



September 8, 2014

Via Federal eRulemaking Portal: www.regulations.gov

Department of the Treasury
Attention: Ms. Janet Vail
Room 2050
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220

**Re: Comments on Treasury Interim Final Rule Regarding
Regulations for the Gulf Coast Restoration Trust Fund.
RIN: 1505—AC44; 31 CFR Part 34;
Federal Register Number: 2014-1932479**

Dear Ms. Vail:

On behalf of the Gulf Consortium, we appreciate the opportunity to provide formal comments on the U.S. Department of the Treasury's (Treasury) Interim Final Rule regarding Regulations for the Gulf Coast Restoration Trust Fund (TIFR).

Our comments to the original Treasury Rule addressed the following issues:

1. Regulatory Flexibility Act and Seven Fiscally Constrained Counties.
2. Recognition of the Gulf Consortium as the Entity Required to Prepare the State Expenditure Plan.
3. Pre-Award Costs for the Consortium and Coastal Political Subdivisions.
4. Planning Costs for the Gulf Consortium and Florida's 23 Gulf Coast Counties.
5. Administrative Costs.
6. Procurement Issues.
7. Advance Payment.
8. Incremental Plans and Grants.
9. Additional Treasury Rule and a Standard Format.
10. Formula for the Eight Disproportionately Affected Counties.
11. Formula for the Fifteen Nondisproportionately Impacted Counties.

12. Environmental Law Compliance.

Not that we are keeping score, but the TIFR favorably addresses eleven of our twelve issues, leaving recognition of the Gulf Consortium to the Restoration Council's recently published Interim Final Rule. See, 40 CFR Part 1800.

Compared to the original Treasury Rule published in September 2013, the provisions of TFIR represents substantial improvements. We appreciate the changes reflected in the TIFR that affect the 23 Gulf Coast counties eligible for the Direct Component and the Gulf Consortium eligible for the Spill Impact Component. Treasury heard our concerns and the TIFR reflects that.

We are grateful that the TIFR addresses grants for planning costs and grants management start-up costs. We appreciate the provision specifically allowing Multi-Year Implementation Plans and State Expenditure Plans to be incremental, phased and amended.

Thank you for adopting our proposed allocation formulas for the counties. We are delighted that the Treasury website published a chart of the amount currently in the Restoration Trust Fund available to each county.

We appreciate Treasury's quick publication of The Direct Component Guidance and Application to Receive Federal Financial Assistance, providing counties with a road map for grants and multi-year implementation plans.

We are pleased to see the specific references to the OMB Uniform Guidelines for measures governing pre-award costs, administrative costs, and procurement.

In revising the original Rule to transform it into the TIFR, it is obvious that Treasury thoughtfully considered issues the Consortium raised and the uniqueness of the position created by the RESTORE Act for the 23 Florida counties and the Gulf Consortium. While the Consortium continues to need a clear path to securing grants for plan development and to obtaining operating costs to serve and manage the work, Treasury's Interim Final Rule sheds some much needed light on the way forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Grover C. Robinson IV". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Grover C. Robinson IV, Chairman
Gulf Consortium

Ms. Janet Vail
September 8, 2014
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cc: The Honorable Bill Nelson
The Honorable Marco Rubio
The Honorable Steve Southerland, II
The Honorable Jeff Miller
Ms. Mimi Drew, Governor Rick Scott's Appointee to the Restoration Council
Mr. Nick Wiley, Executive Director, Florida Fish & Wildlife Commission
Mr. Noah Valenstein, Office of Policy Budget, Governor's Office
Gulf Consortium Directors, Alternates and Governor Appointees
County Managers and County Attorneys of the 23 Florida Gulf Coast Counties
Mr. Chris Holley, Executive Director, Florida Association of Counties
Ms. Sarah M. Bleakley, Interim General Counsel, Gulf Consortium

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