



Florida
Wildlife
Federation



The Nature
Conservancy
Protecting nature. Preserving life.



Ocean Conservancy

May 20, 2016

Mr. Warren Yeager, Restore Coordinator
1000 Cecil G. Costin Sr. Blvd, Room 310,
Port St. Joe, FL 32456
Via: wyeager@gulfcounty-fl.gov

Re: Comments on Gulf County's Draft Multi-Year Implementation Plan

Dear Mr. Yeager,

Thank you for the opportunity to submit comments on Gulf County's Draft Multi-Year Implementation Plan

Our collective organizations (Audubon Florida, Defenders of Wildlife, Florida Wildlife Federation, National Wildlife Federation, Ocean Conservancy, and The Nature Conservancy) represent nearly 100,000 members and supporters along Florida's Gulf Coast, several of whom are Gulf County residents. Working together as a coalition as well as within our individual organizations and chapters, we have been advocating for Gulf restoration that is comprehensive, and targets watersheds for protection of coastal and marine resources. Our collaboration began with the crafting and passage of the RESTORE Act and is now focused on ensuring the best allocation of restoration funds.

In anticipation of the diverse perspectives on how to spend restoration funds, our groups collaborated to develop a framework, including comprehensive restoration principles and outcomes, designed to inform project selection and Multi-Year Implementation Plans (MYIP). We encourage Gulf County to consider these themes throughout the planning and implementation of both current and future restoration activities.

A successful MYIP should have four key project outcomes: environmental impact, fisheries management, wildlife resource enhancement and community resiliency.

The cornerstone of a strong MYIP should be careful consideration of **environmental impact**. We are pleased to see that the Gulf County MYIP has focused on this element. A MYIP should include projects that protect water quality and wildlife habitat, and provide the

public with environmentally sustainable outdoor recreation opportunities. The Plan should promote restoration, health and sustainability of coastal habitats, fisheries, marine resources and vulnerable species. Projects included in the MYIP should work together to maximize environmental benefits. Most importantly, the plan should not include projects that would result in further damage to the Gulf ecosystems. MYIPs should include regional projects that advance priorities toward achieving identified restoration goals that enhance watersheds and estuaries along the Gulf Coast. Examples of projects in the Gulf County Draft MYIP that may address these priorities include the septic to sewer conversion projects and development of a Stormwater Master Plan.

The MYIP should also consider the sustainability and health of its **commercial and recreational fisheries**, building in projects that protect and restore habitats and estuaries, and remove threats to fisheries such as marine debris and invasive species. In addition, the MYIP should prioritize **wildlife resource enhancement** as a means to ensure healthier communities and a thriving nature-based economy. Although the draft Gulf County MYIP does not include any such projects, we hope to see those in future restoration projects.

Another key project outcome is enhanced **community resiliency**. Investments in projects that will enhance resiliency may reduce the impact of hurricanes and other disasters. Restoring and protecting marshes, wetlands, reefs and other coastal habitats also mitigate storm surge, erosion and coastal flooding, further reducing the costs of insurance and disaster relief.

In order to efficiently and effectively achieve these outcomes, we encourage several guiding principles for project selection: science-based metrics and evaluation, phased approach to implementation, clear outcomes, local input/participation, leverage opportunities, and mutual project compatibility. We appreciate that Gulf County MYIP appears to have considered some of these principles.

Employing the guiding principle of **science-based evaluation** is instrumental to proper project selection and plan development. Every project should be evaluated across a broad metrics of science-based criteria. In addition, project implementation should be monitored and subject to an ongoing review process to ensure short and long-term goals are being met, allocated funds are being spent responsibly and projects are performing and managed adaptively.

Furthermore, project descriptions should state clear, measurable and achievable ecological and community **outcomes**. Making these outcomes understood by the public and stakeholder groups, and providing opportunities for meaningful input into project selection and evaluation increases public confidence in the success of these projects and will elicit more public support.

Counties should consider ways to **leverage** resources across RESTORE funding allocations and as a match for other local, state and federal funding sources. We were pleased to see

Gulf County identify matching funds for some of its selected projects (such as St. Joseph Peninsula Feeder Beach Project/Artificial Reef Submerged Breakwaters project, which had a significant match), and encourage Gulf County to similarly leverage and identify matches for the majority of its projects (as most of its projects lack a substantial match).

