comment: The current and historical land loss in coastal Louisiana is an emergency situation; there is an urgent need for action to address this.

Response: The Strategy notes in several places the current crisis situation facing Louisiana in terms of its rate of land loss and contemplates a state/federal partnership to help expedite implementation of mutual priorities in the Louisiana State Master Plan update, scheduled to be completed in December 2012. Of specific note is the Strategy's recommended action to develop alternative implementation processes for coastal improvement projects that can be responsive to emergency needs of Gulf communities. Similarly, the Strategy's recommended actions related to Mississippi River management and wise use of sediments are anticipated to address Louisiana land loss. More specific activities, including suggested process improvements and permitting efficiencies, are anticipated in the context of developing Strategy implementation to help better meet the urgency of this issue.

Comment: Several comments referenced coastal improvement programs and identified the need to address risk reduction and ecosystem restoration at the local level.

Response: The Strategy recommends that Gulf Coast states build on or create comprehensive, scientifically based and stakeholder-driven coastal improvement programs that would incorporate a range of federal and state coastal improvement and restoration programs. The Task Force has suggested the Mississippi Coastal Improvement Program (MsCIP) as a model framework/process for achieving restoration at the local, state and regional ecosystem levels. Given the wide range of options for addressing coastal improvements and restoration, developing a local, regional and state approach to coastal improvement planning, such as the MsCIP, allows for full consideration of local input and a means to address a variety of projects (both structural and non-structural) to reflect differing situations. Similarly, locally driven restoration program development allows for focused consideration of vulnerable populations, communities and cultures. The Task Force intends to continue finding ways to address ecosystem restoration at the local level as it develops implementation planning.

Analytical Support Tools for Community Planning, Risk Assessment and Smart Growth

Comment: The public comments received voiced strong support from individuals and organizations for developing and making available analytical tools to help communities

better plan for and respond to changes associated with living along the coast, for example, by mitigating storm impacts, climate change and sea-level rise; protecting wetlands; and improving community resiliency.

Response: Many organizations indicated willingness to work with the Task Force to build on existing decision-support tools that help community leaders better evaluate options and tradeoffs associated with policy decisions. The Task Force intends to use the suggestions and recommendations provided through public input to develop more specific plans to accomplish the Strategy-recommended actions in this area.

Additionally, public comments raised the issue of climate change and sea-level rise as serious problems impacting the long-term sustainability of Gulf Coast communities and pointed to the need for additional leadership and potential policy changes in this area (such as exploring a more comprehensive way to facilitate management of increasing water levels and storm surge elevations while minimizing loss of infrastructure). In this era of budget constraints, it is essential that federal and state agencies, nonprofits, academic institutions, and the private sector work together to better coordinate and leverage activities that can benefit communities and their decision-makers. There is considerable work going on within the federal government and in states to address climate adaptation and sea-level rise issues. The Task Force intends to develop implementation planning that should address coordinating current work on analytical tool development and deployment and identifying opportunities for future investment and policy review.

Environmental Stewardship Through Environmental Education and Outreach

Comment: There was considerable support expressed for efforts to promote environmental education and outreach activities relating to ecosystem protection. There was a specific suggestion to include education and outreach actions in each of the Strategy's four goals and to consider a fifth goal, "Enhance Environmental Education and Outreach." Several organizations and individuals offered suggestions for partnering opportunities and recommended specific focus areas for this effort.

Response: The four-goal structure of the Strategy was developed after careful discussion and deliberation by the Task Force. The Community Resilience goal highlights the connectedness of ecosystem restoration with the well-being of coastal communities and the people living there. Additionally, it identifies opportunities to address information, capacity-building and education needs, such as technical assistance to help assess risks and plan for and respond to natural disasters; consideration of sustainable development approaches; and environmental education and outreach. As a key component of enhancing community resiliency, the Task Force has included the specific

action focused on enhancing environmental education and outreach. Like community resilience, environmental education permeates each of the Strategy goals and is a necessary component to achieving stated objectives under each of these categories. As it develops implementation plans, the Task Force intends to work closely with GOMA, other community-oriented organizations and the private sector to develop long-term programs that engage citizens in environmental restoration and increase public understanding and appreciation of the natural systems on which they depend. The Task Force envisions that these plans will directly or indirectly support each of the Strategy goal areas. The Task Force also intends to develop outreach efforts that involve working closely with non-English speaking communities to ascertain and help address language barrier issues.

Science/Adaptive Management

Comment: The principles of adaptive management should be used to promote learning and to refine management and restoration approaches.

Response: The Executive Order creating the Task Force highlighted the critical need to ensure that restoration efforts have a robust scientific foundation. The need for science to support restoration and conservation is readily apparent, both at a whole ecosystem level and the project-specific level, as highlighted throughout many of the actions previously described in the Strategy. However, many elements of the Gulf ecosystem are rapidly declining and cannot wait for exhaustive scientific certainty; they demand immediate action. A process is therefore needed that allows for many restoration efforts to move ahead in a scientifically defensible manner, which will increase the fundamental scientific certainty necessary for successful restoration on larger scales. This process would also determine the efficacy of the restoration actions through a focused effort of monitoring, modeling and research to support effective management and decision-making.

