

1 **Title**

2 Protecting wetlands for people: Strategic policy action can help wetlands mitigate risks and
3 enhance resilience

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17 **Highlights**

- 18 • Wetlands can help protect human communities from consequences of extreme weather events
- 19 • Society has not valued the protective services of wetlands
- 20 • Coordinated and effective policy action is needed to protect wetlands to protect people
- 21 • We propose countries take policy action to create national wetland commissions
- 22 • Commissions would integrate wetland protective services with disaster planning, infrastructure
- 23 investment, and climate change adaptation strategies

24 **Abstract**

25 We elevate the undervalued role of wetland protective services for mitigating disastrous
26 consequences of unprecedented weather-related events for human communities. Scientific
27 evidence increasingly reveals that wetlands play critical hydrologic roles in landscapes, helping
28 to mitigate flood, drought, and, in some cases, fire risks. However, wetland protective services
29 have not received sufficient policy action. We propose national wetland commissions, modeled
30 after the concept of lake and river commissions, as one way to strategically link wetland
31 protection to other societal objectives, including human disaster risk planning, infrastructure
32 investments, and climate adaptation strategies. We offer an example applicable to the United
33 States, describing an institutional design for a National Interagency Wetland Commission. We
34 suggest it could be patterned after existing federal commissions statutorily created by Congress
35 with delegated administrative and regulatory authority and designated independent agency status
36 within the executive branch. It is time for bold and innovative policy action to incorporate
37 wetland protective services into societies' defenses against extreme weather events.

38 **Keywords**

39 extreme weather events; wetland protective services; disaster risk planning; climate change
40 adaptation; wetland policy

41 **Manuscript text**

42 ***1. Introduction***

43 Extreme weather and climate events are becoming the norm—breaking records, dominating
44 news, and creating cumulative impacts to regions suffering from recurrent events (Ummenhofer

45 and Meehl, 2017). A 2020 assessment of the global risk landscape rated extreme weather events
46 second (2014–2016) or first (2017–2020) in terms of likelihood for the past seven years, and
47 among the top four risks in terms of impact for the fourth year in a row. In 2020, for the first
48 time in the annual report’s history, all top five global risks in terms of likelihood and three of the
49 top five risks in terms of impact are environmental in nature. Accompanying extreme weather
50 events in the top five likely risks the world faces in 2020 are the closely related challenges of
51 climate action failure, natural disasters, biodiversity loss, ecosystem collapse, and human-made
52 environmental disasters (World Economic Forum, 2020).

53 Hurricanes, typhoons, cyclones, and monsoons are wreaking havoc across the globe
54 (World Meteorological Organization, 2019). Tropical storms are slowing due to climate change,
55 resulting in more fatalities and destruction, particularly in densely populated urbanized areas,
56 mostly due to compound flooding from storm surges and heavy rainfall (Needham *et al.*, 2015;
57 Kossin, 2018). Climate change is also causing tropical cyclones to have enhanced average and
58 extreme rainfall (Patricola and Wehner, 2018). Mounting devastation has occurred just in the
59 past three years. Most notably, 2019 saw hundreds of people killed and widespread devastations
60 from Cyclone Idai in southeast Africa, the deadliest storm ever in the Southern Hemisphere,
61 Typhoon Hagibis in Japan, Typhoon Lekima in China, and historic floods in the U.S. Midwest
62 and South. In 2018, Super Typhoon Mangkhut ravaged parts of the Philippines and China,
63 Hurricane Florence devastated several states in the United States (U.S.) Southeast, the Indian
64 state of Kerala experienced the worst monsoon flooding in at least 100 years with over a million
65 people displaced and 400 killed, and an overwhelming 125 cm of rain in 24 hours led to massive
66 flooding and mudslides in Hawaii’s island of Kauai. And in 2017, communities throughout the

67 Caribbean and southeastern U.S. suffered extensive losses from hurricanes Harvey, Irma, Jose,
68 and Maria. The third largest U.S. city, Houston, was subjected to a 500-year flood, supposedly a
69 rare event, for the third year in a row with billions of dollars in damages.

