



Gulf Consortium: Stand-up State Expenditure Plan for Florida

Points of contact for Gulf Consortium

The Gulf Consortium (Consortium) is the designated entity responsible for the development of the Florida State Expenditure Plan (FSEP), as recognized in the Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act of 2012 (RESTORE Act) and subsequent rulemaking. The Consortium is a public entity created in October 2012 through an Interlocal Agreement between Florida's 23 Gulf Coast counties - from Escambia County in the western panhandle of Florida to Monroe County on the southern tip of Florida - to meet the requirements of the RESTORE Act. The Consortium's Board of Directors consists of one representative from each county government. Since its inception, the Consortium has met approximately every other month and has held numerous committee meetings to develop Florida's State Expenditure Plan. The points of contact for the Consortium are as follows:

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Introduction and Statement of Purpose

The purpose of this Standup State Expenditure Plan (SSEP) is to describe the activities required to enable the Consortium to provide the necessary financial controls and administrative duties needed to manage implementation, including grant management, of all the projects contained in the Florida State Expenditure Plan (FSEP). The goal of the SSEP is to expedite implementation of projects in the FSEP by ensuring that the Consortium is prepared to receive and effectively manage implementation grants once the FSEP is approved and grants have been applied for and awarded. The SSEP will support establishment of additional administrative and fiscal management processing structures to ensure sufficient separation of duties, internal controls, and financial integrity of the Gulf Consortium.



The Gulf Consortium is the designated public entity created to develop and manage the implementation of the State Expenditure Plan for Florida's portion of the Spill Impact Component ("Pot 3") funds designated by the RESTORE Act (33 U.S.C. § 1321(t)(3)).¹ The Gulf Consortium has an approved Planning State Expenditure Plan and associated implementation grant from the RESTORE Council that has been utilized to develop the FSEP for Florida. The development of the FSEP has involved extensive coordination with county stakeholders to develop projects, explore funding leveraging opportunities, and formulate the final FSEP, which is scheduled to be submitted to the Gulf Coast Ecosystem Restoration Council (RESTORE Council) in February, 2018.

State Certification of RESTORE Act Compliance

State Certifications of RESTORE Act Compliance

On behalf of the State of Florida, the Gulf Consortium hereby certifies to the following:

- Pursuant to the RESTORE Act, 33 U.S.C. § 1321(t)(3)(B)(i)(I), the Stand-up State Expenditure Plan (SSEP) includes projects, programs, and activities that will be implemented with the Gulf Coast Region and are eligible for funding under the RESTORE Act.
- Pursuant to the RESTORE Act, 33 U.S.C. § 1321(t)(3)(B)(i)(II), the projects, programs, and activities in the SSEP contribute to the overall economic and ecological recovery of the Gulf Coast.
- Pursuant to the RESTORE Act, 33 U.S.C. § 1321(t)(3)(B)(i)(III), the SSEP conforms to and is consistent with the goals and objectives of the Initial Comprehensive Plan adopted by the RESTORE Council.
- Pursuant to the RESTORE Act, 33 U.S.C. § 1321(t)(2)(B)(i), the projects and programs that would restore and protect the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, coastal wetlands, and economy of the Gulf Coast included in the SSEP will be based on the best available science as defined by the RESTORE Act.²
- Pursuant to the RESTORE Act, 33 U.S.C. § 1321(t)(3)(B)(ii), not more than 25% of the funds will be used for infrastructure projects for the eligible activities described in 33 U.S.C. § 1321(t)(1)(B)(i)(VI-VII).

Cross-border issues are not pertinent to the scope of this Stand-Up State Expenditure Plan, which addresses Gulf Consortium internal administrative matters only.

¹ Affirmed by letter from RESTORE Council to the Chair of the Gulf Consortium, dated October 6, 2017.

² The single project of the Stand-Up SEP is intended to advance and manage the implementation of projects in the FSEP that will achieve the indicated environmental and economic objectives of the RESTORE Act.



Development of the SSEP

The development of the SSEP involved an open and transparent process requiring its need, its intent, and its scope. The process resulted in a single project consistent with RESTORE Act requirements and which will further the success of the subsequent FSEP. The process included four phases:

Phase 1: Identifying Need

Phase 2: Concept Formulation

Phase 3: SSEP Development

Phase 4: Agency and Public Input; SSEP Refinement

Supporting tasks occurred in each phase. The activities of each phase were informed by the following objectives:

- Ensure the most efficient path to creating the requisite administrative and financial structure and capabilities of the Gulf Consortium;
- Establish the Consortium's administrative and financial architecture in advance of submitting and receiving implementation grants for projects within the FSEP;
- Via the Consortium's internal procedures, ensure that eligible projects, programs and activities included in its FSEP contribute to overall ecological and economic recovery of the Gulf Coast; and
- Promote funded projects to be as successful, cost-effective, and sustainable as possible.

