

COASTAL STATES ORGANIZATION



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March 31, 2023

Via USGCRP Public Contribution Site

Dr. Chris Avery
Chief of Staff for the National Climate Assessment
U.S. Global Change Research Program
1800 G Street, NW, Suite 9100
Washington, D.C. 20006

Subject: Framing the National Nature Assessment

Dear Dr. Avery:

The Coastal States Organization (CSO) respectfully submits these comments to the U.S. Global Change Research Program (USGCRP) and Office of Science and Technology Policy in response to the request for information to inform the framing, development, and eventual use of the first National Nature Assessment (NNA).¹ Since 1970, CSO has served as the collective voice for the nation's coastal states, commonwealths, and territories on policy issues relating to coastal, Great Lakes, and ocean management. CSO's governor-appointed delegates – representatives from the state and territory coastal management programs – partner with coastal communities, the federal government, tribal governments, and industry for the effective management, beneficial use, protection, and development of the coastal zone through the federal-state partnership established under the Coastal Zone Management Act (CZMA) and overseen by the National Oceanic and Atmospheric Administration (NOAA).²

CSO commends the goals set out in Executive Order 14,072, "Strengthening the Nation's Forests, Communities, and Local Economies," to elevate nature-based solution to tackle climate change and enhance resilience, including integration of policy and program changes across the federal government to deploy appropriate and effective nature-based solutions, improve valuation of ecosystem and environmental services and natural assets in federal decision-making, and comprehensive assessment of the condition of nature within the United States.³ This work, in conjunction with the objectives identified in the *Conserving and Restoring America the Beautiful* report,⁴ provide a generational opportunity to improve interagency coordination and modernize policy on management of the Nation's natural resources.

Conservation and restoration of coastal natural resources are key management strategies for accomplishing the goal articulated in the CZMA to preserve, protect, develop, and where possible, to restore or enhance, the resources of the Nation's coastal zone.⁵ Federal agencies will need to closely

¹ Framing the National Nature Assessment, 87 Fed. Reg. 65622 (Oct. 31, 2023).

² 16 U.S.C. § 1451 *et seq.*

³ Exec. Order No. 14,072, 87 Fed. Reg. 24851, 24854 (Apr. 22, 2022).

⁴ National Climate Task Force, *Conserving and Restoring America the Beautiful* (2021), available at <https://www.doi.gov/sites/doi.gov/files/report-conserving-and-restoring-america-the-beautiful-2021.pdf>.

⁵ 16 U.S.C. § 1452(1).

coordinate with coastal states to align federal and state conservation goals by strategically coordinating coastal conservation efforts to achieve the ambitious target of conserving 30 percent of U.S. lands and waters by 2030. Coastal management programs are well positioned to implement that close, cross-agency coordination. Many manage state lands and resources, and are key partners in establishing and managing national protected areas such as the National Estuarine Research Reserves. Over the past ten years, Coastal management programs have protected over 69,000 habitat acres and restored an additional 64,000 acres.

CSO provides the following recommendations based on the experience and expertise of state and territory coastal management programs. These comments are made in addition to and in support of comments submitted by individual states.