70 Meanwhile, Australia, Brazil, Canada, Greece, Portugal and the U.S. are among the
71 growing number of places experiencing what has been called “the Age of Megafires,” where
72 “unprecedented” dangers from widespread, fast-moving, and intense fires have increased in areas
73 subject to drought and often undergoing rapid landscape-scale change (Pyne, 2009; Attiwill and
74 Binkley, 2013). Australia experienced one of its most calamitous summer fire seasons in 2019–
75 2020 with widespread destruction resulting from millions of acres burned, thousands of homes
76 destroyed and people displaced, and close to a billion animals and dozens of people killed
77 (Morton, 2020). In 2018, California experienced its most deadly and destructive wildfire season
78 on record, part of a trend where 75% of the largest, 75% of the most destructive, and 50% of the
79 deadliest top 20 wildfires in the state’s history have occurred since 2000 (Cal Fire, 2019). A
80 recent study suggests that extreme swings from heavy precipitation to drought conditions are
81 likely for California throughout the rest of the century (Swain *et al.*, 2018), supporting other
82 evidence that climate change will further increase the frequency and impacts of extreme fire
83 events (Flannigan *et al.*, 2009).

84 The ecological, human, and economic consequences of catastrophic storm and drought
85 events can, at times, be linked, directly or indirectly, to landscape-scale changes that have
86 resulted in massive losses of wetlands. Yet, the protective services of wetlands—for preventing
87 and mitigating weather-related disasters—are greatly undervalued by people and governments
88 worldwide. We have failed to sufficiently protect wetlands to protect ourselves as well as the

89 wildlife that depend on them. It is time to take bold, effective, and coordinated policy action to
90 incorporate wetland protective services into societies' defenses against extreme weather events.
91 Here we lay out the scientific case for how wetlands provide protective services and why it is
92 important to link wetland management to disaster risk planning and climate adaptation strategies.
93 We then propose one policy alternative for better protecting and managing wetlands to help
94 people mitigate flood, drought, and fire risks and their devastating consequences: national-level
95 wetland commissions. This suggestion is based on the general success of the commission model
96 applied to rivers and lakes as an effective way to manage transboundary water resources and to
97 bring together diverse stakeholders interested in their protection. Finally, we present our
98 arguments with U.S. examples of opportunities for inter-agency cooperation and a proposed
99 structure for a U.S. National Interagency Wetland Commission. While the commission model
100 has been widely applied in water management and other problematic governance situations, its
101 adoption, purpose, and design to specifically help wetlands mitigate societal risks and enhance
102 resilience to extreme weather events is the strategic policy innovation that we offer here.

103 ***2. Recognizing and valuing wetland protective services***

104 *2.1 Wetlands provide essential ecosystem services and terrestrial-aquatic linkages*

105 Wetlands are some of the most productive ecosystems on earth and play critical roles in
106 hydrologic, nutrient, and carbon cycling while providing vital wildlife habitat (Zedler and
107 Kercher, 2005; Alexander *et al.*, 2018). Their habitat value has motivated wetland protection
108 through avenues such as wildlife refuges and spurred vast restoration efforts in response to
109 waterfowl population declines. Wetlands play critical hydrologic roles in landscapes through

110 storing and slowly releasing water downstream or recharging shallow groundwater, enabling
111 them to mitigate flood risks during hurricanes or other extreme precipitation events while also
112 delaying the onset and impacts of drought under some circumstances (Zedler and Kercher, 2005;
113 Westbrook *et al.*, 2006; Alexander *et al.*, 2018; Fairfax and Small, 2018; Ameli and Creed,
114 2019). The dendritic landscape patterns of riparian networks can also lessen the impacts of
115 wildfire (especially those that are beaver-dammed) by serving as a firebreak and providing
116 refuge for wildlife (**Fig. 1**; Fairfax and Whittle, 2019; Wheaton *et al.*, 2019). Wetlands can also
117 dissipate wave energy which reduces stream and coastal erosion and associated land loss,
118 decreasing risks to growing cities and urbanized areas (Duarte *et al.*, 2013; Narayan *et al.*, 2017;
119 Espeland and Kettenring, 2018; Narayan *et al.*, 2019). Because of these protective services of
120 wetlands, there is growing interest in their role in risk and disaster reduction, but these protective
121 services have not received sufficient policy action.



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Fig. 1. Riparian wetlands associated with beaver dams can mitigate the impacts of wildfire. These so-called “emerald refuges” can serve as firebreaks and refuge for wildlife during fires (Pettit and Naiman, 2007; Rood *et al.*, 2007; Wheaton *et al.*, 2019). Beaver-dammed riparian areas create broad, diffuse floodplain habitat that are more resistant to burning and these habitats crisscross some landscapes with dendritic stream networks (Fairfax and Small, 2018; Fairfax and Whittle, 2019; Wheaton *et al.*, 2019). The presence of these riparian features is on the rise with increasing efforts to restore beaver and beaver-associated wetlands throughout the semi-arid West or, when beaver are not present, through the use of BDAs (beaver-dam analogues) (Pollock *et al.*, 2014; Charnley, 2018; Goldfarb, 2018; Wheaton *et al.*, 2019). (Photo credit: Joseph M. Wheaton).

