

**Written Statement of Holly A. Bamford, Ph.D.  
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**House Committee on Natural Resources  
Subcommittee on Water, Oceans, and Wildlife**

**ENVIRONMENTAL JUSTICE FOR COASTAL COMMUNITIES:  
EXAMINING INEQUITIES IN FEDERAL GRANTMAKING  
OCTOBER 15TH, 2020 (2PM)**

***Introduction to NFWF***

Thank you, Chairman Huffman, Ranking Member McClintock, and members of the subcommittee, for inviting me to participate in this discussion about the federal grantmaking process as it pertains to conservation and coastal communities. I am the Chief Conservation Officer of the National Fish and Wildlife Foundation – also known as “NFWF” (*pronounced nif-wiff*) and have primary responsibility over all the Foundation’s programmatic and scientific work, including our grantmaking. My testimony today will focus on 1) NFWF’s conservation role; 2) NFWF’s grantmaking processes; 3) NFWF’s coastal resilience and restoration programs; and 4) observations about the federal grantmaking process based on the Foundation’s experience.

The National Fish and Wildlife Foundation is an independent 501(c)(3) nonprofit organization created in a bipartisan manner by Congress and signed into law by President Reagan in 1984. Since then, NFWF has grown to become the nation’s largest private conservation grantmaker, with a total conservation impact of more than \$6.1 billion supporting more than 18,600 projects. Last year alone, we granted more than \$507 million to support 930 projects. These investments drew more than \$245 million in matching support from grantees, generating a total conservation impact of more than \$752 million.

Congress created NFWF to strengthen our country’s conservation practices for the benefit of wildlife and their habitats. We currently work with 15 federal partners, more than 45 corporate and foundation partners, and have funded more than 5,000 organizations in all 50 states, the District of Columbia and U.S. Territories. Our approach of blending federal and private funds enables us to make significant investments to conserve fish, wildlife and their habitats at a landscape scale. Ninety-six cents of every federal dollar we receive is spent on conservation, and every dollar Congress directly appropriates to NFWF goes to on-the-ground conservation projects. We are also required by law to match each directly appropriated federal dollar with a

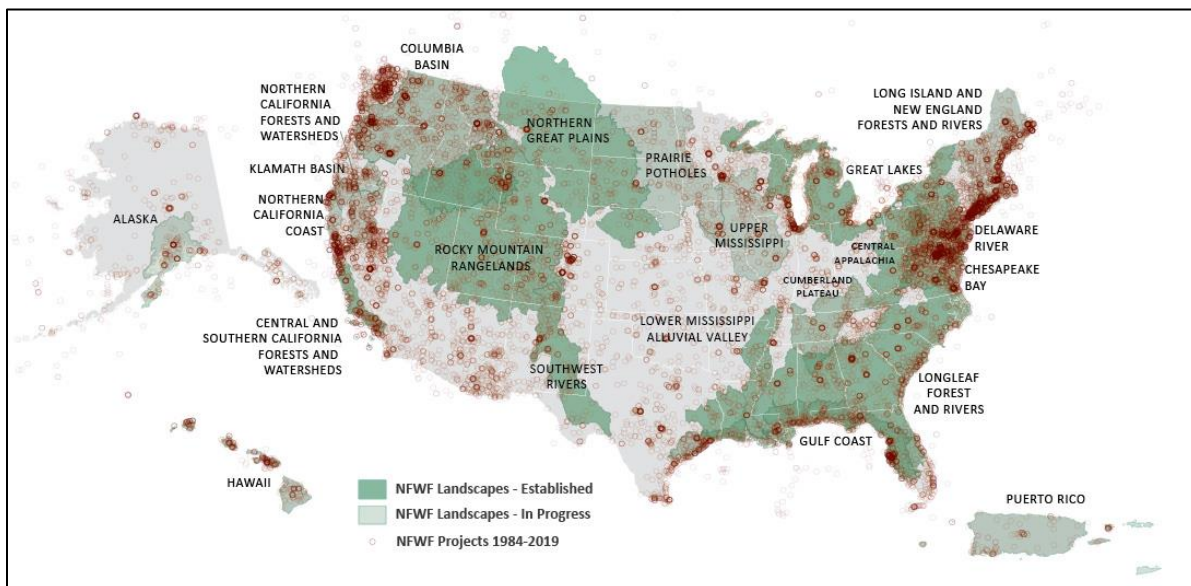
minimum of one non-federal dollar. We consistently exceed this requirement by leveraging federal funds at an average ratio of more than three to one.

NFWF operates with the highest standards of excellence and transparency. We are required by law to notify Congress of every grant involving federal funds over \$10,000, and every grant we make is available to the public on our website: <https://www.nfwf.org/grants/grants-library>.

Furthermore, in fiscal year 2019, NFWF was audited by an independent accounting firm and issued an unqualified report, with no material weaknesses identified and no deficiencies identified. This is the 11th consecutive year of unqualified audits for the Foundation. In addition, NFWF has continually qualified as a low-risk auditee under the Office of Management and Budget.

