

Public Comments from The Partnership for Gulf Coast Land Conservation To the Gulf Coast Ecosystem Restoration Council Regarding the Draft Initial Comprehensive Plan

June 25, 2013

To the Gulf Coast Ecosystem Restoration Council:

The Partnership for Gulf Coast Land Conservation (PGCLC) is a coalition of 30 national, local, and regional non-governmental organizations dedicated to advancing land and water conservation in the Gulf of Mexico coastal region (see current membership list attached). The organizations that make up the Partnership have been working in the Gulf region for decades to restore and protect priority natural communities and have significant expertise in land conservation.

Our mission is to work together across the Gulf of Mexico coastal region and within watersheds bordering the Gulf of Mexico to increase the pace, quality, and permanence of voluntary land and water conservation. We wish to offer our help and expertise to the Gulf Coast Ecosystem Restoration Council as you seek the best and most appropriate ways to restore the Gulf Coast's Ecosystem and Economy.

As the Trustees move forward, we urge you to make a commitment to the PERMANENT protection of natural habitats, ecosystems, and watersheds in the region. Permanent protection can be accomplished by land acquisition from willing sellers to government and non-profit organizations and conservation management agreements with private landowners, in addition to remedial restoration activities. Permanent land protection must be a priority in the *Deepwater Horizon* oil spill restoration effort.

Why permanent land protection?

- 1) It works. Permanent protection of land allows for the restoration of natural resources and services and ensures that the benefits of the natural resources will be available to the public in perpetuity.
- 2) It is feasible. There are thousands of willing property owners in the Gulf region who would sell their land or enter into conservation agreements.

3) It meets several Objectives. Decades of research show that permanent land protection restores and protects habitats, restores and protects water quality, protects and restores living coastal and marine resources, restores and enhances natural processes and shorelines, and promotes community resilience.

We look forward to working with the Trustees of the Gulf Coast Ecosystem Restoration Council on the further development of the Comprehensive Plan and the restoration of our region.

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Chair, Executive Committee

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General Comments

The Trustees asked the public to address the specific aspects of the Draft Initial Comprehensive Plan. The PGCLC has provided comments in the format that was provided by the Trustees on pages 4 - 6. We also offer these general comments:

- As stated on page two of the Plan, the Plan does not yet include the Ten-Year Funding Strategy or a project priority list. The PGCLC recommends that the final version of the Comprehensive Plan be delayed until these items are ready for public review.
- The PGCLC recommends that the Trustees provide another iteration of the plan for public comment. NGO's, community members, and the general public need to be able to review a more detailed plan in order to provide meaningful public input.
- The PGCLC recommends that the Council adopt a transparent process by which non-Trustees can propose projects.
- We advocate that the Council adopt policy that would allow RESTORE funds to be used for
 - 1. Land acquisition and protection funds for the Gulf of Mexico region, and for the states of Mississippi, Louisiana, and Texas, similar to the Forever Florida and Forever Wild funding mechanisms in Florida and Alabama.
 - 2. Match and cost-share for other federal and state conservation programs; and
 - 3. Endowments, dedicated management funds, revolving funds and similar funding mechanisms so that long-term restoration and management can be conducted.

The Draft Plan includes restoration Priority Criteria established in the RESTORE Act and applicable to the Council's selection of projects and programs for at least the first three

years after publication of the Initial Comprehensive Plan. The Council is considering further defining these criteria and developing additional criteria for consideration.

The RESTORE Act directs the Council to use the best available science and give highest priority for at least the first three years to ecosystem projects and programs that meet one or more of the following four Priority Criteria. In order to support its vision for integrated and coordinated Gulf Coast ecosystem restoration, the Council may develop other criteria as necessary to refine the selection process. The Council will use these criteria to evaluate proposals and select the best projects and programs to achieve comprehensive ecosystem restoration.

The Council should give the highest priority to ecosystem projects and programs that meet the Priority Criteria every year – not just the first three years.