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Wetlands, by their very nature, are highly dynamic and provide essential linkages between terrestrial and aquatic ecosystems and between human-dominated and natural landscapes (Alexander *et al.*, 2018). Wetlands often constitute the critical landscape nexus between land and water on coasts, lakeshores, and river and stream banks where they buffer and stabilize these transition zones. Paradoxically, their locations at these nexuses make them highly

140 productive and simultaneously vulnerable. Many wetlands are threatened due to human
141 competition for land and water, lack of landscape-level planning, and lack of appreciation for the
142 integral functioning of wetlands within watersheds (Zedler and Kercher, 2005; Clare *et al.*, 2011;
143 Narayan *et al.*, 2017). The highest levels of competition for land often occur in the very places
144 where protective services of wetlands are most needed, surrounding and within human
145 communities (Narayan *et al.*, 2017), the largest of which are often located on coasts and rivers
146 (Li *et al.*, 2015). Understanding their protective services and the important functions wetlands
147 play in different contexts requires a landscape perspective and greater scientific integration.

148 *2.2 Insufficient wetland protection has enormous societal costs*

149 Humanity has viewed wetlands as wastelands and vigorous national campaigns to drain
150 and fill them have been pursued over centuries (Vileisis, 1999; Zedler and Kercher, 2005;
151 Gardner, 2011). These ‘marginal’ lands have been deemed too costly to protect, given society’s
152 insatiable appetite for ever-increasing land development, first for agricultural expansion and
153 more recently with (sub)urban sprawl. Wetland degradation and destruction have resulted in
154 radical landscape transformations with less natural wetland protection and more highly
155 engineered built water infrastructure that often gives society a false sense of security (Zedler and
156 Kercher, 2005; Creed *et al.*, 2017; Sutton-Grier *et al.* 2018). Hindsight has revealed the
157 cumulative effects of wetland loss. Failure to protect wetlands has not only led to extensive
158 ecological impacts but also resulted in enormous societal costs (Zedler and Kercher, 2005; Creed
159 *et al.*, 2017). Many countries face increased loss of life as well as rising costs of destroyed assets,
160 unsustainable insurances risks, and mounting government debt from weather-related disasters in
161 flood- and drought-prone areas (Deryugina, 2017; Smith, 2020). These financial burdens—often

162 the result of poor land-use planning—fall on citizens, and the political will of taxpayers and
163 investors to compensate other people for short-sighted decisions is diminishing (Choe, 2020).
164 Mounting societal costs provide an urgent and compelling rationale for policy action now to save
165 lives and avoid public and private financial losses.

166 *2.3 Need for more comprehensive approach to wetland protection*

167 Our current approach to managing wetlands is fragmented and ineffective (e.g., Gardner,
168 2011; Strand and Rothschild, 2015). Since its 1971 inception, the Ramsar Convention on
169 Wetlands International Importance especially as Waterfowl Habitat has focused on the principle
170 of “wise use of wetlands,” acknowledging the importance of their sustainable use to human
171 communities, recognizing the need for national wetland policies, and encouraging wetland
172 integration into national land and resource use planning and management (Finlayson *et al.*,
173 2011). But few countries have specific and comprehensive wetland policies, and “many countries
174 lack capacity or the cross-sectoral political will to ensure such landscape-scale collaborative
175 implementation is undertaken” (Finlayson *et al.*, 2011:197).

176 The full range of environmental and societal values provided by wetlands, and the
177 diversity of wetland types critical in different landscape settings, remain unprotected in most
178 countries (Sun *et al.*, 2015, Turner *et al.*, 2000; Kentula and Paulsen, 2019) and are subject to
179 diverse anthropogenic disturbance and stressors related to agriculture, development, industry,
180 and hydrologic and habitat modifications (Herlihy *et al.*, 2019; Lomnický *et al.*, 2019). Because
181 of their unique character and value in different contexts (Peimer *et al.*, 2017), and due to a
182 general lack of specific wetland statutes and implementing agency authorities, many wetlands do

183 not receive adequate attention in national governments' policy landscapes. Most wetland
184 protection occurs under more general environmental laws and is aimed at protecting wetland
185 ecosystem services related to sustainable human uses or protecting biodiversity (Strand and
186 Rothschild, 2015; Peimer *et al.*, 2017). The very concept of mitigation and the practice of
187 wetland mitigation banking imply that some wetlands will be allowed to be degraded or
188 destroyed (Clare *et al.*, 2011). Restored or created wetlands take a long time to or never achieve
189 the same level of functioning as natural wetlands (Moreno-Mateos *et al.*, 2012). Thus, the very
190 approach of using wetland mitigation results in loss of function and a change in where within the
191 landscape wetlands are located and how effectively they provide protective and other services
192 (Zedler and Kercher, 2005; Clare *et al.*, 2011).

