



National Wildlife Federation

Gulf of Mexico Restoration Program

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Triumph Gulf Coast, Inc. Board Members
P.O. Box 12007
Tallahassee, FL 32317
Via email: info@myfloridatriumph.com

RE: Comments on Project Pre-Proposals under Consideration for Triumph Gulf Coast Funding

The National Wildlife Federation (NWF) appreciates the opportunity to comment on projects being considered for funding through Triumph Gulf Coast, Inc. for the recovery, diversification, and enhancement of the eight Northwest Florida counties disproportionately affected by the oil spill. On behalf of our more than six million members and supporters across the United States, we respectfully submit the following comments for your consideration.

With staff on the ground across the Gulf, including in Florida, NWF is deeply committed to the restoration of the Gulf Coast Region, for the benefit of both people and wildlife. We have supported the investment of oil spill-related funds in ecological restoration projects that benefit the Gulf's economy, with an emphasis on estuaries. Whereas Triumph Gulf Coast seeks to select projects and programs that have the potential to generate increased economic activity in the disproportionately affected counties, the enabling legislation identified that priority be given to projects and programs that benefit the environment, in addition to the economy. NWF has reviewed the 135 pre-applications submitted through March 8, 2018 and identified several projects that offer both economic and ecological benefits.

Last year, NWF released a report highlighting 50 projects across the five Gulf States: [*Making the Most of Restoration: Priorities for a Recovering Gulf*](#). This report used ecological stressors in key estuaries across the Gulf to prioritize projects that will make progress towards meeting each system's restoration needs. NWF believes that a significant portion of the Deepwater Horizon restoration dollars should focus on efforts to improve the Gulf of Mexico's estuaries, including two in Florida's panhandle: Pensacola

Bay and Apalachicola River and Bay. Likewise, we focused on a few specific project types that target known stressors: habitat protection, oyster reefs and living shorelines, hydrologic restoration, and coastal wetlands. Whereas this report and the priorities identified within focus on ecological restoration, some of the projects under consideration by Triumph Gulf Coast, Inc. intended to address economic needs will likewise have direct or indirect ecological benefits. We have identified projects in NWF's two panhandle priority estuaries that will provide such benefits.

Pensacola Bay

The Pensacola Bay system is affected by numerous historic and current environmental stressors. Several portions of the watershed are considered "impaired" under the Clean Water Act – largely a result of urban stormwater, agricultural fertilizer runoff and sewage and septic tank overflows. To address system stressors, NWF supports projects in Pensacola Bay that improve coastal wetlands, restore oyster reefs and living shorelines, and restore hydrologic function.

Project #87, City of Milton - N. Santa Rosa Reg. Water Reclamation Facility is a public infrastructure project that will enhance economic recovery. The project will relocate an existing wastewater treatment plant (WWTP), thereby removing effluent currently discharging into the Blackwater River. Implementation of this project will reduce nutrients entering the Blackwater River, improve water quality, and benefit oyster recovery efforts downstream of the existing WWTP, aligning this proposal with a NWF Priority Project (East Bay Oyster Restoration).

Apalachicola River and Bay

The Apalachicola River and Bay system is an area of exceptional ecological importance. It constitutes one of the least polluted, least developed, resource-rich systems left in the U.S. The Apalachicola River and its floodplain are the biological factories that fuel the estuary's productivity. Despite its ecological value, the Apalachicola ecosystem has been severely degraded over recent years from reduced water flows, channel alterations, prolonged drought, and consumptive use. The economy of the region has been historically linked to the health of the river and bay, and is likewise suffering in recent years. Several pre-proposals will improve both the ecology and economy of the region.

Project #69, Apalachicola Bay System Initiative (ABSI) (submitted by Florida State University Coastal and Marine Laboratory) uses a multidisciplinary, collaborative approach to develop a restoration strategy for Apalachicola Bay and the oyster fishery throughout Franklin County, with oyster recovery efforts that address both wild and aquaculture oyster production. ABSI will contribute to both economic and environmental recovery and create jobs (including for local oystermen). ABSI will collaborate with other state, federal, and non-governmental institutions working in the region to optimize their

efforts and integrate with existing projects. This project aligns with the NWF Priority of Restoring Oysters and priority estuary Apalachicola Bay.

Two projects address public infrastructure needs that will lead to enhanced economic recovery, benefit the environment, and align with the NWF priority estuary, Apalachicola Bay. Project #25, City of Carrabelle Septic Tank Abatement will remove dozens of septic tanks systems from a community located along banks of St. George Sound and Apalachicola Bay. Placing these homes on central sewer will improve water quality as well as the economy of the area. Project #35, City of Apalachicola Stormwater/Wastewater Improvements will improve stormwater and wastewater facilities, and thereby promote economic development and improve water quality.

NWF urges the Triumph Gulf Coast Board to prioritize and maximize projects that both invest in economic recovery and diversification and also benefit the environment. We also encourage the board to consider efforts that leverage investments from other oil-spill related funding sources, such as projects to improve water quality in Pensacola and Apalachicola Bays. Thank you very much for all of your hard work for Florida and for considering our comments. Please do not hesitate to contact me to discuss further.

Sincerely,

Jessica Bibza
Florida/Alabama Policy Specialist, Gulf of Mexico Program