Adaptive management is a process of learning by doing, wherein flexibility is built into projects, and actions can be changed based on their progress toward a defined end state. It is the intent of the Task Force to promote developing and using an effective adaptive management approach in preparing implementation plans.

Comment: Monitoring is a critical element for successful restoration. A national science plan for coordinated science and monitoring is recommended.

Response: The Strategy addresses research and monitoring in the Gulf of Mexico in the Science-Based Adaptive Management section. The scientific efforts in the Strategy are intended to support the restoration efforts. Given the complexities of the Gulf of Mexico ecosystem, a broad understanding of the ecosystem is critical to fully assessing the impact of Gulf-wide restoration.

Comment: Several commenters stated that the Strategy document needs to focus more explicitly on restoration as part of the oil spill response.

Response: Restoration from the *Deepwater Horizon* oil spill is currently being conducted through the Natural Resource Damage Assessment (NRDA) process. The Task Force is charged with addressing the long-standing ecological decline of the Gulf of Mexico beyond the oil spill. There is coordination between the Task Force effort and the NRDA process.

Comment: There should be greater inclusion of ecosystem service valuation, as well as greater integration of fisheries socioeconomic data.

Response: Ecosystem service valuation and socioeconomic data are important components of restoration planning. As such, ecosystem service valuation is addressed as part of the Science-Based Adaptive Management discussion. Additionally, fisheries monitoring data would benefit from the inclusion/increased collection of relevant socioeconomic data.

Next Steps

Implementation Plan

Comment: The Task Force should move ahead as quickly as possible with the development of the supporting implementation plan called for in the Strategy.

Response: The Task Force uniformly shares the public’s desire to move as quickly as possible to implementation planning and begin work to address the critical needs of the Gulf. It was recognized from the outset that this effort would need to be undertaken in two steps to be effective: first, identify and achieve broad public concurrence and support for taking aggressive action to address a focused set of restoration priorities; second, establish, through the implementation planning, the underlying accountability framework needed to ensure integrated and effective action going forward. The collective feedback provided during the many public listening sessions held over the past year, coupled with the inputs provided through this public input process, confirm broad support for the Strategy as outlined. Consequently, the Task Force will move forward with the supporting implementation planning.

Performance Measures and Milestones

Comment: A number of commenters expressed concerns that the Strategy currently does not contain the measures needed to support establishing the pace of steps going forward or the ability to gauge progress toward accountable outcomes and outputs.

Response: The Task Force set out to achieve broad concurrence on the Strategy’s priorities as the foundation for guiding the subsequent development of implementation planning, including milestones. The Task Force believes that the comments received through this public input process demonstrate the wisdom of investing additional time to expand the development of the appropriate milestones that are not simply gauged on the investments of the government sector. By way of example, the nongovernmental groups throughout the region provided a wealth of emerging opportunities to leverage their implementing capacities in conjunction with that of the public sector. The Task Force intends to assess how these partnerships could be used.

Science Support of the Implementation Plan

Comment: Science should be effectively employed in support of any implementation plans.

Response: The Strategy highlights the need to build out and support the science required to help inform the Strategy’s future investments. This will be accomplished by developing an adaptive management framework necessary to help inform all aspects of the Strategy, including implementing planning activities. The Strategy recognizes that building this capacity will take time and will require the collaborative integration of both technical and operational resources Gulf-wide, including governmental, nongovernmental and private organizations. The Task Force intends to identify and

secure broad collaboration among the entities possessing these capabilities and obtain their commitment to help support this effort.

Implementation Funding

Comment: The Strategy does not identify immediate and long-term funding sources that will be needed for successful implementation.

Response: The Task Force has established a three-pronged approach to putting Strategy implementation on the best possible resource footing within the current fiscal climate. The first step will be to comply with the direction outlined in the President’s Executive Order related to aligning existing federal authorities in support of implementing the Strategy. Given the scope, scale and duration of the actions to be addressed, the improved alignment of intergovernmental authorities will be key to providing the long-term resource support needed for Strategy implementation. Second, the Task Force will work to ensure that the Strategy has the appropriate substance and structure to help better align and leverage the strategic application of resources that may become available through current and/or evolving coastal restoration authorities (e.g., potential portion of Clean Water Act penalties in response to the *Deepwater Horizon* oil spill; Gulf of Mexico Energy Security Act [GOMESA] funds). Finally, the Task Force seeks to identify and secure broader public–private partnership implementation support. This will involve exploring opportunities to partner with the broad array of capable private sector and nonprofit organizations in the Gulf region that stand to benefit from restoration projects. Effective partnering offers state and federal governments (as well as private sector partners) the ability to leverage funds for projects whereby both the public and industry interests are jointly served. Given the obvious need to act expeditiously to implement the Strategy, the Task Force will establish and leverage early opportunities where they are readily feasible and practicable.

