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Office of Environmental Information Docket, Mail Code 28221T
1200 Pennsylvania Ave., N.W.
Washington, DC 20460
Via email to oei.docket@epa.gov

Dear Gulf Coast Ecosystem Restoration Task Force members,

Audubon of Florida (Audubon) is pleased to see the comprehensive scope of the Gulf Coast Ecosystem Restoration Task Force's Preliminary Strategy (Strategy), and we are grateful for the opportunity to contribute comments and suggestions. Please find our specific comments below, referenced by page number where relevant for your convenience.

The Importance of Barrier Island Erosion and Accretion

Much of the language regarding barrier island dynamics in this document seems inclined to managing barrier systems as static. For example, "barrier island erosion" is cited as one of the negative consequences of reduced Mississippi River flows (pg. 1), "Erosion of barrier islands and shorelines throughout the Gulf Coast" is identified as a "problem affecting the Gulf" (pg. 7), and shoreline "stabilization" is championed throughout the document as a virtue. As a result, the Strategy does not adequately or accurately characterize how essential coastal erosion and accretion are to these habitats and the species which depend upon them. Many of these species are imperiled because of our tendency to interrupt these processes in an attempt to "stabilize" these naturally evolving landscapes.

Especially in the Eastern Gulf, where sediment transport is not as much of an issue, discussions of "stabilizing" barrier islands are largely intended to protect the built environment, often at the expense of wildlife habitat. Beach "renourishment" is not de facto habitat creation, and often, "stabilization" projects such as large sea oats plantings or dune construction eliminate the early successional portions of the beach-dune mosaic upon which imperiled species like Piping, Snowy and Wilson's plovers depend. Much of the language in this document referring to stabilization of barrier systems is the same used by the tourism industry in the Eastern Gulf to inaccurately characterize all beach renourishment and coastal engineering projects as habitat protection. Beach projects can be good for wildlife, but they must be held to a higher standard, if we hope to see both economic and ecological benefits.

If we truly intend to restore the Gulf of Mexico, we must ensure that preserving and restoring coastal processes and dynamism is fundamental to the restoration plan.

Beneficial Uses of Dredge Spoil (pp. 24-25)

In addition to looking for opportunities to use dredge spoil for habitat restoration, even artificial spoil islands can be managed in a way which is beneficial for imperiled species. In particular, beach-dependent birds like Least and Gull-billed Terns, Black Skimmers, American Oystercatchers and Wilson's Plovers can use these sites for nesting if they are maintained with little vegetation, gradual slopes to the water and disturbance limited during the breeding season. Similarly, we envision a scenario in which a spoil island could be designed as a seasonal recreation site to take pressure off nearby nesting areas that suffer disturbance from recreational users.

We encourage the Task Force not only to think about the restoration of habitat using dredge spoil, but also managing artificial spoil islands for the benefit of imperiled and declining species.

Exotic Species and the Issue of Predator Control (pp. 41-42, pg. 68)

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 nesting at Florida's coastal parks. Coyote control is essential if we are to maintain and recover the dwindling populations of beach-dependent birds and nesting marine turtles of the Gulf. Similarly, it would be appropriate to expand this section beyond simply "exotic species" to "predator control." In addition to coyotes, raccoon populations amplified by several orders of magnitude as a result of human food sources and the absence of apex predators have a devastating effect on wading-, shore- and sea bird nesting. Without raccoon control, productivity at many nesting sites would be zero.

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.

Promote Environmental Stewardship (pg. 48)

Audubon applauds the Strategy's emphasis on environmental education and outreach activities and encourages the Task Force to expect more from this outcome than simply awareness-raising. Audubon has been very successful in Florida with our beach-dependent bird stewardship programs in which volunteers chaperone nesting colonies and aggregations of migrating birds to protect them from disturbance and to educate beachgoers about these remarkable species. It has been our experience that opportunities like these—not just to experience, but to engage—not only educates participants but invests them in the future protection of these resources. Audubon is very proud of our efforts to help these species "nest in peace" in locations where they otherwise would not survive the crush of public recreational beach use, and at the same time, cultivate new community leaders and civic engagement.

