Activity: Gulf of Mexico Habitat Restoration via Conservation Corps Partnerships - Program

Extension

Unique Identifier: DOC_RESTORE_003_007_Cat1

Location: States of Texas, Louisiana, Mississippi, Alabama, and Florida

Type of Activity: Programmatic Implementation

FPL Category: 1 - Funding Approved

Cost Estimate: \$2,000,000

Responsible Council Members: Department of Commerce (DOC)/National Oceanic and

Atmospheric Administration (NOAA), Department of the Interior/Bureau of Indian Affairs

Partnering Council Member(s): States of Alabama, Florida, Louisiana, Mississippi, and Texas

("State" or "States")

Originally submitted by: The DOC as a component within the proposal "Gulf of Mexico Habitat

Restoration via Conservation Corps Partnerships"

Executive Summary: This funding provides a cost and time extension (\$2 million over 16 months) of the Gulf Coast Conservation Corps (GCCC) Program, including a Tribal Youth Conservation Corp component, funded in the Initial FPL at \$8,000,000 for 3 years. This time is needed to ensure continuity of the Program's operation while the RESTORE Council considers whether to include longer-term funding by including it in FPL 3b (anticipated to be finalized in the first half of 2021). In its first three years of implementation, the GCCC Program established a regional workforcetraining program to benefit local communities and support long-term Gulf coast restoration implementation. Individuals trained under the program help to execute priority restoration projects selected for funding and implementation under Deepwater Horizon-related recovery programs, including other activities funded in the FPL, as well as other restoration and conservation programs. GCCC workers work only on projects or activities that are in compliance with all applicable environmental laws and regulations ("compliant"). GCCC benefits include recruiting and training local workers (particularly youth, veterans, and displaced workers) in a variety of habitat restoration techniques and providing paid, hands-on work experience in onthe-ground restoration projects. These jobs vary depending upon the scope of the project, but can include operators, machinists, welders, surveyors, and a variety of laborers, scientists, and managers. The GCCC Program has two primary activities – the first overseen by DOC/NOAA and tailored to the unique needs and communities of each State, and the second overseen by DOI/Bureau of Indian Affairs (BIA) focused on tribal youth. DOI/BIA works with Federally Recognized Tribes within the Gulf Region to engage tribal youth in support of environmental restoration and implementation of projects selected by the Council. The GCCC Program leverages existing partnerships among Federal, state, academic and non-profit organizations and provides opportunities for local citizens to gain part of the knowledge, skills and training necessary for implementation and management of restoration projects. The cost and time extension will continue this work as described above.

PROJECT DESCRIPTION:

Specific Actions/Activities: Over a 16-month period, an additional \$2 million (\$1.7 million to

NOAA/DOC; \$300 thousand to DOI/BIA) will be used to continue the GCCC Program, as approved and funded in the Initial FPL. This time is needed to ensure continuity of the Program's operation while the RESTORE Council considers whether to include longer-term funding by including it in FPL 3b (anticipated to be finalized in the first half of 2021). This program was originally approved and funded at \$8 million for three years. In this time, NOAA, in partnership with DOI and the States, invested \$8 million to help execute environmentally compliant priority coastal habitat restoration projects across the Gulf. The GCCC Program has two primary activities — the first overseen by DOC/NOAA and tailored to the unique needs and communities of each State (\$7.5M), and the second overseen by DOI/BIA focused on tribal youth engagement (\$500k). DOC and its partners recruit and train members in a variety of skills, and mobilize paid crews that receive on-the-ground training through working on portions of other environmentally compliant projects. The GCCC program supports the restoration of coastal habitat, including oyster reef, marsh, seagrass, shorelines, longleaf pine forest/savanna, and coastal prairie.

The \$7.5M that DOC/NOAA originally received will be increased by \$1.7 M to continue restoration implementation. This includes program planning, development and oversight. Each Gulf state will have GCCC labor and supplies to conduct restoration projects. Depending upon other leverage and cost sharing within each state, the total value of the GCCC could extend beyond the amount invested by the RESTORE Council. The cost extension will ensure that investments made in the first three years of this program continue without interruption while the Council considers whether to include the Program in FPL 3b. Developing this program required program planning, training, recruitment, capacity building, and an evaluation of leveraging opportunities and partnership development. This cost and time extension ensures that this work will continue. Should the Council decide to include the GCCC Program in FPL 3b, the Program continuity provided by this cost and time extension will save the Council time and money by not needing to reinitiate the Program NOAA is planning to continue to contract out portions of the project to knowledgeable local or regional organization(s) to assist in the administration and operational development of this program. Such activities include developing and conducting recruitment strategies, managing and overseeing corps members, facilitating training, and conducting education and outreach. This is done through a competitive bidding process. Program planning efforts, described in more detail below, have helped to shape the competitive Federal Funding Opportunity (FFO) solicitation. Program planning includes, but is not limited to:

