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U.S. Interior Department
Fish and Wildlife Service
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RE: John H. Chafee Coastal Barrier Resources System; Hurricane Sandy Remapping Project for Delaware, Massachusetts, New Hampshire, and New Jersey

We at the R Street Institute appreciate this opportunity to comment on the U.S. Fish and Wildlife Service's proposed remapping, which would add a net 135,705 acres and 37 units across four Northeast states would be added to the John H. Chafee Coastal Barrier Resources System.

Signed by President Ronald Reagan in October 1982, the Coastal Barrier Resources Act sets aside 1.3 million acres of protected wetlands, coastal barrier islands and aquatic habitat as, effectively, a “federal subsidy-free” zone. Units within the system, which also includes an additional 1.8 million acres of state and federal parkland designated as “otherwise protected areas,” do not have access to federal funding for roads and other infrastructure, cannot participate in the National Flood Insurance Program and are ineligible for federal disaster relief under the Stafford Act.

We believe the CBRS models an ideal free-market approach to conservation. In essence, the bargain struck by the CBRA is this: land owners are free to develop in whatever ways they deem appropriate, including within the protected coastal system. They just aren't entitled to a single dime of taxpayer money to do it. We long have felt this paradigm strikes the right balance between respecting private property and avoiding spending that serves to encourage bad behavior.

The CBRA can and has been used as a model for other market-based approaches to the environment, from the U.S. Department of Agriculture's Conservation Compliance program to the Florida Legislature's 2014 decision (based on an R Street proposal, attached) to bar new

development seaward of the Coastal Construction Control Line from getting subsidized insurance from the state-run Citizens Property Insurance Corp.

The system's benefits were on full view during the 2017 hurricane season. While Hurricane Harvey is estimated to have caused as much as \$125 billion in damage, including massive flooding in and around Houston, the destruction would have been far worse were it not for where the Category 4 storm made landfall – at San José Island, an uninhabited barrier island that is entirely within the CBRS. Much of the coastal regions of surrounding Aransas County likewise fall within CBRS units, and are thus largely free of development.

These updates all will ultimately have to be approved by Congress, where development interests are likely to lobby for scaling back the existing system as much as possible. We think it is crucial for environmentalists and taxpayer advocates alike to stand up to defend the CBRS and to expand the model to new areas, such as those that face wildfire risk. Not only is this a conservation program that has proven to work, but it remains one of Ronald Reagan's enduring legacies.

Sincerely,

R.J. Lehmann
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