

October 19, 2011

Lisa Jackson
Administrator, USEPA
Chair, Gulf of Mexico Ecosystem Restoration Task Force
Washington, DC.

Dear Administrator Jackson,

The undersigned groups submit this letter as our formal comment on the Preliminary Gulf of Mexico Regional Ecosystem Restoration Strategy issued for public comment by the Gulf of Mexico Ecosystem Restoration Task Force (Task Force) on October 26, 2011.

Overview:

We applaud the strategy as a significant step towards restoring the Gulf of Mexico in light of the myriad of environmental problems facing the Gulf, including a coastal wetlands crisis, an enormous seasonal Dead Zone offshore, increasingly vulnerable coastal communities, and finally BP's oil drilling disaster, but there is still, of course, a long road to restoration. However, while the release of the Gulf Coast Ecosystem Restoration Task Force's preliminary strategy for restoration lays out good basic prescriptions for restoring the Gulf, it provides little beyond what was previously known and lacks the specifics we had hoped to see. We are disappointed with the lack of detail, in terms of measurable objectives and timelines, within the current strategy. While the strategy is appropriately comprehensive we do not find in the draft the type of proactive or action oriented items needed. Given the urgency of restoration needs, this seems a step back." For example, Louisiana and Mississippi who, prior to the BP Horizon disaster, had obtained a Restoration Roadmap (March of 2010) from the Louisiana-Mississippi Gulf Coast Ecosystem Restoration Working Group. This Roadmap set forth measurable objectives. In light of the current Preliminary Strategy, the fate of the Roadmap is unclear.

Comments/Answers to Task Force Questions

Following the format that was used throughout the Task Force public meetings process which asked the public to answer five questions, we have organized our comments in terms of the Preliminary Strategy's responsiveness to public comment on each of these questions:

I. *ARE THESE THE RIGHT GOALS?*

Gulf Coast Ecosystem Restoration Strategy's (hereinafter the Preliminary Strategy) integration of new and existing restoration, conservation and protection initiatives focused on achieving Gulf-wide restoration, as well as the Gulf-wide scope and intent to achieve a functioning and productive Gulf ecosystem. The strategy should provide an overarching framework to address both injured natural resources and lost ecological services due to the Deepwater Horizon Oil

Disaster, as well as more systemic problems, such as the on-going loss of coastal wetlands and formation of the hypoxic zone at the mouth of the Mississippi River.

At the Task Force meetings and in public comments the need to set forth a focused restoration agenda with measureable goals and objectives was repeatedly raised by Gulf citizens. The Preliminary Strategy fails to achieve this. Similarly, it does not identify funds that can be directed to identified priorities and effective programs and projects. Instead it set forth broad goals for the myriad environmental issues that exist in the Gulf. Statements such as “Restore and Conserve Habitat” combined with similarly vague objectives with no linkage to timelines will not ensure that real progress is made in a reasonable period of time nor does it convey a sense of urgency that the Preliminary Strategy should be implemented immediately.

While it is difficult to predict the future activity across a diverse geographic area with multiple partners, we would like to see in the Final Strategy more concrete goals, measurable objectives, benchmarks, with specific deliverables, a clear timeline, and metrics to assess performance focused on addressing root causes of problems, not symptoms, and address long-term recovery goals. Long-term monitoring will be key to judging the process of both the implemented restoration projects and the strategy as a whole. An approach that we prefer to address restoration issues is provided in *Strategy for Restoring the Gulf of Mexico: Recommendations to the Gulf Coast Ecosystem Restoration Task Force* issued in 2011 by Audubon, Environmental Defense Fund, Harte Research Institute, Lake Pontchartrain Basin Foundation, the National Wildlife Federation, Nature Conservancy, and Ocean Conservancy.

A key element that was stressed by the public in each of the public meetings in all five states and supported on numerous occasions by Lisa Jackson in her remarks, is that the Task Force was not merely focused on “environmental restoration” but must incorporate and address the needs of coastal community for economic restoration and sustainability. This is lacking in the Preliminary Strategy and must be addressed in the Final Strategy. The Strategy does include a generic goal of coastal resilience but it is tied to community planning for sea level rise. Environmental degradation of the Gulf has negatively affected the economies of many Gulf coast communities. The goals and objectives of the strategy should ensure the economic restoration of these communities. For example, the strategy should ensure that there is local infrastructure in place to support restoration activities and creation of a “restoration economy” that is linked to economic development (job creation, etc). To achieve ecosystem restoration billions of dollars in restoration and recovery funding will come to the region whether via penalties from the BP disaster or from existing or future revenue streams. The strategy document provides an opportunity to build a framework to tackle not only the restoration challenges but the economic challenges that face the Gulf’s coastal communities. Appropriate coordination of investments, technical assistance and outreach could build an inclusive restoration economy that creates tens of thousands of jobs.

