Connecticut Fund for the Environment
Save the Sound®

April 17, 2019

VIA ELECTRONIC MAIL

Public Comments Processing
Attn: Docket No. FWS-HQ-ES-2018-0034
Division of Policy, Performance, and Management Programs
U.S. Fish and Wildlife Service
5275 Leesburg Pike, MS: BPHC
Falls Church, VA 22041-3808

RE: Comments on 2018-2019 Draft Revised Boundaries for Units of the John H. Chafee Coastal Barrier Resources System (CBRS) in Connecticut and New York (Long Island)

To Whom It May Concern:

Connecticut Fund for the Environment/Save the Sound (CFE/Save the Sound) supports the proposed amendments to the Coastal Barriers Resources Act (CBRA), and this letter reflects our very strong support for the proposed amendments that expand the coastal barrier system within the coastal regions of Long Island, which includes Connecticut and the entirety of Long Island and its North Shore.

CFE/Save the Sound is dedicated to protecting and improving the land, air, and waters of Connecticut and Long Island Sound. CFE/Save the Sound uses legal and scientific expertise to bring people together to achieve results that benefit the environment for current and future generations. CFE/Save the Sound works to ensure that the Long Island Sound, rivers, and lakes are safe for drinking, swimming, and fishing and that our waters and coastal habitats support thriving populations of fish and other wildlife. The proposed amendments directly align with CFE/Save the Sound's mission and vision.

The Coastal Barriers Resources Act

The CBRA, enacted in 1982, serves to protect critical habitats as a method to minimize loss to human life, wasteful federal revenue expenditures, and damage to fish, wildlife, and other natural resources. The Act accomplishes this goal through the creation of a Coastal Barrier Resource System, which has since been renamed the John H. Chafee Coastal Barrier Resources System. Within a coastal barrier resources area, residences, businesses, and other developments are not eligible for federal funding, effectively precluding them from building in the system unless the

builder self-funds and self-insures the entire project. Preclusion from federal funding includes a preclusion from the National Flood Insurance Program, which is an additional requirement that federally regulated lenders must consider in mortgage and lending decisions. The last major update for most areas within the system occurred in 1990 and the current update is a direct response to the damage caused by Hurricane Sandy.

This update is the second part of two-part update for the eastern seaboard and will remove 787 acres from the system while adding approximately 141,072 acres from the affected states (Connecticut, Maryland, New York, Rhode Island, and Virginia). While there are removals from the system, they are warranted because the updated maps show that those acres were originally added because of mapping errors. This update will help to further protect critical areas, such as wetlands, which serve a dual purpose of being the most efficient natural flood sponge. Protecting the wetlands will directly help further the mission of both the CBRA and the CFE/Save the Sound because it will help protect the critical environmental features as well as reduce the potential for loss of human life in future hurricanes and coastal storms. Furthermore, this update will protect vulnerable species in the areas because of the disincentive to develop. The lack of development is a direct benefit to all wildlife in the area because there will be more protected habitat for them to live in. This also helps promote the purpose and vision of both the CBRA and the CFE/Save the Sound in supporting a healthy environment and a thriving population of wildlife.

Regional and Economic Analysis of Additional Coastal Barrier Resources Proposed within Long Island Sound

The Long Island Sound updates are of the highest concern to CFE/Save the Sound. For our own purposes, we have split the Connecticut coast into three sections: Eastern Connecticut, which includes Stonington to Madison; Mid Connecticut, which includes Madison to Stratford; and Western Connecticut, which includes Stratford to Greenwich. We will address each section as well as comment on coastal barrier resource expansion on Long Island as a whole.

Each of the four sections will include a breakdown of acreages added under the proposed amendment, including an estimate of the increase in associated aquatic habitat (which, under the FWS definition is: "wetlands, marshes, estuaries, inlets, and open water landward of the coastal barrier, but does not include open water seaward of the shoreline").[1] Each section will also include an economic estimate based on the ecological services provided as well as a valuation of the flood protection service that the areas provide. These estimates are based on expert economic findings included in a 2015 study, "The Trillion Dollar Asset: The Economic Value of the Long Island Sound," conducted by Earth Economics and prepared for the Long Island Sound Study

[1] CFE/Save the Sound is most concerned with the associated aquatic habitat because those are the most valuable and vulnerable areas that need to be protected in order to better fulfil the mission of both CFE/Save the Sound and CBRA.

(LISS).[2] LISS is the national estuary program established for Long Island Sound and New England Interstate Water Pollution Control Commission with funding from the US Environmental Protection Agency.

Eastern Connecticut

The updates for Eastern Connecticut include units CT01, CT02, CT03, CT04, CT05, CT06, CT07, CT08, CT10, CT11, CT19P, E01A, E01, E02, E03A, E03B, E03, E04, and E05 (19 units). Prior to the update, the Eastern Connecticut system included a total of 3,917 acres. The update will increase that total to 7,106 acres, an increase of 3,189 acres. Of that increase, the associated aquatic habitat changes account for 3,069 acres. According to the study prepared by Earth Economics, the new additions to the aquatic habitat will have an estimated ecological services value between $35.9 and $237.1 million on an annual basis.[3] Furthermore, the aquatic habitats help moderate extreme events, and prevents and mitigates damages from natural hazards such as floods, hurricanes, fires, and droughts. The economic value of the additional acres in providing flood protection service during coastal storm events is approximately $11.6 million annually.