193 ***3. Proposal for National Wetland Commissions***

194 *3.1 Forging wetland policy in an interagency nexus for coordinated protection*

195 Countries need a more comprehensive and integrated approach to wetland policy.
196 Because wetlands are connected to landscape features and services that are generally under the
197 administrative purview of different and often powerful government agencies, fostering
198 interagency cooperation that would expand and coordinate instead of displace or challenge
199 existing agency efforts is a more politically viable policy approach. Wetland protection could be
200 enhanced if pursued in a governmental decision-making nexus that includes the water, land,
201 human, and wildlife dimensions of wetlands and makes more explicit connections to human
202 disaster preparedness and response, infrastructure investments, and national defense. A
203 collective-action institutional strategy of this nature would enable a nation's relevant agencies to

204 jointly monitor wetland conditions, assess cumulative impacts and risks associated with wetland
205 loss, and identify opportunities to realize mutual benefits wetlands can provide for achieving
206 various societal objectives. This strategy would move countries in the direction of exercising
207 greater foresight to increase the long-term resilience and sustainability of ecological and social
208 systems to natural disasters and climate change.

209 *3.2 Applying the river and lakes commission model to wetlands*

210 We propose consideration of national-level interagency wetland commissions as
211 institutional structures for coordinated wetland protection, management, and restoration. Such
212 commissions could be modeled after joint river and lake commissions, which are generally
213 created by international treaties or interstate compacts and charged with management of
214 transboundary international or interstate watercourses (United Nations 2007; Rieu-Clarke *et al.*,
215 2017; Caponera and Nanni, 2019). We note that the type of organization we suggest may not
216 always be called a commission as there are a variety of river basin organizations with different
217 types of autonomy, authorities, rules and incentives, and connections to existing institutions
218 (Huitema and Meijerink, 2017). Nor is a commission the only policy option that could be
219 selected to better manage wetlands. Robust assessment and debate are occurring within the
220 environmental and water governance literatures over experiences with collaborative, landscape-
221 scale environmental planning efforts (Blatter and Ingram, 2001; Layzer, 2008), how best to
222 manage environmental risks and increase water security (Bakker and Morinville, 2013), and the
223 politics and interactions of scales and networks (Bakker and Morinville, 2013; Lejano *et al.*,
224 2013; Norman *et al.*, 2015). These examinations reveal the importance of multiscalar
225 institutional dynamics and decision-making processes in environmental problems and their

226 solutions. Devolution of governmental authority and decision making to local levels is often
227 thought to produce better environmental outcomes, but national-level institutions with legal
228 mandates, management authorities, technical and financial resources, and responsibilities to
229 wider publics remain important for organizing collective action on scales commensurate with the
230 2020 global risk landscape (Thomas, 2003; Hecl, 2008; Layzer, 2008; Rieu-Clarke et al., 2017;
231 World Economic Forum, 2020). Overarching policy challenges for addressing the global risks
232 society currently faces include finding ways for existing governmental agencies to work more
233 productively together in complex institutional landscapes and to engage more effectively with
234 non-governmental organizations and civil society.

235 We argue that applying the commission model to wetlands at a national scale would be
236 an excellent way to confront challenges involved in managing wetlands to help mitigate risks
237 from and enhance resilience to extreme weather events. We advocate this policy approach for
238 several reasons. First, commissions are often formed to work across national or more local-level
239 (e.g., regional or state) geographic boundaries to address problems that transcend the
240 management capacities of singular government scales or institutions (United Nations, 2007).
241 National wetland commissions could be involved in similar intergovernmental and institutional
242 boundary-spanning by working across a country's own wetland-relevant government agencies
243 and jurisdictions. Second, current wetland management tends to be polycentric with legal
244 authorities often dispersed across different agencies (Environmental Law Institute, 2008; Strand
245 and Rothschild, 2015). This situation likely makes a coordinated, interagency approach through
246 the commission model more politically feasible than the older environmental protection model of
247 passing a national law that a particular agency would then be charged with implementing. Third,