II. WHAT ARE THE CRITICAL ACTIONS OR MAJOR OUTCOMES THAT NEED TO BE ACCOMPLISHED AS PART OF THIS STRATEGY IN ORDER TO ACHIEVE THE OVERARCHING GOALS?

The Actions or Major Outcomes that the undersigned groups continually emphasized at every opportunity as critical to any Restoration Strategy include:

➤ **Environmental and Conservation Advisory Group and Other Comprehensive Public Outreach**

The Preliminary Strategy refers to its reliance on public meetings and two of EPA's federal advisory committees, the Local Government Advisory Committee and the National Environmental Justice Advisory Council for input into Strategy development. The Preliminary Strategy also refers to EPA's proposed formation of a Gulf of Mexico Citizen Advisory Committee that is intended to become a vehicle for citizen engagement and support. The level of public engagement to date has been laudable. The number of opportunities for public comment alone is insufficient. It is apparent in reviewing the Preliminary Strategy that comments voiced by the public within these forums were not incorporated into the document. If the Task Force truly wants to achieve ecosystem restoration, the public and local scientists must be included, not only in public comments, but also in the decision-making process and their input must be incorporated. Moreover, any public engagement process going forward must include:

- * a transparent process for public monitoring program/project progress, and outcomes;
- * a process for incorporating local and traditional knowledge in management decisions.

We also wish to express our concern that despite the stated intent of EPA to establish a Citizens Advisory Committee (CAC) the role of the CAC has yet to be clearly defined. To this end, we are extremely disappointed that the Citizens Advisory Committee was not named in sufficient time to allow them a formal role in review, comment, and revision of this strategy. Participation of the CAC in finalization of this strategy would go far in ensuring that it is responsive to public input and concerns. It was the need for this type of formal input that motivated us to recommend that the Task Force establish an Environmental and Conservation Advisory Group (ECAG), comprised of community leaders and scientific experts who live and work along the Gulf. The CAC when formed must be fully integrated into the decision-making process of the Task Force. Moreover, the Task Force should work with the CAC to identify opportunities to fund technical assistance, planning and outreach to community-based organizations in socially vulnerable areas to better equip them to participate in environmental decision-making.

➤ **Consistency and Coordination**

The Preliminary Strategy does not adequately address the barriers to implementation of a restoration agenda. The Strategy simply states that the Task Force plans to evaluate barriers that hinder implementation and seeks to improve cooperation and coordination among state and federal agencies. Yet, the strategy's authors admit that several of the barriers and the need for coordination were identified during stakeholder meetings. In light of the uncertainty of continuation of the Task Force once this strategy is issued, it is unfortunate that the Task Force has not taken this opportunity to address barriers and the need for coordination that, as acknowledged within the Preliminary Strategy, has kept promised protection, conservation and restoration actions from fully materializing.

➤ **Ensuring consistency in the enforcement of existing law**

Prior to finalizing the Strategy, we call upon the Task Force to take on these thorny issues. As has been made very clear in all of the public meetings held by the Task Force, to be successful, local, state, and federal agencies must ensure that there is consistency between ecological restoration and environmental permitting in the designated Coastal Zone of each Gulf state. The Preliminary Strategy does take a step forward in this regard, when it calls for an increase in beneficial use of dredge materials for restoration by the U.S. Army Corps of Engineers. However, beneficial use policy does not address the more thorny issue confronting restoration: namely the permitting of wetlands destruction, which is inconsistent with restoration objectives. For example, activities pursued or permitted by the U.S. Army Corps of Engineers (Corps) must be consistent with coastal restoration goals and undergo cumulative impacts analysis pursuant to the National Environmental Policy Act (“NEPA”).