Developing and Expanding Partnerships Going Forward

Comment: A number of commenters identified either their own organizational implementation support capabilities or those of others as important to consider engaging in the implementation of the Strategy.

Response: The maximum possible integration and engagement of the region’s combined partnership capacities is essential for the successful implementation of the Strategy. The commenters’ identification of interested partner organizations should be a key resource guide throughout implementation planning to both help expand existing partnerships and develop those needed to most effectively engage in Strategy implementation activities.

State Input

General

Comment: A comprehensive and holistic approach to ecosystem restoration for the Gulf of Mexico should include projects that span state boundaries and require coordination across the states. Additionally, the state priorities outlined in the appendices should be consistent with the goals and actions laid out in the Strategy.

Response: The Task Force recognizes the interconnectedness of the Gulf of Mexico ecosystem and the communities it supports. The Strategy sets forth goals and major actions for a comprehensive approach to ecosystem restoration. While effective ecosystem restoration will transcend state boundaries, a regional Strategy should be supported by state-specific efforts and perspectives. The five Gulf Coast states are key leaders in the restoration of the Gulf of Mexico ecosystem. Using the goals and major actions laid out in the Strategy as a guide, each state has developed its appendix to highlight the ongoing activities and priorities in the state. Introductory language has been added to Appendix B to clarify the relationship of the state appendices to the overall Strategy document.

Comment: Each state should make avian monitoring, protection and conservation a priority in the Gulf Coast regional restoration process as part of the Conserve Habitat and Protect and Replenish Living Coastal and Marine Resources goals. Select locations should be designated as sentinel sites under the Restoration Strategy, and regional sentinel avian species at these locations should be identified and monitored both short- and long-term.

Response: Coastal wetland and shoreline habitats are high priorities in the Strategy document. There are a number of actions identified in the Strategy to protect and restore important coastal habitat and living coastal and marine resources. Although the Strategy does not include specific shorebird habitats to acquire and protect, or identify specific species to monitor, the overall Strategy does identify a collaborative process to best identify and protect these resources. These efforts will benefit bird species along the coast.

Florida

Comment: Given the magnitude of the historical changes in Florida's landscape, along with predicted future changes, restoring and improving ecological function should be emphasized. By focusing on ecological function instead of historic water levels, the goal is qualitative rather than quantitative. Creating a higher-quality resource in these areas should serve to meet not only the present and growing demand for water resources, but also the present and growing demands of species in need of conservation.

Response: As mentioned by a speaker during one of the Task Force's Gulf Coast listening sessions, "If you get the water and the land right, the species and ecosystem will follow." A good example in Florida is the Apalachicola-Chattahoochee-Flint River system. This Gulf Coast watershed drains major areas of Alabama, Georgia and Florida and created a river that once flowed in natural, historic, seasonal and decadal cycles, accommodating an ecologically functional hardwood river bottom forest and tidal estuarine bay system. Although the river forest and bay system is still essentially ecologically intact, major dams, diversions and withdrawals from the river system now significantly compromise the ecological function of these systems and certain key species. Florida has been working for almost two decades to guarantee the reestablishment of the natural, historic flow regime to protect the ecological function and key species of this high-quality natural resource.

Comment: The information on Florida priorities is very general and does not reflect the best science regarding such topics as coastal wetlands and seagrass restoration efforts to date and their successes and failures. There is an obvious emphasis on "fish hatcheries and aquaculture programs for marine species propagation and enhancement" and an obvious bias against management and restoration of existing salt marshes and mangroves, many of which in their existing condition are experiencing "cryptic environmental degradation," in particular, water logging due to impaired tidal influence and natural drainage.

Maintaining or restoring critical habitats in the correct areal extent and in the correct locations are the key to ensuring maintenance of existing and future populations. Scientific support for these actions is not cost-effective. If this document is to be truly based on the best science, recommending methods such as stock enhancement should be removed from the document.

In their place, using hydrologic restoration on a larger scale to overcome both existing cryptic environmental degradation and actual death and loss of tidal marshes and mangrove forests in Florida, in particular, should be emphasized and prioritized. Mapping and identifying sites that would benefit from this extremely cost-effective method of restoration should be a priority under Appendix C. Mapping of habitat types

is mentioned in Table 1 in Appendix C; however, specific mapping and identification of existing, but hydrologically impaired, habitats is not. It should be a priority.