- Partnering with the RESTORE Council to identify restoration priorities for GCCC labor to support implementation of FPL projects
 - Through the Council, DOC/NOAA partners with the other RESTORE members to prioritize restoration needs that are appropriate for Corps labor, so that training can be tailored to best serve those needs. An inherent element of this project is integration with RESTORE projects, as well as potentially other regional restoration opportunities to which their training qualifies.
- Recruitment, Training, and Evaluation of Leveraging Opportunities (ELO)
 DOC/NOAA are in close collaboration and utilize national data systems through
 the EDA and MBDA to identify economically depressed coastal communities and
 underserved sectors of their respective labor forces. Working in collaboration

with these bureaus, the Department of Labor, and state counterparts, DOC/NOAA focuses corps recruitment within those sectors as appropriate to meet the restoration objectives of the selected projects and near-term restoration priorities within each state. DOC/NOAA has also completed an ELO. After evaluating and identifying leveraging opportunities, they contracted with local and regional conservation groups experienced in corps education and training to assist in program development and execution as scoped and overseen by DOC/NOAA. Training is orchestrated by DOC/NOAA, in collaboration with their contractors and state partners, to focus on those skill sets required of the restoration tasks selected. Training logistics are established to provide efficiencies across corps member groups, where knowledge and experience can be leveraged throughout the region.

Crew Scheduling and Mobilization

Once crews are developed and trained, DOC/NOAA works with their contractors and state partners to establish construction schedules and timeframes for mobilizing trained crews to project sites. Schedules are established for each calendar year in accordance with anticipated construction activities within each state.

Continuing Education and Training

The GCCC serves as a springboard to other restoration-based vocational training that is already present across the Gulf coast. Part of the up-front planning process included leveraging existing vocational programs and continuing education to continue to provide opportunity to corps members after the life of this project.

Throughout the life of the program, DOC/NOAA commits to performance monitoring of both the restoration activities conducted by the GCCC, as well as performance metrics related to member recruitment goals, retention, labor hours, and job skills gained. DOC and DOI, working with State and federal partners, determine compliant Gulf restoration project implementation needs. Through the pre-planning work for this project, the GCCC then tailors work crews and training to both conduct on-the-ground work within the projects and monitor project performance over time. A corps organization or multiple organizations are competitively selected to help coordinate the enhancement of local corps programs, recruitment of crew members, training, mentoring, labor and oversight, maintenance of administrative records, and support of some supply and equipment costs. The program seeks to help revitalize local economies through providing hands on skills training supporting these on-the-ground restoration projects, as well as help launch corps members into long-term vocational training for restoration-based careers.

DOI/BIA, working with local tribes, designed a tribal conservation corps program that followed the model of adult mentors guiding crews of youth working on compliant conservation projects along with education, workforce programming and support services. Given the comprehensive nature of corps organizations, they adapted program models to align with a variety of career pathways based on the type of project they are working on. The

corps model also focused heavily on ensuring essential skills. For the initial pilot program, DOI focused on engaging with tribal youth from Federally Recognized Tribes in the Gulf Coast region, defined as within 25 miles of the Gulf States' coastal zones.

Deliverables: The Program will continue to provide support to compliant regional habitat restoration while providing training, skills, and hands-on experience to local communities. The Program will continue to support and provide habitat restoration, the scale of which will be determined according to the projects identified, in concert with the other RESTORE members, for the GCCC to help implement. Through the tribal youth conservation corps activity, DOI/BIA will continue to work with the Federally Recognized Tribes within the Gulf Region to engage tribal youth in compliant local restoration projects. This will continue to be accomplished through youth leadership and development, civic engagement, natural resource management, and hands-on job training.

Ecological Benefits/Outcomes and Metrics: The Program will continue to support appropriate habitat restoration elements of the FPL, as well as other regional restoration opportunities. Where feasible, crewmembers will continue to be trained in monitoring techniques to assist in accurate data collection and to provide an additional technical skill set.

In addition, labor statistics will continue to be collected, including total number of crews employed, total labor hours, and training provided. Furthermore, DOC/NOAA and its project partners will continue to meet during the course of project implementation to evaluate monitoring data, and project and corps' performance, to make adjustments as needed to the program. DOC/NOAA and its partners will continue to evaluate the efficacy of the Program and apply adaptive management principles to refine and optimize efficiencies.

