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Mr. Ralph Cantral
Senior Advisor and Evaluation Team Leader
NOAA Office for Coastal Management
Charleston, South Carolina

Submitted via email (Ralph.Cantral@noaa.gov)

Dear Mr. Cantral:

*RE: North Carolina Coastal Management Program and National Estuarine Research Reserve
Federal Program Evaluation (2011-2020)*

Thank you for the opportunity to provide comments on North Carolina's Coastal Management Program, formally approved by the National Oceanic and Atmospheric Administration in 1978 as part of the National Coastal Zone Management (CZM) Program. This evaluation is taking place under Section 312 of the Coastal Zone Management Act (CZMA), which calls for the periodic evaluation of state and territory coastal management programs relative to the priority goals of the CZMA.

The Pew Charitable Trusts' (Pew's) main interest relative to North Carolina's Coastal Management Program (CMP) and this Section 312 evaluation is to support and collaborate with the CMP in efforts that promote and maintain healthy coastal ecosystems and to reduce the impacts of flood-related disasters on communities. With its goal to protect, conserve, and manage North Carolina's coastal resources through an integrated program of planning, permitting, education and research, the CMP plays a critical role in addressing the challenges facing the state's coastal communities and natural resources. Our comments on the CMP, included below, focus on the specific areas of interest to NOAA: coastal resilience, program administration and partnerships.

The CMP has achieved several precedent-setting reforms over the evaluation period to address sea level rise and flooding through resiliency-related policy and programmatic work. For example, the CMP's collaboration with the U.S. Army Corps of Engineers on permitting of marsh sills has resulted in the state having among the quickest permitting processes for "living shorelines" in the nation. The CMP now has the opportunity to advance the use of living shorelines throughout the state's coastal areas to increase community resilience to flooding and sea level rise, and to conserve critical habitats, such as oyster reefs and wetlands.

Another example is the CMP update for Inlet Hazard Areas and associated policies, such as construction set-backs. Previously based on decades-old maps, these areas are particularly vulnerable to coastal hazards like erosion and flooding that are only accelerating with increasing severe storms and hurricanes. The CMP invested considerable resources and worked closely with communities in

this effort. We commend this work, including the plan to regularly update the boundaries based on new data and science.

The CMP has also conducted critical capacity building work with local governments to increase coastal resiliency. These include the development of a [Coastal Adaptation and Resiliency portal](#) and the [Resiliency Guide Story Map](#). The Department of Coastal Management worked with community and non-profit partners on its coastal resilience pilot program and conducted a coast-wide survey to determine the need for local resilience efforts. These assessments include mapping community assets, public engagement and education, identification of vulnerabilities, and conversations about projects that could address these risks.

The lessons from the pilot program helped build the foundation for the newly-launched [Resilient Coastal Communities Program](#) (a key component of the North Carolina Resilient Communities Program). This initiative will increase capacity in North Carolina's 20 coastal counties to assess risk, plan, and prioritize specific coastal resilience projects. The first phase of the effort – which will entail community engagement and risk and vulnerability assessments – can aid in setting tailored resilience goals and establishing a framework for “shovel ready projects,” as well as developing plans and policies related to CMP's regulatory mission.

Moving forward, we recommend the CMP leverage its centralized role in coastal resource management to support holistic, community approaches that expand the use of nature-based solutions and maximize ecosystem services. For example, the CMP is engaged in updates to the [North Carolina Coastal Habitat Protection Plan](#) (CHPP) that will provide new recommendations for conserving and restoring habitats that support coastal economies, recreation, and a way of life. Linking CHPP recommendations for protecting and restoring wetlands and submerged aquatic vegetation with community resilience planning will help drive additional resources and management attention to these habitats that play a critical role protecting coastal communities against erosion, flooding and damaging waves.

In addition, the CMP can work with partner agencies to integrate flood plain management, stormwater management, and local hydrological impairment to help address priorities identified through the risk and vulnerability assessments. Cross-agency coordination can also leverage co-benefits related to coastal habitat protection; in particular, watershed plans can account for water quality issues that are exacerbated by increased flooding and storms. Development and implementation of these plans would have significant positive impacts on downstream habitats like submerged aquatic vegetation and oyster reefs. Flood plain management can prioritize nature-based solutions, such as wetland restoration and identification of areas for marsh migration. These examples highlight how the CMP can align the various policy and regulatory tools and agency partnerships at its disposal within the context of the Resilient Coastal Communities Program to strategically focus limited resources.

With respect to program administration, Pew would like to highlight the importance of incorporating new policies related to coastal conservation and resiliency, such as the Inlet Hazard Area updates and CHPP implementing regulations, as enforceable policies in the CMP. This will facilitate effective state and federal coordination on permitting in the coastal zone and ensure federal actions and permitted activities are consistent with North Carolina's ambitious coastal adaptation and resiliency goals.

Finally, regarding partnerships, Pew commends the CMP for its stakeholder engagement process conducted as part of its recent 309 strategy assessment and update. We note that despite the resource and staffing constraints facing the CMP, the Department of Coastal Management team takes the time to meet with stakeholders to receive and provide input and insights on coastal zone management issues.

We would like to highlight that good opportunities exist for the CMP to leverage limited resources via federal and regional partnerships. One example is the living shoreline at Marine Corps Air Station Cherry Point that, at roughly a mile in length when complete, will be one of the largest projects of its kind on the East coast. The extensive list of partners includes state agencies, universities, NGOs, and the Department of Defense, which just announced \$1 million in funding from the Readiness and Environmental Protection Integration (REPI) challenge. Pew is pleased to support ecological and policy research at the site that will be conducted by Duke University and with the help of the North Carolina Coastal Federation. This model of leveraging partnerships and budgets can be replicated and expanded to address the significant resources needed for large restoration projects.

We also note the role that multi-state partners like the [Southeast Regional Partnership for Planning and Sustainability](#) (SERPPAS) can play in conserving habitats like salt marsh on a region-wide scale. North Carolina's approximately 350 square miles of salt marsh habitat, when combined with South Carolina, Georgia and Florida, represents some of the largest, most intact stretches of salt marsh left in the United States. This critical ecosystem requires a comprehensive plan for protection and management in the face of sea level rise and other threats. Pew is exploring a potential partnership with SERPPAS to develop a multistate initiative to protect salt marsh across the U.S. South Atlantic modelled on the successful Long Leaf Pine Initiative. The CMP could play an important role in this or other region-scale opportunities for salt marsh protection.

Pew is committed to promoting the important work conducted by North Carolina's Coastal Management Program to improve protection and management of the state's coastal resources and advance community resiliency, and we encourage NOAA to continue its vital support. We thank NOAA and the North Carolina Division of Coastal Management for the opportunity to provide these comments.

Sincerely,



Leda A. Cunningham
Officer, Conserving Marine Life in the U.S.
The Pew Charitable Trusts