In addition to generating conservation benefits, NFWF also helps the economy by creating jobs and bolstering local businesses. In 2019, we helped support more than 6,500 jobs across the nation, in both urban and rural communities. Our projects tend to create and sustain localized employment and economic benefits, while supporting relatively well-paying jobs, compared to the national average salary. More importantly, NFWF projects support a broad range of jobs across various industry sectors, from agriculture and forestry to engineering and other technical services. These projects sustain a diversity of positions, from student interns to organizational directors. In a time when our country needs to stimulate job growth, the restoration economy provides an excellent path to do so.

NFWF's programs are guided by conservation business plans, available on our website, that detail the goals and strategies for conservation action. NFWF's staff and partners use these plans to make the most informed and important conservation investments, by intensively focusing on measured results and continually adapting our conservation strategy to maximize the benefits of our conservation investments.



Map of NFWF Landscapes and Funded Projects. Established landscapes have board approved business plans. In Progress landscapes are areas that have draft plans still under development.

NFWF evaluates investments through rigorous internal and external assessments. A team of scientists and conservation experts review grant proposals and weigh assessments against goals identified through the business plans. The Foundation's conservation business plans and programs center on landscapes and wildlife, as well as community stewardship and resilience. We engage communities, citizens, and conservation experts to voluntarily implement restoration programs that have a positive impact on wildlife, improve water quality and quantity, and benefit local economies to improve the standard of living.

### **NFWF's Grantmaking Process**

NFWF has developed an efficient and effective grantmaking process that is responsive to Congress's, federal agencies' and implementation partners' ongoing priorities. In past grantee surveys, we have consistently ranked higher than federal agency grant programs for the ease of our process. At any given time, we have roughly 3,000 active grants under management. Annually, we award approximately 700 new grants and close out a similar number, recording the final outcomes and accomplishments from these activities. Despite this large grant volume, we maintain a high level of operational efficiency that ensures we can move funding quickly and responsibly.

NFWF uses a competitive grant selection process to award conservation grants. Upon receiving funding from Congress or a federal agency, we follow a standard set of procedures determined by our authorizing legislation. First, we develop a Request for Proposal (RFP) that includes Congress's or the federal agency's priorities and key factors, including geographic focus, program priorities and strategies, project metrics, grant guidelines, timelines, and applicant assistance. The RFP application period is usually open for three to four months but can be shortened to move funds more quickly.

The RFP is posted publicly on our website, shared via multiple electronic communications, and circulated to our partner network so that we can publicize the funding opportunity as widely as possible. NFWF staff host applicant webinars to provide more in-depth information about the program priorities and answer questions about the application process. Staff also make themselves available to answer questions from potential applicants. In some cases, NFWF staff will make in-person site visits to areas within the geographic focus of the RFP to conduct further outreach into the community and solicit a greater diversity of project applications.

For example, staff conducted an in-person workshop in Charleston, SC to encourage more communities to apply for funding from NFWF's Emergency Coastal Resilience Fund in the aftermath of Hurricane Florence. Initial outreach had generated lower interest from South Carolina compared to other states in the region prompting us to take this action.

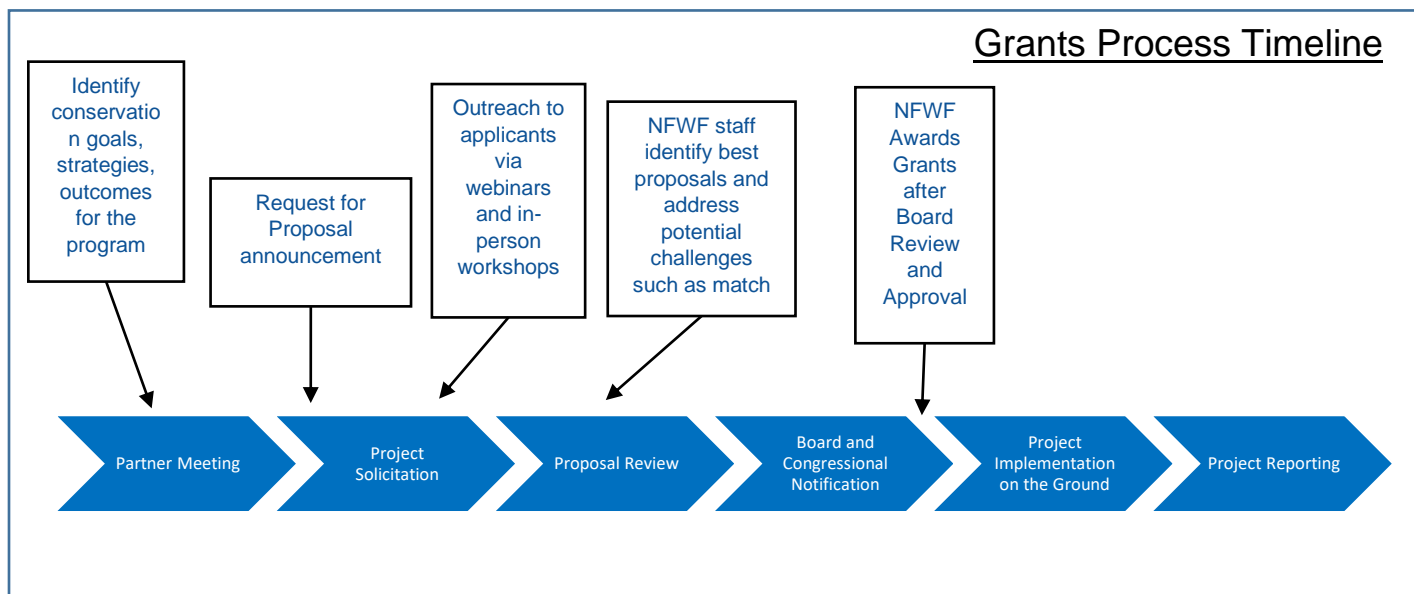
We have also hosted specific webinars for underserved and extremely vulnerable communities to encourage proposals for restoration grants, as was the case with the Commonwealth of the Northern Mariana Islands (CNMI) in the aftermath of Typhoon Yutu. NFWF was able to work with community leaders to provide funding from our Emergency Coastal Resilience Fund and our Hurricane Response Marine Debris Removal Fund totaling more than \$10 million.

