EARTHJUSTICE

ALASKA CALIFORNIA FLORIDA MID-PACIFIC NORTHEAST NORTHERN ROCKIES
NORTHWEST ROCKY MOUNTAIN WASHINGTON, D.C. INTERNATIONAL

July 9, 2013

VIA ELECTRONIC FILING
Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Re: Additional Information for *Dominion Cove Point LNG, LP*, Docket No. CP13-113-000

Dear Secretary Bose:

On behalf of intervenors EarthReports, Inc. (dba Patuxent Riverkeeper); Potomac Riverkeeper, Inc.; Shenandoah Riverkeeper; Sierra Club; and Stewards of the Lower Susquehanna, Inc. (collectively, "Intervenors"), we respectfully submit additional information relevant to Dominion Cove Point LNG, LP's application to construct and operate a liquefied natural gas ("LNG") facility and associated infrastructure being proposed under Docket No. CP-13-113 (the "Project"). In particular, we submit three reports: (1) the *NOAA Atlantic Hurricane Season Outlook* for 2013 ("Hurricane Report," attached as Exhibit A), prepared by the National Oceanic and Atmospheric Administration ("NOAA"); (2) a report entitled *Updating Maryland's Sea-level Rise Projections*, prepared by the Scientific and Technical Working Group of the Maryland Climate Change Commission ("Sea-Level Report," attached as Exhibit B); and (3) a report entitled *Addressing Adaptation in the Oil and Gas Industry*, prepared by the IPIECA, a global oil and gas industry association ("IPIECA Report," attached as Exhibit C). In light of these reports, we respectfully submit that the Federal Energy Regulatory Commission ("FERC") must consider the impacts of climate change, including increased risks that the Project poses to the surrounding areas, in FERC's environmental review of the Project.

The Hurricane Report summarizes NOAA's finding that there is a significant likelihood that the 2013 hurricane season will have higher-than-average storm activity, due in part to above-average sea surface temperatures in the Atlantic Ocean. Hurricane Report at 4. In particular, NOAA predicts a 70 percent likelihood that the 2013 Atlantic Hurricane Season will produce "13-20 named storms, of which 7-11 are expected to become hurricanes, and 3-6 are expected to become major hurricanes." *Id.* This number is well above the ranges that previously were recorded over the last 30 years. *Id.*

The Sea-Level Report estimates that sea-level in Maryland could rise by up to 2.1 feet by 2050, and up to 5.7 feet by 2100. Sea-Level Report at 15. Although an assessment of the consequences of changing tropical storm intensity was beyond the scope of the Sea-Level Report, the Sea-Level Report estimates that the height of storm surges in the Chesapeake Bay would increase as the Bay deepens due to sea-level rise. *Id.* at 14. Taken together, the Hurricane Report and the Sea-Level Report support Intervenors' position, explained in more detail in the comments submitted on May 3, 2013, that the effects of climate change—including more

NORTHEAST 156 WILLIAM STREET, SUITE 800 NEW YORK, NY 10038

T: 212.845.7376 F: 212.918.1556 NEOFFICE@EARTHJUSTICE.ORG WWW.EARTHJUSTICE.ORG

frequent hurricanes and heightened storm surges from rising sea levels predicted in the attached reports—could have significant negative impacts on the Project and the ships navigating to and from the LNG export facility.

Indeed, the consequences of major storms, and rising sea levels, already have been felt by multiple areas on the East Coast. Superstorm Sandy caused 60 deaths, destroyed approximately 300,000 housing units, left two million customers without power, flooded roads and low-lying infrastructure, and caused an estimated $42 billion of damage in New York State alone.[1] Tropical Storm Irene also caused an estimated $15.8 billion damage, multiple deaths, and inland flooding, and it had major impacts on infrastructure, including knocking out a nuclear power plant in Maryland.[2]

Similar storms could inflict comparable damage to the area around the Project. In fact, more active storm seasons coupled with rising sea levels increase the likelihood that storms will cause more harm to coastal areas. Given these climate-related risks, even industry recognizes the need to plan for and adapt to climate change, as the attached IPIECA Report makes plain. In this instance, however, the climate-related risks of placing a large LNG export facility on the Chesapeake Bay have not been addressed adequately. FERC must require Dominion Cove Point LNG, LP to conduct a full-fledged climate risk assessment to inform FERC's review of the potential impacts climate change could have on the Project and its associated shipping activities. FERC's review should include assessing the location and design of the Project in light of the susceptibility of the low-lying and subsiding areas of the Chesapeake Bay to flooding and erosion. The applicant's construction and sediment and erosion plans also should include measures to account for the potential for the higher-intensity rain events associated with the increased storm activity predicted in the Hurricane Report. In addition, the Project and its associated ship traffic should be reviewed in light of the potential for higher wind and storm activities that risk compromising the LNG facility or causing LNG ship accidents. A breach at the LNG facility or the shipwreck of a vessel carrying LNG could have catastrophic consequences for the surrounding communities and therefore must be assessed as part of FERC's consideration of the Project.

[1] *See* Governor Andrew Cuomo, *State of the State 2013* (Jan. 9, 2013), *available at* http://www.governor.ny.gov/NY/2013-State-of-the-State; New York State Div. of the Budget. 2012, *New York State Hurricane Sandy Recovery Needs Summary* (Nov. 26, 2012), *available at* http://www.governor.ny.gov/assets/documents/sandyimpactsummary.pdf.

[2] Associated Press, *Hurricane Irene Facts: A Region-By-Region Look At The Storm's Toll* (Aug. 29, 2012), available at http://www.huffingtonpost.com/2012/08/27/hurricane-irene-damage-statistics-2011_n_1832342.html.

Respectfully,

Deborah Goldberg

Deborah Goldberg
Managing Attorney
Earthjustice
156 William Street, Suite 800
New York, NY 10038
212-845-7377
dgoldberg@earthjustice.org

Attachments

cc: All Parties

Exhibit A

NOAA PRESS RELEASE

Atlantic Hurricane Season Outlook Video

NOAA Atlantic Hurricane Season Outlook

Issued: 23 May 2013

Realtime monitoring of tropical Atlantic conditions
Realtime monitoring of tropical East Pacific conditions

Atlantic Hurricane Outlook & Seasonal Climate Summary Archive

The 2013 Atlantic hurricane season outlook is an official product of the National Oceanic and Atmospheric Administration (NOAA) Climate Prediction Center (CPC). The outlook is produced in collaboration with hurricane experts from the National Hurricane Center (NHC) and the Hurricane Research Division (HRD). The Atlantic hurricane region includes the North Atlantic Ocean, Caribbean Sea, and Gulf of Mexico.

Interpretation of NOAA's Atlantic hurricane season outlook This outlook is a general guide to the expected overall activity during the upcoming hurricane season. It is not a seasonal hurricane landfall forecast, and it does not predict levels of activity for any particular region.

Preparedness
Hurricane disasters can occur whether the season is active or relatively quiet. It only takes one hurricane (or tropical storm) to cause a disaster. Residents, businesses, and government agencies of coastal and near-coastal regions are urged to prepare for every hurricane season regardless of this, or any other, seasonal outlook. NOAA, the Federal Emergency Management Agency (FEMA), the National Hurricane Center (NHC), the Small Business Administration, and the American Red Cross all provide important hurricane preparedness information on their web sites.

NOAA does not make seasonal hurricane landfall predictions
NOAA does not make seasonal hurricane landfall predictions. Hurricane landfalls are largely determined by the weather patterns in place as the hurricane approaches, which are only predictable when the storm is within several days of making landfall.

Nature of this Outlook and the "likely" ranges of activity This outlook is probabilistic, meaning the stated "likely" ranges of activity have a certain likelihood of occurring. The seasonal activity is expected to fall within these ranges in 7 out of 10 seasons with similar climate conditions and uncertainties to those expected this year. They do not represent the total possible ranges of activity seen in past similar years.

This outlook is based on 1) predictions of large-scale climate factors known to influence seasonal hurricane activity, and 2) climate models that directly predict seasonal hurricane activity.

Sources of uncertainty in this seasonal outlook

1. Predicting El Niño and La Niña (also called the El Niño-Southern Oscillation, or ENSO) impacts is an ongoing scientific challenge facing climate scientists today. Such forecasts made during the spring generally have limited skill.

2. Many combinations of named storms and hurricanes can occur for the same general set of climate conditions. For example, one cannot know with certainty whether a given climate signal will be associated with several short-lived storms or fewer longer-lived storms with greater intensity.

3. Model predictions of sea-surface temperatures, vertical wind shear, moisture, and stability have limited skill this far in advance of the peak months (August-October) of the hurricane season.

4. Weather patterns that are unpredictable on seasonal time scales can sometimes develop and last for weeks or months, possibly affecting seasonal hurricane activity.

2013 Atlantic Hurricane Season Outlook: Summary

NOAA's 2013 Atlantic Hurricane Season Outlook indicates that an above-normal season is most likely, with the possibility that the season could be very active. The outlook calls for a 70% chance of an above-normal season, a 25% chance of a near-normal season, and only a 5% chance of a below-normal season. See NOAA definitions of above-, near-, and below-normal seasons, which have been slightly modified from previous years. The Atlantic hurricane region includes the North Atlantic Ocean, Caribbean Sea, and Gulf of Mexico.

The 2013 seasonal hurricane outlook reflects a combination of climate factors that have historically produced above-normal Atlantic hurricane seasons. The three main climate factors for this outlook are:

1) The ongoing set of atmospheric conditions that have been producing increased Atlantic hurricane activity since 1995, which includes

2) An expected continuation of above-average sea surface temperatures (SSTs) across the tropical Atlantic Ocean and Caribbean Sea, and

3) A likely continuation of ENSO-neutral conditions (i.e., no El Niño or La Niña); meaning El Niño is not expected to develop and suppress the hurricane season.

This combination of climate factors historically produces above-normal Atlantic hurricane seasons. The 2013 hurricane season could see activity comparable to some of the very active seasons since 1995.

Based on the current and expected conditions, combined with model forecasts, we estimate a 70% probability for each of the following ranges of activity during 2013:

- 13-20 Named Storms
- 7-11 Hurricanes
- 3-6 Major Hurricanes
- Accumulated Cyclone Energy (ACE) range of 120%-205%

The seasonal activity is expected to fall within these ranges in 70% of seasons with similar climate conditions and uncertainties to those expected this year. These ranges do not represent the total possible ranges of activity seen in past similar years.

Note that the expected ranges are centered well above the official NHC 1981-2010 seasonal averages of 12 named storms, 6 hurricanes, and 3 major hurricanes.

This Atlantic hurricane season outlook will be updated in early August, which coincides with the onset of the peak months of the hurricane season.

Hurricane Landfalls:
While NOAA does not make an official seasonal hurricane landfall outlook, the historical likelihood for multiple U.S. hurricane strikes, and for multiple hurricane strikes in the region around the Caribbean Sea, increases sharply for very active (or hyperactive) seasons (ACE > 165% of median). It only takes one storm hitting an area to cause a disaster, regardless of the overall activity predicted in the seasonal outlook. Therefore, residents, businesses, and government agencies of coastal and near-coastal regions are urged to prepare every hurricane season regardless of this, or any other, seasonal outlook.