Mid Connecticut

The updates for Mid Connecticut include units CT12, CT13, CT14P, CT15P, CT18P, E07, and E08AP (7 units). Prior to this update, the Mid Connecticut system included a total of 1,852 acres. This update will increase the total to 2,790 acres, an increase of 938 acres. Of that, the associated aquatic habitat changes account for 803 acres. Based on the values assigned within the Earth Economics analysis, aquatic habitat increase will have a total estimated ecological services value between $9.4 and $62 million.[4] Furthermore, the economic value that this area provides in moderating extreme coastal storm events is approximately $3 million annually.

Western Connecticut

The updates for Western Connecticut include units CT20P, E09P, and E09 (3 units). Prior to this update the Western Connecticut system included a total of 1,812 acres. This update will increase that total to 2,498 acres, an increase of 686 acres. Of that, the associated aquatic habitat changes account for 665 acres. Based on the values assigned by the Earth Economics analysis, this aquatic habitat increase will have a total estimated value between $7.8 and $51.4 million each year.[5] The economic value from the moderation of extreme coastal storm events from this subsection is approximately $2.5 million annually.

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[2] Maya Kocian et. al, The Trillion Dollar Asset: The Economic Value of the Long Island Sound Basin 34, EARTH ECONOMICS (July 2014). https://static1.squarespace.com/static/561dcdc6e4b039470e9afc00/t/5b8061864fa51af3faea6fa1/1535140261942/TheTrillionDollarAsset_EarthEconomics_2015.pdf (All habitat estimated economic values in this comment are based on the values found on pages 7 or 34 in this research paper).

[3] Ibid.

[4] Ibid.

[5] Ibid.

Long Island (including the North Shore)

The updates for Long Island include units F01, F02, F04P, F05P, F05, F06, F08A, F08B, F09, F10P, F10, F11, F12, F13P, F13, NY03, NY04P, NY05P, NY06P, NY06, NY07P, NY09P, NY10P, NY10, NY11P, NY11, NY12, NY13, NY14, NY15P, NY15, NY16P, NY16, NY17P, NY17, NY18, NY19P, NY20P, NY21P, NY22P, NY23P, NY23, NY24, NY25P, NY26, NY27, NY28, NY29P, NY30, NY31A, NY31P, NY31, NY32, NY33, NY34, NY35P, NY36P, NY36, NY37, NY38, NY39, NY40P, NY40, NY41P, NY42, NY43P, NY43, NY44, NY45, NY46, NY47, NY48, NY49, NY50, NY51P, NY52, NY53, NY54P, NY55P, NY56P, NY56, NY57, NY58, NY59P, NY59, NY60P, NY88, NY89, NY90P, NY92, NY93, NY94, NY95P, and NY96P (94 units). Prior to the update, the Long Island coastal barrier system included a total of 97,441 acres. This update will increase that total to 120,450 acres, an increase of 23,009 acres. Of that, the associated aquatic habitat changes account for 20,155 acres. Based on the Earth Economics study, the aquatic habitat increase acreage contains ecological services value between $235.8 and $1,557.2 million each year.[6] The economic value from the moderation of extreme coastal storm events across Long Island is approximately $76.6 million annually.

Summary

The two regions (the Connecticut coast and across Long Island) will see a net increase of 27,822 acres added to the coastal barrier system, with an aquatic habitat increase of 24,692 acres. The total economic value of the ecological services provided by this total in the two regions' increased aquatic habitat range from $288 million to $1.9 billion annually.[7] The total economic value of this increased acreage of aquatic habitat in moderating extreme coastal storm events is approximately $93.8 million each year, on average. With economic values of this magnitude, it is critically important to protect these areas that the U.S. Fish and Wildlife Service have identified as additions to the acreage contained in the existing John H. Chafee Coastal Barrier Resources System.

The value of aquatic habitat and other coastal resources within Long Island Sound is high, economically, recreationally, and ecologically. These resources help absorb and lessen the effects of increasingly frequent storm surge events. Protecting critical coastal resources requires a multi-layered set of protections. Expanding the coastal barriers designation within Long Island Sound will add an additional layer of protection to these resources beyond the protections provided under current state and federal wetland regulatory programs.

Conclusion

CFE/Save the Sound strongly supports the proposed update to the Coastal Barrier Resources Act because it will help protect human life, reduce wasteful expenditure of federal funds, and minimize the loss of wildlife and other natural resources. The proposed update directly aligns

[6] Ibid.
[7] Ibid.

with the goals and mission of CFE/Save the Sound in helping to protect an area that has a high economic value from flood damage and provides a wide array of ecological, environmental, and recreational benefits. This area provides valuable resources that must be protected for future generations and this proposed update is a much-needed step in the right direction.

Sincerely,

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Connecticut Fund for the Environment/Save the Sound