

Remarks of Deputy Commissioner Jane K. Stahl, Connecticut Department of
Environmental Protection

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Admiral Watkins, distinguished members of the Commission, colleagues and members of the public, thank you for affording me this opportunity to represent Connecticut's viewpoint within the context of the wide-ranging mandate of the National Ocean Commission. I would like to raise a number of specific topics for discussion dealing with the coastal aspects of a national ocean policy, but I would begin with the basics--the first law of ecology states that everything is connected to everything else. A national ocean policy must, first and foremost, embrace that principle of connectedness and coordination. To develop a comprehensive ocean policy, therefore, a great place to start would be vigorous support of the federal Coastal Zone Management Act and the programs developed under it. The CZMA stands as a model of connectedness and coordination, as it created a comprehensive, voluntary federal-state partnership unique in its mission to address both development and resource protection goals. In particular, the CZMA recognized that we can't protect oceans without better management of coastal lands and watersheds.

Improve Coastal Growth Management Capacity

The environmental health and economic value of coastal areas in large part determine how we can access and utilize the resources and values of the oceans. From the perspective of a non-ocean coastal state, our biggest challenge is managing the land side of the land-water interface. Increasing, poorly planned development of coastal watersheds threatens to eliminate or fragment habitat for spawning fish and shellfish, degrade coastal water quality, and displace water-dependent economic activity such as commercial fishing, recreation, and tourism. Development of coastal areas, watersheds and habitats is essentially irreversible, a permanent loss of our natural capital. A federal ocean policy must therefore place a high priority on strengthening state and local capacity to manage development, reduce nonpoint source pollution, minimize exposure to coastal hazards, and preserve open space against development pressures. To accomplish this, we

need better coordination with other federal agencies, and the authorities pursuant to which they operate, to remove impediments to and in fact enable full federal support for actions consistent with coastal management principles. For instance, the Department of Agriculture should encourage through funding and technical assistance more widespread use of BMPs to reduce nonpoint source pollution. The Department of Transportation and the funding formulas under which it operates should de-emphasize highway construction leading to sprawl and build in sufficient funding for effective stormwater management and resource mitigation. NOAA and other resource agencies should make technical assistance such as remote sensing data, GIS projects, and natural resource indicators more readily available in a form that can be easily applied by state and local governments. Every local planning & zoning commission should be enabled to undertake a buildout analysis to better manage the resource and development consequences of different growth patterns.

Funding for Land Acquisition

To cite financial aspects specifically, we need to move aggressively forward in acquiring and protecting undeveloped land on the coast and in coastal watersheds. Protecting our common natural resource base is necessary to preserve habitats for plants and animals, to provide open space for recreation and quality of life and to make room for sea level rise. In Connecticut, we have already seen noticeable tidal wetland loss associated with rising sea levels; without open space to allow for landward migration, these wetlands, along with other coastal resources, will simply disappear. To fund such an effort, the Commission should revisit the system of distributing OCS revenues proposed in the CARA legislation of previous years. Failing that, legislation such as the proposed Coastal and Estuarine Land Protection bill (S. 2068) would be an excellent start. Whatever the funding mechanism, a national ocean policy must provide the means for coastal land protection while there is still an opportunity to do so.

Reform the National Flood Insurance Program

In addition to providing more funding for protecting coastal resources, a national ocean policy should also stop providing incentives for regressive programs that endanger our security against coastal hazards. Simply put, the federal government should eliminate subsidies and incentives (e.g., availability of new government-sponsored insurance) for development and

redevelopment in coastal high hazard, flood and erosion areas. This is a matter of prudent fiscal and emergency management as much as environmental protection. At a time when the dangers of sea level rise and climatic instability are increasingly recognized, the federal government should not continue to pay for placing thousands of lives and millions of dollars in property at risk from coastal storms and erosion.

Revitalize the U.S. Army Corps of Engineers

The Corps, as a historic institution, represents an impressive collection of expertise and ability, but these attributes are not being used to best effect because the Corps' policies, processes, and the laws under which it operates remain historic. Opportunities for efficient use and enhancement of coastal resources (and not incidentally saving money) have been squandered because of archaic funding formulas and inadequate coordination between regulation, operations, and coastal management planning. The Commission should look seriously at removing the impediments to beneficial reuse of dredged material, eliminating the bias in Corps policy and funding formulas for costly "hard" erosion control structures, and promoting better coordination and prioritization of projects based on a comprehensive plan rather than a focus on individual projects. The Corps' regulatory and operational functions should be integrated so that both are serving the same goals; the nation's natural infrastructure of beaches, wetlands, estuaries need to be protected and maintained quite as much as its harbors and navigation channels.

Better Dredge Disposal Management

Connecticut is, of course, well aware that dredging of harbors and navigation channels is essential for maritime commerce and water-dependent businesses to survive. Appropriate management of the disposal of dredged sediments is equally important to protect and enhance coastal environments. Unfortunately, the existing federal process for managing dredging projects and dredged material disposal accomplishes neither goal. The process should be based on science, and not be driven by rigid Corps guidelines or what type of dredging equipment they have on hand, nor by the political influence of communities adjoining disposal areas. For instance, because of misguided environmental concerns embodied in the Ambro amendment to the Ocean Dumping Act, Long Island Sound has been unfairly singled out as sole estuary subject to regulatory criteria designed for open-ocean

environments. Given the difficulty of designating new disposal sites under the ODA criteria, in the next few years we are likely to experience the closure of dredge disposal areas in Long Island Sound, dealing a serious blow to maritime commerce without any corresponding environmental benefit. We urge the Commission to take a hard look at dredged material management.

Coastal Consistency

Last, but certainly not least, we should recognize and build upon one of the success stories in cooperative management of coastal resources--the federal consistency provisions of the Coastal Zone Management Act. As the Commission has heard many times by now, many diverse interests and values depend upon our coasts and oceans, and many stakeholders deserve a voice in considering how our coastal resources should be allocated, protected, and developed. Through a give-and-take partnership between state coastal managers and federal agencies, CZMA consistency has become an essential mechanism for ensuring that all interests are taken into account and appropriately balanced. We recognize that there may have been sporadic problems in the OCS leasing context with timeframes and decision processes, but the basic concept of CZMA consistency is sound and is more necessary than ever. Even if some procedural streamlining is warranted, any weakening of the consistency process at behest of the energy industry will disempower citizens of all coastal states on the whole range of coastal issues. CZM consistency must remain a cornerstone of any national ocean policy; without it, we cannot hope to effectively balance the diverse interests and values associated with our coast. Only with the CZMA as an essential foundation, can we effectively coordinate and streamline all federal programs which affect ocean and coastal management.

Thank you.