248 establishment through national-level action would recognize a country's collective responsibility
249 for protecting wetlands and provide avenues for both diplomatic cooperation in various
250 international fora and coordination within the country. National wetland commissions could be
251 more influential in representing treaty countries that participate in the Ramsar Convention on
252 Wetlands of International Importance especially as Waterfowl Habitat. Their national status
253 would also enable them to work across different national agencies and sub-national
254 governmental jurisdictions such as territories, regions, tribes, states, provinces, districts, and
255 zones. Fourth, most countries nationalize their military defense and disaster response functions
256 under compelling imperatives for mutual protection. Putting greater emphasis on the protective
257 services of wetlands implies the same level of national commitment and effort.

258 The commission model has been an important way to facilitate cooperation and
259 stakeholder engagement over rivers and lakes, as well as to bring both technical expertise and
260 financial resources to bear on managing shared natural resources (United Nations 2007; Rieu-
261 Clarke *et al.*, 2017; Caponera and Nanni, 2019). In a similar way, wetland commissions could be
262 an important innovation in terms of how wetlands are managed, bringing needed resources and
263 partner organizations and communities together to identify the significance of different wetland
264 types within their respective landscape contexts for providing multiple ecosystem services,
265 including protective services. This approach would counter the piece-meal, one-at-a-time model
266 that currently exists, which often narrowly focuses on a limited number of ecosystem service
267 benefits wetlands provide (e.g., clean water). However, wetlands are not linear features like
268 rivers or as clearly bounded as lakes; wetlands also are sometimes ephemeral and can change
269 size depending on water inputs and precipitation patterns. These geomorphic distinctions imply

270 wetland commissions would need to be modified versions of river and lakes commission models
271 in terms of geographic extent and context, incorporating institutional design differences to fit the
272 dynamic nature of these resources. Such an approach is supported by policy theory that
273 emphasizes the need for appropriate contextualization of a particular policy model to fit the
274 circumstances of time and place in which it is applied, the nature of the problem it is designed to
275 address, and societal objectives it is intended to achieve (Schneider and Ingram, 1997; Sabatier,
276 2007).

277 Below we describe generally some of the proposed work of national wetland
278 commissions, recognizing that it is premature to be too prescriptive on the exact structure and
279 function of such commissions and what they would be expected to accomplish since this will
280 naturally vary to fit different national institutional contexts. Here we describe some of the
281 aspects we see as critical components of national wetland commissions as a starting point for
282 their design and development.

283 *3.3 The work of national wetland commissions*

284 The mandate of national wetland commissions would be to provide a comprehensive
285 interagency approach to strategically protect wetlands for critical ecosystem services they
286 provide in diverse landscape and watershed contexts. One of the first tasks for wetland
287 commissions would be to establish science and policy objectives, as well as stakeholder
288 engagement goals, and then to develop plans for how to meet those objectives and goals. These
289 commissions ideally would seek ways to leverage member agencies' institutional resources and
290 existing stakeholder networks, including private property and public sector interests, but they

291 would also need to navigate potentially contentious politics and build trust among agencies with
292 varying power and access to resources. Commissions' responsibilities would include making
293 recommendations on how to integrate information about key wetland functions and services into
294 land-use and infrastructure decisions, including disaster management planning and response.

295 To be successful, national wetland commissions would need sufficient administrative
296 independence and political power to work across existing agencies, integrate science with policy
297 considerations, and avoid having disasters be politicized. Their work would require authority,
298 funding, and flexibility to strategically fulfill their missions and purposes. Work of commissions
299 would need to be supported by technical committees and staff. National wetland commissions
300 would benefit from having a standing Scientific Committee and Policy Committee.

301 The Scientific Committee would be charged with addressing questions of effectiveness in
302 protecting wetlands going well beyond trends reporting in wetland cover changes. It could be
303 tasked to: (1) oversee a coordinated research agenda to develop a comprehensive spatially-
304 explicit inventory of national wetlands (including guidance on frequency, scalability, metrics of
305 wetland health, and key information on links between wetlands and human benefits including
306 disaster risk reduction); (2) improve understanding of wetland functions related to type,
307 condition, and landscape position; (3) further characterize how wetland protective services would
308 reduce human vulnerability to extreme weather-related events; and, (4) develop better forecasts
309 of the scope and scale of future threats from extreme weather events that wetlands could help
310 mitigate.