For years we have seen both the Corps of Engineers and the state of Louisiana talk about and encourage coastal restoration. At the same time, both the Corps and the states agencies--through Clean Water Act (CWA) Section 404 permits (administered through the Corps and reviewed by EPA), CWA Section 401 Water Quality Certifications (administered by the state), and Coastal Use Permits (administered by the state)—continue to allow the destruction of wetlands and the unmitigated dredging of canals that contribute to the Gulf’s coastal crisis. The first step to coastal restoration is to stop the bleeding by halting all avoidable and unnecessary wetland destruction. Failure to address this barrier to implementation of a comprehensive restoration strategy will doom near term restoration goals.

➤ **Re-evaluation of legacy projects**

Similarly, legacy projects throughout the Gulf of Mexico region should be re-evaluated in light of current needs and restoration priorities and to ensure consistency with the Natural Resource Damages Assessment and Task Force initiatives.

We believe that there are numerous decades-old navigation and dredging projects in the Gulf’s coastal zone whose original purpose is no longer relevant or is inconsistent with current coastal restoration goals and efforts. Thus these must be re-evaluated and analyzed to see if they continue to be economically justified, particularly when they are incompatible with environmental restoration efforts. There are many Corps-authorized projects, especially dredging projects, along the Gulf’s Coastal Zone. Given the Corps’ long history of dredging we feel that it is highly likely some projects exist that have been maintained for decades, despite the fact that the initial purpose of those projects no longer exists or contradicts current coastal restoration goals or efforts.

A good example that includes members of the Task Force is the Bayou Segnette Waterway (Intracoastal Waterway to Westwego, Jefferson Parish), which was authorized in 1954. This 12.2 mile navigation channel was to afford, "fishing and shrimp boats a shorter route to packing and canning industries" in Westwego. Due to changing consumer preferences and advances over time in the commercial fishing industry, there packing plants have closed. This waterway passes through the Park's Barataria Preserve and erosion of the waterway has and continues to destroy

marsh along its banks. Despite its age, there has been no new cost benefit analysis, or re-evaluation of the project's purposes in light of the current focus on restoration of ecology and hydrology of the National Park.

Implementation of any comprehensive restoration strategy requires reconsideration of the projects that impede or undermine restoration.

➤ **Need for Criteria and Prioritization of Long-term Ecosystem Restoration**

We believe that the goals and objectives of the Preliminary Strategy should be clarified to ensure that true ecosystem restoration is the focus of projects pursued under that Strategy. Although marrying environmental restoration with community protection, such as restoration of wetlands critical for reducing storm surge, is an appropriate use of scarce restoration funding, the construction of structural components of “protection” are not. However, far too often throughout the coastal Gulf, we have seen beach and shore armoring projects pursued in the name of restoration, when in fact; they result in destruction of the environment. The strategy’s goals should clarify that this is not the acceptable focus for “restoration.”

Additionally, restoration activities should focus on projects that have been developed with an eye to the impacts of sea level rise. Restoration funding should be focused on restoration of habitats that can withstand the predictable effects of anthropogenic, climate change fueled rising seas and strengthening storms. This will ensure that restoration of important habitats is sustainable over the long-term.

➤ **Need for Scientific Input and Review.**

We applaud the Preliminary Strategy’s commitment to the use of the best available science for implementation. We strongly believe that the Final Strategy must ensure that all restoration decisions are rooted in science so that project selection and funding allocations create an effective region-wide restoration strategy. It will also advance transparency in decision-making and enhance credibility with the public. We believe, however, that the Final Strategy should go further than a generic commitment to the use of best available science. There should be a requirement that all ecosystem restoration projects be subject to independent scientific review before approval and should state a clear, measurable and achievable endpoint. Specifically we request that the Task Force create a Science Advisory Committee to provide independent input on restoration project selection, implementation, and monitoring processes.

➤ **The Decision-Making Body and Process**

The Preliminary Strategy fails to recommend any formal decision-making body for implementation of the Final Strategy. Instead, it presumes the continuance of the Task Force in its current form, which has no independent authority or budget. Additionally, the Preliminary Strategy focuses on coordination of existing entities, such as the Gulf of Mexico Alliance, or processes such as the Natural Resource Damage Assessment.