Once the RFP closes, NFWF screens each proposal for completeness and eligibility based upon the RFP and federal funding requirements. NFWF program and science staff, agency partners

and third-party technical experts then participate in the proposal review. NFWF recruits third-party technical reviewers to gather unbiased assessments of the merits and feasibility of a proposed project to make the most informed funding decisions. Reviewers weigh proposals against a common set of evaluation criteria, which are detailed in the RFP. At a minimum, the criteria include (1) contribution to program goals and priorities, including those included in NFWF business plans, (2) technical merit and work plan, (3) cost-effectiveness, and (4) long-term sustainability. Other program-specific criteria may be added.

At the conclusion of the review process, NFWF convenes a meeting with reviewers to discuss the merits of individual proposals and any differences in reviews. Then NFWF and agency partners select the collection of well-reviewed proposals that best advances the overall goals of the program. At this stage, additional criteria such as geographic representation, a mix of urban and rural projects, a mix of coastal and upland projects, and a mix of small and large organizations, are applied to the whole slate of projects. This final phase of the review process is important because NFWF staff and reviewers can ensure that we fund the most impactful grants across a landscape to achieve the greatest conservation benefit, while also considering the impacted communities.

Once the final grant slate is selected, NFWF provides the recommended grant slate to the primary funding source partners, including federal agencies, for final review. NFWF also provides 30-day advance notification of awards to any Members of Congress with projects in their district. Finally, NFWF’s Board of Directors reviews and approves each grant before the Foundation grants the award.



### **Coastal Resilience and Restoration**

Since its founding, NFWF has worked in coastal areas to foster conservation. As coastal issues became more urgent, the Foundation began investing more deliberately in the restoration of natural systems to enhance habitats for fish and wildlife, better protect coastal communities,

and enable these coastal areas to recover more quickly from the impacts of storms, floods and other natural hazards. NFWF has developed tools to guide investment priorities and standard monitoring protocols to measure the impact of projects on the ground. NFWF works in partnership with our grantees to strengthen their technical capacity to implement high-impact projects in these coastal areas.

NFWF draws upon the knowledge gained from the implementation of a portfolio of large-scale resilience projects, many implemented in partnership with NOAA and the U.S. Department of the Interior (DOI). By documenting and sharing successful approaches, NFWF helps practitioners overcome challenges that have hindered project implementation in the past, resulting in more successful projects that deliver greater impact over time. The following are examples of programs NFWF has launched to address coastal resilience and restoration challenges.

**National Coastal Resilience Fund**

Established in 2018 as a partnership between NOAA and NFWF, the National Coastal Resilience Fund (NCRF) restores, increases, and strengthens natural infrastructure to protect coastal communities while also enhancing habitats for fish and wildlife.

The NCRF invests in conservation projects that restore or expand natural features such as coastal marshes and wetlands, dunes and beach systems, oyster and coral reefs, forests, coastal rivers and flood plains, and barrier islands that minimize the impacts of storms and other naturally occurring events on nearby communities.