The four-phase process was implemented in part under a Planning grant approved by the Gulf Coast Ecosystem Restoration Council in May 2015, in part with Consortium funds and in part with Pre-Award costs for a SEP Planning grant, approved by Council in September 2017.

Phase I: Identifying Need

Through review of the Gulf Consortium's first Organizational Self-Assessment (OSA), Council, the Consortium Interim Manager (the Florida Association of Counties), and the Consortium Manager (The Balmoral Group) determined that the general administrative and financial controls that have been in place to date for the management of the current Planning Grant are insufficient to conform to applicable Federal requirements, and that the Council could not release any funds to the Consortium for implementation grants until such time that adequate controls have been adopted and operating. In sum, the Consortium would be required to institute appropriate controls prior to advancing the implementation of the projects anticipated as part of the FSEP.

Phase II: Concept Formulation

The concept of a "Stand-Up SEP" to establish the necessary administrative and financial architecture within the Consortium as an initial project within the development of the FSEP was considered. Subsequent discussion with Council staff and the Consortium Executive Committee identified the possibility that such a Stand-Up SEP could be submitted separately from and in advance of the FSEP. The RESTORE Act provides that multiple SEPs may be submitted by an individual state.



Between May 17 and June 28, 2017 the Consortium deliberated whether to amend the existing Planning Grant and include the Stand-Up project in the FSEP or to submit an independent SSEP. In selecting the latter option at a duly advertised and open public meeting, the Board directed staff to prepare a Draft SSEP for review at the Board's September 27, 2017 meeting. The Board's stated objective was to advance the general calendar of implementation of the FSEP and to ensure the Consortium's capacity to manage future projects, provide transparency to all Consortium operations and withstand audits. The Board further recognized that the success of the FSEP with respect to consistency with the goals and objectives of the Initial Comprehensive Plan developed by the RESTORE Council and the Consortium's efforts to contribute to the overall ecological and economic recovery of the Gulf Coast depended on successful implementation of the SSEP. The Board tabled its approval of the Draft SSEP on September 27, 2017.

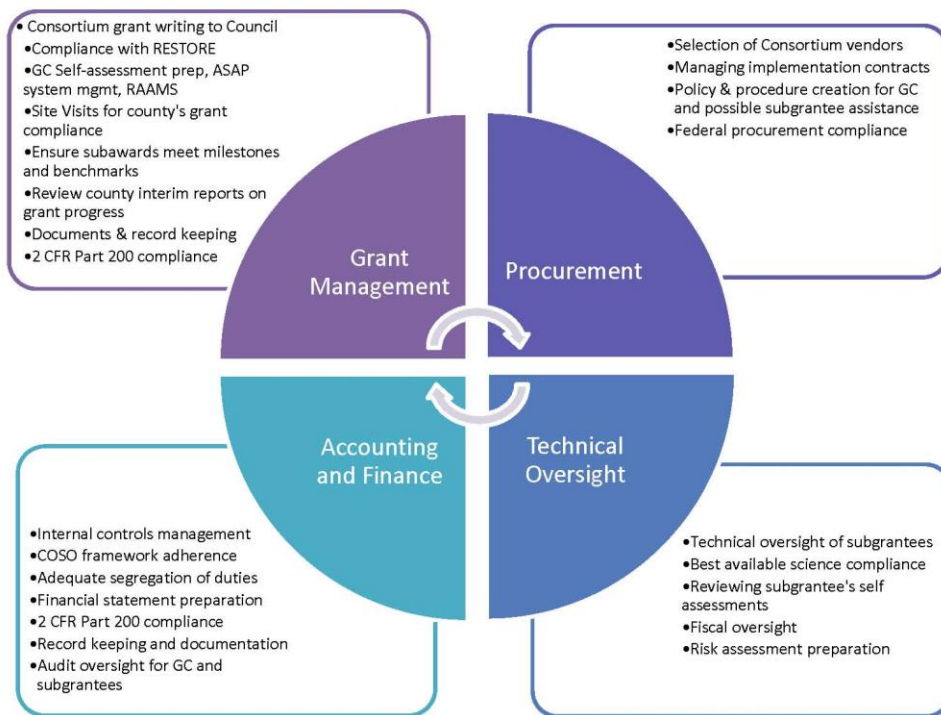
Phase III: SSEP Development

Pursuant to Board direction, the four generalized categories of the Consortium's administrative and fiscal responsibilities to be addressed by the SSEP include procurement, grant management, accounting and finance, and technical oversight (**Figure 1**). The scope (reviewed by Council staff, DEP, FWC, and with input from Florida's SEP consultant) identifies specific tasks under each category. Ultimately, each task will be supported by policies, procedures, and assignments of roles to ensure full compliance with Federal requirements for all implementation grants and sub-awards.