Response: The Strategy is meant to be a general plan that outlines the broad priorities and structure (Science-Based Adaptive Management) that the Task Force will use going forward. The Strategy was not intended to lay out specific projects in its current phase. Taken in its entirety and in the way it was intended, the reference to “fish hatcheries and aquaculture programs” is part of a two-pronged approach to restoring fish and wildlife populations: restoring nursery and fish habitats and enhancing fish populations through stocking actions. The Strategy places prime importance on direct stationary habitat restoration (“Restore and conserve coastal and nearshore habitats”) and indirect dynamic habitat restoration (“Prioritiz[e] watersheds on a statewide basis for nitrogen and phosphorus loading reductions,” “Focus restoration actions in priority watersheds to address excess nutrients in coastal waters and reduce hypoxic conditions,” and “Improve the quality and quantity of freshwater flow into priority estuaries to protect their health and resiliency”). In addition, the Apalachicola, Suwannee, Peace, and Caloosahatchee Rivers and Florida Bay have been prioritized as sites to reestablish historical water flow (quality, quantity, timing and distribution). Finally, Appendix C is a compilation of all the states’ needs. It was discovered that Florida is further along in mapping its habitats than other states; the first objective of the Task Force is to not duplicate effort but to build on existing data.

Comment: Projects that use an ecosystem approach and are based on an understanding of factors that affect: 1) the populations of species; and/or 2) the condition of coastal and marine habitats should be fully supported. Additionally, priority should be given to projects that benefit multiple species or resources.

In April 2011, BP agreed to give funding for early restoration projects to several states affected by the oil spill (including Florida). The Florida Department of Environmental Protection (FDEP) released a draft list of potential early restoration projects. This list includes approximately 20 beach renourishment projects for critically eroded shorelines. The applicable laws and regulations and BP’s early restoration funding agreement clearly limit restoration projects to those projects that respond to damages caused by the oil spill under study. Permissible projects will remedy the damages at the site of impact, or if that is not possible, off site, where the offsite projects are necessary to long-term ecosystem recovery. Here, it does not appear that renourishment projects are designed to respond to injuries arising from the spill. Rather, the projects seem to be based on pre-existing preferences unrelated to damages caused by the spill. Many of the project descriptions contained in the draft list suggest that that the critical erosion at the potential project sites was caused by natural forces and human development, not the spill.

Response: Projects that use an ecosystem approach and are based on an understanding of the factors that affect the populations of species and the condition of coastal and marine habitats are the “backbone of the economic and cultural well-being of the Gulf region.” A major focus of the Strategy is to “restore and conserve coastal and near-shore habitats, with a focus on marshes, mangroves, seagrasses, barrier islands, natural beaches and dunes and coastal forests and prairies” for the purpose of “providing nurseries, food, and habitat to numerous species of commercially and recreationally important finfish and shellfish, as well as migratory birds, and a diverse array of mammals, amphibians and reptiles.”

NRDA is a separate legal process distinct from the Task Force established by President Obama. NRDA trustees will review projects, including any that are aimed at beach renourishment, with the goal of proposing projects that meet the NRDA criteria and the Framework Agreement for early restoration. Trustees will decide, based on the nexus of impacts from the *Deepwater Horizon* oil spill and the type of damage, which projects to move forward for negotiation with BP for early restoration.

Comment: What do you mean, “Florida is the largest ocean-owning state”? Is it the most populous? Does it have the most shoreline? Does it own the most ocean? It certainly isn’t the largest Gulf state in land area.

Response: Florida owns more offshore, submerged, territorial lands than any other state in the contiguous United States, including 770 miles of linear Gulf shoreline, 5,095 miles of tidal shoreline, and, like Texas, three (3) marine leagues or nearly 10 miles of offshore territorial seas.

Comment: Florida has a tidal shoreline of over 5,000 miles and a Gulf Coast population of nearly 8 million. The restoration of the Everglades should be the Task Force’s number one undertaking. The addition of canals and connecting waterways in the Everglades will protect and help revitalize the biodiversity of the region. The next step should be the restoration of Florida’s beaches, since tourism brings in nearly \$63 million in revenue annually.

Response: Restoration of Florida’s Everglades is both a state and national priority. Both Everglades and beach restoration are high state and federal priorities in the Task Force Strategy document. The appropriate federal and state agencies will be developing the actions to further these priority goals through implementation planning.

Comment: The Gulf oil disaster not only has negative impacts on climate change, our water supply and the other living creatures with which we share our environment, but also has had a major effect on Florida’s ecotourism. Businesses such as fisheries, restaurants and hotels have been heavily affected. Jobs have been lost, creating an even greater burden on the government.

Response: The negative environmental and economic effects of the *Deepwater Horizon* oil spill were only the latest in a series of natural and human-made impacts to the Gulf Coast ecosystem and its inhabitants. This is one of the reasons President Obama charged the Task Force with developing a long-range and multipurpose Strategy to address the longstanding ecological decline of the Gulf Coast and focus on recovery and sustainability. The ecosystem restoration goals outlined in this Strategy have been developed to further the environmental and community resource recovery and resiliency necessary for a sustainable future.

Comment: Florida is highly susceptible to environmental damage because it is encompassed by the greatest amount of water. Florida’s economy is at risk because so much of it depends on fishery, tourism, etc.