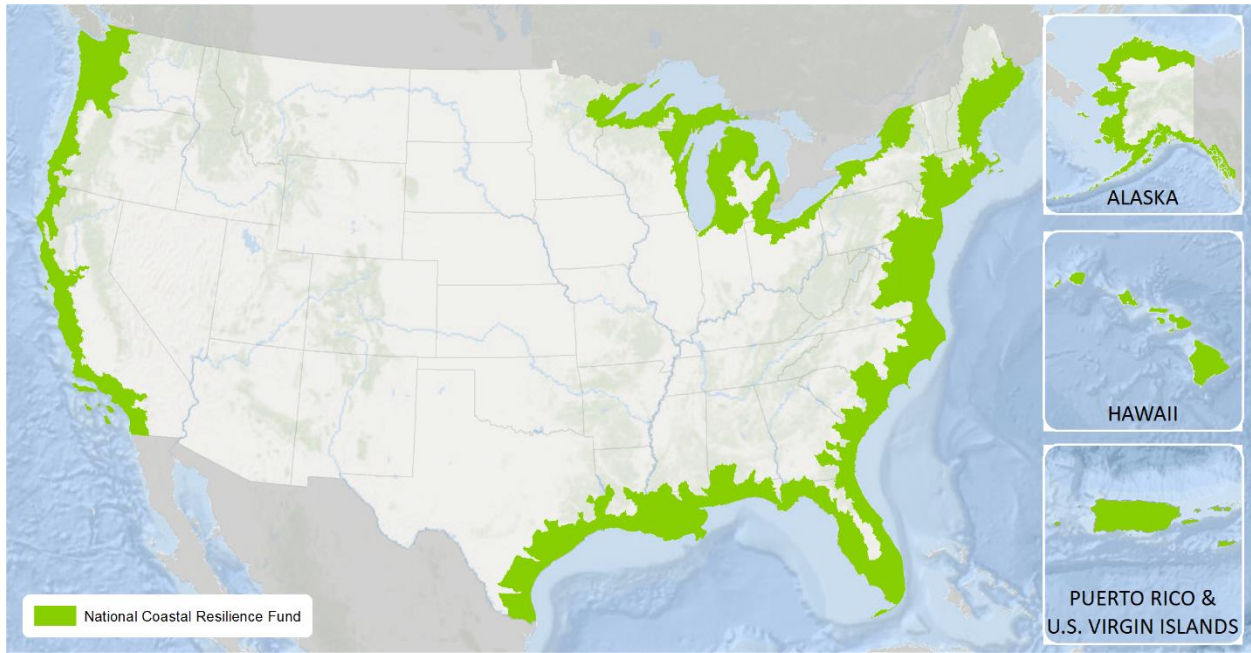
Projects are located within the coastal areas of the U.S. coastal states, including the Great Lakes states, and territories, within all coastal watersheds that drain to the sea and any adjacent watersheds that are particularly low-lying or tidally influenced.

To date, the Fund has awarded resilience grants in 23 states and U.S. territories to enhance, build, or restore more than 11,900 acres of coastal habitat that will provide protection to more than 98,000 properties and 2,400 critical facilities or vital infrastructure.

Interest in the NCRF has increased significantly since its inaugural year. As the chart below shows, applications have almost doubled in just three years. We expect interest to continue increasing as the program becomes more well-known and more coastal communities take steps towards building more nature-based infrastructure to protect against natural threats.

<b>Year</b>	<b># of Applications</b>	<b># NFWF Funded</b>	<b>% of Projects Funded</b>
2018	153	34	22%
2019	176	44	25%
2020	289	44	15%

Chart providing number of applications submitted to and funded by NFWF



Map of Coastal Area Eligible for the National Coastal Resilience Fund

We manage the NCRF so that we can meet communities where they are, whether they are very advanced in planning and designing for their resilience needs, with a list of shovel-ready projects, or they are taking their first steps to explore how restoration using nature-based infrastructure can help to address risks and provide other benefits to their community. The NCRF offers all communities an opportunity for high-quality projects along each phase of planning, design and implementation. We expect that each year, we will receive more high-quality applications than can be funded, due to limited resources. While NFWF leverages funding from corporate partners and grantee match, we still fall short of funding all qualified proposals. For example, in fiscal year 2019, NFWF raised \$760,000 from corporate partners and more than \$60 million in nonfederal grantee matching funds for a total of more than \$90 million dollars. Even so, we could still only fund 25 percent of the proposals we received.

### Emergency Coastal Resilience Fund

The Emergency Coastal Resilience Fund (ECRF) was established when Congress appropriated \$50 million in the 2019 emergency supplemental appropriations bill, Public Law 116-20. The program improves the resilience of coastal communities located within federally declared disaster areas impacted by hurricanes Florence and Michael, Typhoon Yutu and wildfires in 2018. The ECRF supports conservation projects that strengthen natural systems at a scale that will protect coastal communities from the future impacts of storms, floods and other natural hazards.

NFWF received 45 applications to the program and funded 26 based on the funding available. These shovel-ready projects improved community resilience and recovery in and around impacted areas. NFWF focused on projects that helped communities recover from the disasters and reduce the impact of future disasters and associated natural hazards, including coastal

storm surge, sea-level rise, wave velocity, flooding, debris flow and stormwater runoff. The projects also improved the ecological integrity and functionality of coastal ecosystems to enhance coastal habitats and wildlife populations.

As the United States faces the threat of an increasing number of natural disaster occurrences – including hurricanes and wildfires - the ECRF model provides an excellent example of NFWF’s capability to move funding rapidly to help communities rebuild with nature-based solutions that bolster resilience against future threats.

