



June 27, 2016

Ms. Laurie McGilvray and Ms. Janet Vail
U.S. Department of Treasury
Office of Gulf Coast Restoration
1801 L St. NW
Washington, D.C. 20009

Dear Ms. McGilvray and Ms. Vail,

As organizations engaged at the federal, state, and local levels to advance Gulf restoration, we appreciate the U.S. Department of Treasury's continuing effort to reduce paperwork and applicant burden in its administration of the Direct Component and the Centers of Excellence Research Grants Program under the Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act (RESTORE Act).

We recognize that this request for public comment is very timely. With the BP settlement now final and with less than a year before the first funds from this settlement begin to flow, many Gulf states, counties, and parishes eligible for RESTORE Act dollars are eager to plan and prepare for anticipated expenditures. Unfortunately, it has come to our attention that the relatively new Office of Management and Budget guidance for grant recipients of federal awards¹, along with multiple grant application and reporting platforms across the various RESTORE Act components, are presenting a daunting administrative challenge for Gulf states, counties, and parishes, many of which have limited staff and capacity.

Our organizations consider accountability and transparency in the expenditure of RESTORE funds to be of paramount importance. However, we appreciate the challenges that state and local agencies are encountering as they navigate these federal grant requirements and agree that the process may be unduly cumbersome. We recognize that there must be a balance between speed and efficiency in grant-making and the need for Treasury to perform its due diligence, and believe that there are likely ways to make the process more efficient over time as Treasury acclimates to its new role as an administrator of Gulf restoration grants. We applaud Treasury's ongoing efforts to ease the burden by holding in-person trainings around the Gulf, and urge Treasury to repeat such trainings regularly, as staff at the local levels may frequently change. We also encourage Treasury to provide additional resources that may be helpful for the states, counties, and parishes, such as process maps/timelines and templates for grant sub-recipients or contractors, as well as other guidance documents specific to the needs and scale of the program.

¹ Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), at 2 C.F.R. Part 200, at 79 Federal Register 75880 (December 19, 2014.)

We acknowledge that by providing clear, consistent expectations and direction throughout the process, Treasury can help to reduce inefficiencies, and will facilitate states, counties, and parishes learning from each other. Additionally, understanding that the RESTORE Council, and not Treasury, has administrative responsibilities for the Council-Selected Restoration Component and the Spill Impact Component, we encourage collaboration and sharing of best practices between the agencies, as many of the grantees and their associated challenges are common across RESTORE components.

Thank you for your efforts to make the distribution of RESTORE dollars as transparent, responsible, and efficient as possible, so that the important work of on-the-ground restoration can continue.

Sincerely,

David Muth
Director, Gulf Restoration Program
National Wildlife Federation

Bethany Kraft
Director, Gulf Restoration Program
Ocean Conservancy

Steve Cochran
Associate Vice President for Coastal Protection
Environmental Defense Fund

Robert L. Bendick, Jr.
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The Nature Conservancy

Brian Moore
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