Predicting where and when hurricanes will strike is related to daily weather patterns, which are not reliably predictable weeks or months in advance. Therefore, it is currently not possible to accurately predict the number or intensity of landfalling hurricanes at these extended ranges, or whether a particular locality will be impacted by a hurricane this season.

DISCUSSION

1. Expected 2013 activity

Climate signals and evolving oceanic and atmospheric conditions, combined with dynamical and statistical model forecasts, indicate that an above normal Atlantic hurricane season is likely in 2013. This outlook calls for a 70% chance of an above-normal season, a 25% chance of a near-normal season, and only a 5% chance of a below-normal season. See NOAA definitions of above-, near-, and below-normal seasons, which have been slightly modified from previous years.

An important measure of the total overall seasonal activity is NOAA's Accumulated Cyclone Energy (ACE) index, which accounts for the intensity and duration of named storms and hurricanes during the season. This outlook indicates a 70% chance that the 2013 seasonal ACE range will be 120%-

205% of the median. According to NOAA's hurricane season classifications, an ACE value above 120% of the 1981-2010 median reflects an above-normal season, and an ACE value above 165% of the median reflects a very active (or hyperactive) season.

The 2013 Atlantic hurricane season is predicted to produce (with 70% probability for each range) 13-20 named storms, of which 7-11 are expected to become hurricanes, and 3-6 are expected to become major hurricanes. These ranges are centered well above the 1981-2010 period averages of 12 named storms, 6 hurricanes and 3 major hurricanes.

For the U.S. and the region around the Caribbean Sea, the historical probability of a hurricane strike generally increases with increasing seasonal activity. During very active seasons, the historical probabilities increase markedly for multiple hurricane strikes in these regions. Nonetheless, predicting the location, number, timing, and strength of hurricanes landfalls is ultimately related to the daily weather patterns, which are not predictable weeks or months in advance. As a result, it is currently not possible to reliably predict the number or intensity of land-falling hurricanes at these extended ranges, or whether a given locality will be impacted by a hurricane this season. Therefore, NOAA does not make an official seasonal hurricane landfall outlook.

2. Science behind the 2013 Outlook

The 2013 seasonal hurricane outlook reflects a combination of climate factors which have historically produced above-normal Atlantic hurricane activity. The three main climate factors for this outlook are: 1) the tropical multi-decadal signal in the atmosphere, which reflects conditions associated with the ongoing high-activity era that began in 1995 (Goldenberg et al. 2001, Bell and Chelliah 2006), 2) the expected continuation of above-average SSTs in the Main Development Region (MDR), which spans the Caribbean Sea and tropical Atlantic Ocean between 9˚N-21.5˚N; Goldenberg et al. 2001), and 3) ENSO-neutral conditions most likely to persist in the tropical Pacific Ocean.

The outlook also takes into account dynamical model predictions from the NOAA Climate Forecast System (CFS), NOAA Geophysical Fluid Dynamics Lab (GFDL) model CM2.1, the European Centre for Medium Range Weather Forecasting (ECMWF), the United Kingdom Meteorology (UKMET) office, the EUROpean Seasonal to Inter-annual Prediction (EUROSIP) ensemble, along with ENSO (El Niño/ Southern Oscillation) forecast models contained in the suite of Niño 3.4 SST forecasts compiled by the IRI (International Research Institute for Climate and Society) and the NOAA Climate Prediction Center.

a. Expected continuation of tropical multi-decadal signal

One factor guiding this outlook is the expected continuation of the tropical multi-decadal signal (Goldenberg et al. 2001, Bell and Chelliah 2006), which has contributed to the current high-activity era in the Atlantic basin that began in 1995. This signal incorporates the warm phase of the Atlantic Multi-decadal Oscillation (AMO) and an enhanced west African monsoon system. It is associated with an inter-related set of atmospheric conditions that are conducive to increased Atlantic hurricane activity.

During 1995-2012, some key atmospheric aspects of the tropical multi-decadal signal have included reduced vertical wind shear and weaker easterly trade winds, and a configuration of the African easterly jet (i.e. increased cyclonic shear) that is much more conducive to hurricane development from tropical cloud systems (aka easterly waves) moving off the African coast.

Two important features of the multi-decadal signal are now present: the warm phase of the AMO, and with weaker mid-level easterly winds across the eastern tropical Pacific and tropical Atlantic Ocean. During ASO, this wind pattern typically produces a more conducive configuration of the African easterly jet.

b. Expected above-average SSTs in the Main Development Region

The second factor guiding this outlook is the expectation of above-average SSTs across the MDR during much of the hurricane season. This expectation is based on current observations, the ongoing warm phase of the AMO, and CFS T-382 model forecasts.

April sea surface temperatures measured over the entire MDR were 0.4^{o}C above-average, and were also well above those of the remainder of the global tropics. This relative warmth is consistent with the ongoing high-activity era, and with our expectation for an above-normal Atlantic hurricane season this year.

c. ENSO-neutral conditions

Another climate factor known to significantly impact Atlantic hurricane activity is ENSO. The three phases of ENSO are El Niño, La Niña, and neutral. El Niño tends to suppress Atlantic hurricane activity, while La Niña tends to enhance it (Gray 1984). These typical impacts can be strongly modulated by conditions associated with a low- or high-activity hurricane era.

The combination of a high-activity era, above-average Atlantic SSTs, and ENSO-neutral historically produces active or very active Atlantic hurricane seasons. ENSO-neutral conditions have been present since last summer. Currently, equatorial Pacific SSTs are near average and the Niño 3.4 index is slightly below zero. The equatorial Pacific sub-surface temperatures and oceanic heat content are also near average.

Most models contained in the suite of IRI/ CPC Niño 3.4 SST forecasts predict ENSO-neutral conditions for ASO, with the statistical forecasts being generally cooler than the dynamical models. The CFS T-382 high-resolution model below-average SSTs in this region, which is consistent with its forecast for below-average sea-level pressure and reduced vertical wind shear within the MDR. This CFS model is also predicting above-average SSTs in the MDR during ASO.

The observations, ENSO model forecasts, the official CPC/IRI ENSO forecast issued in early May, all suggest that ENSO-neutral conditions are likely to continue through the summer and fall (55% chance). There is no substantial expectation that El Niño will develop this summer or early fall and suppress the hurricane season.

3. Multi-decadal fluctuations in Atlantic hurricane activity

Atlantic hurricane seasons exhibit extended periods lasting decades (25-40 years) of generally above-normal or below-normal activity. These multi-decadal fluctuations in hurricane activity result almost entirely from differences in the number of hurricanes and major hurricanes forming from tropical storms that first develop in the MDR.

The current high-activity era began in 1995 (Goldenberg et al. 2001). Hurricane seasons during 1995-2012 have averaged about 15 named storms, 8 hurricanes, and 4 major hurricanes, with an ACE index of 151% of the median. NOAA classifies 12 of the 18 seasons since 1995 as above normal, with eight being very active (i.e., hyperactive defined by ACE > 165% of median). Only two seasons since 1995 were below normal (1997 and 2009).

This high level of activity contrasts sharply to the low-activity era of 1971-1994 (Goldenberg et al. 2001), which averaged only 8.5 named storms, 5 hurricanes, and 1.5 major hurricanes, with an ACE index of only 74% of the median. One-half of the seasons during this period were below normal, only two were above normal (1980, 1989), and none were hyperactive.

Within the MDR, the atmospheric circulation anomalies that contribute to these long-period fluctuations in hurricane activity are strongly linked to the Tropics-wide multi-decadal signal (Bell and Chelliah 2006), which incorporates the warm phase of the AMO and an enhanced west African monsoon system. A change in the phase of the tropical multi-decadal signal coincides with the transition in 1995 from a low-activity era to the current high-activity era.

NOAA FORECASTERS

Climate Prediction Center
Dr. Gerry Bell, Lead Forecaster, Meteorologist; Gerry.Bell@noaa.gov
Dr. Jae Schemm, Meteorologist; Jae.Schemm@noaa.gov

National Hurricane Center
Eric Blake, Hurricane Specialist; Eric.S.Blake@noaa.gov
Todd Kimberlain, Hurricane Specialist; Todd Kimberlain@noaa.gov
Dr. Chris Landsea, Meteorologist; Chris.Landsea@noaa.gov
Dr. Richard Pasch, Hurricane Specialist; Richard.J.Pasch@noaa.gov

Hurricane Research Division
Stanley Goldenberg, Meteorologist; Stanley.Goldenberg@noaa.gov

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NOAA/ National Weather Service
NOAA Center for Weather and Climate Prediction
Climate Prediction Center
5830 University Research Court
College Park, Maryland 20740
Page Author: Climate Prediction Center Internet Team
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Exhibit B





Updating Maryland's **Sea-level Rise Projections**

Scientific and Technical Working Group
Maryland Climate Change Commission

June 26, 2013

Table of contents

Preferred citation:

Boesch, D.F., L.P. Atkinson, W.C. Boicourt, J.D. Boon, D.R. Cahoon, R.A. Dalrymple, T. Ezer, B.P. Horton, Z.P. Johnson, R.E. Kopp, M. Li, R.H. Moss, A. Parris, C.K. Sommerfield. 2013. Updating Maryland's Sea-level Rise Projections. Special Report of the Scientific and Technical Working Group to the Maryland Climate Change Commission, 22 pp. University of Maryland Center for Environmental Science, Cambridge, MD.

Sea-level Rise Expert Group

Donald F. Boesch[*], University of Maryland Center for Environmental Science, Chair

Larry P. Atkinson[‡], Old Dominion University

William C. Boicourt[*], University of Maryland Center for Environmental Science

John D. Boon[‡], Virginia Institute of Marine Science

Donald R. Cahoon[*], U.S. Geological Survey

Robert A. Dalrymple[#], Johns Hopkins University

Tal Ezer[‡], Old Dominion University

Benjamin P. Horton[#~], University of Pennsylvania

Zoë P. Johnson, Maryland Department of Natural Resources

Robert E. Kopp, Rutgers University

Ming Li, University of Maryland Center for Environmental Science

Richard H. Moss[+], Joint Global Change Research Institute

Adam Parris[+], National Oceanic and Atmospheric Administration

Christopher K. Sommerfield, University of Delaware

[*] Member of the 2008 Scientific & Technical Working Group

[#] Member of the National Research Council Committee

[+] Co-author of the National Assessment Scenarios report

[‡] Author of paper(s) on recent sea-level rise

[~] Author contributing to the Intergovernmental Panel on Climate Change Fifth Assessment

Funding provided by: University of Maryland Center for Environmental Science

Teacher Participants

Michael Katz, Delaware State University

Amy Reese, Howard County School System

Mary Weller, Howard County School System

UMCES Staff Contributors

Marcus Griswold

Caroline Wicks

Alexandra Fries

Jane Hawkey

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Flooded roads during spring storm
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Damaged infrastructure and beach erosion
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Flooding in Baltimore
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Flooding during high tide on the Eastern Shore
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Flooding of park building on Assateague Island
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MARYLAND DEPARTMENT OF NATURAL RESOURCES

University of Maryland CENTER FOR ENVIRONMENTAL SCIENCE

Sea Grant Maryland

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Introduction

Sea-level Rise and the Free State

With its 3,100 miles of tidal shoreline and low-lying rural and urban lands, "The Free State" is one of the most vulnerable to sea-level rise. Historically, Marylanders have long had to contend with rising water levels along its Chesapeake Bay and Atlantic Ocean and coastal bay shores. Shorelines eroded and low-relief lands and islands, some previously inhabited, were inundated. Prior to the 20th century, this was largely due to the slow sinking of the land since Earth's crust is still adjusting to the melting of large masses of ice following the last glacial period. Over the 20th century, however, the rate of rise of the average level of tidal waters with respect to land, or relative sea-level rise, has increased, at least partially as a result of global warming. Moreover, the scientific evidence is compelling that Earth's climate will continue to warm and its oceans will rise even more rapidly.

