



National Headquarters

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The Honorable Nancy Sutley
Chair

Council on Environmental Quality
722 Jackson Place, NW
Washington, DC 20503

Dear Ms. Sutley,

Thank you for the opportunity to comment on the interim progress report of the Climate Change Adaptation Task Force. Defenders of Wildlife is a national, nonprofit membership organization with over 1 million members and supporters dedicated to the protection of all native animals and plants in their natural communities. Defenders of Wildlife is extremely concerned about the impacts of climate change on wildlife and ecosystems and is committed to developing solutions to this complex problem.

As documented by the U.S. Global Change Research Program, climate change poses serious challenges to our society, from agriculture to public health to infrastructure. Suffering on the front lines of these challenges are our wildlife and ecosystems, with the most prominent examples being polar bears and other sea ice-dependent species.

While most of the nation's and the world's attention has been focused on reducing greenhouse gas pollution to lessen the impacts of climate change, an increasingly important response to climate change is adaptation: anticipating, planning for, and responding to the impacts that are already occurring and will occur due to the disruption we have already caused to the global climate. We commend the administration for beginning to call attention to the need to develop adaptation responses throughout the federal government and we support the work of the Climate Change Adaptation Task Force (Task Force).

Below we provide background on policy calling for a national wildlife and climate change adaptation strategy, as well as comments to assist the Task Force in completing its recommendations to the President in the fall.

The Case for a National Wildlife Adaptation Strategy

Climate change is and will continue to have profound impacts on wildlife and ecosystems. Many existing environmental threats, including habitat loss and fragmentation, competition with invasive species, and pollution are driving species declines. Climate change compounds these problems and creates a host of new ones.

The diversity of wildlife and ecosystems is directly tied to climate. Species have evolved under specific climate conditions – in particular specific temperature and precipitation regimes. Climate

change alters the conditions species have evolved under. The only options are to adapt, to move, or to go extinct.¹

Addressing this conservation challenge will require a massive, coordinated response. Increasingly, individual state and federal agencies are beginning to grapple with responding to the impacts of climate change. While it is important for each agency to develop measures for protecting wildlife from the effects of climate change, climate change affects all jurisdictions. It is insufficient for individual agencies, or even individual federal land units, to contemplate and plan strategies purely on their own. The problem is simply too complex.

For example, there are over 160 national wildlife refuges and 50 national park units that are located on the nation's coasts. Each of these refuges and parks should begin planning for a future of rising sea levels. However, it should not be up to each individual land manager to reinvent response strategies in isolation from other protected areas. Similarly, planning the conservation of species which need to shift their ranges in response to climate change necessarily must be conducted at large landscape scales across jurisdictions. An interagency planning effort, in coordination with state and tribal partners, academic institutions, conservation organizations and the public, should assist field managers with wrestling with the impacts of global warming.

Current U.S. Legislative Actions on Developing a National Wildlife Adaptation Strategy

A number of bills in Congress to address climate change include a national wildlife and natural resources adaptation planning component. The first bill in Congress to specifically include provisions requiring a national wildlife adaptation strategy was the Global Warming and Wildlife Survival Act (H.R. 2338) passed by the House of Representatives in 2007 as part of the New Direction for Energy Independence Act (H.R. 3221). Similar provisions have since been included in subsequent comprehensive climate change legislation including the Climate Security Act (S. 2191) introduced by Senators Warner and Lieberman in 2008, the American Clean Energy and Security Act (H.R. 2454) introduced by Representatives Waxman and Markey in 2009, the Clean Energy Jobs and American Power Act (S. 1733) introduced by Senators Kerry and Boxer in 2009, the free-standing Natural Resources Climate Adaptation Act (S. 1933) introduced by Senator Bingaman in 2009, and most recently the American Power Act, released as a discussion draft by Senators Kerry and Lieberman on May 12, 2010.