311 The Policy Committee would be charged with addressing governance questions. Its tasks
312 would include helping to: (1) coordinate and simplify compliance with wetland-related

313 regulatory and permitting processes often administered by different agencies; (2) develop policy
314 guidance for interpretation and implementation of existing statutory and regulatory authorities of
315 its participating agencies; (3) make and enforce decisions that bridge existing agency authorities
316 (through means such as Memoranda of Agreement or Understanding) to facilitate consultation
317 and coordination; and, (4) utilize member agencies' established networks and avenues for
318 engaging private landowners and other stakeholders and working with regional and local
319 governments to integrate wetlands into landscape-scale conservation efforts.

320 ***4. A National Interagency Wetland Commission for the United States***

321 Policy shortcomings are obvious when it comes to explicit protection of wetlands in
322 many countries, including the U.S. Many cultural and natural resources are protected and
323 managed under treaties and laws titled for and focused on them. The U.S. has specific laws to
324 protect air, coastal zones, forests, marine mammals, rangelands, rivers, endangered species,
325 water, wilderness, and other resources (Fairfax and Russell, 2014). In sharp contrast, wetlands
326 are minimally protected under laws primarily designed to accomplish other objectives or protect
327 other features of landscapes and ecosystems (Gatz and Stubbs, 2017). As "wet land," wetlands
328 do not fall neatly within larger U.S. governmental divisions of responsibility over land and water
329 and split authority between states and the federal government (Environmental Law Institute,
330 2008; Clarke *et al.*, 2018). At the national level, wetlands are managed indirectly through a
331 unique regulatory arrangement between the Army Corps of Engineers (charged with engineering
332 harbors and rivers for navigability and enforcing section 404 of the Clean Water Act) and the
333 Environmental Protection Agency (charged with overall implementation of the Clean Water

334 Act), through Fish and Wildlife Service refuges managed primarily for bird habitat, and through
335 agricultural incentive programs aimed at stemming wetland loss and impairment on private lands
336 (Gardner, 2011; Strand and Rothschild, 2015). Many tribal and state governments also have
337 wetlands programs through which they exercise various regulatory, monitoring and assessment,
338 restoration, and cooperative activities (Environmental Law Institute, 2008). However,
339 insufficient regulatory protection through the Clean Water Act with constantly shifting
340 definitions of ‘Waters of the United States’ (i.e., WOTUS) (Mulligan, 2019) and the fragmented
341 institutional landscape for wetland protection leave the future of wetlands in the U.S. insecure
342 (Gardner, 2011; Strand and Rothschild, 2015; Creed *et al.*, 2017; Gardner *et al.*, 2019).
343 Consequently, wetlands remain largely unprotected in regards to the diversity and full range of
344 environmental and societal values they sustain including their protective services (Herlihy *et al.*,
345 2019; Kentula and Paulsen, 2019; Lomnický *et al.*, 2019).

346 Some opportunities currently exist to coordinate interagency action, such as protecting
347 both land and water that wetlands need in arid regions (e.g., Downard *et al.*, 2014), or
348 incorporating wetland restoration and management into storm risk reduction strategies (**Box 1**) or
349 drought risk reduction strategies (**Box 2**). However, even with these efforts, a U.S. National
350 Interagency Wetland Commission (NIWC) is needed to provide a more comprehensive,
351 coordinated and direct approach to wetland protection (**Fig. 2**). It is a strategic institutional
352 design choice located at agency intersections in the national policy landscape that would mirror
353 the intersections wetlands occupy in physical landscapes. A NIWC would specifically enable
354 agencies to work across both jurisdictional and geographic boundaries to promote cooperation
355 for wetland protection within the U.S., using existing federal agency networks and procedures

356 that involve working with tribal, state, and local governments (Clarke *et al.*, 2018). A NIWC
357 would also promote stakeholder engagement to foster discussion and shared goal setting, and
358 would help federal agencies become more aware of the needs and interests of both the private
359 and public sectors affected by federal management decisions. If broadly structured to include and
360 promote the protective services of wetlands (Fig. 2), a NIWC would not be limited in its research
361 and discussions to only WOTUS-protected “jurisdictional” wetlands that fall under the current
362 Clean Water Act definition and the implementing authority of the Army Corps of Engineers and
363 Environmental Protection Agency. Multiple agencies and their private and public sector
364 stakeholders with different missions and cultures, broader perspectives, and varying interests,
365 could potentially help the U.S. significantly reframe and rescale its approach to wetland
366 management. The compelling and urgent challenge to mitigate the disastrous consequences of
367 unprecedented weather-related events for human communities, and the role that wetlands could
368 play in meeting that challenge, could unite and propel the NIWC to find opportunities to
369 strategically protect wetlands not only for their benefits to wildlife but to people as well.