"As storms such as Hurricane Sandy have shown, it is vital that we commit our resources and expertise to create a ready and resilient Maryland, by taking the necessary steps to adapt to the rising sea..."
—Governor O'Malley

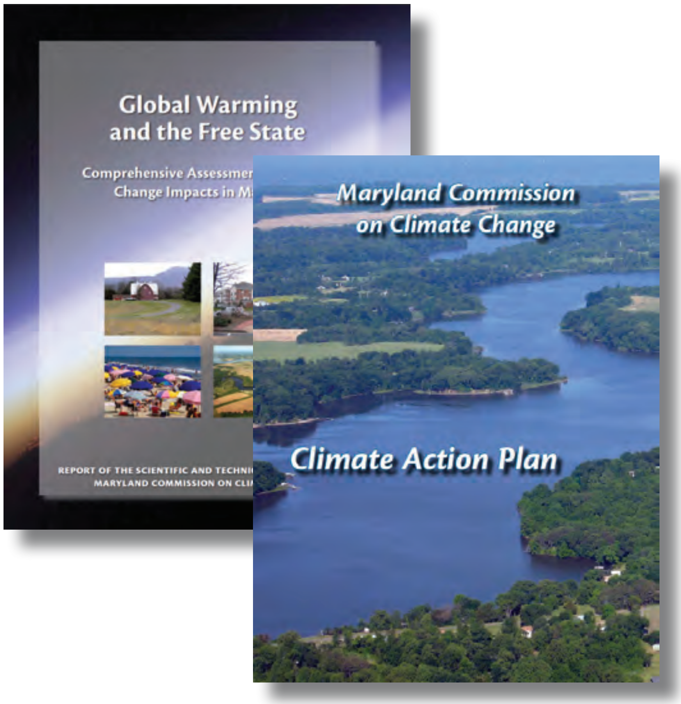
Recognizing the scientific consensus around global climate change, the contribution of human activities to it, and the vulnerability of Maryland's people, property, public investments, and natural resources, Governor Martin O'Malley established the Maryland Commission on Climate Change on April 20, 2007. The Commission produced a *Plan of Action*[1] that included a comprehensive climate change impact assessment, a greenhouse gas reduction strategy, and strategies for reducing Maryland's vulnerability to climate change. The *Plan* has led to landmark legislation to reduce the state's greenhouse gas emissions and a variety of state policies designed to reduce energy consumption and promote adaptation to climate change.[2]

Don Boesch

Downtown Annapolis was flooded during Hurricane Isabel in 2003. Higher sea levels will increase the extent and frequency of flooding from such storms.

Sea-level Rise Projections in the Maryland Climate Action Plan

Previous projections[3] of sea-level rise specific to Maryland and extending throughout the 21st century were developed by the Climate Change Commission's Scientific and Technical Working Group (STWG) and presented in its 2008 report, *Comprehensive Assessment of Climate Change Impacts in Maryland*[4]. These projections were used in Phase I[5] of a *Comprehensive Strategy to Reduce Maryland's Vulnerability to Climate Change* that specifically addressed vulnerability due to sea-level rise and coastal storms. Phase II[6] included broader strategies to build societal, economic, and ecological resilience.



Left: Global Warming and the Free State, a Comprehensive Assessment of Climate Change Impacts in Maryland.

Right: Climate Action Plan, Maryland Commission on Climate Change.

These projections indicated that Maryland might experience a relative sea-level rise of 0.82 m (2.7 ft) during this century under a scenario of lower greenhouse gas emissions[7] and as much as 1.04 m (3.4 ft) under a scenario of higher greenhouse gas emissions. These, and the other climate change projections used in the STWG assessment, were developed in early 2008 following the release of the Fourth Assessment of the Intergovernmental Panel of Climate Change (IPCC).[8] The IPCC took a conservative approach to projecting sea-level rise that included modeling of the specific processes that would contribute to sea-level rise, such as expansion of the volume of the ocean as it warmed and the melting of glaciers. It indicated that the rise in global mean sea level (GMSL) would not likely exceed 0.52 m (1.7 ft) by the end of the century. However, the IPCC explicitly excluded future changes in flows from polar ice sheets that, at that time, could not be confidently modeled based on the peer-reviewed literature. It noted that, if flows from polar ice sheets would grow linearly with global mean temperature, the projection might increase by as much as an additional 0.2 m (0.7 ft).

With emerging evidence of a more rapid acceleration of polar ice sheet melting[9], the IPCC projections were criticized as being too conservative even as they were published. Around the same time of the release of the IPCC report an alternative method for projecting sea-level rise, called the semi-empirical approach, was published.[10] It is a statistical, rather than a process-based, approach that mathematically fits a relationship between the observed sea-level rise and temperature increase over the past century. Future sea-level rise is then estimated based on projections of future global mean temperature, using the same emissions scenarios and climate models used by the IPCC. This resulted in significantly greater best projections for global sea-level rise of 0.87 m (2.9 ft) and 0.72 m (2.3 ft) for the same higher and lower emissions scenarios used in the 2008 Maryland Assessment. The projections of relative sea-level rise used in the Maryland assessment were based on projections of GMSL rise derived from the 2007 version of the semi-empirical model. These projections were also adjusted by the rate of vertical land movement (VLM) of -1.7 mm yr^{-1} derived from 20th century estimates of relative sea-level rise for coastal Maryland as a whole. There was no explicit attempt to include a range of estimates, as only the mean projections were used.

Rapidly Developing Science

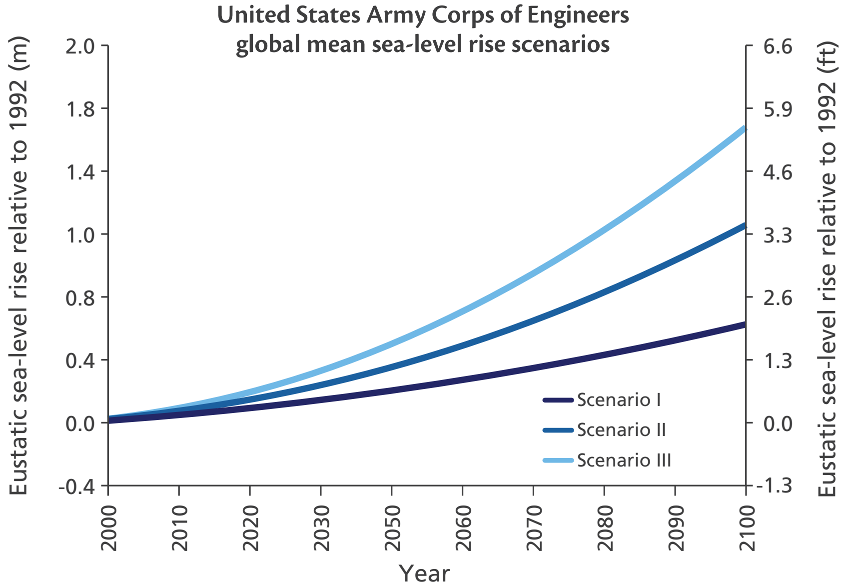
Since 2008, there has been a virtual explosion of the scientific literature related to past and future sea-level rise that can better inform projections of sea-level rise for Maryland. These publications include a refinement of the semi-empirical approach[11]; criticisms of this approach[12]; more definitive estimation of present and future rates of melting of polar ice sheets and glaciers; detailed assessments of sea-level rise indicators from tide gauges, satellite altimeter measurements, and coastal sediment deposits; studies of historical sea-level rise based on tide gauges within the region; and investigations of the causes of regional differences in sea-level rise. In general, these scientific results have demonstrated: (1) the 20th century experienced the highest rate of sea-level rise in the last 2,000 years[13]; (2) global mean sea level (GMSL) rose at an average rate of 1.7 mm yr^{-1} during the 20th century based on tide gauge records[14] and an average of 3.2 mm yr^{-1} from 1993 to the present based on satellite measurements[15]; (3) rates of melting of the Greenland and West Antarctic ice sheets accelerated[9]; and (4) sea level is likely to rise more than estimated by the IPCC 2007 assessment.

Key Message

The 20th century experienced the highest rate of sea-level rise in the last 2,000 years.

Recent Federal Guidance

In 2011, the U.S. Army Corps of Engineers (USACE) issued guidance[16] for incorporating the direct and indirect physical effects of projected future sea-level change across the project life cycle in managing, planning, engineering, designing, constructing, operating, and maintaining USACE projects and systems of projects. Insofar as it affects federal projects in the State of Maryland, as stated in Executive Order 01.01.2012.29, this guidance should also be considered in developing Maryland-specific sea-level projections. Rather than requiring a specific range of sea-level rise to be used in planning, the Corps guidance specifies that alternatives be evaluated under three scenarios of a curvilinear increase in sea level during the 21st century: low, resulting in 0.5 m (1.6 ft) of GMSL rise by 2100; medium, resulting in 1.0 m (3.3 ft); and high, resulting in 1.5 m (4.9 ft). The guidance indicated that GMSL rise should be adjusted by the local rate of vertical land movement (VLM) for planning specific projects.



Sea-level rise scenarios included in the Corps guidance for coastal project planning.[16]

A large piece of ice calving off the Margerie Glacier in Glacier Bay, Alaska. Photo by Larry D. Moore, 2011. From http://commons.wikimedia.org/wiki/File:Margerie_calving.jpg

The Charge

Jane Hawkey

Coastal erosion during Tropical Storm Hanna (2008) on Taylors Island, in Dorchester County. The effects of coastal storms become worse when paired with sea-level rise.