This is simply not sufficient to ensure effective implementation of a comprehensive restoration strategy. A decision-making body must be created that is actually solely focused on Gulf-wide

restoration as delineated within the strategy. Whether an existing or new governing body is established, it must be empowered with specific duties and authorities relevant to comprehensive Gulf restoration in order to provide a sound management structure. These duties and authorities should include, but are not limited to:

- * Ensuring that a collective restoration agenda is implemented throughout the Gulf and funds are directed to identified priorities and effective programs and projects;
- * Establishing a Gulf-wide restoration agenda with public input, available to all stakeholders and the public, with sound programs and projects directed at ecosystem-based restoration needs;
- * Developing priority criteria for the selection of programs and projects that can be applied in an equitable and transparent manner across the Gulf;
- * Creating a structure that allows for consistent communication with stakeholder groups, independent scientists and experts, and the public, along with state and local government throughout the Gulf Coast;
- * Establishing a transparent process for monitoring program/project progress, and outcomes; and
- * Establishing a process for incorporating local and traditional knowledge in management decisions.

It is imperative that the decision-making body charged with implementing the strategy creates a unified, comprehensive environmental restoration plan that integrates environmental restoration into a focused vision for a resilient Gulf Coast. There are many worthy individual projects to be considered, however, many of these do not fit into a long-term holistic restoration vision. We must ensure that the Final Strategy prioritizes projects that fit within a comprehensive vision for coastal resiliency, ones that address systemic enhancement, restoration and protection of our coastal resources.

Additionally, we repeat again the need for the Final Strategy to adopt a decision-matrix to provide a general framework from which to make funding decisions. The Preliminary Strategy fails to do so. Creating such a matrix ensures that projects with the most substantive environmental benefit are pursued and funded first. Factors we suggest as key evaluators under such a matrix would ensure that chosen projects accomplish the following:

- * Address long-term recovery goals such as prevention of or recovery from oil spills, preservation/restoration of fish and wildlife, restoration of use;
- * Have a Gulf-wide or Regional benefit;
- * Address root causes of issues, not symptoms; and
- * Have specific deliverables and measurable objectives.
- * Each factor should be assigned a point value, and those projects that meet the most criteria, and thus have the greatest point value, will be chosen. A clearly defined system such as the matrix suggested by the Gulf Future campaign (attached) will ensure that environmental restoration projects that maximize long-term coastal resiliency will receive higher priority when funding becomes available.

III. WHAT NEW PROGRAMS AND ACTIONS (STATE, FEDERAL AND PRIVATE) ARE NEEDED?

➤ Harbor Maintenance Trust Fund Should be Refocused

We recommend that the Task Force agencies (such as the Corps of Engineers) set as an objective issuance of a policy memo stating that the Harbor Maintenance Trust Fund should be used, to the maximum extent practicable, to supply beneficially used Mississippi River dredge material to coastal restoration projects. The Strategy should stress the importance of use of the Harbor Maintenance Trust Fund, to supply beneficially used Mississippi River dredge material to coastal restoration projects.

➤ Long Term Monitoring

We appreciate the Preliminary Strategy's inclusion of two forms of monitoring within its discussion of goals and proposed actions: monitoring of sentinel species and sites over time to identify current and potential threats; and integration of monitoring, modeling and research into restoration planning through to adaptive management decision-making. The BP oil disaster revealed significant scientific uncertainty about how marine species at various life history stages and in a range of habitats would respond to oil exposure. Understanding the species-specific and broader ecosystem effects of oil is critical to prescribing restoration measures needed to facilitate and track recovery of injured, living marine resources. A significant lesson from the Exxon Valdez and Ixtoc I oil disasters is that while the full environmental effects of discharged oil or gas may not be known for years (or ever), early and sustained investments in ecosystem monitoring and research are critical to detecting lingering or subtle effects. Even in the absence of episodic or catastrophic human-induced events like the BP disaster, however, the Gulf of Mexico ecosystem is in perpetual flux.

Monitoring is also needed to allow the Natural Resource Trustees and other decision-makers to audit the effectiveness of restoration activities against program objectives and make changes in programmatic investments accordingly.

We continue to believe that a Gulf of Mexico Ecosystem Research and Monitoring Program modeled after the North Pacific Research Board ("NPRB") is needed to provide a clearer understanding of Gulf ecosystem dynamics, track restoration progress, and support adaptive and sustainable management of living marine resources, including forage and fishery species. NPRB-funded research has improved scientists' ability to forecast ecosystem changes, answered important questions about fish-habitat relationships, and led to more informed resource management decisions. An endowed monitoring program should emphasize an integrated, interdisciplinary approach to long-term research and monitoring. While the program's ultimate goal is to take the pulse of the Gulf and facilitate sustained human use of a productive, diverse Gulf of Mexico ecosystem, the following supporting goals should guide specific project funding: 1) measure performance of Gulf ecosystem restoration projects; 2) assess lingering injury from the BP Deepwater Horizon disaster; and 3) improve understanding of the Gulf ecosystem to guide future decision-making and adaptive resource management. Such a program should include an expanded Ocean Observing System in the Gulf of Mexico so that large-scale or subtle shifts in the ocean ecosystem, and resulting changes in productivity and fishery resources, can be

detected with sufficient warning.

