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February 5, 2016

Mississippi Department of Environmental Quality
Attn. Melanie Green
515 E. Amite St.
Jackson, MS 39201
Melanie_Green@deq.state.ms.us

RE: Steps Coalition's Addendum Comments on Mississippi's Multiyear
Implementation Plan

Dear Melanie Green:

Steps Coalition submits the following comments as an individual addendum to a group letter our organization signed along with other NGOs and conservation groups submitted by the Mississippi Environmental Focus Group (MEFG). While we support the comments made in the MEFG document, there are additional points we would like to make that extend beyond the letter's focus on process.

There has been a strong consensus among many NGOs and conservation groups that restoration recovery does not have to be viewed as separate from economic recovery. In fact, it is our view that addressing water quality issues on the coast is an investment in the economy. Our coastal tourism and seafood industries depend on having clean and safe water. People come to the Mississippi Gulf Coast to play in our water and eat our Gulf seafood. Thus, we would have liked to see more infrastructure projects that address water quality issues, such as upgrades to existing sewer plants, replacement of failing pipes and leaky lift stations, etc. It is irresponsible to invest \$17 million for an aquarium in Gulfport when our beaches are closed several times a year because they are not safe and our seafood industry, especially the oysters, is threatened. If the aquarium is going to be the "home run" it is expected to be then the state must also ensure that natural resources vital to our local economy are restored and maintained.

Smart and strategic economic investments are necessary to revitalize our Gulf Coast economy, especially at a time when the unemployment rate is high and tax cuts threatened the social safety net for many living on the Mississippi Gulf Coast. Absent from the Multi-year Implementation Plan is a cost benefit analysis and/or feasibility studies that demonstrate to the public how these selected

projects will result in the best return on investments. The fact that the plan does not have such an analysis runs contrary to the state's commitment to transparency and accountability and the Pew-MacArthur Results First Initiative implemented by the state.

There are two specific economic projects whose projected investment raises a red flag. The first is the Jackson County Corridor Connector Road for \$10.2 million. The proposal for this project can be found in the Mississippi portal and the requested amount is \$5 million because the total projected cost is \$13.7 million of which \$8.75 million has already been secured through federal funds. Why then is the state giving two times the amount requested for the same project? We request that the state to justify this amount.

The second project is the \$5 million for Improved Fiber Optic Infrastructure. It is unclear in the plan how much of the \$5 million will be used for actual investments in building/enhancing the state fiber optic infrastructure (if at all) and how much will be used for planning. The open-ended language of the project leaves room for the state to spend too much money on an action plan. Also, without a plan, the amount secured for this project is arbitrary. Why \$5 million? We support a project that will improve the state fiber optic infrastructure because it has been documented in other cities, such as Lafayette, LA, that such investments stimulate the economy and have positive social benefits as well. However, if what other cities have spent is an indicator, the financial investment for improving the fiber optic infrastructure is significant and exceeds the proposed \$5 million. We would thus, like to see more detailed report on how the state plans to use the \$5 million.

The state is receiving a significant amount of money as a result of the BP Oil Spill Disaster. However, it does not reflect the total amount owed to the people of the Gulf Coast. The Clean Water Act fines alone are half of what they could have been. Many communities we work with on the Gulf Coast are concerned that the money will not be enough to fully restore what was taken from us on that tragic day April 20, 2010, especially those whose livelihoods depend on the health of the natural resources. We believe that the State has a responsibility first and foremost to these communities and should make it clear every step of the way that it will use the money to ensure that what BP took will be made whole. The State has failed to do so, especially as it relates to the seafood industry. It has been over five years and there is no sign that the oyster industry will be returning anytime soon. Those who depend on this industry continue to take on a significant financial burden, especially the Vietnamese American Fisherfolks, who have also not had full access to restoration opportunities.

In addition, given the devastation that the oil and gas industry has had on the entire Gulf, it is irresponsible of the State to make investments to support the

growth of the oil/gas industry that not only threatened and continues to threaten the health and sustainability of our communities, but also threatens the health and sustainability of our planet. Thus, of all the possible projects, BP money should not be used to fund a Trans-Loading Terminal Facility at the Port Bienville and a Work Ready Program that includes training for the oil/gas sectors. We do not specifically oppose infrastructure projects for Port Bienville. The Hancock County Port Harbor Commission submitted 24 proposals for project at the Port, one of which includes upgrades to the Port's water and sewer infrastructure. The current infrastructure is not up to industry standards. Why then was this particular project at the Port selected over the other 24?

We also do not oppose a Work Ready Program. However, we would like to see the program include growing sectors, such as environmental conservation and alternative energy and specifically exclude the oil/gas industry. Secondly, we would like to see workforce development projects/programs that target those most affected by the oil spill disaster, especially the fishing communities. Lastly, all workforce development projects should also include partnerships with non-profit organizations that already have successful programs that provide similar kinds of curriculum (developmental and employable skills training and skill assessment) and/or provide the additional services that are often necessary to support re-entry and advancement in the workforce, such as financial support for childcare. Investments in a program that involves partnerships between NGOs and community colleges would likely produce better outcomes and strengthen the capacity of these organizations and agencies to support a skilled workforce.

Lastly, in addition to restoring the natural resources and livelihoods of those most impacted by the BP Oil Spill Disaster and revitalizing our local economy, the money that will come to the state over the next 17 years is an opportunity for the state to make vitally important investments to build resiliency and protect our communities from the inevitable threat of sea level rise and future storms and flooding. There are individuals and families living in neighborhoods along the coast that will need to be relocated if the local, state, and federal government does not act. The cost of relocation and lost revenues threatens the economic security of these communities. Thus, we believe that the state should consider using BP restoration funding for infrastructure projects and climate mitigation programs, such as flood/wind mitigation for low-income communities, to ensure the resiliency of the Mississippi Gulf Coast in the face of climate change. There are currently a number of vetted federal spending infrastructure projects in the Mississippi Coastal Improvement Plan (MsCIP) created by the state and Army Corps of Engineers that could be implemented with a non-federal state match using the BP restoration monies, such as the Turkey Creek Ecosystem Restoration and the Forest Heights Levee Elevation.

In conclusion, the first round of projects proposed under the Multi-year Implementation Plan lacks the transparency, accountability, and vision required to restore and protect our natural resources, local economies, and future sustainability of our communities. We would like to see more infrastructure and restoration projects that addresses water quality, climate mitigation, and restores our fisheries and economic and workforce development projects that demonstrate sound returns on investment, enhance cross sector partnerships and expand more sustainable industries, such as renewable energy and environmental conservation rather than the oil/gas industry.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Crosslin". The signature is written in a cursive, flowing style.

Jennifer Crosslin
Steps Coalition

cc:

Laura McGilvray, Program Director of US Department of Treasury
Nicole Comsiky, Grants Management Specialist of US Department of Treasury
Liz Barber, Mississippi Environmental Focus Group