Figure 1. Conceptual Overview of Stand-Up-SEP Content

Consortium Responsibilities during Implementation*



*Some tasks may overlap process categories. These tasks are not intended to be exhaustive or all inclusive as more will be identified as Stand-Up SEP is prepared.

Phase IV: Agency Input, Public Comment and SSEP Refinement

As part of developing the Draft SSEP, staff to the Consortium reached out to various parties for background information, programmatic support and input regarding SSEP format and content. Prior to finalization of the SSEP, the Consortium will have obtained input from each of the following:

- Florida Department of Environmental Protection
- Florida Fish and Wildlife Conservation Commission
- Office of the Governor
- Leon County, which has served as Fiscal Agent for the Consortium
- Gulf of Mexico University Research Collaborative (GOMURC)
- Florida Institute of Oceanography, Florida RESTORE Act Centers of Excellence Program (FLRACEP)
- Gulf Coast Ecosystem Restoration Council, Science Program
- RESTORE Act coordinators in the 23 Florida counties



- Environmental Science Associates, the Consortium’s SEP Consultant
- Langton Consulting, the Consortium’s SEP Planning Grant manager
- Nabors, Giblin & Nickerson, the Consortium’s General Counsel
- Reedy Creek Improvement District

The development of the Draft SSEP includes review of potential management and oversight structures, staffing/contracting for services, software, and costs for procurement, grant management, accounting and finance, and technical oversight (including review of grant requests, project interim and closeout reports, and the application of Best Available Science, where applicable). The Draft reflects input from the Florida Department of Environmental Protection and responds to issues raised by the Board and the public.

Compliance with RESTORE Act requirements for SEPs was specifically addressed as part of the agenda items and Board discussions relating to the SSEP at its May, June, September and November, 2017 meetings, all duly advertised and open to the public. Compliance also was an element of the discussions about the SSEP at (teleconference) meetings of the Gulf Consortium Executive Committee, which are publicly noticed and within which public comment is also accepted.

Process Used to Verify Compliance

The compliance of the SSEP with the RESTORE Act was accomplished via both legal and technical review. The intent, general outline, and specific content of the SSEP were evaluated relative to the applicable RESTORE Act provisions, and content was amended as needed in response to any concerns or issues raised. **Appendix A** summarizes the roles of the several parties contributing to this compliance review. The respective Responding Parties were asked to verify that the content of the Draft SSEP met the indicated subject. All comments on the Draft are addressed in this Final SSEP; comments are summarized in the Appendix.

Results of the Process Used to Verify Compliance

The process used to verify compliance resulted in a determination that the single project in the Draft SSEP is an eligible project, will contribute to the economic and ecological recovery of the Gulf (via ensuring the success of the FSEP and its own compliance with the RESTORE Act), conforms with the Council’s Comprehensive Plan, will make use of the application of best available science (where applicable) and does not violate the limitation on infrastructure projects.

Public Participation Statement

Public outreach will be completed in accordance with pertinent requirements and the Consortium’s intent for transparency. The following language previews proposed content following the public comment period.



Consistent with Treasury regulations, this Standup State Expenditure Plan was made available for public review and comment in accordance with 31 CFR § 34.503(g). The SSEP was extensively advertised and made publicly available at the Consortium website (<https://www.gulfconsortium.org/>) between November 16, 2017 and January 19, 2018 (i.e., 64 days). Links to this site were provided on the DEP Portal (<http://www.dep.state.fl.us/deepwaterhorizon/>) and several Consortium County member homepages (see **Appendix B**). All submitted comments were reviewed and incorporated as appropriate.

Financial Integrity and Program Management

The Consortium understands its fiduciary responsibilities under the RESTORE Act and is committed to maintaining the highest level of transparency and internal controls to ensure financial accountability. It is the Consortium's mission to maintain transparency in such a way that assures the public's faith and trust in the ability of the Consortium to appropriately manage and disburse funds for the FSEP projects. The SSEP will allow the Consortium to build accounting and financial systems based on principles of strong and reliable financial management.

The SSEP is designed to include the following financial principles which are best practices recognized around the world by leading government and private sector organizations. The basic principles of sound financial management include, but not limited to, tight internal controls, financial transparency, segregation of duties, and independent external auditing. By integrating these processes into the administrative functions and fiduciary functions of the organization the Consortium can ensure timely, accurate, and complete reporting throughout the FSEPs lifecycle.

Segregation of Duties – To maintain effective internal controls, the Consortium will properly create internal checks and balances among the entities performing contract administration and financial duties for FSEP related projects, programs, and activities. The SSEP anticipates carefully assigning the authorities and roles of staff with the guidance of the Board, to create a robust duty segregation hierarchy. Furthermore, the Consortium has sought to retain a fiscal agent to manage any grant funds received from Council, instituting firewalls between approval of disbursements and access to funding.