Response: Florida is truly a “water state,” with some of the most diverse and interdependent ecosystems, economies and way of life dependent on Florida’s multiple water resources. The goals and actions detailed in the Strategy document will go far to better understand, restore and protect these water resources and the ecosystems and economies they support; these goals and actions will be further addressed in implementation planning.

Comment: In Florida, coyotes are not naturally occurring, but they have colonized much of the state. As such, they should be added to the plan’s list of exotic species, especially given the devastating effect they have had for sea turtle and shorebird/seabird populations nesting in Florida’s coastal parks. Coyote control is essential to maintaining and recovering the dwindling populations of beach-dependent birds and nesting marine turtles of the Gulf area. In addition to coyotes, raccoon populations, amplified by several orders of magnitude because of human food sources and the absence of apex predators, have had a devastating effect on wading, shore and seabird nesting. Reframing this issue as “Exotic Species and Nest Predator Control” and adding coyotes to the list of exotic species (at least in Florida) would better reflect the challenge we face.

Response: Coyotes are already on the list of invasive (exotic) species in many state and federal land management plans. Where a nuisance to native populations such as sea

turtles and shorebird nesting, both coyote and raccoon populations are controlled and known wildlife nest sites marked and protected. Specifically, the Florida Strategy proposed action addresses this issue: “Develop and implement invasive species’ eradication and management plans to address impacts to natural ecosystems within the Gulf region.”

Comment: Dynamism is essential to the health of coastal systems, yet a majority of the priority actions for Florida’s Habitat Conservation and Restoration goal revolve around putting sand on beaches and otherwise trying to make a dynamic system static. While beach renourishment has a role to play in our plan, it is equally if not more important that we address the needs to restore the function of coastal processes, migrate the built environment upslope ahead of sea-level rise and create corridors for coastal habitats to migrate. Constraining a dynamic system is an ongoing effort, not a “restoration” effort that can reach an end state; the effects of dollars spent on these practices will be short-lived. It would be tragic if the majority of Florida’s Habitat Conservation/Restoration dollars went to ephemeral sand placement projects. It also appears that this list was not developed collaboratively among Florida’s resource agencies, and it favors the priorities of the agency represented on the Task Force.

Response: There are a number of proposed actions other than beach renourishment identified in Florida’s Strategy section to address habitat conservation and restoration regarding the state’s beaches. These include, among others:

- Protect, stabilize and restore salt marsh, seagrass, oyster, coral reef, beach, dune, mangrove and other important marine bottom habitats in strategic locations where human-made and storm impacts have occurred or are likely to occur in the future.
- Strategically acquire, buffer and protect identified properties in state and federal acquisition programs to provide watershed improvements and wildlife corridors to downstream estuarine and marine habitats of ecological and economic importance to the Gulf region.
- Refine and implement inlet management plans to restore the natural flow of sediments around inlets to downdrift beaches.
- Restore and manage critically eroded sandy beaches and dunes for upland protection, recreation, tourism and wildlife.

These proposed actions are meant to better understand the state’s beach management system, and adapt it to the dynamic and diverse coastal processes and environments and the economies they support.

FDEP has worked extensively, cooperatively and collaboratively with a number of other state agencies and entities, particularly the Florida Fish & Wildlife Conservation

Commission (FWCC), in developing the list of recommended actions for Florida presented in this Strategy document.

Comment: This summary of the Florida Forever program may be misleading. While Florida does have a proud history of conservation land acquisition, the current political climate eliminated funding for the program in 2011, and many state leaders are talking of divesting the state of its public conservation lands on ideological grounds that land should be privately held. It would be wise to include reverter clauses to the federal government as a condition of any land acquisition funding dispensed to states to ensure that land acquired through implementation is retained for the duration of time intended by this Strategy.

Response: Lands acquired under the Florida Forever program and its predecessor, the Preservation 2000 program, are specifically held in trust by the state for conservation and recreational purposes. Any transfer of these lands to another state or federal agency would require these covenants and purposes to be preserved. The state and the federal government have a long history of working together to purchase and exchange lands to meet their respective conservation goals. It is anticipated that this relationship will be maintained and enhanced through this Gulf Coast Restoration Strategy.

Comment: Declines in species should also be attributed to increased incompatible recreational uses of coastal areas, making otherwise healthy habitat unsuitable for some species.

Response: There are a number of proposed actions identified in Florida's Strategy section to address living coastal and marine resources, human activities and the ability of stakeholders to be involved in addressing specific species concerns, including: 1) develop and implement programs to balance and integrate the interests and needs of people living and recreating in coastal areas with the needs of fish and wildlife species dependent on marine and coastal habitats; and 2) involve the public in developing initiatives to help educate citizens and communities on the importance of coastal wildlife conservation, shorebird protection and sea turtle monitoring.

