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

RE: John H. Chafee Coastal Barrier Resources System; Hurricane Sandy Remapping Project for Connecticut, Maryland, Massachusetts, New York, Rhode Island, and Virginia.

We at the R Street Institute appreciate this opportunity to comment on the U.S. Fish and Wildlife Service's proposed remapping for five Northeast and mid-Atlantic states, which would add 141,072 acres, while removing 787 acres erroneously included under the current maps, to the John H. Chafee Coastal Barrier Resources System (CBRS). We strongly support these changes, as well as continued robust expansion of the CBRS. Importantly, the proposed revisions include 5,057 acres of otherwise developable fastland.

Signed by President Ronald Reagan in October 1982, the Coastal Barrier Resources Act sets aside 3.5 million acres of protected wetlands, beaches, coastal barrier islands and aquatic habitat along the Atlantic Ocean, Gulf of Mexico and Great Lakes as, effectively, a “federal subsidy-free” zone. Units within the system, do not have access to federal funding for housing, roads and other infrastructure, cannot participate in the National Flood Insurance Program (NFIP) and are ineligible for federal disaster relief under the Stafford Act.

Docket No. FWS-HQ-ES-2018-0034 references a second set of proposed revisions to maps of coastal state’s affected by Superstorm Sandy in October 2012. The earlier set of map revisions – covering changes in New Hampshire, Massachusetts, New Jersey and Delaware – proposed to add 136,268 acres to the CBRS in those states, while removing 557 acres of erroneously included parcels. We supported those changes, as well as supporting H.R. 5787, Strengthening Coastal Communities Act of 2018. That legislation, signed by President Donald Trump in December 2018, added more than 18,000 acres to the system.

We believe the CBRS serves as an ideal free-market approach to conservation. The law allows property owners to develop in whatever ways they deem appropriate, including within the protected coastal system, provided they do not take any taxpayer subsidies. As a result, more than 84 percent of the CBRS zones remain undeveloped. In a recent study published in the *Journal of Coastal Research*, researchers Andrew Coburn and John Whitehead found that, from 1989 through 2016, the program saved taxpayers

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\$9.5 billion of federal funds that otherwise would have been expended, mostly by the Federal Emergency Management Agency through post-disaster relief for properties within the zone. The authors also project the CBRS could save as much as \$108 billion in federal expenditures over the next 50 years.

The strike of Hurricane Harvey in 2017 offers an illustrative example of how the CBRS can serve to disincentivize development in risk-prone regions. The system's benefits were on full view during the 2017 hurricane season. While Harvey's estimated \$125 billion in damage, including nearly \$9 billion in NFIP claims, was concentrated in and around the City of Houston, the storm made landfall as a Category 4 some 200 miles away at San José Island. Because both the island and much of surrounding coastal Aransas County falls within the CBRS, they were largely free of development that Harvey would otherwise have devastated.

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 to bar new development seaward of the Coastal Construction Control Line from getting subsidized insurance from the state-run Citizens Property Insurance Corp. In testimony last month to the House Financial Services Committee, R Street proposed that the NFIP itself adapt a version of the CBRS model by refusing to insure new construction located within 100-year floodplains. We also have explored the potential to adapt the CBRA model to other risks, including wildfire risk in the Western states.

We applaud FWS' efforts to finalize these updates to the program's maps and present them for congressional approval. The CBRS remains one of Ronald Reagan's enduring legacies and continues to offer a compelling case that protecting taxpayers and the environment can go hand in hand.

Sincerely,

R.J. Lehmann
Director of Finance, Insurance and Trade Policy
R Street Institute