Transparency – The Consortium is committed to sustaining transparency with the public, RESTORE Council, and other constituents for reporting on FSEP related projects, programs, and activities. The SSEP seeks to put in place administrative positions that will allow frequent, detailed, and complete grant reports and financial statements for the Consortium's stakeholders.

Independent Financial Auditing – The Consortium is subject to annual audits conducted by independent auditors which evaluate not only the presentation of financial statements but also the effectiveness of internal controls based upon widely held government standards including, but not limited to, 2 CFR Part 200 and the Single Audit Act of 1996.



Financial Controls

The financial controls put in place through the SSEP will allow the Consortium to reduce the risk of asset loss or misappropriation of funds, maintain compliance with the RESTORE Council's financial documentation requirements, create a uniform financial standards for member counties, and ensure that financial reports and disclosures are complete reliable, and ensure compliance with all state and federal laws and regulations. The Consortium's financial control system will contain both preemptive controls (created to prevent errors or fraud) and detective controls (designed to identify an error or fraud after it has occurred).

Project management, grant managers, and other Consortium member county staff responsible for governance will be required to apply internal control processes created by the SSEP. The processes created by the SSEP are designed to provide reasonable assurance in the reliability of project financial reporting.

The proposed financial control system includes multiple protections of public funds including:

- Procedures that provide for appropriate segregation of duties to reduce the risk of asset loss or fraud;
- Personnel training materials that ensure employees are qualified to perform their assigned duties and responsibilities;
- Defined roles for the proper employees to authorize and records financial transactions,
- Both the RESTORE Act and the FSEP grants will require sub-recipients to operate and use resources with minimal potential for waste, fraud, and mismanagement.

The Consortium's internal control system has been, and continues to be modeled in accordance with the Committee of Sponsoring Organizations of the Treadway Commission (COSO) internal control framework and the five inter-related components. Further the Consortium will evaluate each of these categories on a regular basis to adjust or change policies and procedures to enhance the internal control policy.

1. **Control Environment** – The internal control environment
2. **Risk Assessment** – The types of risks both perceived and real must be identified, analyzed, and categorized in relevant way to manage the goals of the SEP and requirements of the Consortiums regulatory bodies.
3. **Control Activities** – The Consortium's internal control activities include written policies, procedures, techniques, and mechanisms that help ensure management's directives are carried out in compliance with the RESTORE Act criteria.
4. **Communication and Information** – Communication is vital to effective project management, and the Consortium's financial information system has mechanisms in place to properly capture and



communicate RESTORE Act project financial data at the level appropriate for sound financial management.

5. **Monitoring** – Monitoring of the internal control system will be performed to assess whether controls are effective and operating as intended.

Conflicts of Interest

Consistent with Chapter 112, Florida Statutes, conflicts of interest are situations “in which regard for a private interest tends to lead to disregard of a public duty or interest.” The Consortium requires a conflict of interest affidavit to be completed by all contractors and sub-recipients to ensure that no conflicts of interest for any proposed or contracted work would affect the impartiality or quality of the work. Strict conflict of interest policies ensure that no sub-recipients or contractors are given an unfair competitive advantage. Accordingly, contracts for the General Counsel, Manager, and FSEP Consultant were amended on September 27, 2017, to include provisions required by 2 CFR Part 200 for all non-Federal recipients of Federal funds.

Proposed Project

Expanding the financial and administrative capabilities of the Gulf Consortium

The single project included in this SSEP involves the development of sufficient financial and managerial structure in order to ensure the Consortium will provide the financial integrity, controls, and management duties that will be required for individual project implementation. The four primary elements of the Consortium administrative structure to be developed include: 1) grant management, 2) procurement and contract management, 3) accounting and finance, and 4) technical oversight of deliverables under contracts and grant sub-awards.

The organizational structure of the Consortium envisioned by the SSEP is outlined in **Figure 2** and **Table 1**. This structure illustrates functional roles within the Consortium rather than individual personnel.



Figure 2. Proposed organizational chart of administrative functions of the Gulf Consortium

