



813 Heritage Springs Trail  
Round Rock, TX 78664  
512.415.2012

*Free Markets. Real Solutions.*  
[www.rstreet.org](http://www.rstreet.org)

Sept. 28, 2015

Gulf Coast Ecosystem Restoration Council  
Attention: Draft FPL Comments  
Hale Boggs Federal Building  
500 Poydras Street, Suite 1117  
New Orleans, LA 70130

### **Re: Texas Funded Priorities List**

The R Street Institute is encouraged by the inclusion within the initial Funded Priorities List (FPL) released by the Gulf Coast Ecosystem Restoration Council (Council) of the six Texas-focused projects, split between the Laguna Madre Estuary and Galveston and Matagorda Bays.

Texas' coast provides diverse recreational, economic and environmental benefits to the state. At the same time, the coastline is subject to a number of vulnerabilities, ranging from threats to water quality and endangered species to the threats posed by tropical storms. Protecting the Texas Gulf Coast as a source of both industrial growth and critical diverse ecosystems must be a priority for both the state and the region.

The FPL contains projects that range from restoration to monitoring and planning. They point to one central theme: Gulf states must develop a regularly updated coastal master plan that effectively articulates the state's priorities. Such planning is needed to ensure that states have a ready list of priority projects, regardless of whether project funding comes from the Natural Resource Damage Assessment (NRDA) process, RESTORE Act resources, economic-damage settlements or other revenue streams. Each project should have clear objectives, define measures of success and be based on the best available science. We can't afford to wait for another natural or manmade disaster to quicken our focus on the economic and environmental importance of the region's coast.

Texas already has taken a number of steps in this direction: developing a draft framework for implementing the RESTORE Act in Texas, as well as draft principles and a scoring system for prioritizing projects. The state also has developed a website, [restorethetexascoast.org](http://restorethetexascoast.org), where parties can submit project proposals under NRDA, RESTORE ACT or Gulf Environmental Benefit Fund, and give feedback on existing planning documents. The framework builds off the existing Texas Coastal Management Program, which is run out of the General Land Office. It focuses on and provides funding for projects related to coastal erosion, wetlands protection, water supply and water quality, dune protection and shoreline protection along the Texas coast.

As the state develops a coastal master plan, it must work with other states in a coordinated approach to Gulf Coast conservation. Rather than relying on distant federal authorities and mechanisms, Gulf Coast states must assume the responsibility to ensure both economic prosperity and environmental stewardship at the water's edge.

In undertaking this planning, there is an exceptional model for coastal planning in Louisiana's "Comprehensive Master Plan for a Sustainable Coast." Updated every five years, the plan focuses on prioritizing projects needed to ensure the continued environmental and economic well-being of the state's coast. As funding becomes available, projects are initiated. Louisiana's plan demonstrates and effectively articulates the crucial interplay between the economy and the environment. Politicians, trade associations, landowner groups and environmental advocates across the political spectrum all contributed to the plan's framework. Texas must similarly adopt a plan that transcends politics, while focusing on the challenges facing the state's coast.

Sincerely,

Josiah Neeley  
Texas Director  
R Street Institute