



December 19, 2024

Dr. Rachel Gentile
Minority Staff Director
Water, Wildlife, and Fisheries Subcommittee:
Natural Resources Committee
1324 Longworth House Office Building
Washington, D.C.

Dear Dr. Gentile:

Thank you for providing the Coastal Flood Resilience Project (CFRP) an opportunity to comment on the draft Ocean Based Climate Solution Act. The [CFRP](#) is a coalition of nonprofit organizations working for stronger national programs to prepare for coastal storm flooding and rising sea levels along the coast of the United States.

Valuable Elements of Draft Ocean Based Climate Solutions Act (OBCSA)

Based on our review of the draft OBCSA, CFRP believes it will make an important contribution to coastal and ocean policy and programs. Some key elements of the draft OBCSA that should be included in a final, introduced bill include:

- 1) Living Shoreline Project Standards and Grants:** The bill provides new authority for grants for living shoreline projects and for development of standards for these projects (see p. 18);
- 2) New Authority for National Oceans and Coastal Security Fund:** The bill expands uses of the National Oceans and Coastal Security Fund and provides for new state plans to address coastal resilience (see p. 29);
- 3) Shovel Ready Project Funding:** The bill provides significant new funding for coastal restoration, protection and resilience projects that are “shovel ready” (see p. 32);
- 4) Relocation Initiative:** A “Strategic Climate Change Relocation Initiative and Program” is established including an advisory committee and a report to Congress (see. p. 33);

- 5) **New Coastal Resilience Centers of Excellence:** The bill includes new authority for “Centers of Excellence” for coastal research and education at universities; (see p. 38);
- 6) **Improvements to Coastal Barrier Resources Act (CBRA):** Improvements to CBRA include a new coastal hazard pilot project to demonstrate how areas that could support landward migration of coastal barriers, but are not now part of CBRA, might be included in CBRA (see p 42);
- 7) **Creation of New Interagency Committee on Sea Level Rise:** The White House Office of Science and Technology Policy is to chair a new interagency committee to align federal activities related to coastal flooding and sea level rise (see p. 75);
- 8) **Blue Carbon Initiative:** New authority for several measures to identify and protect greenhouse gas sequestration in coastal environments (i.e., blue carbon) and to protect these blue carbon assets (see p. 77); and
- 9) **New Funding for Oceans:** The bill proposes a new tax on virgin plastic as a funding source for the bill (see p. 101).

Recommended Changes to Draft OBCSA:

Some key changes that would improve the draft OBCSA are summarized below. Bill text edits are provided in this [document](#):

- 1) **Fisheries Habitat Loss Due to Sea Level Rise:** The bill should recognize sea level rise as a cause of significant wetland loss and loss of habitat needed for healthy fisheries (see p. 7).
- 2) **Fishery Infrastructure and Sea Level Rise:** Sea level rise will result in loss of land-based infrastructure critical to economic sustainability of fisheries and the extent and timing of infrastructure losses should be evaluated and plans for infrastructure adaptation developed (see p. 7).
- 3) **Living Shoreline Projects:** Living shoreline projects are often an improvement over other more damaging shoreline stabilization approaches, such as seawalls, bulkheads and rip rap. The design of these projects, however, varies widely and, because there is no national design standard, many living shoreline projects bring some of the same undesirable features as more conventional infrastructure projects (e.g., a project uses mostly natural material such as sand and rocks with minimal or superficial biological material). The bill should require the development of minimum standards for living shorelines and require that project grants comply with the standards (see p. 21).

The definition of “living shoreline” should be amended to require the use of biological materials, to provide for application of biological materials in a buffer area between the shoreline and the community, and to support removal of infrastructure or other structures when needed to enhance the stabilization benefits (see p. 22).

The authorization for project grants should be increased from \$50 million to \$150 million per year (see p. 21).

- 4) Competitive Research Topics:** The development of new tools to communicate risks of coastal flooding and rising seas should be included among topics needing external research (see p. 24).

The authorization for external research should be increased from \$5 million to \$20 million (see p. 25).

- 5) Eligible Uses of Coastal Security Fund:** The eligible uses of Coastal Security Fund funds should be expanded to include projects for better communication of risks of coastal flooding, planning to manage new coastal development, relocation of non-critical community infrastructure, and support of coastal ecosystem migration pathways (see p. 28 and 29).

- 6) Priority for Projects in State Plans:** The bill should give priority in award of funds for projects identified in section 906 to projects that implement State plans under subsection 906(b) (see p. 29).

- 7) State Allocations for Grants:** The percentage of grants allocated to all states equally should be reduced and the percentage allocated to states based on population should be increased (see p. 30).

- 8) Add Goals for State Plans:** State plans under subsection 906(b) should include consideration of key questions including:

- a. relative investments in resilience of communities, ecosystems, and infrastructure,
- b. criteria for addressing most pressing needs;
- c. criteria for cost-effective investments in different resilience strategies, including seawalls, elevation, and relocation;
- d. criteria for responding to underserved communities, and
- e. steps to improve risk communication. (see p. 31)

- 9) Cap on Grants to States:** The 5% cap on grants to states will result in most states getting the full 5% regardless of size of coastline or population. The cap should be raised to 10% (see p. 30).
- 10) State and Tribal Administrative Costs:** States and tribes should be able to use up to 5% of grants to cover administrative costs of managing the plan and projects (see p. 32).
- 11) State Grant Funding Level:** The funding authorization level for grants under section 908 should be significantly increased from \$200M to \$400M (see p. 33).
- 12) Shovel Ready Project Expansion:** The range of projects eligible for funding under the shovel ready program should include adaptation projects such as removal of coastal abandoned structures and protection and construction of ecosystem migration pathways (see p. 32)
- 13) Clarify Priority for Disadvantaged Communities:** The priority given to disadvantaged communities for shovel ready projects should be more clearly focused on these communities (i.e., these communities should be the principal beneficiaries of a priority project rather than just that the project “includes” such communities) (see p.33).
- 14) Coastal Barrier Resources Act (CBRA) Coordination with Buyouts:** Many barrier islands are considered developed and not eligible for the CBRA program. Structures on some of these barriers will be removed through federal buyouts and other means and these removals may make some barriers eligible for the program (i.e., they will become undeveloped). Federal agencies should report removal actions to the FWS and FWS should periodically consider whether some barriers are newly eligible for the program (see p. 43).
- 15) Expand Mapping of Coastal Wetlands:** The bill calls for new mapping of blue carbon assets and will result in mapping of much of the nation’s coastal wetlands but should be revised to call for mapping of all coastal wetlands and the corridors that would allow for landward migration of these wetlands (see p. 80).
- An assessment of the potential for landward migration of coastal ecosystems should be included in the report to Congress on blue carbon (see p. 82).
- 16) Add New Report on Coastal Demographics:** Addition of a report to Congress describing expected changes in coastal demographics in the coming decades would provide valuable information to support policy and planning efforts (see p. 108).

17) Add New Report on Coastal Beaches: Addition of a new report to Congress describing the impacts of rising sea levels on beaches and dunes would help federal, state, and local governments take effective action to minimize losses in the ecological and recreational values of beaches (see p. 109).

The [Coastal Flood Resilience Project](#) is a coalition of organizations working for stronger programs to prepare for coastal storm flooding and rising sea level in the United States. The views expressed in this *White Paper* are those of the contributors listed below and do not represent the views or endorsements of their organizations.

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