Box 1. WETLANDS AND STORM RISK REDUCTION

Wetlands can help mitigate the effects of storms (**left**; photo credit: NOAA), such as the catastrophic flooding Houston experienced in 2018 (**right**; photo credit: NOAA). Historically, wetland protective services have been left out of disaster planning and management efforts. In the U.S., managing risks to human communities and infrastructure are responsibilities of several agencies that do not specifically include wetland management or protection in their missions. While water management likely will continue to use some engineered solutions—such as dams, reservoirs, levees, and seawalls—integrating wetlands, and more broadly all types of “natural” or “green infrastructure”, into infrastructure planning and disaster risk reduction is a vital part of increasing community resilience to natural disasters and improving infrastructure investments (*Sutton-Grier et al., 2018*).

Opportunities to better integrate wetlands into U.S. disaster planning and response efforts currently exist. For example, the U.S. Federal Emergency Management Agency’s “National Preparedness System” (NPS) guides the community process of preparing for disasters, particularly in its mitigation of disasters framework which recognizes wetlands can help “reduce loss of life and property by lessening the impact of disasters.” Another opportunity at the local scale, where disaster planning generally occurs, is to incorporate wetland risk reduction benefits into implementation of the Coastal Zone Management Act (CZMA). Each coastal state has a CZM lead agency that could coordinate and provide guidance on how best to incorporate wetlands into that state’s disaster planning. Leading communities around the U.S. could demonstrate how and why to include wetlands benefits into disaster planning and convince others to follow suit.

Another opportunity is the potential to include a focus on wetlands for disaster management into each state’s wetland mitigation banks. A certain percentage (such as 25%) of the credits could be specified as “disaster risk reduction” mitigation credits. These credits would come from wetlands that had specifically been created or restored to reduce the risk of floods or droughts. Currently there are no such requirements. This change would mean that wetland protective services could be factored into considerations about landscape locations where loss and mitigation are taking place.



Box 2. WETLANDS AND DROUGHT RISK REDUCTION

Better use of wetlands can be a key aspect of preparedness for and mitigation of drought impacts (**left**; photo credit: K Kettnering). There is growing interest in the reintroduction of beavers (*Castor canadensis*) (**middle**; photo credit: R Donovan) for their engineering abilities to restore wetlands (**right**; photo credit: D Kimble, USFWS) as a means to capture winter precipitation above- and particularly below-ground, facilitate shallow aquifer recharge, and delay and slow the release of water throughout the growing season (Westbrook *et al.*, 2006; Hood and Bayley, 2008; Gibson and Olden, 2014; Hafen, 2017; Holmes *et al.*, 2017; Wheaton *et al.* 2019).

Similar to hard-engineering approaches taken in coastal environments, dealing with water shortages in drylands has relied on building dams and reservoirs to store water when it is plentiful (e.g., spring snowmelt in montane ecosystems) and release it when it is scarce (e.g., late irrigation season). This approach, however, has many risks, including costs of building and maintaining dams, dangers of dam failures (e.g., Oroville Dam in 2017), and ecological and economic impacts of vast flooding associated with reservoir sites and emergency releases.

Wetland restoration and creation, including through use of beaver reintroductions and beaver dam analogues, can promote the hydrologic protective functions of wetlands (Westbrook *et al.*, 2006; Gibson and Olden, 2014). Opportunities exist in drought mitigation and climate adaptation activities to put greater emphasis on the role of green infrastructure, such as wetland networks. Other opportunities arise when replacing aging water infrastructure, where strategic wetland protection and restoration could become cost-effective alternatives to store and release snowmelt (Holmes *et al.*, 2017; Macfarlane *et al.*, 2017; Jones *et al.*, 2018). In addition, use of mitigation banks with “disaster risk reduction credits” (See Box 1) could work for drought prevention equally as well as for flood mitigation.

Effectively and strategically relying on wetlands in the landscape for drought reduction requires deeper understanding of mechanisms by which wetlands influence hydrology and what wetland types, densities, areal coverage, and locations would have the greatest positive impacts (Gibson and Olden, 2014; Holmes *et al.*, 2017; Macfarlane *et al.*, 2017; Jones *et al.*, 2018). NOAA’s National Integrated Drought Information System (NIDIS) (<https://www.drought.gov/drought/>) provides opportunities to support such efforts through its “Coping with Drought” research initiative, support of Regional Integrated Sciences and Assessments (RISAs), and interagency coordination that can facilitate integrating wetlands into cross-agency planning and policies.

