From: Doug Darling [mailto:ddarling@fl-counties.com]
Sent: Wednesday, May 22, 2013 5:33 PM
Subject: Chair Robinson Letter to US Treasury

Gulf Consortium Directors & Alternates:

Attached find the letter that forwards the Consortium's action on Treasury Rules discussed at our May 17 meeting. Please distribute as appropriate.

Regards,
Doug

May 22, 2013 VIA ELECTRONIC & US MAIL

Paul G. Wolfteich Principal Deputy
Chief Counsel Bureau of the Fiscal Service
United States Department of the Treasury
401 14th Street, S.W.
Washington, D.C. 20227

Dear Mr. Wolfteich:

Florida has taken a unique and collaborative approach in its implementation of the RESTORE Act. Florida recognizes the importance of working together, not as silos of government but as partners for the full restoration of Florida. To that end, the 23 Gulf Coast counties have joined together to form the Gulf Consortium. In addition to 23 separate governments joining in collaboration, the Gulf Consortium will also be working with the State of Florida and its many agencies to ensure that, as projects are reviewed, they meet not only local needs but also regional, state and federal requirements.

This collaborative Gulf Consortium is requesting the Department of Treasury to consider the items unanimously adopted items at its meeting May 17, 2013:

1. As provided for in the RESTORE Act, allow plan development costs and pre-award costs to be reimbursed, even before funds have been allocated. This is critically important for the Gulf Consortium and Florida Counties. To ensure RESTORE Act funds are spent appropriately and without waste, planning is a prerequisite. The ability to use RESTORE Act funds for planning should not be arbitrarily limited to only when initial funds become available, but allow for the Gulf Consortium and Florida Counties to start the planning now with ability to recoup pre-award costs.

2. Incorporate by Rule that State Allocation and Expenditures ((33 U.S.C. 1321(t)(1)(C)(i)Pot #1)) funds flow *directly* to Florida Counties. Due to ambiguities in the Florida model, clarification of Congressional intent is needed to ensure that this allocation flows directly to Florida Counties upon approval of the Secretary of the Treasury.

3. Incorporate by Rule the Gulf Consortium is the "…*consortia of local political subdivisions*" specified in the RESTORE Act. The Gulf Consortium was formed expressly with the intent to administer the Oil Spill Impact Allocation (33 U.S.C. 1321(t)(3)) and as required by 33 U.S.C. 1321 (t)(3)(B)(iii)(II). The Gulf Consortium's state statutory authority is Chapter 163, Florida Statutes.

4. Adopt by Rule the percentages agreed to by the Eight Disproportionately Affected Counties. The RESTORE Act was silent on how 75 percent of the State Allocation and Expenditures (Pot #1) would be divided between the Eight Disproportionately Affected Counties. Informal advice provided by the United States Treasury indicated that if a consensus was reached by the eight affected counties, the Treasury would consider this as an allocation methodology. The percentages unanimously agreed to by the Eight Disproportionately Affected Counties are:

Bay County 15.101%
Escambia County 25.334%
Franklin County 8.441%
Gulf County 6.743%
Okaloosa County 15.226%
Santa Rosa County 10.497%
Wakulla County 4.943%
Walton County 13.712%

The Gulf Consortium is sympathetic to the burden the RESTORE Act has placed on the resources of the Department of Treasury and appreciates your consideration of our requests as rule making is undertaken.

Sincerely,

Grover Robinson, Chairman
Gulf Consortium

cc: Gulf Consortium Members

Mr. Chris Holley, Executive Director, Florida Association of Counties
Mr. Douglas Darling, Interim Manager, Gulf Consortium
Ms. Sarah Bleakley, Interim General Counsel, Gulf Consortium