On December 28, 2012, Governor Martin O'Malley issued an executive order on Climate Change and "Coast Smart" Construction that requires State agencies consider the risk of coastal flooding and sea-level rise to capital projects and to site and design such projects to avoid or minimize associated impacts. In addition, Section 7 of the order directs: "The Scientific and Technical Working Group shall review the sea-level rise projections in the Maryland Climate Action Plan (2008) and shall provide within 180 day of the effective date of this Executive Order, updated projections based on an assessment of the latest climate change science and federal guidance." This present report responds to the directive through interpretation of recent scientific results to produce projections useful for sea-level rise adaptation in Maryland.

The Approach

This revision of sea-level rise projections for Maryland was developed through consultation with a group of experts from Maryland and the Mid-Atlantic region. These experts included several who led or participated in the national assessments of sea-level rise published within the past year that are discussed below, as well as authors of recently published papers on sea-level rise in Chesapeake Bay and the Mid-Atlantic region. Three members of the Scientific and Technical Working Group (STWG) that produced the 2008 Maryland Assessment, who are familiar with sea-level rise issues, were included in the expert group to ensure continuity and context. The group of experts was convened on March 8, 2013 for a focused workshop to review and revise a draft framework document that drew heavily from recent national assessments. Drafts were subsequently reviewed and revised by the group of experts to produce this consensus report.

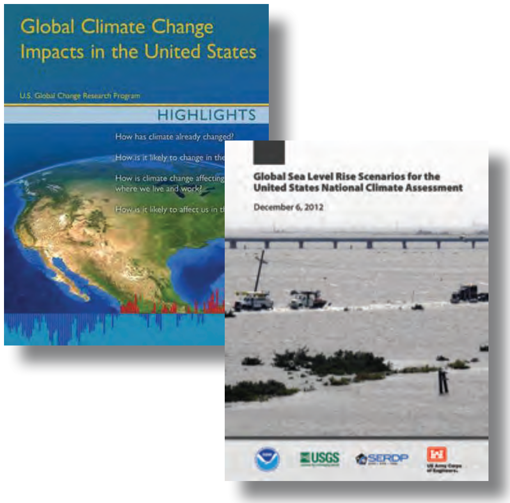
Experts participate in a workshop on March 8, 2013 to start the process of updating sea-level rise projections in Maryland.

Maryland Sea Grant

Recent Assessments

During 2012, two important assessments of projected sea-level rise were published: a report by the National Research Council (NRC) on sea-level rise along the California, Oregon, and Washington coasts[17] and the development of sea-level rise scenarios[18] used in the National Climate Assessment[19] that is scheduled to be released in 2013. The NRC assessment examined in detail the latest science concerning the processes contributing to sea-level rise, including thermal expansion of ocean volume; melting of glaciers, ice caps, and ice sheets; terrestrial water storage; and factors that would affect sea-level rise along the U.S. West Coast, including changes in ocean circulation and vertical land movement. From these, processed-based projections were made through the 21st century and contrasted with projections made using the revised (2009) semi-empirical approach.[11]

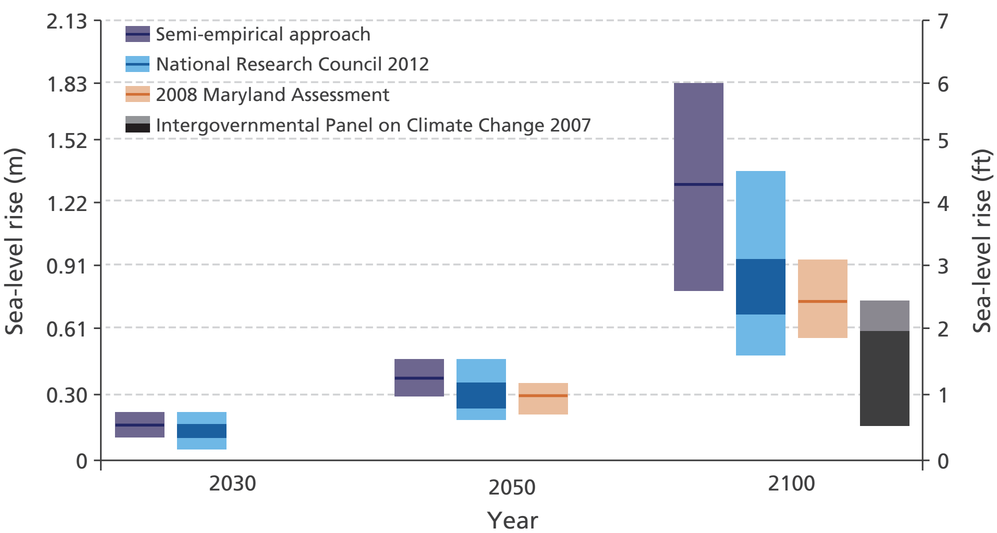
The figure below compares these projections with those that served as the basis for the 2008 Maryland Assessment. For the NRC projections, the dark portion of the bars represent the confidence limits of the mean and the full bars represent the 5 to 95% probabilities. Also depicted are the Intergovernmental Panel on Climate Change (IPCC) projections plus the scaled-up ice sheet component (lighter shade) that was mentioned earlier. As presented here, ranges of projections do not differentiate among the emissions scenarios on which they are based. The much higher range for projections based on the semi-empirical approach is caused, in part, by inclusion of a scenario with greater emissions[20] than the "higher emissions" scenario that has been used in the 2008 Maryland Assessment. Even so, the semi-empirical projections produce greater sea-level rise for a given emissions scenario than process-based models used by the NRC and IPCC.



Left: Global Climate Change Impacts in the United States published by the National Climate Assessment in 2009. The updated report is scheduled to be released in 2013.

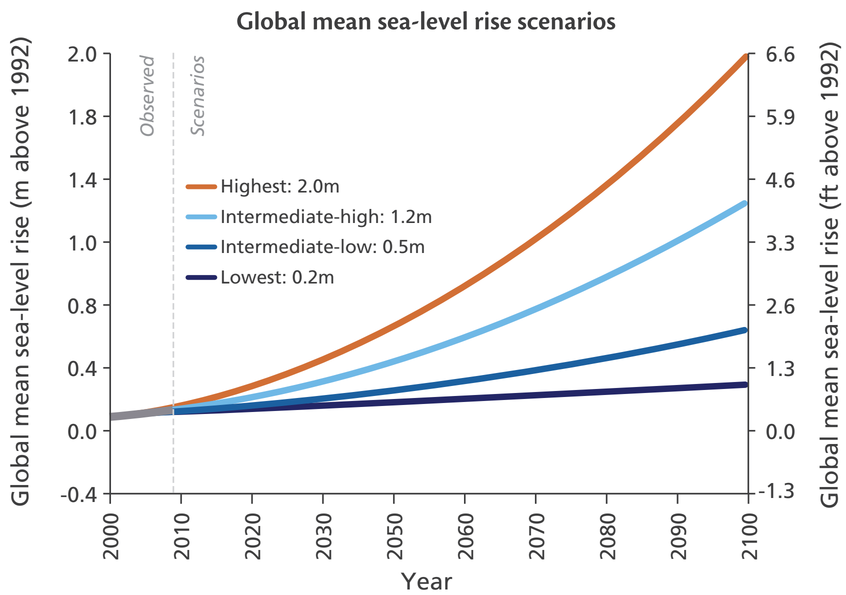
Right: Global Sea Level Rise Scenarios for the United States National Climate Assessment published by the National Research Council.

Comparison of global mean sea-level rise projections



Comparisons of global mean sea-level (GMSL) rise projections developed by the National Research Council[17] with those generated by the semi-empirical approach[11] as presented in the NRC report. The GMSL rise component projections used in the 2008 Maryland Assessment[4] are included for comparison as are projections for 2100 by the IPCC Fourth Assessment,[8] including the scaled-up ice-sheet component.

The expert panel that developed sea-level rise scenarios for the National Climate Assessment (NCA) used a different approach. After synthesizing prior assessments, the panel recommended four discrete scenarios for the purposes of risk assessment, building on the scenario approach in the U.S. Army Corps of Engineers guidance discussed above. The Corps used multiple scenarios to deal with key uncertainties for which no reliable or credible probabilities can be obtained. The NCA report[18] notes that how much weight decision makers would put on different parts of the distribution would depend on the time frame being considered, costs, consequences of disruption or damage, and the level of risk aversion. Thus, the highest scenario might be used for long-term projects where there is low tolerance of risk, and the lowest scenario might be used for decisions in which the tolerance of risk is high. The report also stresses that the need to take into account regional differences from the global mean, but does not specifically estimate them for the diverse coastlines of the United States.



Sea-level rise scenarios developed for the National Climate Assessment.[18]

The approach taken in this current assessment for Maryland follows the approach used in the recent National Research Council (NRC) report for the West Coast. This probabilistic approach is similar to that undertaken in Intergovernmental Panel on Climate Change (IPCC) assessments for projections of global temperature, sea-level rise, etc., and provides the relative advantage of understanding the likelihood of a specific sea-level rise trajectory. This allows some narrowing of possible and probable outcomes. In addition, specific regional factors such as vertical land movement (VLM) and ocean dynamics are incorporated to provide Maryland-specific projections.

Key Message

This reassessment narrows the probable range of relative sea-level rise based on the latest science, including regional vertical land movement and ocean dynamics.

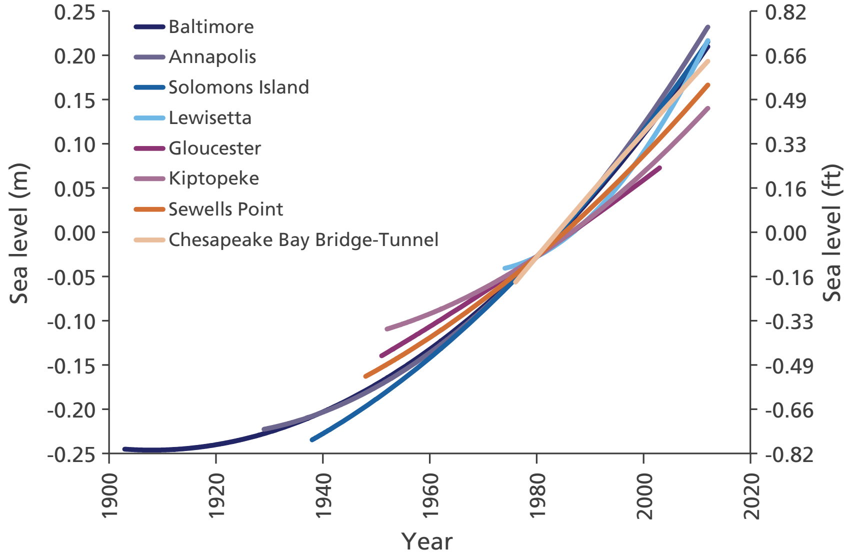
The first report on the Fifth Assessment of Intergovernmental Panel on Climate Change, dealing with the Physical Science Basis, is scheduled to be released in September 2013. These projections are based on a new set of greenhouse gas concentration scenarios called Representative Concentration Pathways (RCPs) that better reflect greenhouse gas emission reduction possibilities and climate change stabilization goals.[21] These RCP scenarios span the greenhouse-gas radiative forcing values found in the literature, ranging from RPC 2.6, with greenhouse-forcing peaking in 2020, to RCP 8.5, with greenhouse-gas forcing continuing to rise into the 22nd century.