Louisiana

Comment: Rather than using current and highly variable annual surveys as the reference point for duck winter populations, use the North American Waterfowl Management Plan, Gulf Coast Joint Venture (NAWMF, GCJV) population goals (<http://www.gcjv.org/documents.php>). The conservation partners in the GCJV have

agreed on population-based, spatially explicit winter waterfowl habitat goals across the GCJV focus area. Given that the Strategy calls for science-based planning and decision-making, it seems most appropriate to rely on the more widely used and accepted GCJV data, goals and objectives.

Response: The reference to the number of ducks using Louisiana wetlands each year should not be confused with a goal. The science-based NAWMP, GCJV goals and objectives are good candidates by which to measure success of restoration efforts on the Louisiana and Gulf Coasts, and this information will be considered during implementation planning.

Comment: More intensive restoration efforts must be contemplated, but many of the ideas that come out of the best science are detrimental to the state's largest economic engine. The navigation industry was not involved in the development process of the state's Prioritization Tool. The state continues to move forward with actions to redirect or change the flow of the Lower Mississippi River, yet it is not engaging with its own primary economic engine. The navigation industry needs to be involved in the coastal restoration efforts. It is obvious that a navigation representative must be placed on the Gulf of Mexico Citizen Advisory Committee. The state Coastal Program's positions fail to take into account the potential negative impact to the navigation industry. The navigation industry would like to be involved in the front end of projects so that navigation is protected and the recycling of marshes is also promoted.

Response: As the comment states, the navigation industry is a huge contributor to the economy of the state of Louisiana. As indicated in the state's annual denial of consistency for dredging operations on the Lower Mississippi River, the Task Force in no way wishes to reduce the level of service provided to the navigation industry on the nation's waterways. Efforts to restore the coastal ecosystem, in large part, are to ensure the safety and prosperity of our citizens and industries. However, it is clear that the coast as it is today, and under current management practices, is unsustainable in the long term. The services that the Gulf Coast provides, including those to the navigation industry, will change in the future if no action is taken. Navigation channels are becoming increasingly difficult and expensive to maintain and are much more vulnerable to catastrophic events such as hurricanes. As such, the state is attempting to proactively manage that change in a manner that is beneficial to our citizens, rather than allowing the impending change to be forced on us. This is being accomplished in large part through the 2012 Master Plan (MP) update. Navigation interests have been represented in the MP development process from the beginning. One element of the MP update is the Framework Development Team (FDT). The FDT is made up of business and industry representatives; local, state and federal government representatives; researchers; and members of nonprofit organizations who advise the state on the MP process and help develop elements of the MP. There are both shallow and deep draft

navigation interests on the FDT, commerce and business interests that rely on Louisiana's navigation system, as well as the Louisiana Department of Economic Development and the Maritime Focus Group mentioned in the comment. Related to the comments on the mandatory use of sediment and reevaluation of the federal standard, it is broadly understood that much would have to change to accomplish those actions, including increasing operations and maintenance (O&M) budgets, developing innovative equipment and possibly others. The point of including this as a priority is to put in motion those things that would have to be accomplished to achieve the goals as laid out in the priority areas.

Comment: Identifying sentinel locations and avian species to be monitored, protected and conserved should be a critical part of the Strategy. The Strategy states that over the past 70 years, Louisiana has lost the equivalent land mass of the state of Delaware in coastal wetland habitat. This staggering statistic alone illustrates the critical importance of the Restore and Conserve Habitat goal. The Strategy should emphasize the recommended action, "Restore and Conserve Coastal and Near-Shore Habitats," by focusing on barrier island and marsh restoration, an effort that will not only create more habitat for breeding, wintering and migrating birds, but also protect coastal public resources important to Louisiana residents. The Mississippi River Delta was heavily impacted by the oil spill, and a large portion (i.e., Pass a Loture WMA) is owned and managed by the state. The Strategy points out that 20 percent of the entire North American duck population winters in Louisiana. Restoration and new marsh creation efforts throughout the Delta will contribute to the ongoing support of wintering waterfowl populations, while also providing resources for breeding and migrating birds. Tidal marshes were also impacted, making restoration, marsh creation and freshwater inflow projects a priority in recovering this habitat.

It seems logical that protecting and restoring key regional breeding bird populations and habitats used by birds would be of the highest priority for Louisiana, yet it isn't currently included as a recommended action under the goal of Protect and Replenish Living Coastal Marine Resources; we recommend the addition of this action.

Response: The state of Louisiana recognizes the importance of the bird species that use our coastal habitats. While protecting and restoring key regional breeding bird populations and habitats used by birds is not specifically listed as a recommended action under "Replenish and Protect Living Coastal Marine Resources," all of the actions recommended under the other action areas, particularly "Restore and Conserve Habitat," support such bird population and habitat restoration. As the comment points out, those efforts will not only create more habitat for breeding, wintering and migrating birds, but also protect coastal public resources important to Louisiana residents.

