July 19, 2022

President Joe Biden and Vice President Kamala Harris
1600 Pennsylvania Ave NW
Washington, DC 20500

RE: Administration Ocean Climate Action Plan

Dear President Biden and Vice President Harris,

On behalf of the Coastal Flood Resilience Project (CFRP), a coalition of nonprofit organizations advocating for stronger national programs to prepare for coastal storm flooding and rising sea levels along the coasts of the United States, we are writing to thank you for working to combat the climate crisis.

Your administration has made significant efforts to reduce greenhouse gases, advance renewable energy, grow clean transportation, and overturn harmful policies implemented by the previous Administration. This letter focuses on the development of the Biden/Harris Ocean Climate Action Plan (OCAP) announced on June 8, 2022, World Ocean Day.

Our ocean and coasts are at the center of climate change. Sea level is projected to rise between 4 and 6 feet by 2100—putting communities, infrastructure, and ecosystems in danger. Climate change is resulting in more severe coastal storms and storm surge flooding that puts lives at risk and causes billions of dollars in damages. Rising sea levels will bring storm surge further inland and permanently inundate low-lying coastal areas in the coming decades. Low income and BIPOC (Black, Indigenous, People of Color) communities are especially vulnerable to coastal flooding and need to be better engaged in finding solutions.

The Biden/Harris OCAP rightfully focuses on important work such as greening shipping and fishing, developing renewable ocean energy and protecting blue carbon. While the plan is under development, the CFRP strongly urges more focus on strengthening coastal flood resilience and sea level rise planning.

Your administration, and Congress, have a rare opportunity to create swift change by implementing specific laws and policies to ensure our ocean and coasts are ‘front and center’ during the flight to combat climate change. The recommendations below can help your administration and Congress increase coastal resilience and planning for sea level rise to protect our coasts from climate change.
For more information on the risks that more severe storms and rising sea level pose for coasts and recommendations for improving coastal flood resilience programs and policies, please see the White Papers produced by CFRP on our website.

**Recommendations for the Biden/Harris Ocean Action Plan**

Recommendations for critical elements of an Ocean Climate Action Plan are provided below. These actions should build on the Administration’s existing commitment to conserve or protect 30 percent of the global ocean by 2030. In addition, it is critical that the Environmental Protection Agency rapidly develop work-around solutions to the recent *West Virginia vs EPA* Supreme Court decision and that a comprehensive climate change legislative package be a part of reconciliation this summer. We urge you to work closely with Congress to pass this critical legislation with strong climate change authority.

- Reinstitute moratoriums on offshore drilling.
- Advance nature-based (living shorelines) solutions such as wetland and dune restoration.
- Improve weather forecasting to keep people safe from increasingly intense and changing storm activity.
- Increase federal support for renewable offshore energy, including wind, tidal, and wave energy.
- Work with Congress to implement and fund a Civilian Climate Corps that provides job opportunities and helps communities be more resilient against extreme weather and sea level rise.
- Require mapping of vulnerable sea level rise areas. NOAA and FEMA should publish maps of areas expected to be inundated because of higher sea levels later this century.
- Provide guidance and funding for state and local sea level rise plans. NOAA should use funds provided through the Infrastructure Investment and Jobs Act (IIJA) or related legislation to offer grants to states to work with local governments to develop plans to address coastal flood resilience, consistent with national guidance that sets minimum standards for the plans.
- Encourage states and local communities to identify and map coastal migration pathways to existing coastal beaches and wetlands and the upland areas that these ecosystems will migrate to as sea level rises, including identifying natural and anthropogenic obstacles to successful landward migration. These agencies should cooperate with states to facilitate landward migration of ecosystems on a priority basis giving attention to sustaining the significant carbon sequestration benefits of coastal wetlands (e.g., blue carbon).
• Continue to work with Congress to strengthen the National Flood Insurance Program (NFIP). FEMA should also strengthen NFIP regulations to better recognize risks of permanent flooding posed by rising seas, improve public information about storm surge and sea level rise risks, discourage development in sea level rise risk areas by declining insurance for new projects in these areas, and implement a means-tested flood insurance affordability program to make insurance more affordable for low-income/low wealth homeowners and communities.

• Develop national plans to relocate critical infrastructure to higher ground; Federal agencies should identify critical infrastructure facilities and assets at risk of permanent inundation by rising seas and develop long term plans to relocate assets to high ground and avoid locating new infrastructure in at risk areas.

• Expand buyouts of coastal property at risk of rising seas. Using funds provided by infrastructure and related legislation, FEMA should expand funding for buyouts of property at risk of inundation by rising seas where a purchase is in the federal government’s financial interest, giving priority to economically disadvantaged owners.

• Frame policies to support community scale relocation. With leadership from CEQ and OMB, federal agencies should evaluate and develop programs to provide incentives and support to coastal communities interested in gradually relocating neighborhoods and community infrastructure at risk of permanent inundation by rising seas to higher ground.

• Address sea level rise in IIJA guidance. Major new infrastructure investments need to be sited and designed with sea level risks in mind. The Administration should ensure that all implementing regulations and guidance for IIJA funding and programs, as well as future infrastructure and disaster preparedness and relief funding, require all eligible projects to identify, analyze, and address risks of greater storm surges and permanent inundation due to sea level rise.

• Expedite implementation of Federal Flood Risk Management Standard (FFRMS). Federal agencies should expedite work to fully implement the FFRMS within their programs and operations. FEMA should support this work by providing guidance on key topics such as the Climate Informed Science Approach and practices to strengthen agency decision-making to avoid location of projects or investments in flood risk areas.

Our nation’s coastlines are essential resources that support ecosystem health, thriving recreation and tourism industries, and resilience to climate change impacts. They contribute to an enhanced quality of life for hundreds of millions of Americans and their protection is directly linked to the advancement of environmental justice. However, Congress has yet to adequately respond to critical coastal climate issues such as coastal resilience, coastal adaptation planning, nature-based solutions, and improving coastal management. Your administration has an excellent opportunity to address coastal flood resilience challenges through the expanded use of existing authority and funding.
Thank you for expediting these efforts to take meaningful action on the climate crisis. The recommendations above will save our nation's taxpayers money in the long run by allowing for effective pro-active adaptation actions to strengthen coastal food resilience.

Sincerely,

John Englander; Executive Director, Rising Seas Institute

Harriet Festing and Stephen Eisenman; Anthropocene Alliance

Grace Hansen; Middlebury Institute of International Studies

Rich Innes; Senior Policy Director of the Association of National Estuary Programs and former senior staff to the Senate Committee on Environment and Public Works

Charles Lester; Former Executive Director of the California Coastal Commission

Jeffrey Peterson; author of *A New Coast: Strategies for Responding to Devastating Storms and Rising Seas* and former Deputy Associate Director for Water, White House Council on Environmental Quality

Susan Ruffo; United Nations Foundation and former Associate Director for Climate Preparedness and Resilience, White House Council on Environmental Quality

Jason Scorse; Middlebury Center for the Blue Economy

Stefanie Sekich-Quinn; Surfrider Foundation

Mary-Carson Stiff; Wetlands Watch

Rob Young; Director, Program for the Study of Developed Shorelines

*The Coastal Flood Resilience Project is a coalition of organizations and individuals working for stronger programs to prepare the United States for the more severe coastal storms and rising sea level resulting from a changing climate. The views expressed in this letter are those of the contributors listed below and do not represent the views or endorsements of their organizations.*