The Strategy should anticipate this goal cultivating not only awareness, but also leadership and civic engagement—helping to rebuild our Gulf Coast communities.

Adaptive Management and Interagency Coordination (pp.49-50)

Audubon is pleased to see the attention provided in this plan to the need for coordination among agencies and levels of government. Much of the damage in the Eastern Gulf as a result of the Deepwater Horizon disaster came not from oil's arrival on beaches, but from uncoordinated and harmful monitoring and protection activities undertaken by different levels of government, agencies, landowners and the non- and for- profit sectors. The tragedy—and lesson—in this is that each of these actors was trying to *prevent* harm, and instead caused it. Each was focused on completing their immediate task at hand; unfortunately, activities often ran counter to one another. For example, vessels of opportunity regularly checking that booms remained in place caused propeller scarring of seagrasses. Low flying helicopters surveying the extent of oil caused disturbance and destruction of beach-nesting bird colonies. Volunteers cleaning the beach of debris trampled Snowy Plover nests and eggs. We must ensure that restoration efforts do not suffer the same fate. Targeted restoration projects run the risk of working at odds with one another if not well coordinated. In addition to the collaborative and inclusive consortium that the plan anticipates guiding this process, we suggest that an "air traffic controller" of sorts also be appointed. This individual would work as an ombudsman to vet projects for compatibility and to identify and address issues quickly, should they arise. This will also provide entrée for state agencies that do not have the same degree of representation on Gulf Restoration decisionmaking bodies as the state's primary trustee/delegate.

The Strategy should call for an Ombudsman to ensure the effects of restoration projects are additive rather than competitive.

Florida Priorities for Habitat Conservation and Restoration (pg. 68)

As stated previously, 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 which 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 between our state's resource agencies and it privileges the priorities of the agency represented on the Task Force.

Include sand placement activities, but do not let them dominate our priorites as they do currently. Additionally, consider adding the strategy "Evaluate recreational pressures and establish wildlife refugia protected from disturbance to ensure population recoveries."

Florida Forever (pg. 67)

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.

To this end, 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 this restoration plan is retained for the duration of time intended by this Strategy.

Additional Suggestions

Pp. 36-7: Threats to coastal species should be expanded to include predation and disturbance.

Pg. 38: In addition to federally listed species, it would be better to also include state listed species and those identified in State Wildlife Action Plans as Species of Greatest Conservation Need.

Pg. 41: Sentinel birds should also be expanded to include a representative colonial nesting bird like Least Tern and/or Black Skimmer, and colonially nesting wading birds like Roseate Spoonbills or Reddish Egrets. Similarly, sentinel sites should also include national wildlife refuges and seashores, as well as state parks and preserves. Emphasis should be placed on implementing management improvements; it is easy for funding and time to be exhausted on monitoring alone if emphasis is not placed on management.

Pg. 66: Declines in species should also be attributed to increased incompatible recreational uses of coastal areas making otherwise healthy habitat unsuitable for some species.

Pg. 67: The summary of Florida's natural resources would be remiss if it did not recognize the unique dune lake features of the central Panhandle coast. The ocean outfalls for many of these unique freshwater features were closed during the summer of the Deepwater Horizon incident with consequences for coastal wildlife.

Pg. 97: Wildlife populations (abundance, diversity and distribution) should be one of the categories of information collected under "Monitoring Programs."

Again, thank you for the ongoing opportunities to contribute to the development of this historic strategy. Audubon has been working in Florida for the conservation of Gulf habitats and wildlife for more than 100 years, and we look forward to the abundant Gulf that this bold strategy anticipates.

Sincerely,

Julie Wraithmell
Director of Wildlife Conservation