Gulf County should also seek to achieve **mutual project compatibility** to ensure that discrete projects are not inadvertently working at odds with one another. Accordingly, it would be beneficial for a panel of resource and economic managers to provide oversight and ensure project designs avoid unintended impacts to key resources that are also restoration targets.

The ultimate success of the RESTORE Act rests on selecting and implementing integrated ecological restoration projects, consistent with state-wide plans, and rigorous application of criteria to ensure that only the best and most appropriate projects are funded. We feel these themes have been well considered in projects proposed in the published MYIP and encourage Gulf County to continue to keep these themes in mind in planning and implementing future restoration activities.

We applaud Gulf County for selecting projects and preparing a Draft MYIP. We respectfully urge Gulf County to consider our comments and incorporate them as appropriate into both the current Draft MYIP, as well as in future MYIPs (which may be prepared as additional RESTORE Act funds become available).

Thank you very much for considering our comments.

Sincerely,



Kent L. Wimmer, AICP

On behalf of:

Audubon Florida
Defenders of Wildlife
Florida Wildlife Federation
National Wildlife Federation
Ocean Conservancy
The Nature Conservancy

Wilson, Estelle

From: National Wildlife Federation <NationalWildlifeFederation@nwf.org> on behalf of Karen Spragg <NationalWildlifeFederation@nwf.org>
Sent: Wednesday, May 25, 2016 7:48 AM
To: Wilson, Estelle
Subject: Please select projects that help wildlife and the ecosystem.

May 25, 2016

E Wilson

Dear Wilson,

I care deeply about the fish, wildlife, and natural areas in Gulf County. The 2010 oil spill in the Gulf of Mexico was a horrible tragedy, and it is imperative that we use the restoration funds resulting from the spill to improve the water quality and restore fish, wildlife, and their habitats locally, so we can repair the Gulf Coast as a whole.

Some of the highest priorities for our community are clean water, abundant fish and wildlife, and improving natural habitats. I urge you use your oil spill restoration dollars to fund projects that will directly and indirectly help the environment, improve quality of life for locals, attract visitors and in turn boost our economy.

I support those projects that you have selected for this initial round of funding that will help improve water quality of our coastal waters, and especially the famed Apalachicola River, such as the Gulf County Stormwater Management Plan, the City of Wewahitchka Sewer Extension, and the Cape San Blas Sewer Extension but ask you to also prioritize projects that directly benefit fish and wildlife, if not now, then as additional restoration funds become available.

Sincerely,

Mrs. Karen Spragg
1009 Monument Ave
Port St Joe, FL 32456-2121
tkspragg@yahoo.com

Wilson, Estelle

From: National Wildlife Federation <NationalWildlifeFederation@nwf.org> on behalf of Lin Brightly <NationalWildlifeFederation@nwf.org>
Sent: Wednesday, May 25, 2016 11:22 AM
To: Wilson, Estelle
Subject: Please select projects that help wildlife and the ecosystem.

May 25, 2016

E Wilson

Dear Wilson,

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Sincerely,

Ms. Lin Brightly
PO Box 1025
Port St Joe, FL 32457-1025
lin.brightly@gmail.com

Wilson, Estelle

From: National Wildlife Federation <NationalWildlifeFederation@nwf.org> on behalf of Ben Spector <NationalWildlifeFederation@nwf.org>
Sent: Wednesday, May 25, 2016 4:42 AM
To: Wilson, Estelle
Subject: Please select projects that help wildlife and the ecosystem.

May 25, 2016

E Wilson

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Sincerely,

Mr. Ben Spector
6987 FL-71
Wewahitchka, FL 32465
web@nwf.org



NATIONAL WILDLIFE FEDERATION

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May 20, 2016

Warren Yeager
1000 Cecil G. Costin Sr. Blvd, Room 310
Port St. Joe, Florida 32456

Re: National Wildlife Federation's Comments on Gulf County's Draft Multi-Year Implementation Plan (MYIP)

Dear Mr. Yeager,

Thank you for the opportunity to submit comments on Gulf County's draft Multi-Year Implementation Plan (MYIP).

