



National Association of Wetland Managers

“Dedicated to the Protection and Restoration of the Nation’s Wetlands”

September 18, 2023

Executive Director

Marla J. Stelk
500 Washington Avenue, Suite 201
Portland, ME 04103
(207) 892-3399

Chair

Mark Biddle
DE Dept. of Natural Resources
and Environmental Control
285 Beiser Boulevard, Suite 102
Dover, DE 19904
(302) 739-9939

Vice Chair

Samantha Vogeler
KY Division of Water
300 Sower Boulevard, 3rd Floor
Frankfort, KY 40601
(502) 782-6995

Secretary

Amy Lounds
MI Dept. of Environment,
Great Lakes, and Energy
525 W. Allegan Street
Lansing, MI 48933
(517) 331-7966

Treasurer

Lauren Driscoll
WA State Dept. of Ecology
PO Box 47600
Olympia, WA 98504
(360) 407-7045

Past Chair

Collis Adams
Adams Environmental Consulting, LLC
110 Pattee Hill Road
Goffstown, NH 03045
(603) 660-9797

Members at Large

Stacia Bax
MO Dept. of Natural Resources

Denise Clearwater
MD Dept. of the Environment

Andrew Robertson
Saint Mary's Univ. of Minnesota

Bill Ryan
OR Dept. of State Lands

Mary Ann Tilton
NH Dept. of Environmental Services

Office of Management and Budget
Office of Information and Regulatory Affairs
MBX.OMB.OIRA.ESGuidancePCQ@omb.eop.gov

RE: OMB–2022–0016 “Request for Comments on Proposed Guidance for Assessing Changes in Environmental and Ecosystem Services in Benefit-Cost Analysis”

To the Office of Management and Budget,

The National Association of Wetland Managers (NAWM, formerly the Association of State Wetland Managers (ASWM)) submits the following comments in response to the draft document, “Guidance for Assessing Changes in Environmental and Ecosystem Services in Benefit-Cost Analysis”.

NAWM is a national 501(c)(3) professional organization that supports the use of sound science, law, and policy in development and implementation of state and tribal wetland and aquatic resource protection programs. Since 1983, our organization and our member states and tribes have had longstanding positive and effective working relationships with federal agencies. As an association representing states and tribes as co-regulators tasked with implementation of regulations implementing the Clean Water Act (CWA), NAWM understands the complexity of the CWA and the implementation challenges the Act poses.

Overall, NAWM is very supportive of this approach to regulatory decision making. As you highlight in the draft guidance, if the ecosystem services provided by the natural functions of those ecosystems, such as wetlands, are not accounted for in benefit-cost analyses, then the assumption is that they have no value, which is not true. Healthy wetlands in particular provide myriad ecosystem services that have been unaccounted for over many decades, resulting in land use decisions which have damaged or destroyed the ability of those systems to provide the many benefits they formerly provided for communities around the nation, such as flood water attenuation, storm surge protection, groundwater recharge, stormwater filtration, wildlife habitat, and so much more.

NAWM believes this draft guidance provides a sufficient primer for anyone considering using ecosystem service valuation in their cost-benefit analyses.

The eight aspects identified for comments are well covered in the draft, however NAWM has a few comments for consideration:

- 1) The guide addresses cultural values and indigenous ways of knowing, however, it is important to consider that many Tribal members do not embrace this kind of methodology as it human-focused regarding where the benefits flow to. Tribes do not see humans as separate from nature, therefore they do not consider this a legitimate approach. Nature and humans are not separated in their world view, so although this methodology works well for non-Native peoples to gain a better appreciation for and understanding of the value of nature, Tribes and other indigenous communities may not embrace it.
- 2) On page 9 in the footnote, NAWM recommends that you provide some examples regarding the statement ending in “change the character of the natural area”, e.g., do you mean topographical changes that alter hydrology?
- 3) In your tables beginning on page 14, NAWM recommends including consideration of fish and wildlife habitat.
- 4) On page 19, the first sentence under Step 1 needs clarification – the term “large effect” is ambiguous and subjective. NAWM recommends adding more clarity to how that term should be defined.
- 5) On page 33, 2nd paragraph, 1st sentence, the guide includes the word “internationally” but the example it is referring to does not address international impacts. NAWM recommends removing the international reference.
- 6) NAWM recommends a discussion regarding discount rates, as its never substantially mentioned in the guide and is an important consideration given the longer time frames for nature-based projects and the fact that they typically improve in quality and function over time, versus gray infrastructure which typically degrades over time.

Thank you for the opportunity to submit comments on the Proposed “Guidance for Assessing Changes in Environmental and Ecosystem Services in Benefit-Cost Analysis”. In 2014, NAWM published a related document on [“Ecosystem Service Valuation for Wetland Restoration: What It Is, How To Do It, and Best Practice Recommendations”](#) that you may find useful. Although these comments have been prepared by NAWM with input from the NAWM Board of Directors, they do not necessarily represent the individual views of all states and tribes. We encourage your full consideration of the comments of individual states and tribes, and other state and tribal associations.

Sincerely,



Marla J. Stelk
Executive Director