Mississippi

Comment: The Draft Strategy successfully highlights key needs of the state of Mississippi regarding Restoring and Conserving Habitat, Restoring Water Quality, Replenishing and Protecting Living Coastal and Marine Resources, and Enhancing Community Resilience. However, most of the priority actions are general in nature and do not have the necessary specifics yet. One area the Task Force should consider in its final Strategy is providing suggestions for federal-state funding of the implementation of the successful MsCIP Program.

Response: Fully funding MsCIP is a priority for Mississippi, as stated in the Mississippi section under Community Resilience.

Economic Recovery

Comment: The Task Force should focus more directly on economic issues in the region, including addressing economic issues as a specific goal in the Strategy. Local infrastructure and resources should be in place to support restoration activities and the creation of a “restoration economy.” Projects must provide an economic benefit in impacted areas with regard to both workforce development and work for locally, veteran-, women- and minority-owned businesses. Job training, workforce development and job opportunities should also be made available, with the Task Force helping to facilitate economic development. Additional access to these opportunities should also be provided to bilingual communities impacted by the *Deepwater Horizon* spill.

Response: The restoration of the Gulf of Mexico ecosystem is a critical component of a healthy Gulf Coast economy. A healthy coastal ecosystem is essential to continuing the abundant seafood harvests in the Gulf of Mexico. Further, a healthy ecosystem helps to reduce risks that coastal communities and industry face on a regular basis from both storms and sea-level rise. Reducing the risks faced by coastal communities and industry from an unsustainable and unhealthy ecosystem has significant direct and indirect economic benefits for virtually all economic sectors of the Gulf region. Consequently, while the Strategy is not directly focused on economic recovery, the resulting economic benefits brought about by these restoration actions will no doubt enhance the recovery initiatives underway or under development by both the public and private sectors. In addition to those derived from project implementation, economic benefits also should be derived from the implementation of the policies and direction outlined in the Task Force’s Strategy. As the Task Force works toward developing plans to implement the Strategy it will expand its coordination with those agencies charged with leading ongoing economic recovery initiatives to help identify and seize opportunities to further

influence their success. As these coordinated opportunities develop, the Task Force intends to use its outreach programs and website to help ensure that the public has effective access to these resources.

Comment: The Task Force has not adequately addressed the intersection between energy extraction, distribution and consumption and the risks faced by the region. A focus on the clean economy and renewable energy will help to reduce the risks to the ecosystem and the local economy simultaneously.

Response: The direction given to the Task Force was to focus specifically on ecosystem restoration. While there is a nexus between energy extraction, distribution and use with the surrounding ecosystem(s), the Strategy focuses on the energy industry, where there is a direct impact on the Gulf of Mexico ecosystem. The Strategy does not broaden the focus to include the clean energy economy and the potential benefits it could bring to the overall economy and the Gulf ecosystem. While the Strategy does not broaden the focus to explore, or propose solutions to, the issues surrounding energy and the environment, the U.S. government recognizes the need to invest in a clean energy future. The U.S. Department of Energy (DOE) is working to help the United States move toward a new energy economy. More information on DOE's efforts can be found at: <http://www.doe.gov/public-services/energy-economy>.

Comment: Ecological resources need to be, and should have been, valued to be weighed as part of the decision-making process for restoration projects. The Strategy does not mention how standard resource values are to be determined. Data should also be presented on resource values.

Response: During development of the Strategy, Task Force staff explored ways to incorporate pilot projects or initiatives that used or relied on the valuation of ecosystem services provided by existing or restored areas. Overcoming the inherent difficulties and complexities of undertaking such valuations, and then determining how to use those valuations to help realize restoration, was a level of detail that was not reached in the initial Strategy. However, while this did not feature in the Strategy, the Task Force is aware of existing efforts in the region to undertake such efforts, including proposals to sell credits for carbon sequestered by marshland in Louisiana. In addition, the use of such economic evaluations will remain as a tool under consideration during the implementation planning and work undertaken to further the Strategy.

Comment: The Task Force should pursue innovative financing techniques and work with private industry and venture capital investment entities to forge new investment strategies to increase the impact of the federal funding and reduce timing constraints on starting projects.

Response: The Task Force continues to explore opportunities to partner with the many private sector entities and NGOs in the Gulf region that would stand to benefit from restoration projects. Partnering with private sector entities can offer state and federal governments (as well as private sector partners) the ability to leverage funds for projects, whereby both the public good and industry interests are jointly served. An important component of these partnerships can be the valuation of the services provided by the restored/conserved areas to the private sector partners (e.g., through reduced flood risk from wetland restoration). Through the implementation process, the Task Force will continue to explore and pursue opportunities and partnerships where they are feasible and timely. In addition, the Task Force will continue to explore opportunities for changes to process and policy that would allow for reduced time constraints during project planning and implementation.

Comment: Why isn't BP being held responsible, and what happened to the \$20 billion BP agreed to pay?