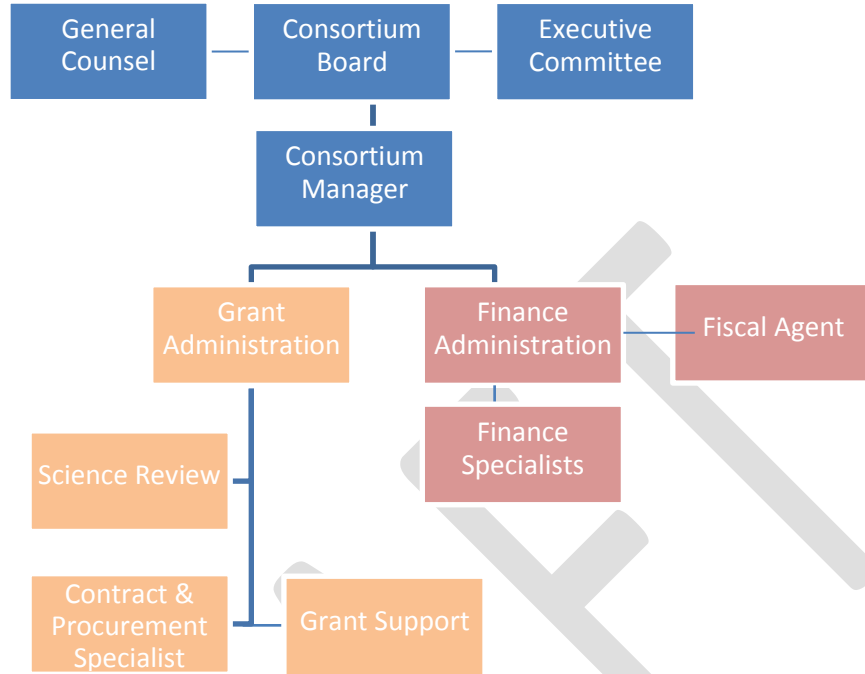


Figure 2 is organized into three primary cluster of functions: overall management as guided by the Board, financial administration, and grant management.

Table 1 recognizes that the only continuous staffing services of the Gulf Consortium are that of the Manager and the General Counsel. Consequently, select responsibilities described by **Table 1** may be contracted for, but with all contract approvals by the Board and oversight provided by the Manager.



Table 1. Summary of responsibilities for administrative functional roles within the Gulf Consortium

Functional Role	Responsibilities/Resource
General Manager	Management and general administration of Consortium business <i>Manager*</i>
General Counsel	Legal counsel, contract development and review <i>General Counsel*</i>
Financial Administration	Prepare financial statements, payment requests, audit functions <i>Manager*</i>
Finance Specialist	Data entry for payment requests, bookkeeping functions <i>Permanent Manager*</i>
Fiscal Agent	Manages disbursements, check registers, bank statement <i>Pending final approval, Leon County Clerk of Courts</i>
Grant Administration	Packages prepared grants for submission to Council; assists County personnel in grant preparation as requested; coordinates with Council and the Gulf Consortium <i>Manager*</i>
Grant Support	Database maintenance, grant submittal support To be determined, as contract volume requirements dictate; <i>Manager* or Contractual Grant managers during periods of high volume</i>
Contract Procurement	Manages contract procurement processes; <i>New position, Contract Specialist</i>
Science Review	Oversight of desktop reviews of prepared grant applications for BAS requirements prior to submittal to Council; determines appropriate specialists for review <i>Manager*</i>

* Under existing Consortium contracts for services

As an example, Science Review – such as for the application of Best Available Science for a particular project – may be expected to be contracted for; however, the oversight of the reviews and coordination of findings as part of required reporting to Council would be handled by through the Manager.

Procurement

The SSEP will implement procurement methods consistent with those outlined in 2 C.F.R. § 200.320. Procurement will be carried out by the manager of the Consortium and the respective accounting and finance individuals on their team with assistance from the general counsel. The SSEP will institute the following procurement scenarios depending on cost threshold and product or service.

1. Procurement by micro-purchases: Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed \$3,000 (or \$2,000 in the case of acquisitions for construction subject to the Davis-Bacon Act). Micro-purchases may be awarded without soliciting competitive quotations if the recipient considers the price to be reasonable.



2. Procurement by small purchase procedures: Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold (currently \$150,000). If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources. The Consortium will consider three qualified bids as sufficient.
3. Procurement by sealed bids (formal advertising): Bids are publicly solicited and a firm-fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming to all the material terms and conditions of the invitation for bids, is the lowest in price.
4. Procurement by competitive proposals: The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed-price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. A new requirement under this method is that the recipient must have a written method for conducting technical evaluations of the proposals received and for selecting recipients.
5. Procurement by noncompetitive proposals: Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source. 2 C.F.R. Part 200 clarified that this may be used only when one or more of the following circumstances apply:
 - a. The item is available only from a single source;
 - b. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
 - c. The Council or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the recipient; or
 - d. After solicitation of a number of sources, competition is determined inadequate.

The counties may rely on the Consortium to provide resources such as Best Available Science or other skilled professionals to assist their grant efforts. Those professionals will need to be procured at the Consortium level. The Stand-Up phase will prepare the Consortium for the following procurement scenarios depending on the level of projects that are developed enough to begin once implementation begins. **Table 2** provides expected levels of activity that have been assessed; the FY 2018 budget has been derived based on the "Likely" Scenario. It is important to note that while first year FSEP activities show more than 30 grants, more than 20 are related to feasibility studies and conceptual design that based on discussion with Council may be bundled into fewer grant applications.