➤ **Utilizing information technology**

The report should include a robust recommendation for application modern information technology and information sharing. There is a wealth of ecologic data buried in historic reports in state archives. Digitization of these into searchable electronic files creates a windfall of data that can quickly advance our understanding of the gulf and its coast. The existing cumulative knowledge between the five states and federal agencies can be utilized to reduce cost and more quickly advance restoration. Digitization, creating data portals, electronic cataloging, GIS data sharing, are now off the shelf technology that requires relatively small investment for big payoffs.

IV. WHAT KEY POLICY CHANGES WILL IMPROVE THE PROCESSES NECESSARY TO SUPPORT RESTORATION?

➤ **Ensuring that local and regional, populations, including the most vulnerable residents, actively participate in restoration and benefit from new restoration economy.**

The Final Strategy must ensure that restoration projects will economically benefit communities in impacted areas. For example, projects must include workforce development opportunities and set aside requirements aligned with federal standards to promote a project and contracting process that benefits local, minority and women-owned businesses in states where *Disadvantaged Business Enterprise* (DBE) laws are regressive or prohibited.¹ To enhance community resilience through economic diversification and development it is imperative that the Task Force strategy includes goals and measurable objectives that promote:

- Maximize existing federal resources that have been sent to the Gulf to address workforce development and job creation, retention and diversification challenges by issuing, via Executive Order, opportunities that allow States to extend and increase the flexibility of the NEG using disaster NEG provisions;
- Sector based work force initiatives that support community recovery, including promotion of skills training and development of career pathways in coordination with ecosystem restoration projects;
- The hiring of local workers for restoration project, through the development of standards, particularly those who are participating or have completed training programs targeting disadvantaged or multi-lingual populations;
- Bilingual training and workforce ESL to communities where English is not the primary language, but where the workforce has been devastated by the oil disaster.
- Restoration projects that ensure compliance with equal opportunity laws and principles by developing standards for set-asides of contracts for local, small and disadvantaged businesses and appropriate preferences for firms that includes them in their subcontracting plans;
- Priority should be established for contracting restoration projects with local businesses
- Diversification and innovation as a path to economic resilience and economic development. The Task Force should use this strategy to ensure that economic development funds are not simply used to expand coastal communities' reliance on existing industries or to support projects that threaten the sustainability of coastal

communities; and

- Ecosystem restoration projects that build resiliency to disaster. Although the Preliminary Strategy does reference the benefits to Gulf communities from ecosystem services, such as better storm protection and healthier fisheries. However, to truly support building community resilience to disaster the Final Strategy should incorporate the social vulnerability index ⁱⁱ that reflects 32 economic and social variables that contribute to a community's ability to cope with hazards.

➤ **Addressing the Dead Zone:**

The Preliminary Strategy sets, as a goal, efforts to target priority watersheds that contribute excess nutrients in coastal waters and reduce hypoxic conditions. However, the goal and recommendations are less vigorous than is the Mississippi River/Gulf of Mexico Task Force Action Plan, which has over the last 10 years failed to achieve significant reductions in nitrogen and phosphorus pollution flowing into the Gulf.

An effective Final Strategy must:

- * Expand the Mississippi River Basin Initiative (MRBI), and include attention to similar hypoxic zones on smaller watersheds along the Gulf Coast.
- * Expand state-based agricultural programs. Recently the Environmental Law and Policy Center (ELPC) and the Mississippi River Collaborative (MRC) released a report, Cultivating Clean Water.ⁱⁱⁱ This report outlines many state-based conservation practices that can be enacted to help reduce pollution (especially nitrogen and phosphorous pollution) that makes its way into the Mississippi River, and thence the Gulf. We recommend that EPA, USDA, and the State representatives on the Task Force use this publication as a tool to enact conservation activities throughout the basin and Gulf coast, on a state-by-state basis.
- * Ensure development of nitrogen, phosphorus, and dissolved oxygen TMDL for the Gulf and Mississippi River. In October, EPA finalized Louisiana's Impaired Waters List (303(d) list), where they listed the Gulf as impaired for low dissolved oxygen. Now due to this listing, Louisiana and EPA have an obligation under the Clean Water act to develop a Total Maximum Daily Load for dissolved oxygen, nitrogen, and phosphorus in the Northern Gulf and Mississippi River. This is necessary to clean up the Dead Zone.
- * We ask that the members of the Task Force utilize their existing authorities to ensure that these plans are enacted. Without these minimum limits and load allocations for Dead Zone-causing pollution in the Mississippi, it will be even more difficult for the necessary clean-up to happen.