National Wildlife Federation (NWF) is the nation's largest conservation organization. We have four million members and supporters nationally, hundreds of whom reside in Gulf County. Working with our state partner Florida Wildlife Federation, we have been on the ground, lobbying for **comprehensive Gulf restoration** in the wake of the 2010 BP oil spill. Our work has been focused on long-lasting efforts, such as **coastal and watershed protection**. The work that began with the passage of the RESTORE Act is now directed towards **supporting ecological restoration**. We have been closely following as Florida's 23 Gulf Coast Counties consider projects to fund with their Direct Component funds available through the RESTORE Act, as they develop Multi-Year Implementation Plans (MYIP).

Working with a coalition of organizations in Florida, NWF and its partners crafted a restoration framework with project outcomes and guiding principles (outlined in a separate comment letter). We encourage Gulf County to keep these themes in mind while planning and implementing restoration activities.

In addition to these themes and principles, NWF has also reviewed Gulf County's MYIP, and wishes to present comments on the two main components of the MYIP: **Process** and **Projects**.

Process:

In 2014, the U.S. Treasury Department issued their "Direct Component Guidance and Application to Receive Federal Financial Assistance". This Guidance provides critical context for ensuring an effective process and describes the following:

As a prerequisite under the RESTORE Act for requesting and receiving Direct Component funding for eligible activities, each applicant must submit a multiyear plan to cover a period of time during which projects could be undertaken with funds available from the Trust Fund...An applicant must use the form shown at Section 4.0 for its multiyear plans... The multiyear plan must include the Multiyear Implementation Matrix, a map showing the locations where the

work will be performed, and the narrative description. An applicant must provide detail on planned activities in the multiyear plan, including the information required in the multiyear plan matrix and narrative in Section 4.0. The multiyear plan must be available for 45 days for public review and comment, in a manner calculated to obtain broad-based participation from individuals, businesses, Indian tribes, and non-profit organizations. If the applicant has developed a more detailed multiyear plan document in addition to the forms in Section 4.0, the document should be included as an attachment to the multiyear plan submission to Treasury.

Our analysis indicates that Gulf County has met and in many cases exceeded the requirements outlined in the Treasury Guidance. We applaud Gulf County's MYIP process. Elements such as the Needs Assessment, Scoring Criteria, Project Submission Portal, and use of Local Citizen Committee are all elements that strengthened the process. We also appreciate the inclusion of the minutes from the March 15, 2016 RESTORE Committee meeting in the MYIP, as well as a link to the materials from meetings (<http://www.gulfcountyrestore.com/wp-content/uploads/2016/03/3.15.16-Meeting-Packet-Final-Project-Priorities.pdf>) in the Draft MYIP, as it provided additional insight into the project ranking and selection process. In addition, although not necessary for compliance with Treasury requirements, the extensive Overview of Gulf County, Response Efforts, and Restoration Efforts to date provide an excellent framing of the past and present status of Gulf County, and could serve as a "stand-alone document" for other Gulf County purposes. Thank you for considering the comments I submitted via email on those sections.

Website:

We are pleased Gulf County established a website with process-related information clearly posted, including overview of process, Advisory Committee members, and agendas and minutes from Committee meetings. Although it may not be necessary for Treasury requirement, I would have liked to see a more prominent link to the projects submitted (and links to completed Project Applications), evaluation forms and score sheets, and project scores and ranking. Although I was able to locate much of this information in the links to presentations, "stand alone" links would have been helpful. It is important to the transparency and integrity of the process to clearly indicate methods used for soliciting and evaluating project proposals, and for the most part Gulf County has done an excellent job at this.

Public Engagement:

The MYIP recognizes that projects must be selected based on "meaningful input from the public, including broad-based participation from individuals, businesses, and nonprofit organizations..." Gulf County appears to have successfully engaged this broad-based participation in the selection of its Advisory Committee with members representing the relevant and appropriate sectors of the community. In addition, Gulf County made their MYIP available for public comment for 45 days and availability of plan was announced in local media.

Best Available Science:

According the Treasure Guidance, projects related to Natural Resources are required to be based on "Best Available Science" (BAS). Although Gulf County unfortunately does not have any Natural Resource restoration projects in its initial MYIP, the MYIP does provide scientific rationale for septic to sewer conversion projects. Additional information on the scientific rationale for the two specific projects selected (Cape Sewer and Wewahitchka Sewer) would have been useful, but may not be required.