Recent Sea-level Rise in Maryland and the Mid-Atlantic Region

Several papers published within the last year provide detailed analysis of sea-level rise trends as measured by tide gauges along the Mid-Atlantic coast. These papers consistently show that sea level has been rising faster in that region than elsewhere along the Atlantic coast.[22-24] The rate of sea-level rise began to increase in the late 1980s. Sea level along this coast is influenced by the flow of the Gulf Stream, rising as the flow declines.[25] The more rapid sea-level rise in the southern portion of the Mid-Atlantic Bight, including the Chesapeake Bay, has been attributed to the continuous weakening of the Gulf Stream since about 2004.[26]

While relative sea-level rise of 7-8 mm yr^{-1} has been measured at Maryland tide gauges between 2002 and 2011, this time period is too short to interpret this higher rate as a trend, much less attributed to one factor. The Climate Change and "Coast Smart" Construction Executive Order takes explicit note of these recent scientific results, stating: "In July 2012, the U.S. Geological Survey published research in the journal *Nature Climate Change* documenting that over the last 20 years, sea levels along the 1,000 kilometer stretch of coast running north from Cape Hatteras to north of Boston, which includes the State of Maryland, have risen at an annual rate three times to four times faster than the global average."

Trends in relative sea level at tide gauges around the Chesapeake Bay



Relative sea-level rise over the past century from analysis of tide gauge records from the Chesapeake Bay; sea level is relative to 1980.[23] The mathematical analysis applied removes oscillating modes to depict the underlying trends.

A tide gage at Bishop's Head, Maryland, in Dorchester County.

National Weather Service

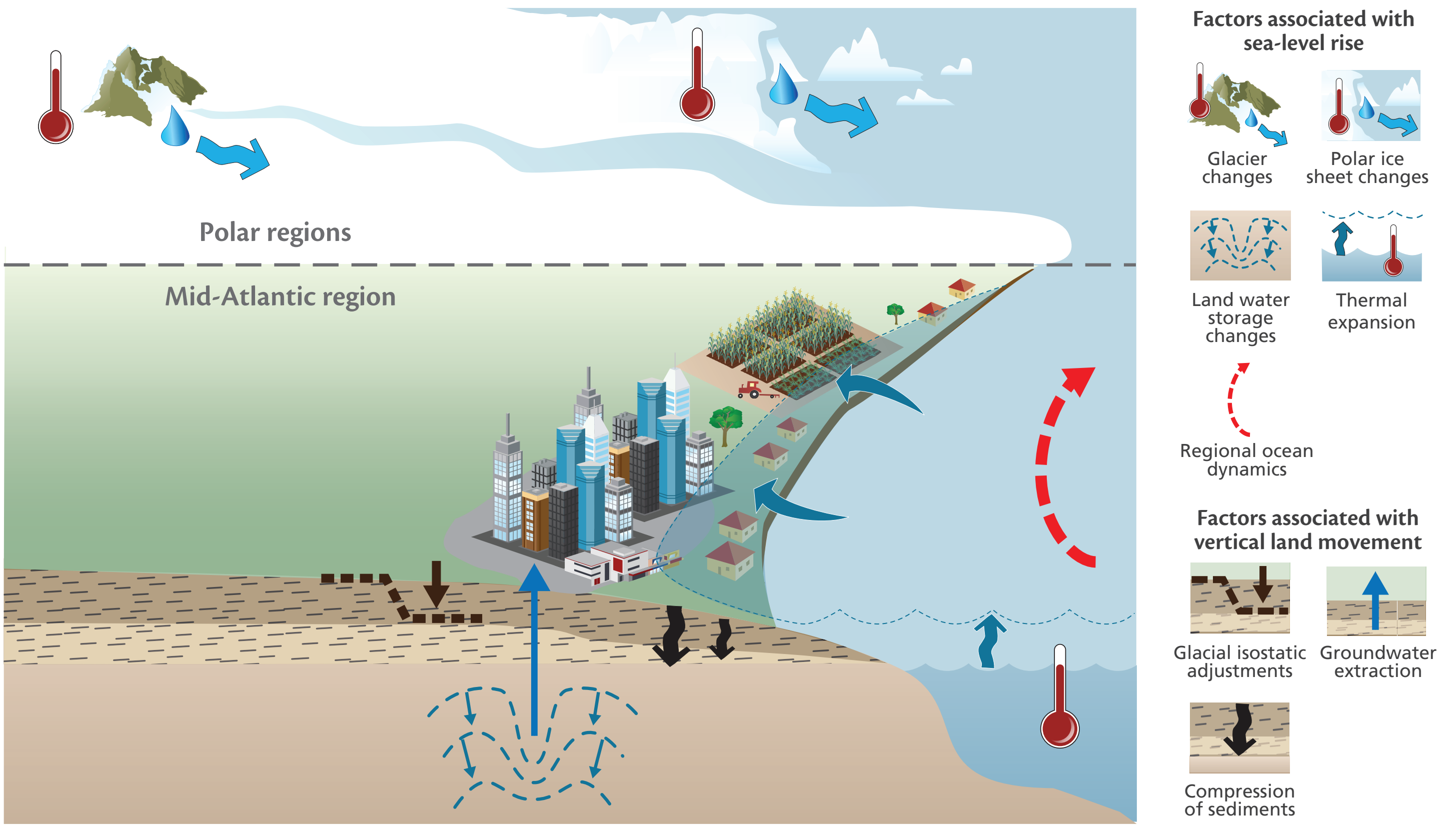
Projecting Future Sea-level Rise for Maryland

Factors That Will Determine Sea-level Rise in Maryland

Developing projections for relative sea-level rise along Maryland's coasts requires consideration of the many factors that will affect: (1) the rise in global mean sea level (GMSL); (2) regional differences in sea level with regard to the global mean; (3) vertical land movement (VLM); and (4) changes in tidal range and storm surges due to inundation.

Process-based projections of GMSL, such as those undertaken in the Intergovernmental Panel on Climate Change (IPCC), National Research Council (NRC) and National Climate Assessment (NCA) assessments, include the contributions of thermal expansion, melting glaciers, the net loss of ice from Greenland and Antarctic ice sheets, and land water storage. The effects on GMSL of longer-term geological processes such as ocean ridge spreading, tectonic plate movement, and depression of continental margins by the weight of sediment and sea water are thought to be negligible over this century. Beyond the dynamics of glaciers, the amount of water stored on the continents is being affected by human activities through depletion of ground water and storage of water in artificial reservoirs. While the addition of water storage behind dams was significant during the 20th century, groundwater depletion is expected to exceed expanded surface-water storage during the present century, thus change in land-water storage is expected to make a small, positive contribution to sea-level rise.

The surface of the world's oceans is not, in fact, level, but varies regionally due to spatial variations in temperature, gravity, and the dynamic motions of ocean currents, among other effects. As the world warms and more water is added to the oceans the rise in sea level will also not be uniform. For example, since 1993, when satellite altimeter measurements have been able to repeatedly measure the sea-surface height over the world's oceans, the rate of sea level has increased by as much as 10 mm yr^{-1} in parts of the western Pacific Ocean while actually declining in parts of the eastern Pacific. Melting of polar ice sheets will reduce the polar land mass and thus the gravitational attraction of ocean water, counter-intuitively resulting in sea-level decline in nearby polar regions and sea-level increase in tropical regions. The effects of these dynamic ocean processes on sea levels along the U.S. northeast coast are considered in a subsequent section.



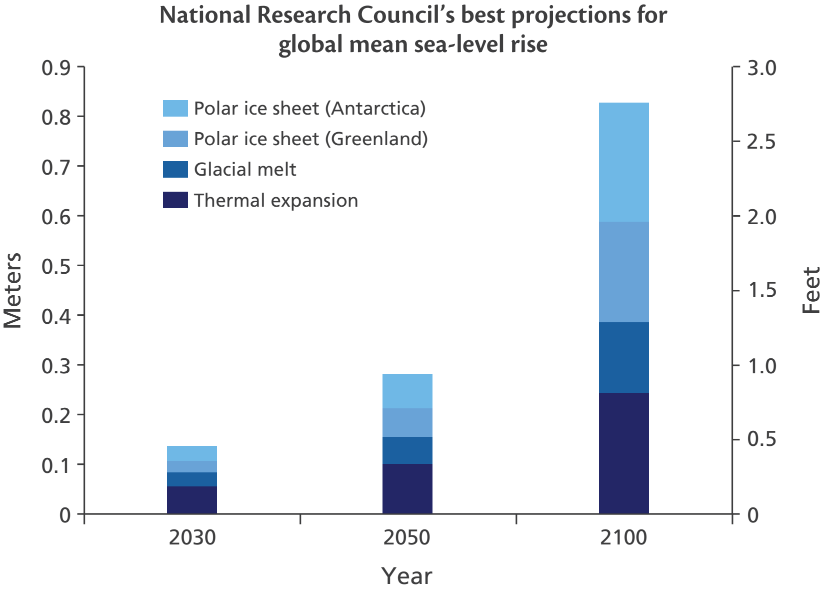
Water levels along Maryland's coasts are actually observed with respect to the land elevation, which in turn is affected by vertical land movement (VLM). VLM is influenced by several subsurface geological processes. In coastal Maryland, the most important of these processes is glacial isostatic adjustment (GIA). The melting of glaciers that existed during the last ice age that ended about 12,000 years ago resulted in a readjustment of Earth's crust. The crust is rising up where it was depressed by this massive load and adjusting downward where a forebulge was created south of where the great glaciers stood, including Maryland. As the melting proceeded, the inundation of the present continental shelf caused further flexing of the crust. GIA is still going on, thousands of years after the disappearance of the glaciers. In addition, VLM may result from compression of unconsolidated sediment lying atop the crust or as a result of extraction of ground water, causing slumping of overlying formations. These effects can be more geographically limited than GIA and may account for differences in VLM within coastal Maryland. The compression processes are often referred to as subsidence, but subsidence is sometimes also used to describe the net effect, including GIA. To avoid confusion, VLM is used here to describe the aggregate effects. More detailed consideration of the rates of GIA and VLM is given in a subsequent section, as is consideration of changing tidal ranges and storm surges on coastal inundation.

As land subsidence occurs in Maryland, more areas in the state are at risk of flooding due to sea-level rise. Photo from Guy W. Willey Sr.

Global Mean Sea Level

The most recent and thorough assessment of the likely rise in global mean sea level (GMSL) that developed process-based projections was that of the National Research Council (NRC).[17] It was developed by prominent U.S. experts and reviewed by the rigorous NRC process for a similar purpose, advising adaptation planning along the states of California, Oregon, and Washington. Future sea-level projections will always produce differences as new data are produced and methods are refined. However, until the release of the Intergovernmental Panel on Climate Change (IPCC) Fifth Assessment, the NRC projections provide the best scientific consensus projections of GMSL rise for use in adaptation planning.