Table 2. Grant management and procurement activity level scenarios

Estimated Volume	Fiscal Year 2018	Fiscal Year 2019	Fiscal Year 2020	Task
High Volume	12	12	12	Grant Applications
	24	24	12	Procurements/Contracts
Low Volume	2	4	4	Grant Applications
	4	4	4	Procurements/Contracts
Likely Scenario	6	6	6	Grant Applications
	12	12	12	Procurements/Contracts

Accounting and Finance

The initial Organizational Assessment submitted to the RESTORE Council highlighted areas that the Consortium can improve upon to carry out its mission related to the ultimate oversight of the FSEP. The Consortium needs to have administrative infrastructure suited for the accounting and finance-related work that will need to be done in order to run all the grants for the projects contained in the FSEP. The SSEP will be used to establish that hierarchy of positions so that the Consortium has finance and accounting structure in the background capable of handling the fiduciary responsibilities of carrying out the grant administration for the FSEP.

The SSEP will give the Consortium manager and supporting vendors the opportunity to create a cohesive administrative arm that fulfill the segregation of duties requirements for robust internal controls and also allows for effective grant management and administration. Further the Consortium has engaged Leon County to act as fiscal agent for the Consortium so that the necessary segregation of duties objective is enhanced.

Software Requirements

Council has indicated their recommendation for the Consortium to implement a standalone grant management system dedicated to Consortium business. Existing accounting software in place has been identified as Defense Contract Audit Agency (DCAA) compliant, but may require upgraded licensing depending on the volume of grant activity in the early years of the implementation of the FSEP. The Consortium has performed due diligence sufficient to establish a conservative budget for both possibilities (grant management software and potential license upgrading) and has estimated an appropriate scale and capacity for software to provide the functionality needed to carry out the FSEP at reasonable costs.

Depending on the procurement selection, software costs for applications compatible with Council systems will cost approximately \$17,500 \$10,000 for software license, \$2,500 for software maintenance, and \$5,000 for vendor provided setup and training costs. Actual costs may vary depending on availability.



Grant Management

The goals of grant management activities are to develop and submit the project-specific grants for implementation, to ensure sub-recipients (the 23 Florida Gulf Coast counties) are achieving the stated project objectives, and to comply with the RESTORE Council's policies and requirements. Additional capacity within the Consortium will be developed as part of this SSEP project. There are two main pieces to this capacity building: 1) a dedicated individual will be hired to provide grant management services and to create sufficient segregation of duties, and 2) the Consortium will acquire grants management software to facilitate efficient grant preparation and project monitoring.

Sub-recipient Monitoring

The tasks involved in this project to establish sufficient capacity for sub-recipient monitoring by the Gulf Consortium include the following:

- Adapting an Organizational Self-Assessment (OSA) to be completed by the 23 Gulf Coast counties (sub-recipients) in order to assess the risk level of sub-recipients;
- Develop the procedures for assistance of high-risk sub-recipients; and
- Develop the procedures for financial and progress review of sub-recipient implementation projects

RESTORE Act Compliance

- Organizational Self-Assessments;
- 2 CFR Part 200 compliance;
- Automated Standard Application for Payments (ASAP); and
- Restoration Assistance and Awards Management System (RAAMS)

Technical Oversight

The goal of technical oversight is to ensure that 1) the projects serve the objectives of the RESTORE Act Spill Impact Component (Pot 3), 2) projects include Best Available Science (BAS) where relevant, and 3) project design and implementation are consistent and of sufficient quality. BAS describes science that:

- Maximizes the quality, objectivity, and integrity of information, including statistical information;
- Uses peer-reviewed and publicly available data; and
- Clearly documents and communicates risks and uncertainties in the scientific basis for such projects.

In addition to BAS, permitting (federal, state, and local), construction feasibility, and construction engineering inspection are among the tasks requiring technical oversight.

The unique project types among the current list of 70 projects that may be in the FSEP were reviewed in order to establish the types of technical professionals needed. The following project types describe one or more of the projects that may be included in the FSEP:

- Aquaculture



- Beach Access, Coastal Access, Boat ramps, and Facilities
- Dredging
- Beach Nourishment
- Living Shorelines, Coastal Uplands, Habitat Restoration
- Reef Systems
- Wetland Hydrology
- Septic to Sewer Conversion, Sewer Expansion or Rehabilitation
- Sewer/Stormwater, Stormwater
- Education

The general groups of technical professionals needed for review at grant submittal and for evaluation after implementation have been identified on a preliminary basis for each of the above project types; the resultant classes of professionals include, at a minimum: 1) Engineering/Design, 2) Ecologists/Biologists, 3) Education Specialists, and 4) Construction Engineering Inspection. The Consortium has preliminarily identified experts for select technical oversight capacities. Technical professionals with experience and credentials in specialized fields that can be contracted for desktop review and implementation evaluation and monitoring, where appropriate, have either been identified or will be secured through a procurement process.