Similarly, Congress has provided direction through the federal appropriations process to the Council on Environmental Quality (CEQ) and the Department of the Interior to develop a national wildlife climate change adaptation strategy. The report language associated with the fiscal year 2010 Interior Appropriations bill (P.L. 111-88) stated:

The conferees note the previous direction provided within the fiscal year 2009 appropriations act directing the Secretary of the Interior to develop a national strategy to assist fish, wildlife, plants, and associated ecological processes in becoming more resilient, adapting to, and surviving the impacts of climate change. This conference agreement provides ample funds to accomplish substantial scientific and management activities, but this needs to be done within the context of an integrated approach among the various Federal

¹ For more information about the impacts of climate change on wildlife and Defenders' policy recommendations for responding to these impacts see *Beyond Cutting Emissions: Protecting Wildlife and Ecosystems in a Warming World*, and our comprehensive website at www.defenders.org/globalwarming.

departments, States, Tribes and other institutions. The conferees urge the Council on Environmental Quality, working closely with the Department of the Interior as the lead department, to develop a national, government-wide strategy to address climate impacts on fish, wildlife, plants, and associated ecological processes. It should provide that there is integration, coordination, and public accountability to ensure efficiency and avoid duplication. The conferees expect to receive a timeline and a blueprint for the completion of such a national strategic planning effort, as well as regular updates as progress is made.

We recommend the Task Force review past and current legislation pertaining to climate adaptation policy to ensure that the Task Force recommendations are consistent with Congressional direction on the issue.

Current Administration Actions to Address Climate Change Impacts

The Task Force progress report identified a number of initiatives underway within the administration that will contribute to build resilience to climate change risks and to improve the nation's adaptation response including the Interior Department's Landscape Conservation Cooperatives (LCCs) and the Environmental Protection Agency's (EPA) Climate Ready Estuaries program. While these and many other initiatives are indeed important contributions to climate change adaptation, and we support them, what is lacking is an overarching national framework for coordinated action and coordinated goals. In an era of increasingly difficult budgets, it is particularly important to ensure that the efforts of the federal government are strategic, effective, synergistic, and non-duplicative. This makes the development of a national climate change adaptation strategy vital, along with the establishment of government structures and procedures necessary to carry out the strategy across agencies and jurisdictions.

Recommendations for the Task Force

Defenders has analyzed U.S. and foreign adaptation policies along with the published literature on climate adaptation and we offer the follow recommendations for important components the Task Force should include in developing a national climate change adaptation strategy:

1. Declare it the policy of the United States to assist wildlife, ecosystems, and communities in responding to the impacts of climate change: The Task Force should include a clear statement to this effect in its recommendations to the President establishing national policy direction for adaptation, through executive order or other means. We recommend language similar to that appearing in S. 1733:

It is the policy of the Federal Government, in cooperation with State and local governments, Indian tribes, and other interested stakeholders, to use all practicable means to protect, restore, and conserve natural resources so that natural resources become more resilient, adapt to, and withstand the ongoing and expected impacts of climate change, including, where applicable, ocean acidification, drought, flooding, and wildfire.

2. Include consideration of wildlife and ecosystems: We support the administration integrating and planning adaptation activities across sectors, agencies, and jurisdictions. We would like to emphasize the importance of considering wildlife and ecosystems in the Task Force's planning and urge integration of wildlife and ecosystem consideration into all sectors that impact wildlife and ecosystems. There are opportunities to create "win-win" solutions to adaptation issues that affect

non-wildlife related sectors and wildlife. For example, increased flooding caused by climate change may require improvements in highway culvert and bridge design. The same projects can be designed to increase wildlife habitat connectivity.

3. Direct the development and implementation of a national fish and wildlife climate change adaptation strategy: Although Congress has already provided direction to the administration to develop a national fish and wildlife climate change adaptation strategy (see appropriations language above), it is important for the President to facilitate the development of such a strategy by issuing direction and guidance to CEQ, the Department of the Interior, and other related agencies to ensure cooperation, collaboration, and timely results. Again, we recommend the Climate Adaptation Task Force review pending legislation for what a national fish and wildlife adaptation strategy would include. S. 1733 includes the following:

- (a) In General- Not later than 1 year after the date of enactment of this Act, the Panel² shall develop a Natural Resources Climate Change Adaptation Strategy--
 - (1) to protect, restore, and conserve natural resources so that natural resources become more resilient, adapt to, and withstand the ongoing and expected impacts of climate change; and
 - (2) to identify opportunities to mitigate the ongoing and expected impacts of climate change.
- (b) Development- In developing and revising the Strategy, the Panel shall--
 - (1) base the strategy on the best available science;
 - (2) develop the strategy in close cooperation with States and Indian tribes;
 - (3) coordinate with other Federal agencies, as appropriate;
 - (4) consult with local governments, conservation organizations, scientists, and other interested stakeholders; and
 - (5) provide public notice and opportunity for comment.
- (c) Revision- After the Panel adopts the initial Strategy, the Panel shall review and revise the Strategy every 5 years to incorporate--
 - (1) new information regarding the ongoing and expected impacts of climate change on natural resources; and
 - (2) new advances in the development of strategies that make natural resources more resilient or able to adapt to the ongoing and expected impacts of climate change.
- (d) Contents- The Strategy shall--
 - (1) assess the vulnerability of natural resources to climate change, including short-term, medium-term, long-term, cumulative, and synergistic impacts;
 - (2) describe current research, observation, and monitoring activities at the Federal, State, tribal, and local level related to the ongoing and expected impacts of climate change on natural resources;
 - (3) identify and prioritize research and data needs;
 - (4) identify natural resources likely to have the greatest need for protection, restoration, and conservation due to the ongoing and expanding impacts of climate change;