#### Hurricane Sandy Resilience Fund

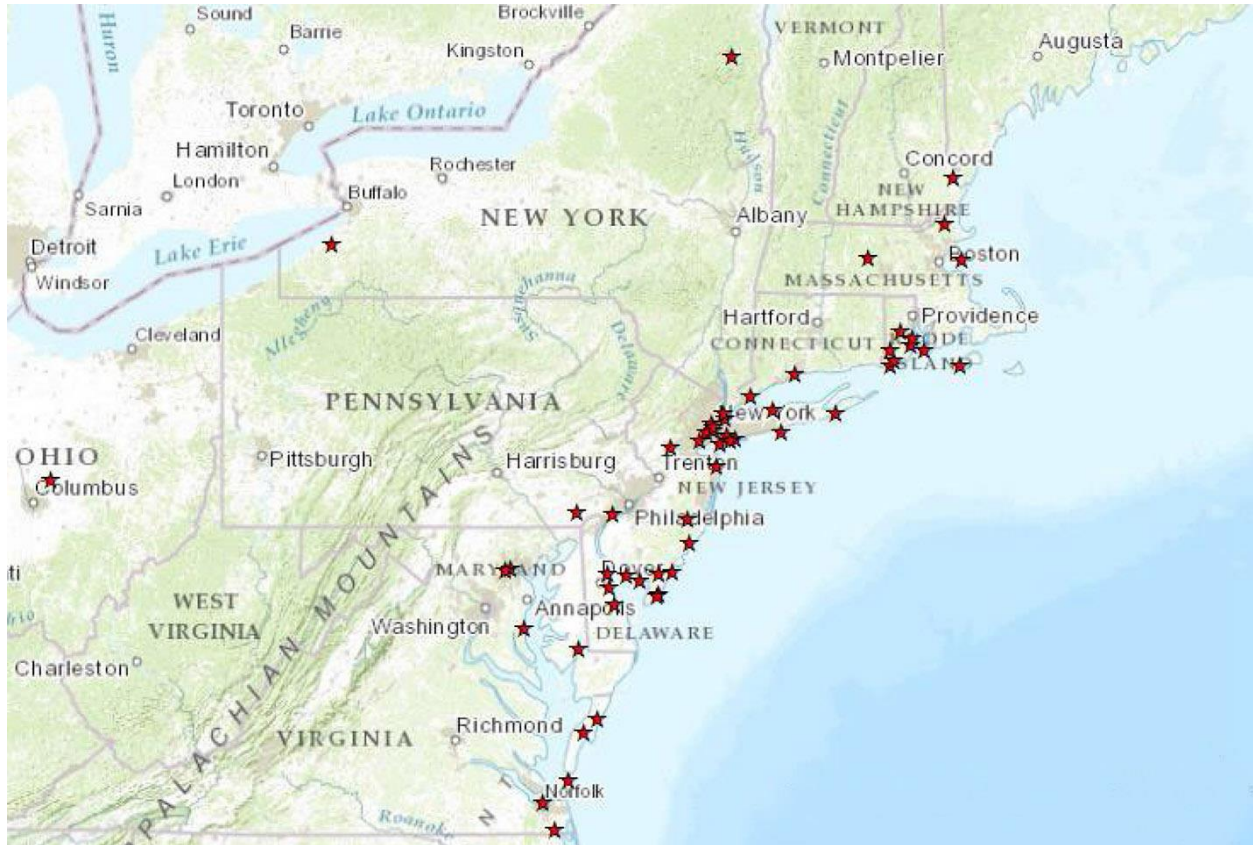
NFWF also played a key role in recovery and restoration following Hurricane Sandy. In 2013, Congress passed the Disaster Relief Appropriations Act of 2013 (the Sandy Supplemental) appropriating \$829.2 million for DOI to rebuild and repair coastal assets and make strategic investments in future coastal resilience. Working with DOI, NFWF administered the Hurricane Sandy Coastal Resiliency Competitive Grant Program, which made \$100 million available to state and local governments, tribes, nonprofits, and universities to address coastal restoration.

NFWF received 375 grant applications requesting more than \$563 million, which clearly shows the high demand for funding to support coastal restoration projects. Fifty-four projects in the region impacted by Sandy received \$100 million in DOI funding from the Sandy Supplemental. NFWF raised an additional \$3.1 million in private funding, and grantees committed over \$55 million in additional funding and in-kind contributions, for a total conservation investment of more than \$158 million.

Projects selected by NFWF and the review team reduced the impacts of coastal storm surge, wave velocity, sea-level rise, and associated natural threats on coastal and inland communities. They also protected citizens and communities by strengthening the ecological integrity and functionality of coastal-inland ecosystems while also helping fish and wildlife and improving their associated habitats. Implementation of these projects enhanced the understanding of the impacts of storm events and identified cost-effective resilience tools that help mitigate the effects of future storms.

The funding benefitted 210 communities and engaged more than 3,200 young people and veterans, along with more than 5,500 volunteers. The funded projects restored more than 6,600 acres of marsh and wetland, more than 225 acres of beach and dune, over 200 miles of river and stream connectivity, and reduced more than 182 million gallons of stormwater runoff.