The activities to be completed in this Stand-Up project related to technical oversight are described as follows:

1. Develop best practices protocol for reviewing project eligibility for Spill Impact Component funding, and for meeting the technical oversight requirements of the RESTORE Council. This protocol will detail how to determine the type of technical oversight and how it is decided if technical oversight needs to be procured or if it can be achieved utilizing capacity within The Balmoral Group, the manager of the Consortium.

Establish contracts with specialized Ecologists/Biologists experts for review of projects at application stage and during implementation to ensure projects are based on BAS, subject to approval. Where possible, the Consortium plans to develop a contract for scientific review services from Federal and local environmental agencies in order to streamline the procurement of technical oversight services from the Ecologists/Biologists class of professionals referenced above. The contract would specify the scopes of services for different project types, the fees for services, and the timelines for desktop review and implementation assessment and/or monitoring. Existing NRDA contracts have been obtained and will be used as a template for Consortium contracting.

2. Establish contracts with groups of qualified technical professionals (Engineering/Design, Ecologists/Biologists, Education Specialists, and Construction Engineering Inspection



professionals) for grant review and implementation assessment and monitoring. This effort will include the development of regionalized Requests for Proposals (RFPs) in three Gulf Coast regions to ensure local experience and to reduce travel costs for each of the four technical professional services. Within each technical professional class, scopes of work will be developed for sub-types of professionals. For example, the expected work and qualifications required from a production fisheries aquaculture expert will be different than the work and qualifications of specialist in living shorelines, but both types would be within the Ecologists/Biologists class of professionals. RFPs will be developed for each services group and will be tailored to each of the three geographic regions that will be established. Detailed review of project descriptions from the FSEP will be used to identify all the sub-types of technical professionals. Existing state agency contracts for similar services have been obtained and will be used as a template for Consortium contracting.

3. Develop a data management plan to ensure consistency of monitoring for biological, water quality, and other environmental data for projects requiring monitoring. This effort will establish the observational protocols and will establish the data storage and analysis system to ensure that monitoring data is preserved and is publicly accessible. Coordination with Treasury staff overseeing Pot 1 funding will occur to attempt compatibility and consistency with long-term monitoring requirements for Consortium projects.

The outcome of the process described above will be contracts with pools of available specialists that can efficiently provide technical oversight services for grant and implementation evaluation.

CONTRIBUTIONS TO THE OVERALL ECONOMIC AND ECOLOGICAL RECOVERY OF THE GULF

By developing the administrative capacity of the Gulf Consortium to receive and manage FSEP project implementation grants and all services required to ensure that such grants are carried out efficiently, the SSEP will contribute to the economic and ecological recovery of the Gulf via the successful implementation of the FSEP and its own compliance with and furtherance of the RESTORE Act.

ELIGIBILITY AND STATUTORY REQUIREMENTS

Administrative costs are eligible for funding in conjunction with one of the eligible activities listed in the RESTORE Act. The SSEP is an administrative cost supporting other RESTORE Act eligible activities in Florida.

COMPREHENSIVE PLAN GOALS AND OBJECTIVES

To the extent that the SSEP supports all projects in the FSEP, the following Comprehensive Goals are supported:

- Goal 1: Restore and Conserve Habitat (Restore and conserve the health, diversity, and resilience of key coastal, estuarine, and marine habitats);



- Goal 2: Restore Water Quality and Quantity (Restore and protect the water quality and quantity of the Gulf Coast region's fresh, estuarine, and marine waters);
- Goal 3: Replenish and Protect Living Coastal and Marine Resources (Restore and protect healthy, diverse, and sustainable living coastal and marine resources);
- Goal 4: Enhance Community Resilience (Build upon and sustain communities with capacity to adapt to short-and long-term changes); and
- Goal 5: Restore and Revitalize the Gulf Economy (Enhance the sustainability and resiliency of the Gulf economy).

IMPLEMENTING ENTITIES

The Gulf Consortium is the implementing entity for Pot 3 for the State of Florida. Council affirmed the authority of the Consortium to implement the FSEP in a letter dated October 6, 2017; the Consortium affirmed its intent to serve in this capacity on November 15, 2017. By his approval of the SSEP and transmittal to Council, the Gulf Consortium will be responsible for receiving the planning grant from Council and implementing the proposed single project, establishing the administrative and financial architecture of the Consortium. Sub-entities will include the Consortium General Counsel, Leon County Clerk of Courts, and the several technical; services providers to be procured under the scope of the project.

BEST AVAILABLE SCIENCE AND FEASIBILITY ASSESSMENT

As a purely administrative initiative, Best Available Science (BAS) is not directly applicable to this SSEP. However, the implementation of the SSEP contemplates the procurement of professionals with BAS expertise to provide review of grant requests (via sub-awards) for which BAS is required.