Response: The Gulf Coast Ecosystem Restoration Task Force is charged with developing a Strategy to set an agenda for Gulf Coast ecosystem restoration. The Task Force is not directed to manage the claims process. This process is managed by the Gulf Coast Claims Facility headed by Ken Feinberg. On Wednesday, June 16, 2010, BP agreed to pay \$20 billion into an escrow account to cover claims associated with the oil spill disaster. This fund is managed by the Gulf Coast Claims Facility. On April 18, 2011, the Gulf Coast Claims Facility provided a report on the status of the claims in the program. To review this report, please visit: <http://www.gulfcoastclaimsfacility.com/press20.php>.

For more information on the oil spill claims process, please visit:
<http://www.gulfcoastclaimsfacility.com>.

Human Health

Comment: The nation should be aware of seafood safety post-oil spill; the Task Force should visit nationalsafeseafoodcouncil.com.

Response: The Task Force is charged with developing a Strategy to set an agenda for Gulf Coast ecosystem restoration and is tasked to coordinate with other federal and state agencies who manage seafood safety issues. To provide continued assurance that Gulf Coast seafood is safe for human consumption, the Food and Drug Administration (FDA) and NOAA have collaborated with other state and federal agencies to ensure seafood safety through surveillance, testing and precautionary closures of fisheries. Federal and state waters closed due to contamination from the oil spill were reopened only after it was determined that seafood harvested in those areas is free from harmful oil and dispersant residues. In addition, federal and state officials continue to collect and test seafood that has been commercially harvested from the Gulf. The seafood collected and tested by FDA and NOAA continues to be free from harmful oil and dispersant residues. In addition, FDA oversees a mandatory safety program for all fish and fishery products under the provisions of the Federal Food, Drug and Cosmetic Act; the Public Health Service Act; and related regulations. If adulterated seafood is found on the market, both the FDA and states have the authority to seize the product and remove it from the food supply.

For more information on seafood safety testing by NOAA and FDA, please visit: http://www.fda.gov/food/ucm210970.htm#FDA_Role.

Additionally, citizens may contact FDA at 1-888-INFO-FDA with questions or concerns about seafood or to report any seafood you have purchased and suspect of being contaminated with oil.

Comments: The Strategy should address the short- and long-term public health concerns resulting from the *Deepwater Horizon* spill since there is a connection between a healthy Gulf and the health of its residents. The Strategy should mandate and call for the necessary resources to better understand, address and meet public health needs across the Gulf.

Response: Part of the federal government response to the oil spill in the Gulf of Mexico is the monitoring of conditions that might affect public health. The majority of this work is managed by the U.S. Department of Health and Human Services (HHS) and includes: human health impacts from the exposure to oil and dispersants, potential mental and behavioral effects of the oil spill, air sampling monitoring, and seafood safety. Because of the dynamic relationship that exists between the health of Gulf Coast residents and the health of their surrounding ecosystem, the Task Force has been coordinating with HHS,¹ which is addressing the continued impacts of the *Deepwater Horizon* oil spill on

¹ The Food and Drug Administration (FDA), National Institutes of Health (NIH), Centers for Disease Control (CDC), Substance Abuse and Mental Health Services Administration (SAMHSA) and Office of the Assistant Secretary for Preparedness and Response (ASPR) are all components of the U.S. Department of Health and Human Services.

the health and well-being of residents in Gulf Coast communities. While the health of the fish in Gulf waters and the restoration of affected marshes and wetlands have been a main concern for the Task Force agencies, monitoring the safety of the seafood, the health and safety of the cleanup workers and residents, and the mental and behavioral health effects of the oil spill on individuals and communities have been a priority for HHS.

The President's Executive Order charged the Task Force to "coordinate with relevant executive departments, agencies, and offices on ways to encourage health and economic benefits associated with proposed ecosystem restoration actions." The Task Force has (outside of the Strategy) coordinated with the relevant departments and agencies of the U.S. government to ensure that communities have access to available resources, though this is not the primary focus of the ecosystem restoration Strategy. For more information on the federal government response to human health issues related to the oil spill, please visit: <http://www.hhs.gov/gulfoilspill>.

Public Engagement and Citizens Advisory Committee

Comment: Several commenters voiced their support for the formation of a Citizens Advisory Committee and requested that the Task Force move ahead quickly with its establishment.

Response: The Task Force is fully supportive of a Citizens Advisory Committee for the Gulf region. EPA's Administrator Lisa P. Jackson, who also serves as Chair of the Task Force, initiated the development of the EPA Gulf of Mexico Citizens Advisory Committee (GMCAC). Solicitation of membership was undertaken by a Federal Register notice published on May 26, 2011. The solicitation period closed on August 30, 2011, with the review of the nominees and selection of the final candidates scheduled to be completed by December 31, 2011. Pursuant to the Federal Advisory Committee Act, this EPA advisory committee will provide its recommendations and findings to the EPA Administrator, providing her with the opportunity to help inform the deliberations of the Task Force from the perspective of citizens throughout the region.