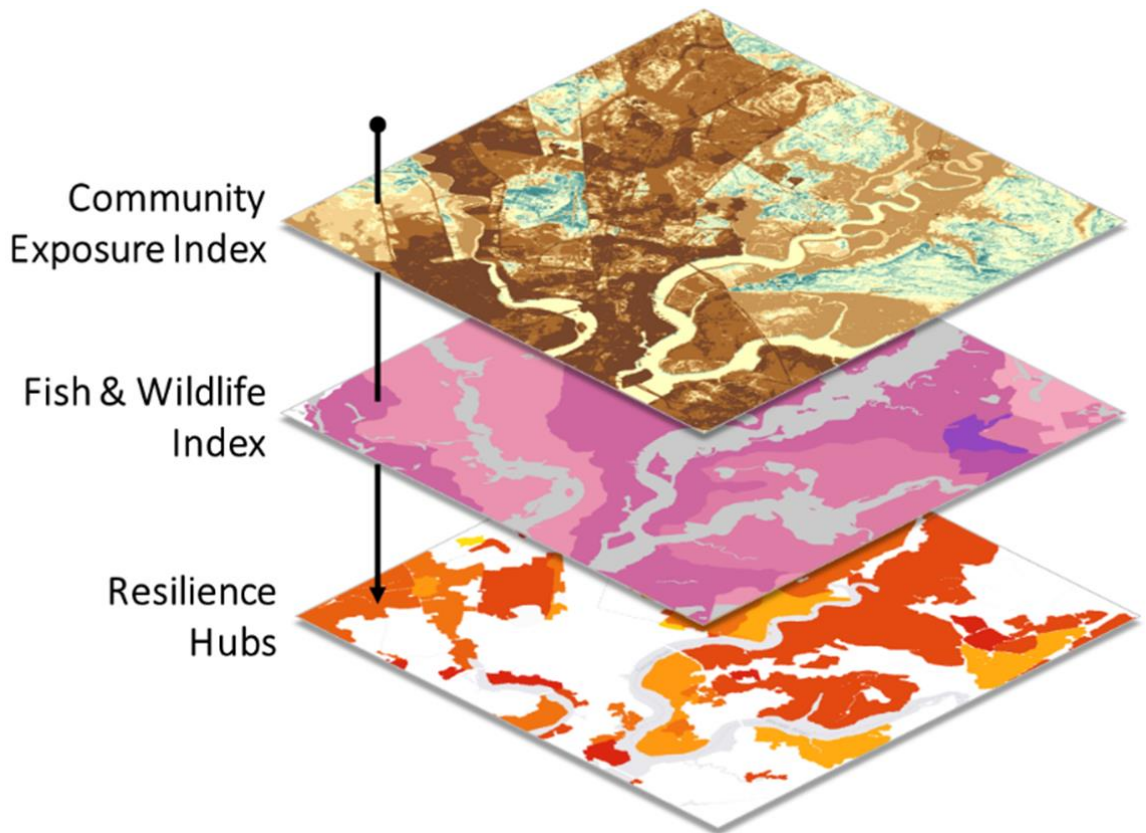
Hurricane Sandy Resilience Fund Project Map

### Coastal Resilience Evaluation and Siting Tool (CREST)

Building upon evaluation concepts developed while managing the Hurricane Sandy Resilience Fund, NFWF worked with NOAA, the U.S. Army Corps of Engineers, the National Environmental Modeling and Analysis Center at the University of North Carolina at Asheville, and NatureServe, a nonprofit conservation science organization, to conduct resilience analyses for U.S. coastlines and eight targeted watersheds. These regional assessments seek to identify areas of open space where the implementation of nature-based solutions could maximize benefits for human communities and wildlife. The assessments identify Resilience Hubs by combining information about flooding threats, human community assets, and fish and wildlife species.

While specific data sources and methods vary by region, each assessment includes the following mapping products: (1) Community Exposure Index, which provides fine-scale data on where communities, people, and infrastructure are at the highest risk of coastal flooding and other flood-related hazards; (2) Fish and Wildlife Index, which identifies important habitat types and the species they support ; (3) Resilience Hubs, which identify large swaths of connected habitat that have potential to protect coastal communities from the effects of storms while also supporting fish and wildlife habitat.





Results can be used by community planners, conservation organizations and others to make informed decisions about the potential of restoration, conservation or other resilience-related projects to achieve dual benefits for people and wildlife. NFWF and its partners also developed CREST as an open-source online platform where users can view, share and download data and modeling results from the Regional Assessments. CREST provides users with an easy-to-use, interactive environment to view and explore key assessment inputs and results within their own areas of interest. Users can also analyze and compare potential project sites and quantify results from the assessment models and search resilience hubs to help identify and site potential projects.

Implementing these assessment tools and review protocols for NCRF, ECRF, and Hurricane Sandy resulted in funding to all types of communities including underserved and vulnerable communities. For example, the Shinnecock Indian Nation’s tribal lands on Eastern Long Island were decimated by Hurricane Sandy. The storm gouged out the reservation’s already eroding shoreline, wiping out natural habitats and stripping the community of its natural cushion against the wave energy and tidal surge of future storms. NFWF and DOI provided a \$3.8 million grant from the Hurricane Sandy Resilience Fund to support tribal efforts to rebuild the lost beach and install a protective “living shoreline” of new marsh grasses, oyster beds and breakwaters. The grant also supported ongoing efforts to restore eelgrass meadows and address stagnant waterways that produced a prodigious number of mosquitoes – a significant nuisance and health threat to the Shinnecock people and millions of their neighbors on Long

Island. The grant has not only helped the tribe better prepare for future storms but has also improved tidal flushing and restored these wetland systems.