Management and implementation of the SSEP are feasible and are fully within the purview of the scope of services of the Consortium's Manager. No permits are required for the SSEP. The budget has been based on hours and costs incurred by the Florida Association of Counties for past Consortium procurements and on recent experience by the Manager. The proposed budget reflects the anticipated workload for standing up the Consortium and processing an initial cycle of FSEP project implementation grants. The SSEP is a one-time initiative that will provide the structure for the Consortium as implementer for Florida for the duration of the payout of Pot 3 funds.

RISKS AND UNCERTAINTIES

There are no risks identified with the SSEP itself as an administrative project. Uncertainties remain as to whether all conditions and requirements of Treasury and Council have been duly identified and for which SSEP tasks, actions, or roles and responsibilities have been defined. Review of the Draft SSEP by Council has flagged no major issues. Uncertainties exist as to the actual costs for implementation (i.e., costs for specific procurements of services) and the time required to put into place all key administrative and



financial functions. While the proposed funding should be adequate, implementation may take longer than estimated.

SUCCESS CRITERIA AND MONITORING

The primary project benefit will be a fully operable administrative and financial structure for the Consortium, capable of meeting all federal requirements and withstanding Council scrutiny and audits. Applicable metrics for success include the following:

- Approval by Council of the SSEP
- Approval by Council of a planning grant to implement the SSEP
- Concluding the “stand-up” process in the timeframe contemplated (8-10 months)
- Efficiently reviewing and transmitting the first cycle of FSEP implementation grants to the satisfaction of Council
- Streamlining processes between county sub-awardees and the Consortium to expedite invoicing and reimbursements / payments

MILESTONES AND SCHEDULE

The SSEP is anticipated to require approximately seven months to implement, from transmittal of the grant request to support implementation until work commences under the first sub-award to a county. In addition, a Gantt chart (**Figure 3**) is provided showing high level milestones for the project, and anticipated start and end dates for each in months from SSEP approval

Figure 3. Milestones Associated with Implementation of the SSEP

MILESTONE	MONTHS FROM SSEP APPROVAL									
	1	2	3	4	5	6	7	8	9	10
Develop, transmit SSEP Implementation Grant	█									
Grant approval by Council		█	█							
Services RFPs developed, advertised		█	█	█	█					
Services agreements executed				█	█	█	█			
1 st County Implementation Grant forwarded to Consortium					█					
1 st County Implementation Grant forwarded to Council						█				
1 st Sub-award executed with County						█	█			
Work Commences							█	█	█	█
1 st Project Payment Request								█	█	
1 st Project Payment Received									█	█



Budget/Funding

Project Cost and Expected Request from Oil Spill Component Funds: \$221,038

These funds will allow the Consortium to pay for the contractor costs which will build the administrative infrastructure as well as the necessary grant management software and installation of those systems.

If funding for the project has been requested from other sources, describe any additional resource:

None is estimated at this time.

Partnerships/Collaboration:

The Consortium anticipates further collaboration with Florida's RESTORE coordinators and with the Gulf of Mexico University Research Collaborative (GOMURC) to refine administrative and FSEP project review procedures.

Leveraged Resources:

None specified at this time; however, county contributions to the Consortium will complement the SSEP implementation grant with respect to Board-meeting costs through the duration of the SSEP.

Funds Used as Non-Federal Match:

No specific matching funds are anticipated. Contributions from the member counties of the Gulf Consortium provide funding for the general administrative expenses in preparing the Board and Executive Committee agenda items for consideration of the SSEP, and for time spent with Board members and RESTORE coordinators to refine SSEP content and processes.

Other: None anticipated



APPENDICES

Appendix A. Compliance Reviews by Responding Parties

Table A-1. RESTORE Act Compliance Review

Subject	Responding Parties	Comments
Project Eligibility	Consortium SEP Consultant; Consortium General Counsel; commenting public	
Contribution to Economic and Ecological Recovery of Gulf	Consortium SEP Consultant; Florida Dept. of Environmental Protection; commenting public	
Conformity with Council Comprehensive Plan	Consortium General Counsel Consortium SEP Consultant; Florida Dept. of Environmental Protection; commenting public	
Application of Best Available Science	Consortium SEP Consultant; Florida Dept. of Environmental Protection; Florida Fish and Wildlife Conservation Commission; commenting public	
Limitation on Infrastructure Projects	Consortium SEP Consultant; Florida Dept. of Environmental Protection; commenting public	
Cross-Border Issues	N/A (Florida Dept. of Environmental Protection; commenting public)	

Appendix B. List of County Webpages used for requesting public comment on the SSEP

To be added prior to submittal to RESTORE Council

Appendix C. Summary of Agency and Public Comments

To be added prior to submittal to RESTORE Council