The NRC projections for GMSL rise demonstrate that, while thermal expansion of the ocean volume is expected to make up the largest component throughout the century, as time goes on, the proportional contribution by the loss of mass of the Greenland and Antarctic ice sheets is expected to increase. Furthermore, the probability distributions for the polar ice sheet contributions are very broad. This is a major factor in extending the high end of the range of projections. Put another way: whether GMSL rises faster than the best projection of 0.83 m (2.72 ft) by 2100 depends largely on the rate of loss in the mass of the polar ice sheets.



Contributions to the component sources of global mean sea-level rise for the National Research Council's best estimates.[17]

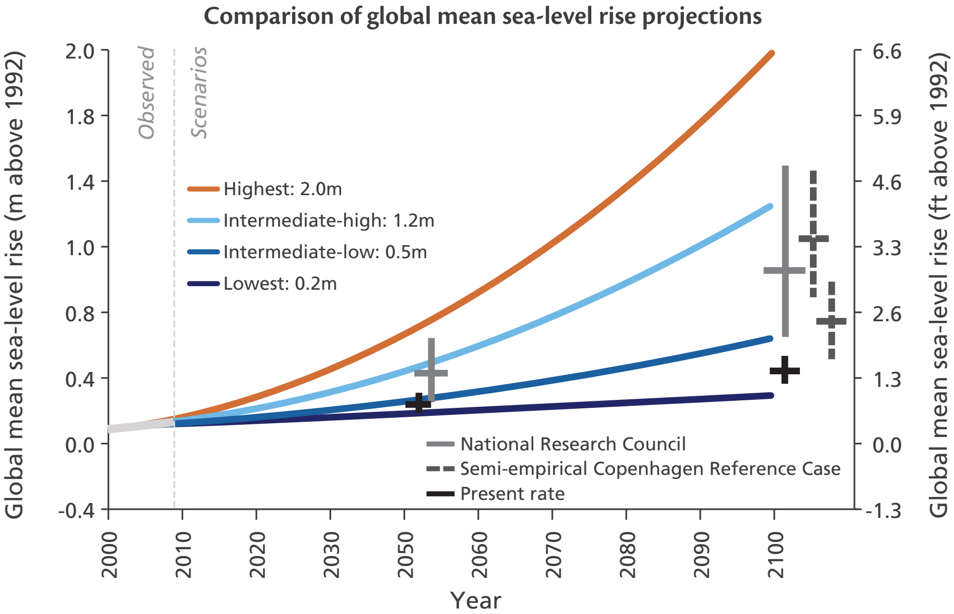
Comparison of global mean sea-level rise projections

	2050		2100	
	Projection or central estimate (m)	Uncertainty range (m)	Projection or central estimate (m)	Uncertainty range (m)
National Research Council 2012[14]	0.28	0.18–0.48	0.83	0.50–1.40
Semi-empirical approach				
A1FI scenario (highest emissions)[11]	0.40	0.36–0.48	1.42	1.11–1.74
A2 scenario (higher emissions)[11]	0.38	0.34–0.46	1.24	0.97–1.50
B1 scenario (lower emissions)[11]	0.36	0.31–0.44	1.03	0.80–1.27
Zero 2016 scenario[25] (human emissions cease in 2016)	0.28	0.23–0.38	0.59	0.40–0.80
RCP 4.5 scenario[25] (used in the IPCC Fifth Assessment)	0.32	0.24–0.40	0.90	0.64–1.21
CPH reference scenario[25]	0.32	0.24–0.40	1.02	0.72–1.39
National Climate Assessment scenarios[15]				
Highest	0.63		2.00	
Intermediate-High	0.40		1.20	
Intermediate-Low	0.22		0.50	
Lowest	0.10		0.20	

Projections based on the semi-empirical approach assume that sea-level change in the future will have the same relationship to the radiative forcing of greenhouse gases and global air temperature change as it has in the past. The projections are sensitive to different data sets for temperature and sea level as well as different statistical techniques.[27] Largely because of these limitations, semi-empirical projections have not attracted a consensus of acceptance by sea-level rise experts. Still, they are useful to compare with projections derived from process-based models to bound likely outcomes and to compare the consequences of different emissions scenarios.

The Antarctic ice sheet might have lost enough mass to cause the worlds' oceans to rise about .05 inches, on average, between 2002 and 2005. Photo from NASA.

Comparing the National Research Council (NRC) projections for global mean sea level (GMSL) rise by the end of the century with the scenarios used in the National Climate Assessment shows that the NRC projections encompass the Intermediate-Low to Intermediate-High scenarios, or 0.5 to 1.2 m (metric measurements will be used throughout this analysis and converted to feet at the end). Projection of the rate of "present" GMSL rise measured by satellite altimeters since 1993 (3.2 mm yr^{-1}), with no acceleration due to global warming, yields a rise greater than the Lowest scenario. Projections from the semi-empirical approach assuming that greenhouse gas emissions fall abruptly to zero after the year 2016 likely exceed the Intermediate-Low level of 0.5 m.[28] The NRC projections also suggest that GMSL rise will very likely exceed the Intermediate-Low level. Consequently, there is little justification based on current scientific understanding for anticipating anything less than a 0.5 m rise in GMSL by the end of the century.



Comparison of the National Research Council's projections of global mean sea-level (GMSL) rise for 2050 and 2100[17] with the scenarios used in the National Climate Assessment.[18] Also compared are sea-level rise projections based on extrapolation of present rates (based on satellite measurements since 1993) and based on the semi-empirical approach for two emissions scenarios: Copenhagen Reference Case without emissions reductions imposed (higher range) and a case where human greenhouse gas emissions ceased in 2016 (lower range).[28]

There is only a very small probability that global mean sea level (GMSL) rise will be more than 1.4 m by the end of the century according to the National Research Council (NRC) projections; this level is comparable to the upper-most range for semi-empirical projections in the Copenhagen reference case for greenhouse gas emissions. Therefore, this might be practically considered the upper limit that would occur this century.

The two semi-empirical projections included in the figure above were among several undertaken in order to explore the continued sea-level rise beyond the end of this century that is implied under mitigation efforts taken to avoid a 2°C increase in global mean temperature. It is important to note that sea level continues to rise through 2300 under all scenarios, but with widening differences depending on when emissions are reduced during the 21st century.[29] Furthermore, this continued sea-level rise is practically irreversible through emissions reductions made later.

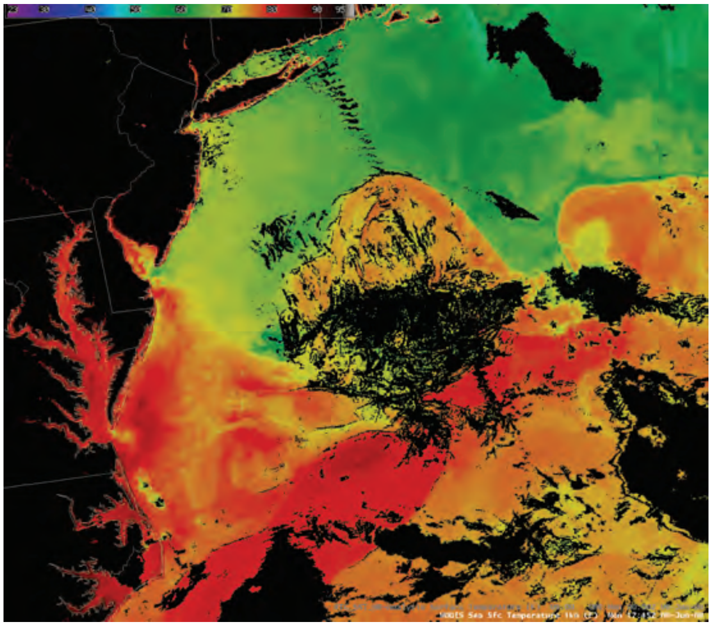
Several observations can be made based on these comparisons. First, both the lowest and highest scenarios used in the National Climate Assessment appear to be highly unlikely based on current understanding, with most projections falling within the Intermediate-Low and Intermediate-High scenarios. A reasonable conclusion might be that GMSL rise of less than 0.50 m by the end of this century is very unlikely and that a rise of more than 1 m, while certainly possible, is not likely. Second, projections of sea-level rise by 2050 are more tightly constrained between 0.20 and 0.40 m, with, as one would expect, emissions scenarios making relatively little difference. Third, differences in 21st century emissions trajectories begin to have significant consequences for the rate of sea-level rise toward the end of this century and result in even greater differences during the next. In other words, steps taken over the next 30 years to control greenhouse gas emissions and stabilize global temperatures during this century will largely determine how great the sea-level rise challenge is for coastal residents in subsequent centuries. There is not much they could do then to slow sea-level rise because of the inertia of ocean warming and polar ice sheet loss.

Key Message

There is no justification based on current scientific understanding for anticipating anything less than a 0.5 m rise in global mean sea level by the end of the century.

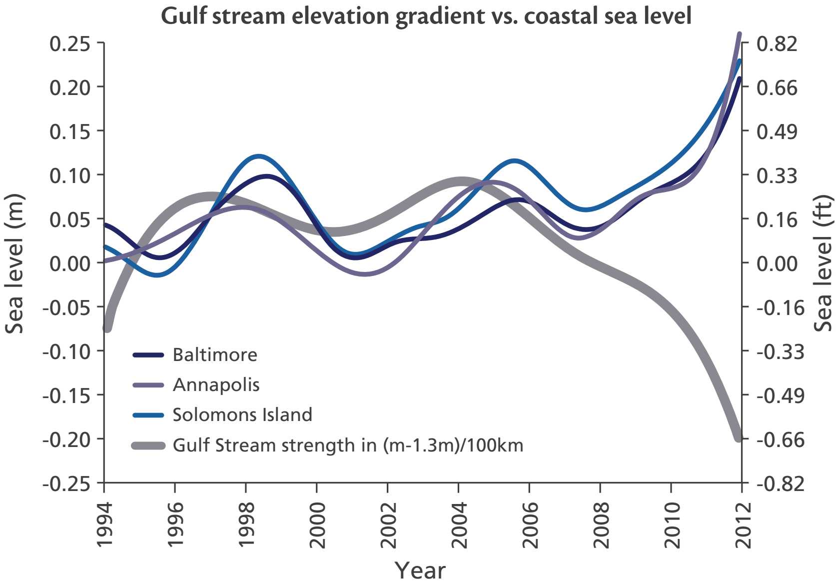
Regional Ocean Dynamics

Recent research suggests higher rates of sea-level rise along the Mid-Atlantic coast during the past decade or two[21-23] and links this trend with the decline in strength of the Gulf Stream.[26] Sea-level projections for Maryland should take such regional ocean dynamics into consideration. As the Gulf Stream flows from the coast at Cape Hatteras and turns north-eastward, the Coriolis force, resulting from the rotation of the earth, acts to force water offshore. To balance this effect, ocean water is drawn off the shelf in the Middle Atlantic Bight and the sea surface along the coast is typically about one meter lower than in the open ocean on the far side of the Gulf Stream. If the flow of this massive current declines, the height gradient is diminished, with the sea surface falling in the open ocean, but rising along the coast. As the figure below shows, sea level at Chesapeake Bay tidal gauges varied over several years in relation to variations in Gulf Stream flow. Beginning around 2004, however, the flow of the Gulf Stream went into steady decline and, by 2007, sea level at the tide gauges in the Middle Atlantic Bight was showing a steady increase. It is important to keep in mind, however, that this analysis has just recently been published and understanding is likely to evolve as more scientists investigate the phenomenon.