Over the past 10 years in Puerto Rico, NFWF has invested millions of dollars in conservation projects that have leveraged matching contributions to generate millions in additional funding. Almost half of the investments that NFWF has made have been in coral reef conservation. As part of this program NFWF has worked with one nonprofit, Protectores de Cuencas, to implement projects in Puerto Rico's central mountain regions to address runoff and sedimentation that flows downstream and negatively affects marine resources including coral reefs. NFWF's support over many years has helped increase the organization's capacity enabling them to successfully compete for other federal grants. In fact, Protectores de Cuencas now competes for larger grants so much so that NFWF is no longer their most significant funder. Organizations such as Protectores de Cuencas represent how NFWF helps locally based organizations develop capacity to become conservation leaders.

### **Observations**

NFWF has built critical experience working in the coastal resilience and restoration space for nearly two decades. Our record working with federal funds and navigating the federal grantmaking process has enabled us to develop strong practices for granting funds quickly and effectively to a diversity of communities and organizations. Despite our size, we have also remained nimble and responsive to Congress's and the federal government's priorities. As this subcommittee continues its examination of coastal resilience and restoration programs and the broader federal grantmaking process I offer the following observations based on NFWF's years of experience.

#### High Demand for Funding Will Only Increase

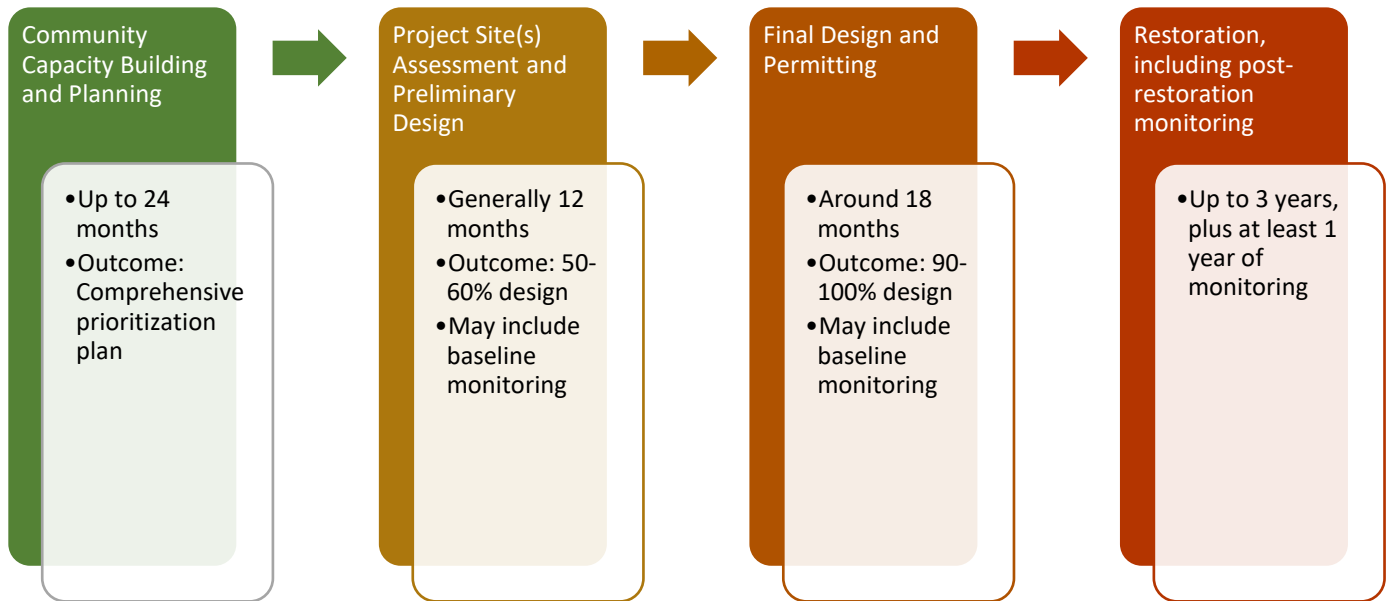
As various stressors on coastal communities and habitats increase, demand for funding, expertise and capacity for coastal resilience and restoration efforts will also increase. In each of the cases I discussed previously in my testimony, NFWF granted funding to the most dynamic, innovative and effective proposals. However, we had to turn down an equal number of qualified projects because of limited funding available.

For example, in fiscal year 2020, NFWF staff could have funded an additional 46 high-quality proposals costing a total of \$27.1 million, if additional funding were available. Unlike a federal agency, NFWF can bring private funding to the table to meet some of this gap, but we are still unable to meet the growing need.