² The legislation would establish a “Natural Resources Adaptation Panel” comprised of CEQ and many natural resources-related agencies to guide the development of the national strategy and implementation of other provisions of the law.

- (5) include specific protocols for integrating natural resources adaptation strategies and activities into the conservation and management of natural resources by Federal departments and agencies to ensure consistency across agency jurisdictions;
 - (6) include specific actions that Federal departments and agencies shall take to protect, conserve, and restore natural resources to become more resilient, adapt to, and withstand the ongoing and expected impacts of climate change, including a timeline to implement those actions;
 - (7) include specific mechanisms for ensuring communication and coordination--
 - (A) among Federal departments and agencies; and
 - (B) between Federal departments and agencies and State natural resource agencies, United States territories, Indian tribes, private landowners, conservation organizations, and other countries that share jurisdiction over natural resources with the United States;
 - (8) include specific actions to develop and implement consistent natural resources inventory and monitoring protocols through interagency coordination and collaboration; and
 - (9) include procedures for guiding the development of detailed agency- and department-specific adaptation plans required under section 368.
- (e) Implementation- Consistent with other laws and Federal trust responsibilities concerning land of Indian tribes, each Federal department or agency represented on the Panel shall integrate the elements of the Strategy that relate to conservation, restoration, and management of natural resources into agency plans, environmental reviews, programs, and activities.

4. Direct each agency to develop agency-specific adaptation plans: Each agency will need to interpret and implement guidance from a national strategy in relation to their own missions, authorizing legislation, regulations, and goals. The Task Force should recommend each agency produce an adaptation plan. Pending legislation is a guide in this regard as well. S. 1733 includes the following:

- (c) Requirements- Each adaptation plan shall--
 - (1) establish programs for assessing the ongoing and expected impacts of climate change, including, where applicable, ocean acidification, drought, flooding, and wildfire on natural resources under the jurisdiction of the department or agency preparing the plan, including--
 - (A) assessment of cumulative and synergistic effects; and
 - (B) programs that identify and monitor natural resources likely to be adversely affected and that have need for conservation;
 - (2) identify and prioritize--
 - (A) the strategies of the department or agency preparing the plan;
 - (B) the specific conservation actions that address the ongoing and expected impacts of climate change, including, where applicable, ocean acidification, drought, flooding, and wildfire on natural resources under jurisdiction of the department or agency preparing the plan;
 - (C) strategies to protect, restore, and conserve such resources to become more resilient, adapt to, and better withstand those impacts, including--

- (i) protection, restoration, and conservation of terrestrial, marine, estuarine, and freshwater habitats and ecosystems;
 - (ii) establishment of terrestrial, marine, estuarine, and freshwater habitat linkages and corridors;
 - (iii) restoration and conservation of ecological processes;
 - (iv) protection of a broad diversity of native species of fish, wildlife, and plant populations across the ranges of those species; and
 - (v) protection of fish, wildlife, and plant health, recognizing that climate can alter the distribution and ecology of parasites, pathogens, and vectors;
- (3) describe how the department or agency will--
 - (A) integrate the strategies and conservation activities into plans, programs, activities, and actions of the department or agency relating to the conservation and management of natural resources; and
 - (B) establish new plans, programs, activities, and actions, if necessary;
- (4) establish methods--
 - (A) to assess the effectiveness of strategies and conservation actions the department or agency takes to protect, restore, and conserve natural resources so natural resources become more resilient, adapt to, and withstand the ongoing and expected impacts of climate change; and
 - (B) to update those strategies and actions to respond to new information and changing conditions;
- (5) describe current and proposed mechanisms to enhance cooperation and coordination of natural resources adaptation efforts with other Federal agencies, State and local governments, Indian tribes, and nongovernmental stakeholders;
- (6) include written guidance to resource managers that--
 - (A) explains how managers are expected to address the ongoing and expected effects of climate change, including, where applicable, ocean acidification, drought, flooding, and wildfire;
 - (B) identifies how managers shall obtain any necessary site-specific information; and
 - (C) reflects best practices shared among relevant agencies, but recognizes the unique missions, objectives, and responsibilities of each agency;
- (7) identify and assess data and information gaps necessary to develop natural resources adaptation plans and strategies; and
- (8) consider strategies that engage youth and young adults (including youth and young adults working in full-time or part-time youth service or conservation corps programs) to provide the youth and young adults with opportunities for meaningful conservation and community service and to encourage opportunities for employment in the private sector through partnerships with employers.
- (d) Implementation-
 - (1) IN GENERAL- Upon approval by the President, each department or agency with representation on the Panel shall, consistent with existing authority, implement the adaptation plan of the department or agency through existing and new plans, policies, programs, activities, and actions.
 - (2) CONSIDERATION OF IMPACTS- To the maximum extent practicable and consistent with existing authority, natural resource management decisions made by

