

Attachment G

Stakeholder Comment; Skip Stiles

Remarks to the Coastal Elevations and Sea Level Rise Advisory Committee
Portsmouth, VA
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Thank you for the opportunity to address the Committee on the draft report, “Coastal Elevations and Sensitivity to Sea Level Rise,” (Synthesis and Assessment Product 4.1). I was in Easton, Maryland, earlier this week at the stakeholder meeting on this draft and am familiar with some of its contents and the direction of the report.

At the outset, I want to thank those involved in producing this report. The report will be coming at a time when discussions on this topic are entering the mainstream, and its contents will help inform that public dialogue.

One person at the stakeholder meeting this week observed that innovative state and local governments often lead the federal government on issues like these. But then, the role of the federal government is to summarize the work done by the innovators in order to bring along the trailing states and localities. This report should serve that function.

There is ample scientific knowledge on this topic to merit this report. There is also sufficient work underway at state and local levels to begin to outline where the public policy process needs to respond. It is important that this report feature and highlight some examples of the existing state of scientific and public policy knowledge – it makes the report more relevant, readable, and informative. The use of examples and text boxes to feature them is one way of accomplishing this.

This is an important function for those of us in the so-called, “trailing” states I just mentioned. Virginia can benefit greatly from the information on this topic and the experiences of other, neighboring states. Virginia is just at the early stages of dealing with the issue of sea level rise and coastal ecosystem impacts. We have not even begun a comprehensive mapping effort of the areas at risk from inundation, let alone starting an ecosystem impact analysis or a mitigation strategy.

A regional assessment of this kind is useful because it groups “like” states with similar problems. For three of the mid-Atlantic states – Delaware, Maryland, and Virginia – we are linked by the commitments made under the Chesapeake Bay 2000 agreement to evaluate the impacts on wetlands from sea level rise. Work to meet this commitment has been started in Maryland and Delaware but not here in Virginia. By showcasing some of the efforts in surrounding states, it helps those of us wanting to motivate Virginia to make good on its Chesapeake Bay restoration promises.

Along those lines, I think it is important that any maps, tables, or analyses be pushed to as local a level as the data and space permit. This issue is a rather ethereal one. Telling a

policymaker that the sea level rising 3 mm/yr in the mid-Atlantic is not going to prompt them to action. Telling them that county “X” stands to lose large chunks of coastal ecosystems and habitat for fish and shellfish will make an impact.

So please push the analysis as close to where we live as possible – it is the only way this report will catch the attention of policymakers and legislators. Besides, this local impact is already being felt: in Virginia insurance companies are pulling out of coastal counties – county by county – because of increased inundation risk. To the extent that you can take advantage of this heightened awareness with more localized analysis and examples, your report will be more meaningful.

The localization of the impact analysis is also critical to the eventual solution to this issue. Local land use decisions and ordinances are going to determine whether we can avoid and mitigate adverse impacts from sea level rise. Federal and state policy can provide information and support, but, with the exception of the policies of the Federal Emergency Management Agency (FEMA), the local governments are on the front line on this issue.

The local governments must go out on a limb to begin protecting potential “retreat” zones for coastal ecosystem features, zones that are non-jurisdictional today under state and federal law. If we wait until the “retreat” zones become jurisdictional (under the Clean Water Act or other statutes) it will be too late in many cases to protect them. So, while you work on a top down outline of the problem, you need to be mindful of the bottom up solution. Again, examples in text boxes might serve this purpose.

However, catching the attention of the public and their policymakers with this report has an inherent risk unless the significant limitations of this report are dealt with clearly. This was a point repeated at the stakeholder meeting in Easton. Having worked in Congress I can tell you that your worst nightmare is that of a legislator reading this report, ignoring or missing the caveats, error bars, limitations and qualifications, and then moving to craft public policy based upon an erroneous conclusion drawn from this report.

You must be clear about the limitations of our current scientific understanding, the extent and detail of our mapping and modeling limitations, and our uncertainty about the social and political responses. At the same time, you do not want so many qualifiers that the report becomes meaningless or plagued with conditional statements that make its central findings hard to determine. The challenge here is to find the balance between scientific safety and certainty and the meaningfulness of the study.

I think that each statement of limitations should be matched with a policy step that could be taken to eliminate those limitations. For example, if the mapping data prevent any clear determination of inundation risks at a 3 + mm/yr rate, a policy step to deal with that would be a suggestion that mapping in coastal areas at a 2 foot or less contour should be a high priority in every mid-Atlantic state. I know that we could certainly take that finding and put it to use here in Virginia where our coastal plain maps are virtually useless for this undertaking. In fact, that is what we are asking of our state government.

Wetlands Watch sent a letter to the Governor of Virginia last week asking for a high level state response to this issue. We cite the limitations in the elevation data, impact analysis, and local land use responses to deal with mitigation of the loss of the coastal ecosystem services due to sea level rise. The letter results from an analysis we conducted on the potential loss of vegetated tidal wetlands from relative sea level rise in the 4-6mm/yr range. We could only make a “best guess” of a loss of between 50 and 80% of vegetated tidal wetlands in Virginia, an absolutely terrifying outcome if unmitigated.

We are asking that the state do the mapping and analysis and hoping that they can prove that we over-estimated the wetland loss. We are asking that they undertake a state-level analysis of the type contained in this report. That is the value in your undertaking – helping prompt similar efforts on a finer topographic resolution in trailing states by showing what work is involved and what questions need answering.

I will be submitting more detailed substantive comments on the draft before you as part of the stakeholder process.

Again, thank you and the authors and staff working on this for what will be a very useful document.