The trajectory of the Gulf Stream is apparent in the warmer temperatures (red) to the northeast off of Cape Hatteras. The force of the Gulf Stream flow affects sea level in the Chesapeake Bay (MODIS-NASA).

Factoring in changes in ocean dynamics into sea-level rise projections for the rest of the 21st century is not a straightforward matter. It is uncertain whether the recently observed trend will continue. Other ocean dynamic processes may also play a role. For the purpose of these projections of relative sea-level rise for Maryland, model projections of the ocean dynamic contribution to sea-level rise for Washington, DC are used: best projection of 0.17 m by 2100, with a low of 0.13 m and high of 0.19 m.[25]

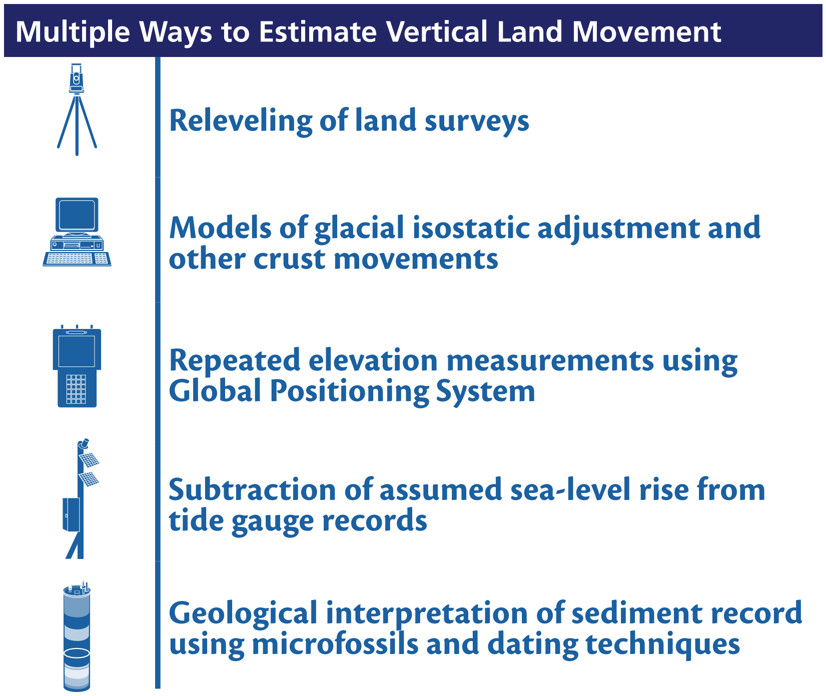


At Maryland tide gauge stations (colored lines) low frequency modes of relative sea level, including decadal oscillations and sea-level rise, closely mirror changes in the Gulf Stream strength derived from satellite altimeter data (gray line).[26]

Vertical Land Movement

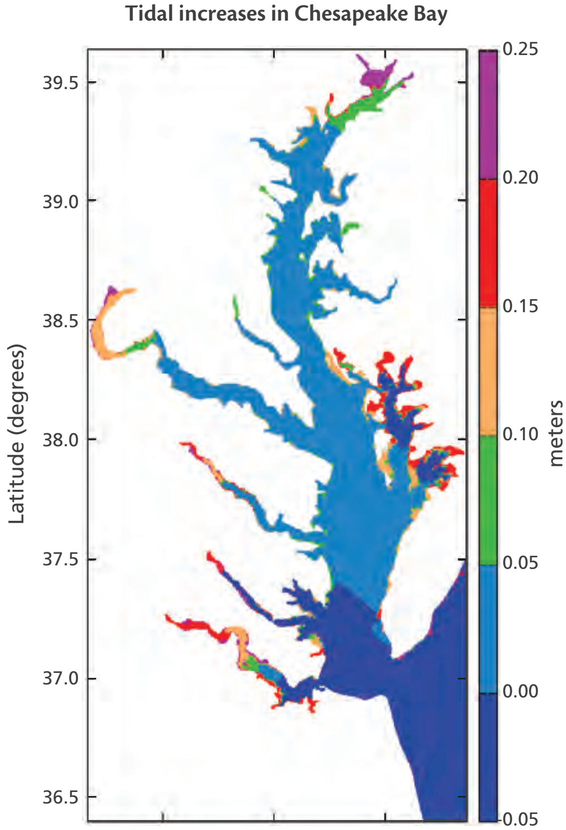
Determination of the rate of vertical land movement (VLM) is not a simple matter, but has been estimated using several techniques. A rate of VLM of -1.7 mm yr^{-1} was assumed for coastal Maryland in the 2008 Maryland Assessment. This was based on published interpretations of tide gauge data and re-leveling surveys that suggested VLM of -1.7 to -2.4 mm yr^{-1} for coastal Maryland.[30] More recently, VLM rates estimated for Maryland tide gauge stations located within the Chesapeake Bay ranged from -1.3 at Baltimore to -1.9 mm yr^{-1} at Cambridge[31, 32], where subsidence due to groundwater withdrawals may have played a role. A higher rate of -2.73 mm yr^{-1} was estimated for Ocean City, on the Atlantic coast of Maryland, but this is based on a much shorter gauge record, beginning only in 1975.

Estimates of VLM determined from tide gauge measurements are derived by difference from estimates of sea-level rise that are complicated and uncertain. VLM can also be estimated from geological sea-level indicators, such as microfossils in salt-marsh deposits and isotope dating; through repeated measurements of elevation by a geographic positioning system (GPS); or computer models of glacial isostatic adjustment (GIA). However, these estimates may not agree, in part because of the different time periods for which they can be applied.[33] Models of GIA, corrected for associated changes in sea surface height resulting with changes in gravity as the crust adjusts, can indicate what the expected effect on tide gauge measurements should be.[34] Estimates from one model are available for tide gauge sites around the world and indicate the net GIA effect on relative sea level to range from 0.76 to 1.02 mm yr^{-1} for Maryland tide gauge sites.[35] Finally, using geological methods, VLM over the last 4,000 years was estimated to have been -1.3 mm yr^{-1} for a site within the inner Chesapeake Bay.[36] For the purpose of this projection of relative sea-level rise in Maryland, a best-estimate VLM adjustment of 1.5 mm yr^{-1} continuing throughout the 21st century was used, with 1.3 mm yr^{-1} as a low estimate and 1.7 mm yr^{-1} as a high estimate. It should be kept in mind, however, that VLM may be greater locally due to sediment compaction and groundwater withdrawal effects.



Changes in Tides and Storm Surges

In terms of human infrastructure, it is not only mean sea level that is of concern, but the height of tides and storm surges. Tidal range in a semi-enclosed bay or estuary is influenced by the depth of the water body. It can be reduced farther away from its connection with the sea due to frictional resistance, or it can be magnified if the morphology of water body creates resonance at the same frequency of tidal oscillation, for example in the Bay of Fundy. If sea level rises substantially this will increase the volume of the estuary and thus reduce frictional resistance along the bottom and change its resonance properties. Increasing tidal range over time has, in fact, been observed at a number of East Coast tide gauges.[37]



A one-meter rise in sea level will shift the resonance response of the Chesapeake Bay toward 24 hours, thus increasing tidal range in the upper Bay.[38]

The tidal range in the Chesapeake Bay is greatest at the mouth and decreases up the Bay due to friction along the bottom acting to slow tidal currents as the tide progresses from the mouth to the head of the estuary. A one-meter rise in sea level will allow more efficient propagation of the tidal wave in the bay and shift the resonant period closer to the tidal frequency. As it does, it could increase the tidal amplitude resulting in an approximate 0.05 m (0.16 ft) increase in tidal range over much of the Maryland portion of the bay, but a much greater increase of up to 0.2 m (0.66 ft) in the upper bay and the heads of some of its tidal rivers.[38]

Modern record storm surges of more than 2 m (7 ft) were experienced in portions of the Chesapeake Bay during Hurricane Isabel in 2003; storm surge levels were highest in the uppermost Bay and tidal Potomac River near Washington, DC.[39] While the frequency of tropical storms is not projected to increase as a result of global warming during the 21st century, highly intense storms are projected to become more common.[40] Moreover, because of warming of sea surface temperatures, tropical storms should maintain more of their intensity as they progress to the higher latitudes along the Mid-Atlantic coast.

Leaving aside assessment of the consequences of changing tropical storm intensity that are beyond the scope of this assessment, the height of storm surges experienced in the Chesapeake Bay would increase for any given storm strictly as a function of the deepening of the bay due to sea-level rise. If mean relative sea level, and thus the average depth of the bay, would increase by one meter, storm surge heights would be expected to increase even more. The amount of increase has not yet been modeled for the Chesapeake Bay and deserves further study, however one study indicated that storm surges could increase 20-50% more than the relative sea-level rise for wetland-fronted, shallow bays in coastal Louisiana.[41] Furthermore, as tidal range would be expected to increase in the upper reaches of the bay and its tributaries, high water events driven by southern winds or storm surges coinciding with astronomic high tides would be further exaggerated.

Putting It All Together

Using the National Research Council's (NRC) projections of global mean sea-level rise as a starting point, projections of relative sea-level rise in Maryland are made here through adjustment for the "fingerprint" effects of the land-ice contributions, as well as inclusion of the dynamic ocean contributions and the effects of vertical land movement.[42] Fingerprint adjustments for reductions in land ice are appropriate because the effects of loss of ice mass in Greenland on sea levels along the U.S. East Coast are not the same as the loss of an equivalent mass in Antarctica.[34] Sea level will increase less close to the ice mass because the gravitational attraction of ocean water is diminished and will increase more farther away from the site of the declining mass. Fingerprint adjustments were used by the NRC in estimating the effects on relative sea level along the U.S. West Coast. Similarly, land-ice change scale factors appropriate to Maryland's location were applied to the contributions of glaciers (0.9), Greenland (0.5)[43], and Antarctica (1.25)[44] to the relative components of global mean sea level (GMSL) rise projected by the NRC.