Demand will also grow for coastal resilience funding, especially from the NCRF, as more communities develop the capacity to take on this type of work. To aid this trend, the NFWF team is building a pipeline of future projects by strategically deploying funding to build capacity and prep projects for implementation. Over the last two years, NFWF has created four funding categories within the NCRF: 1) Community Capacity Building and Planning; 2) Project Site(s) Assessment and Preliminary Design; 3) Final Design and Permitting and; 4) Restoration including post restoration monitoring (see diagram below). This was a direct result of feedback from past applicants, grantees and communities that expressed a strong need for help

developing capacity and undertaking the basic community building and planning necessary to implement coastal restoration projects.

By investing a dedicated amount of funding into capacity building and planning projects we are helping communities develop projects now so they can be implemented in future years. As more projects become ready for implementation, the most expensive aspect of a project, more funding will be needed to meet the growing demand.



NCRF Funding Categories

### Matching Funds

Many of the programs NFWF manages require grantees to provide matching funds to qualify for federal dollars. When we see instances where match funding is a barrier, we work with applicants to navigate these challenges. For example, our RFP for the NCRF and the ECRF encourages applicants to reach out to us if they think match funding will present a problem. We encourage them to apply even if they do not think they can provide a 1:1 match. Match is not an eligibility requirement, in that an applicant who cannot meet this requirement is not necessarily barred from participating. Match is treated as a competitiveness criterion used to evaluate a proposal, with no greater weight than conservation impact or community outcomes, a strong technical approach, or solid citizen engagement. NFWF is often able to work with applicants on a strong proposal to address challenges in one area. In the case of a proposal having less than 1:1 match, NFWF may have the flexibility to still fund a project if the overall NFWF program has more match funding than the program requires. NFWF also can use available private funds to supplement a match shortage for certain grantees. NFWF uses this

flexibility to work with applicants to advance strong projects and work with communities that have fewer resources at their disposal.

We also recognize that our data about matching funds are based on our current network of grantees and applicants and many other organizations and communities have never applied for NFWF funds. We are continually interested in how we can improve our outreach so that we reach more organizations and learn what dissuades them from applying and changes that would prompt them to apply.

### Capacity Building

Over our many years of administering coastal resilience and restoration programs, we have learned the importance of providing communities and organizations with additional capacity. The external evaluation of NFWF and DOI's Hurricane Sandy investments showed that the most frequent implementation challenge experienced by grantees was obtaining permits and other approvals for their projects – steps early in the project timeline.

The lessons learned from the Hurricane Sandy Resilience Fund, the ECRF and the early first year of the NCRF prompted NFWF staff to create funding categories focused on capacity building and planning. Many of the communities that have applied to the NCRF and ECRF request capacity building assistance since they are just starting restoration efforts and grappling with the permitting and planning necessary to implement these projects effectively. The early stages of the NCRF are designed to specifically help these communities build capacity and planning and design expertise. NFWF's long-term strategy is to build a pipeline of projects by funding many of these capacity-building grants that will enable communities to apply for implementation and monitoring funds as they develop their projects.

To further increase capacity, NFWF has allocated funding for at least four technical assistance providers to work with applicants and help them navigate questions and challenges they encounter as they develop resilience and restoration projects. These applicants can utilize these advisors, free of charge, to consider strategies and develop proposals for NFWF's NCRF fund, as well as other funding opportunities. The advisors will not be part of the proposal review process and will not create any conflict of interests as applicants work with them. NFWF will also select advisors that have firsthand experience in communities that often request technical assistance such as underserved and vulnerable communities.

### Grant Review Process

NFWF's primary objective is achieving the greatest conservation impact through science-based programs designed to address conservation priorities. Selecting grants solely based on science however will not always achieve the greatest conservation impact. NFWF staff have designed a review process that accounts for science, cost effectiveness, geographic diversity, grantee diversity and sustainability.

For example, many of our water quality programs focus on entire watersheds. This requires NFWF to balance conservation outcomes from rural areas near the headwaters of a river system and urban areas often located near the mouth of the river. Projects located in rural and urban areas are very different and both should be weighed against the overall conservation of

the watershed. Therefore, NFWF staff take these factors into account when finalizing the grant slate to ensure we have diverse geographic representation across the project area.

### **Conclusion**

Since 1984 the National Fish and Wildlife Foundation has been dedicated to sustaining, restoring and enhancing the nation's fish, wildlife, plants and habitats for current and future generations. Our staff recognizes that we only achieve our best results when we fully engage the communities our collective work will impact. Meeting communities where they are at today is essential to helping them conserve and protect their natural environment and way of life for the generations of tomorrow.

I hope that the observations I shared in my testimony provide useful perspective for how Congress might use the many resources at its disposal to enable more people to take on conservation projects in their communities. At NFWF, we believe that all Americans want to protect fish and wildlife, conserve habitat, and improve their quality of life, but we recognize that some communities are more well equipped to do this than others. NFWF has taken steps over the years to find ways to help underserved communities navigate some of the barriers that impede their ability to conserve and protect the land, water, fish and wildlife around them. Congress's ability to promote conservation far surpasses ours and I hope that my testimony today has provided insights for how Congress can further bolster conservation efforts in the most equitable manner possible. Thank you.