1. The NNA should provide best available scientific evidence to inform protection, conservation, and restoration of natural resources. Critical to this purpose should be assessment of vulnerability and change to natural systems driven by climate change.
2. The NNA should assess public access to, and equitable benefit from, the nation's natural resources. Coastal programs assess, protect, and fund public access to the nation's beaches, public waters, and coastal natural resources. Improving access for disadvantaged and isolated communities is a particular challenge and priority to achieve equitable outcomes.
3. The NNA should include assessment of the sediment supplies and systems critical to shoreline management. In the coastal context, the natural flow of riverine, estuarine, and coastal sediment systems is a critical determinant of shoreline change. Coastal flooding and erosion hazards, and impacts to coastal wetland ecosystems, are driven by disruptions to sediment supplies and processes. Coastal communities nationwide are confronted by sediment deficits impacting their ability to adapt to future conditions.
4. The NNA should support conservation and preservation decision-making, and should reflect existing policies, planning, and opportunities. Coastal states partner with federal agencies through coastal programs to comprehensively assess, prioritize, protect, and manage shoreline and ocean ecosystems, including the identification, designation, and management of coastal protected areas. Coastal management programs work with federal partners, local communities, academia, and stakeholders to prioritize coastal conservation needs and leverage federal and state resources to their management. Through these programs, coastal states collaborate to identify the best strategies to achieve conservation and restoration goals at the local level, ranging from acquisitions and permanent protections to land management partnerships according to local needs and considerations. They are key partners to connecting local needs to national priorities.
5. The NNA should provide guidance and actionable data on the valuation of ecosystem and environmental services to support better cost analysis and programmatic planning decisions at federal, state, and local levels, and should support watershed-scale planning (and other systematic, natural system-driven scales).
6. The NNA should assess and help coastal states to prioritize and meet research needs, including coastal, wetlands, and benthic habitat mapping; high-resolution topo-bathy data; shoreline

change, modelling of sediment system dynamics, and coastal erosion; natural and nature-based solution project design and performance; community and ecosystem vulnerability assessment; harmful algal bloom impacts; and high-resolution sea level rise and climate impact modelling. These research needs are critical for identification of areas which should be protected for ecological, conservation, recreation, coastal and climate resilience, and other purposes.

7. The NNA should incorporate data and knowledge from established research and monitoring programs, including sentinel sites that provide long-term trend and change analysis of key natural systems. For instance, the National Estuarine Research Reserve System (NERRS) under CZMA § 315 is a key program for understanding and managing the coasts. National estuarine research reserves provide long-term protection and place-based management of critical coastal ecosystems, lead comprehensive coastal research initiatives, enhance public awareness and understanding of estuarine areas, and provide suitable opportunities for public education and interpretation. State CZM Program play a leading role in the identification and designation of new reserves, collaborate closely with established reserves – in many states, reserves are managed by the same state offices as the CZM Program. The Connecticut National Estuarine Research Reserve, newly designated on Jan. 14, 2022, is the 30th reserve in the system. CSO supports the new reserve designations under consideration for Wisconsin and Louisiana, which provide a key opportunity to further expand the reach and capacity of the NERRS to meet conservation, restoration, and research goals in the coastal zone.
8. USGCRP and OSTP should make clear how NNA findings will be integrated into government-wide conservation and restoration policy. In particular, specific guidance should be provided on how the NNA will be used toward the America the Beautiful (30x30) initiative, as well as toward future conservation and restoration priorities, and how data from the NNA will contribute toward the development of the Conservation Atlas and *vice versa*.
9. The NNA should incorporate assessment of the following coastal systems and issues:
 - a. Coastal ecosystem functions, including:
 - i. Habitat for economically significant as well as threatened and endangered species;
 - ii. Aquatic connectivity for biological and hydrological functions;
 - iii. Water resources supply; and
 - iv. Water quality improvement;
 - b. Climate resilience and hazard mitigation benefits, including:
 - i. Margins for wetland migration;
 - ii. Wave attenuation by coastal wetlands, mangroves, and reefs;
 - iii. Storm surge protection by healthy dune systems;
 - iv. Stormwater retention capacity in natural floodplains and wetlands; and
 - v. Blue carbon sequestration values;
 - c. Social, economic, and access dynamics, including:
 - i. Access to public waters and natural resources for water-dependent land uses, industries, and community values;
 - ii. Capacity for disadvantaged populations to enjoy and benefit from natural places;

- iii. Coordination with local businesses and economies reliant on equitable and sustainable access to ocean and coastal natural resources; and
 - iv. Transportation system connectivity;
- d. Future conditions, including:
- i. Shoreline changes, erosion, sea level rise, Great Lakes lake level change;
 - ii. Climate change impacts on natural hazards; and
 - iii. Land use and development patterns.

Please contact John Ryan-Henry (jryan-henry@coastalstates.org) for further information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Derek Brockbank".

Derek Brockbank
Executive Director