371
 372 The U.S. NIWC ideally would be modeled after existing federal commissions statutorily
 373 created by Congress that have delegated administrative and regulatory authority in a defined area

374 and are designated as independent agencies within the executive branch (Breger and Edles, 2000;
375 Cole and Shedd, 2014), rather than after temporary commissions often appointed by Congress or
376 the President to complete a specific investigative or advisory task (Egar, 2018; Straus and Egar,
377 2019). Examples of such independent agency commissions are the Consumer Product Safety
378 Commission, Federal Communications Commission, Federal Election Commission, Federal
379 Trade Commission, Interstate Commerce Commission, Nuclear Regulatory Commission, and the
380 Securities and Exchange Commission (see <https://www.usa.gov/independent-agencies>). Design
381 of U.S. NIWC would require considerable innovation, but the history of how and why U.S.
382 commissions have been formed in the past, often in response to national emergencies, would
383 provide valuable guidance (Breger and Edles, 2000).

384 The NIWC would have statutory independence to work in the policy space between
385 agencies located in different executive departments, but be designed to function interdependently
386 to connect key agencies having missions, authorities, or interests relevant to wetland protective
387 services. The NIWC would explicitly link: 1) disaster management functions in the Department
388 of Homeland Security (Federal Emergency Management Agency) and Department of Defense
389 (Army Corps of Engineers); 2) the missions to provide communities with safe, reliable
390 infrastructure of the Department of Transportation and the Department of Housing and Urban
391 Development; and 3) ongoing land, water, and environmental management of agencies in the
392 Departments of Agriculture, Commerce, Interior, and the independent Environmental Protection
393 Agency (**Fig. 2**).

394 To more effectively link wetland science with wetland policy, top career officials of these
395 agencies who have wetland expertise would be designated as commissioners and constitute the

396 primary executive body with formal decision-making powers. These officials should be people
 397 with authority to act on behalf of their agencies in coordinating internally, committing staff,
 398 directing resources, and dedicating funds to support joint interagency actions of the Commission.
 399 Formalized rules and procedures for meetings, communications, decision-making, conducting
 400 work, monitoring activities, involving stakeholders, and resolving conflicts would need to be
 401 established to institutionalize and foster the Commission’s work.



402
 403 **Fig. 2. U.S. Interagency Wetland Commission to Promote Wetland Protective Ecosystem**
 404 **Services.** An integrated, comprehensive approach to protect wetlands for people and wildlife in the
 405 U.S. We call for a National Interagency Wetland Commission authorized to protect wetlands within
 406 their larger watershed and landscape contexts, to sustain the full range of environmental and societal
 407 values they provide, and to elevate wetland protective services. These protective services have
 408 historically been under-valued and not given statutory, regulatory, or policy guidance protection. As
 409 recent current events have demonstrated, this oversight has left communities and wildlife subject to
 410 catastrophic damage. (Photo credit: NOAA)
 411

412 A NIWC would finally give U.S. wetlands both the recognition these ecosystems deserve
 413 for the wide-range of important benefits they provide to society, and a mechanism for the nation

414 to manage and protect these valuable ecosystems across governmental geographic boundaries as
415 well as across institutional and bureaucratic boundaries.

416 ***5. Decisive policy action needed to reduce societal risks***

417 Policy innovation is urgently needed to deal with the devastating human consequences of
418 lost wetlands and harness their protective services to mitigate risks from and enhance resilience
419 to unprecedented disasters. Protecting wetlands can save lives and money, increase security of
420 urban communities and populations that are particularly vulnerable to extreme weather-related
421 events, and promote long-term sustainability. National wetland commissions could integrate
422 wetland science and policy to seek opportunities where wetland protection can be linked to other
423 societal objectives. Although we have proposed a blueprint for a U.S. National Interagency
424 Wetland Commission, it is not the only wetlands policy management option that could be
425 selected. But based on its application to rivers and lakes, the commissions model seems like a
426 viable alternative to foster collaboration across agencies, facilitate stakeholder engagement, and
427 bring technical and financial resources to bear on improving wetland management at the
428 landscape scale. In addition, this national wetland commission model could be appropriate in
429 other countries where similar management at the landscape scale is needed to protect people,
430 wildlife, and built infrastructure from extreme weather events. While creating national wetland
431 commissions would entail extensive effort, collaboration, and innovation, that pales in
432 comparison to societal risks we will continue to face in the absence of bold and forward-looking
433 policy action.

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662 **Competing interests statement**

663 Authors declare no competing interests.