Proposed Criteria:

- 1. Projects that are projected to make the greatest contribution to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region, without regard to geographic location within the Gulf Coast region.
- 2. Large-scale projects and programs that are projected to substantially contribute to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast ecosystem.
- 3. Projects contained in existing Gulf Coast State comprehensive plans for the restoration and protection of natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region.
 - Louisiana is the only state that has a state comprehensive plan. The PGCLC advocates that Alabama, Florida, Mississippi and Texas develop their comprehensive plans through transparent and open processes with meaningful public input.
- 4. Projects that restore long-term resiliency of the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands most impacted by the Deepwater Horizon oil spill.

PGCLC is in general agreement with the four criteria but would like to add language that highlights the need for PERMANENT protection of natural resources. We would also like to highlight the need to consider the health of WATERSHEDs in the criteria and allow for conservation measures on inland and upland properties.

Project and Program Phases

Should the Council further define the Priority Criteria? If so, how?

Yes, the Council should further define the Priority Criteria. These criteria are so broad that it would be difficult to rank projects for funding.

PGCLC also recommends that the Council develop a ranking system so that proposers and the public can know exactly how projects will be ranked.

Should the Council develop additional criteria for consideration now or in the future? If so, what should they be?

The PGCLC recommends that the Council consider whether there is scientific evidence that the proposed strategy and/or intervention will meet its stated goals.

The "Objectives" section of the Draft Plan describes the broad types of activities the Council envisions funding in order to achieve its goals.

The Objectives are:

- 1) Restore. Enhance and Protect Habitats
- 2) Restore, Improve and Protect Water Quality
- 3) Protect and Restore Living Coastal and Marine Resources
- 4) Restore and Enhance Natural Processes and Shorelines
- 5) Promote Community Resilience
- 6) Promote Natural Resource Stewardship and Environmental Education
- 7) Improve Science-Based Decision-Making Processes

Should the Council consider other Objectives at this juncture? If not, at what point, if any, should the Council consider additional Objectives? If so, what should they be?

The PGCLC's position is that these objectives are correct and will help the Council meet its goals under the RESTORE Act. We advocate that additional language be added regarding the PERMANENT protection of habitats, water quality, living coastal and marine resources.

Similarly, should the Council eliminate any of the Objectives?

The Council should not eliminate any of the Objectives.

How should the Council prioritize its restoration Objectives?

It is not necessary to prioritize restoration Objectives. A better strategy would be to prioritize projects based upon how many Objectives the project meets.

The Council is considering establishing or engaging advisory committees as may be necessary, such as a citizens' advisory committee and/or a science advisory committee, to provide input to the Council in carrying out its responsibilities under

the RESTORE Act. Should the Council establish any advisory committees? If so, what type of advisory committees should the Council establish? How should the Council structure such advisory committees? What role should such advisory committees play?

The PGCLC advises that the Council establish the following advisory committees:

- 1. Science/technical
- 2. Citizen's Advisory
- 3. Land Protection and Restoration

The development of the Committees should be in addition to public outreach and public input activities. We further advise that a representative of the nonprofit land protection organizations be named to the Citizen's Advisory and Lands Committees. The Lands Committee would be charged with reviewing and making recommendations on land acquisition and conservation strategies.

Member Organizations

Local and State Organizations

Alabama Forest Resources Center (AL)

Alabama Land Trust (AL)

Bayou Land Conservancy (TX)

Coastal Land Trust (AL)

Apalachee Land Conservancy (FL)

Conservation Foundation of the Gulf Coast (FL)

Dauphin Island Bird Sanctuaries (AL)

Florida Wildlife Federation (FL)

Galveston Bay Foundation (TX)

Guadalupe Blanco River Land Trust (TX)

Land Trust for Southeast Louisiana (LA)

Land Trust for the Mississippi Coastal Plain (MS)

Lemon Bay Conservancy (FL)

Mississippi Land Trust (MS)

Mississippi River Trust (MS/LA)

Pelican Coast Conservancy (FL/AL)

Tall Timbers Research Station & Land Conservancy (FL)

Tampa Bay Conservancy (FL)

Texas Land Trust Council (TX)

Texas Agricultural Land Trust (TX)

Trust for Coastal Stewardship (LA)

Weeks Bay Foundation (AL)

Wildlands Forever Trust (FL)

Wolf River Conservation Society (MS)

National organizations

Land Trust Alliance

National Audubon Society

Ducks Unlimited

The Conservation Fund

The Nature Conservancy

The Trust for Public Land