➤ **A policy should be adopted requiring that legacy oil and gas production and exploration canals on public land should have their spoil banks degraded to narrow the channels and restore more natural hydrology.**

Degrading of spoil banks into the canal, or "backfilling" is a well-documented, highly cost-effective means of ecological restoration that requires no external source of sediment and no further management so long as the backfill is conducted to the proper elevation by a skilled operator.^{iv} Required as part of coastal permits in Louisiana for a short while, the practice soon

ceased as regulatory policy weakened. Over the last twenty years, those few spoil banks have become functional marsh. Given the thousands of miles of these canals that still scar the Louisiana coast, we feel that the Department of Interior and other agencies should prioritize this method of restoration in all public lands in the Gulf's Coastal Zone.

V. WHAT WOULD "SUCCESS" LOOK LIKE, AND HOW SHOULD IT BE MEASURED AND REPORTED?

The Gulf of Mexico is a dynamic ecosystem, and many of its features and functions are not tied to specific points on a map; therefore, the Final Strategy should use a metric of ecosystem functionality to measure and report success. Additionally, success would include clear mission, set of principles and project selection criteria. (We again refer the Task Force to *Strategy for Restoring the Gulf of Mexico: Recommendations to the Gulf Coast Ecosystem Restoration Task Force* issued in 2011 by Audubon, Environmental Defense Fund, Harte Research Institute, Lake Pontchartrain Basin Foundation, the National Wildlife Federation, Nature Conservancy, and Ocean Conservancy).

In addition, signatories to these comments believe that restoration success would require that areas of important habitats are protected through acquisition to allow for continued resilience of coastal areas in the face of migrating shorelines. Permanent protection of habitats would also ensure that areas are available for natural outdoor education, storm attenuation, and water filtration. Successful restoration should include robust monitoring, which includes community members in the monitoring of restoration activities and the ultimate success of habitat restoration.

Overall, however, it is difficult at this point to determine what the specifics of success or restoration activities would look like for the myriad of habitats and coastal communities in the Gulf. As implementation of the strategy moves forward, communities should be engaged in defining success for their unique communities through participation in defining desired outcomes.

We appreciate the opportunity to make recommendations to the Task Force in its effort to develop a comprehensive Gulf Restoration Strategy. We welcome the opportunity to meet with you or Task Force members to discuss these recommendations. If you have any questions or need additional information, please do not hesitate to contact _____.

Respectfully submitted on behalf of the undersigned,

Gulf Island Conservancy
Gulf Restoration Network
Sierra Club
Galveston Baykeeper
The Equity and Inclusion Campaign

CC:

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Heather Zichal, Domestic Policy Council
N.Gunter Guy, State of Alabama
Mimi Drew, State of Florida
Garret Graves, State of Louisiana
Alice Perry, State of Mississippi
Jerry Patterson, State of Texas

ⁱ Recommendations to the Gulf Coast Ecosystem Restoration Task Force: Enhancing the resilience of the most vulnerable communities and building the restoration economy
Oxfam America, BISCO, Coastal Women for Change, STEPS Coalition, TRAC, and Zion Travelers Cooperative Center, 2011

ⁱⁱ Described in Emeric, C (2009) *Exposed: Social vulnerability and climate change in the Southeast*. Boston: Oxfam America

ⁱⁱⁱ <http://elpc.org/wp-content/uploads/2010/05/ELPC-Cultivating-Clean-Water-updated-May-5-2010.pdf>

^{iv} Baustian, J. J. and Eugene Turner, R. (2006), Restoration Success of Backfilling Canals in Coastal Louisiana Marshes. *Restoration Ecology*, 14: 636–644. doi: 10.1111/j.1526-100X.2006.00175.x; see also <http://etd.lsu.edu/docs/available/etd-04132005-180725/>