Projects:

Florida's Gulf Coast economy and way of life are deeply entwined with the land and the water; this is especially true for Gulf County. The fines and penalties from the Deepwater Horizon disaster have great potential to restore and protect the Gulf of Mexico's lands, waters, wildlife, communities, and economy. However, there is a risk that some of these funds could be spent unwisely—even squandered on projects that would harm the very places the money was intended to benefit. The public can and should insist that all recovery monies are spent in a science-driven, transparent process that ensures a healthy Gulf of Mexico for wildlife as well as for future generations. National Wildlife Federation fully supports projects the **restore Gulf County's natural resources** for the benefit of fish and wildlife (and their habitat), and the people who live, work, and visit Gulf County.

We support several of the projects that Gulf County has selected for its initial MYIP, specifically, the three projects that address water quality:

- Gulf County Stormwater Management Plan - Phase I
- Cape Sewer Extension - Phase I
- City of Wewahitchka Sewer Extension - Phase I

Projects that were submitted but were not selected (either because they require further evaluation or were recommended for future consideration in Years 2-5 or 6-10) that NWF supports include,

- Land Acquisition Adjacent to St Joseph Bay Buffer Preserve for Restoration and Recreation
- Money Bayou Land Acquisition for Wetlands Preservation and Recreation
- Beacon Hill Sewer
- Initiating a long-term monitoring program for sea turtles in Gulf County waters

NWF supports land acquisition projects for natural resource protection. However, the land acquisition projects in the Draft MYIP are identified for economic development. NWF encourages Gulf County to consider land acquisition projects for natural resource benefit, especially those that preserve riparian areas along waterways, thus providing “natural” water quality improvement benefits and well as protecting fish and wildlife habitat (such as Money Bayou and St Joseph Bay Buffer Preserve land acquisition projects).

In addition, as indicated above, we appreciate the inclusion of the minutes from the March 15, 2016 RESTORE Committee meeting in the MYIP, as well as a link to the powerpoint presentation from project selection meetings (<http://www.gulfcountyrestore.com/wp-content/uploads/2016/03/3.15.16-Meeting-Packet-Final-Project-Priorities.pdf> and <http://www.gulfcountyrestore.com/wp-content/uploads/2016/03/3.22.16-Project-Priorities.pdf>) in the Draft MYIP. However, explanation for some of the project selection decisions that deviated from the raw scores and ranking were not always apparent from reviewing the available materials. Specifically, Money Bayou Land Acquisition for Wetlands Preservation and Recreation scored 54 points and St Joseph Bay Buffer Preserve Land Acquisition scored 41 points (neither of which were included in the MYIP), both of which scored well above the raw scores for the Bike Path and Land Acquisition - Economic Development/Public Access projects (both of which were included in the MYIP). We recommend the MYIP or its appendices include an explanation as to why lower scoring projects were selected over higher scoring projects.

Finally, two of the projects included in the Draft MYIP (one of which NWF supports) have a relatively small funding request:

- Gulf County Stormwater Management Plan, Phase 1

- St. Joseph Peninsula State Park - Bike Path Extension/Engineering - Phase II

Given the apparent administrative burden that other Florida Counties have experienced in completing the Direct Component funding applications and associated processes, Gulf County may wish to consider using other funding (besides Direct Component funds) for these two projects, OR pursue combining them with other projects in the Draft MYIP OR incorporating into the Treasury-approved MYIP Planning Grant (since they are both Planning Assistance projects), in order to streamline efficiencies.

Conclusion:

We appreciate Gulf County's efforts to select projects and prepare a Draft MYIP. We optimistically anticipate Gulf County taking the same thorough and comprehensive approach with future installments of Direct Component funding. While we would prefer to see Gulf County fund natural resource restoration projects through their MYIP, we are encouraged by the inclusion of three water quality improvement projects. We hope to see additional water quality and natural resource restoration projects in future MYIPs, given the importance of the beaches, bays, rivers, and watershed to the economy and ecology of Gulf County. We welcome the opportunity to support future ecologically-focused restoration projects.

Thank you very much for considering our comments. Please do not hesitate to contact me to further discuss these comments and recommendations.

Sincerely,

Jessica Koelsch
Florida Policy Specialist
National Wildlife Federation