the department or agency shall consider the ongoing and expected impacts of climate change, including, where applicable, ocean acidification, drought, flooding, and wildfire on natural resources.

(e) Revision and Review- Not less than every 5 years, each department or agency shall review and revise the adaptation plan of the department or agency to incorporate the best available science, and other information, regarding the ongoing and expected impacts of climate change on natural resources.

5. Develop policies, structures, and processes to improve the coordination and development of ecological monitoring programs: The biggest challenge we face in addressing the impacts of climate change is uncertainty at all levels. To address these uncertainties, learn and improve our understanding over time, and track performance of management actions, the federal government needs to invest more in monitoring programs, and ensure that they are targeted, strategic, additive, comparable, and coordinated among federal, state, local, and tribal government programs, as well as the academic, private, and non-profit sectors. It makes little sense for different entities to be collecting monitoring data that cannot be compared and used with data collected by others.

6. Educate citizens and decision makers about climate change impacts: A national climate change adaptation strategy cannot be successful without the support of citizens and decision-makers at all levels of government and the private sector. Unfortunately, there is much confusion over the science of climate change and the impacts of climate change on regional scales. An important aspect of the national adaptation strategy should be to develop comprehensive education and outreach programs to ensure the public and decision-makers understand the impacts of climate change on the regions and resources they care about.

7. Train and build the capacity of agency staff and partners: In addition to general education about climate change science, climate change adaptation is a new field that requires ongoing training and capacity building for agency staff and the partners they work with. Capacity building includes identifying the financial and staffing resources needed to meet the challenges posed by climate change.

8. Foster collaboration: The national climate change adaptation strategy should enact mechanisms, processes, and institutions for collaborative action across the federal government and with state, tribal, and local governments, nongovernmental organizations, the private sector, and the public. The effects of climate change cross jurisdictions and need to be addressed in a collaborative way. For example, the Department of the Interior is establishing Landscape Conservation Cooperatives (LCCs) to enhance collaboration of conservation partners to leverage scientific and technical capacity to large-scale climate change and other conservation issues. The Task Force should consider recommendations that expand the participation of LCCs to other agencies, or create additional policies, structures, or processes to achieve similar and complementary goals.

9. Coordinate science capacity: The federal government already has a coordinating climate change research body: the U.S. Global Change Research Program. The Task Force should assess the program to identify opportunities for improvement and ensure that there is increased and coordinated applied scientific capacity specifically towards climate change adaptation.

10. Create a process for revision of the national strategy: The national climate change adaptation strategy should itself be adaptive. We will continually learn new information about climate change

and its effects which should be used to revise and refine the nation's response to those impacts. Revision could be tied together with regular updates of the science of climate change prepared by the U.S. Global Change Research Program. For instance, there could be a requirement in the national climate change adaptation strategy to be updated the year after each national assessment prepared by the U.S. Global Change Research Program. Under the Global Change Research Program Act, these national assessments are supposed to be every four years.

We hope the Climate Adaptation Task Force finds these recommendations helpful and we look forward to continued engagement with the administration to assist in meeting this country's pressing needs to respond to the impacts of climate change. If you have any questions, please contact me at nmatson@defenders.org or (202) 682-9400, ext. 294.

Sincerely,

A handwritten signature in dark ink, appearing to read "Noah Matson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Noah Matson
Vice President for Climate Change and Natural Resources Adaptation