Leveraging and Co-Funding:

- Other Gulf restoration projects: The GCCC program leverages labor and specialized training to implement portions of other projects funded on this FPL or through other Gulf restoration efforts; and utilizes this experience towards the development of a local labor force to support implementation of future FPLs or other project opportunities in the region.
- Existing Groups: The GCCC was formed by leveraging the expertise and proximity of existing institutions and training groups across the Gulf coast to form the core of the program. These partnerships will continue to be a central component of the work conducted under this cost and time extension.

Duration of Activity: 16 months.

Life of Activity: Initial three years, plus 16 months. Potentially longer, pending FPL 3b decision.

2015 Initial FPLRESPONSE TO SCIENCE REVIEWS:

NOTE: The science reviews, and the responses to those reviews, occurred as part of the Initial FPL review.

Comment(s): There is a noticeable absence of detailed discussion of the scientific basis and techniques to be employed vis-a-vis the individual restoration projects, including, 1) it is unclear as to why the projects were selected; 2) there is inadequate documentation demonstrating that the proposed projects are consistent with existing restoration plans for the affected states; 3) no techniques/methodologies are presented in any detail to demonstrate that the restoration practices will reflect generally accepted principles and approaches used within the scientific, engineering, and design communities.

Response: A major element of this program is upfront collaboration with RESTORE state and federal partners, who are critical to shaping restoration project priorities based on existing and current planning efforts within each state. The projects submitted in the proposal were intended to be representative of the types of restoration work that the Corps members would be trained in, to be further developed based upon our initial collaboration with state and federal partners. Given the reduction in budget, the focus of this proposal is to leverage the other projects funded on the FPL by training Corps members to complete elements of those projects, in lieu of designing and developing new projects independent of the FPL. This approach would not preclude work on the NERRS (as outlined in the proposal), but rather create synergies with the other FPL projects to demonstrate the efficacy of using conservation corps groups to conduct meaningful regional restoration. NOAA will work with the other Council Members to identify FPL projects in each respective state that best meet the objectives of the GCCC Program, and where the GCCC can contribute to efficient implementation of those projects. Given the reduction in administration and overhead requirements of this approach, each state will be able to benefit from more on-the-ground labor hours.

Comment: The project and contractor selection process is unclear; whereas, it seems more effective to issue an RFP to existing institutions to perform these functions of a Corps, rather than establish an entirely new entity in an already crowded set of institutional arrangements.

Response: DOC agrees that issuing an RFP to optimize participation within existing regional organizations is the most effective path to administering the program, which we have always seen as the primary leveraging opportunity of this proposal.

Comment(s): There is very little information on the scientific literature or other published information, to show the ecological, social, and economic benefits of conservation corps in achieving restoration results. It is possible that the proposal may have some merit at the conceptual level, but a compelling argument has not been made from either a scientific or job creation standpoint. Additionally, reports of previous NOAA conservation corps projects and any monitoring data associated with the success of ecosystem restoration conducted by the corps would be informative.

Response: While there aren't many scientific studies on the ecological, social, and economic benefits of using a conservation corps to support restoration, NOAA has had success in implementing restoration through the use of Corps in other regions. We expect that the GCCC will bring similar economic and ecologic benefits to other regions. The NOAA Veterans Corps program, implemented in California is one example of the success of a conservation corps approach to restoration. As of March 2015, veterans in the program have completed 43 habitat restoration projects including constructing temporary fishways at the mouths of 20 tributaries to allow threatened salmon access to cold water within the Klamath River, and helping construct off channel habitats on Camp Creek to provide crucial overwintering habitat for coho salmon. The veterans have also contributed to monitoring of the Klamath River fall Chinook. The adult abundance data for this stock collected by the Veterans Corps supports an ocean harvest model that forecasts the number of Klamath River fall Chinook in the coming season to inform the design of ocean and river fisheries management and opportunities.

ENVIRONMENTAL COMPLIANCE:

Since all of the projects that the NOAA component of the GCCC Program will support will be compliant, Council approval of funding for this training activity will not involve or lead directly to ground-disturbing activities that may have any independent significant effects on the environment individually or cumulatively, i.e., in addition to those already addressed by the environmental compliance processes of such projects. Accordingly, the Council has determined that this activity is covered by the Council's National Environmental Policy Act (NEPA) Categorical Exclusion for training, technical assistance, and other related activities (Section 4(d)(1)(vi) of the Council's NEPA Procedures). The Council's NEPA Procedures and the signed CE form for this activity can be found here.

For the DOI/BIA Tribal Youth component, the Council is using an existing U. S. Department of the Interior Categorical Exclusions to address the associated National Environmental Policy Act requirements. The DOI documentation associated with these Categorical Exclusions addresses other laws applicable to the Council approval of funds for this action. This environmental compliance documentation can be found here.