The adjusted contributions can thus be summed for thermal expansion, land-ice loss, dynamic ocean effects, and vertical land movement (VLM). These are presented as Best, Low, and High projections of relative sea-level rise for Maryland for 2050 and 2100. As points of reference, our Low projection for 2100 is approximately equal to the National Climate Assessment's (NCA) Intermediate-Low Scenario after adjustment for VLM; our Best projection is about 0.3 m (1 ft) lower than the NCA Intermediate-High Scenario; and our High Scenario is nearly 0.45 m (1.5 ft) lower than the NCA Highest Scenario. With regard to the Army Corps of Engineers planning scenarios, our Best projection is slightly lower than Scenario II and our High projection is equivalent to Scenario III after adjustment for VLM. Neither the NCA's Lowest Scenario or the Corps' Scenario I appear to be realistic considerations based on the recent NRC projections.

Global Mean Sea-level Rise (National Research Council 2012)	Thermal (m)	Glaciers (m)	Greenland (m)	Antarctica (m)	GMSL Rise	
					meters	feet
2050 best	0.10	0.06	0.06	0.07	0.3	0.9
2050 low	0.04	0.05	0.04	0.03	0.2	0.6
2050 high	0.19	0.07	0.10	0.13	0.5	1.6
2100 best	0.24	0.14	0.20	0.24	0.8	2.7
2100 low	0.10	0.13	0.15	0.08	0.5	1.7
2100 high	0.46	0.19	0.34	0.48	1.4	4.6

Maryland Relative Sea-level Rise	Thermal (m)	Glaciers (m)	Greenland (m)	Antarctica (m)	Dynamic (m)	VLM (m)	Relative SLR	
							meters	feet
2050 best	0.10	0.05	0.03	0.09	0.09	0.075	0.4	1.4
2050 low	0.04	0.05	0.02	0.04	0.07	0.065	0.3	0.9
2050 high	0.19	0.06	0.05	0.16	0.10	0.085	0.7	2.1
2100 best	0.24	0.13	0.10	0.30	0.17	0.15	1.1	3.7
2100 low	0.10	0.12	0.08	0.10	0.13	0.13	0.7	2.1
2100 high	0.46	0.17	0.17	0.58	0.19	0.17	1.7	5.7
Land ice change fingerprint scale factors		0.9	0.5	1.25				

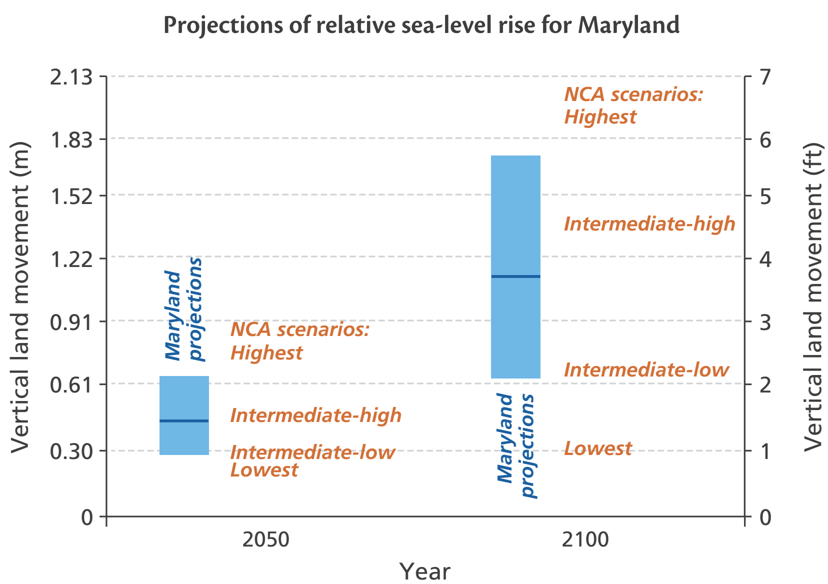
Practical Advice for Adaptive Planning

The challenge in responding to Governor O'Malley's directive is to provide sound and actionable advice based on current scientific understanding. This must be done mindful of, but despite, the uncertainties. Based on the synthesis provided here, the following recommendations are provided:

1. It is prudent to plan for relative sea-level rise of 2.1 feet by 2050 in order to accommodate the high end of the National Research Council (NRC) projections as adjusted for regional factors particular to Maryland. Based on the various methodologies available today, it is very unlikely to rise more than that within that timeframe. This would essentially constitute an increase in mean sea level, on top of which storm surge would have to be factored in, to judge the risks to land-based facilities.

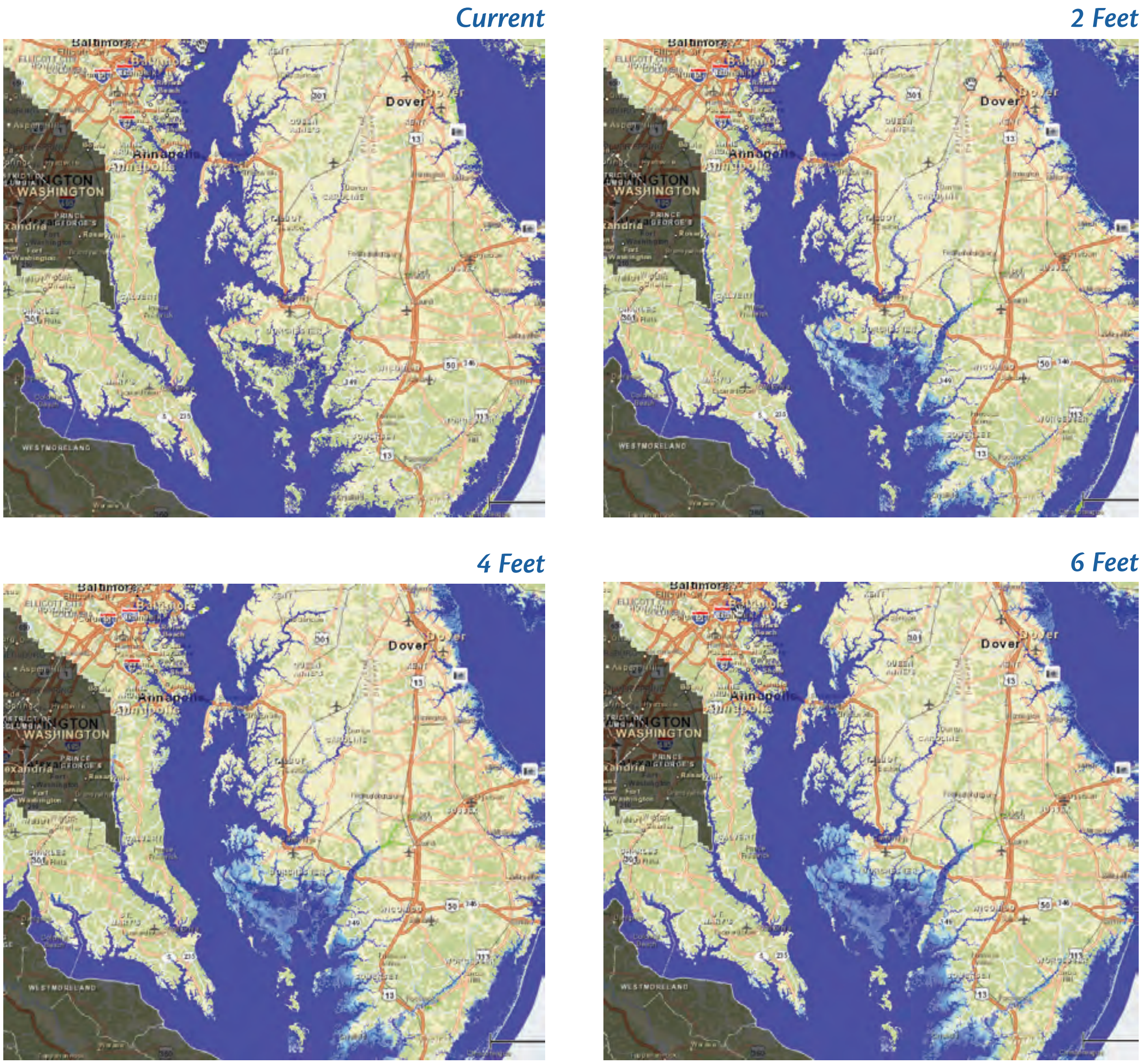
2. Providing planning advice for the end of the century is more challenging, both because the actual greenhouse gas emissions trajectory is unknown and because of greater uncertainties in the models of sea-level response, particularly regarding the rate of loss of the mass of polar ice sheets. How one should use the guidance provided by our projections depends both on the longevity of investments at risk and the acceptance of risk. For example, if one were concerned about an investment in facilities or public infrastructure the useful life of which is not intended to extend beyond this century or which could tolerate very occasional inundation, one might find it acceptable to use our Best projection of sea-level rise of 3.7 feet for adaptation planning. [Note that the projection derived by the 2008 Maryland Assessment for the higher emissions scenario was 3.4 feet.] If, on the other hand, one is concerned about facilities and infrastructure intended to be useful well into the next century or for which any risk of inundation is unacceptable, it might be prudent to use our High projection of relative sea-level rise of 5.7 feet. Such considerations are beyond the scope of this report. Furthermore, planners and engineers should also take into consideration anticipated changes in storm surge heights and tidal flood levels as a result of future sea-level rise, a subject deserving further research.

3. The projections presented here are improvements on those used in the 2008 Maryland Assessment because they are based on the recent process-based projections by the National Research Council and include a range of possibilities that reflect uncertainties about greenhouse gas emissions and the responses of climate and land ice. In contrast with the scenario-based approaches used in the U.S. Army Corps of Engineers guidance, the National Climate Assessment, and adaptation planning in the neighboring states of Delaware[45] and Virginia,[46] these new projections also narrow the range of possibilities and define probabilities based on current scientific evidence. Because our scientific understanding will continue to improve and the trajectories of greenhouse gas emissions will become clearer over time, periodic updating of these sea-level rise projections should be undertaken. Certainly, the new sea-level rise projections in the forthcoming Intergovernmental Panel on Climate Change (IPCC) should be considered.



Newly developed projections of relative sea-level rise for Maryland compared with the National Climate Assessment scenarios,[18] adjusted in the same manner for Vertical Land Movement. Ranges for the Maryland projections span High to Low projections, with the Best projection indicated by thick lines.

4. Maryland's Climate Action Plan addresses both actions taken to limit the magnitude of climate change (commonly referred to as mitigation) and those taken to adapt to climate change. This is appropriate as they are two sides of the same coin: adaptation is required even if aggressive mitigation is undertaken, but without mitigation adaptation becomes increasingly daunting.[47] This is particularly evident with regard to sea-level rise, which will continue to occur through this century and into the next as a result of the global warming that has already occurred. Furthermore, global warming will be substantially greater in subsequent centuries, unless greenhouse gas emissions are substantially reduced during this one.



Sea-level rise map showing land inundation under current conditions (top left), under 2 feet of sea-level rise (top right), under 4 feet of sea-level rise (bottom left), and under 6 feet of sea-level rise (bottom right). Maps are derived from high resolution LIDAR imaging and are taken from NOAA Sea Level Rise and Coastal Flooding Impacts Viewer (http://www.csc.noaa.gov/digitalcoast/tools/slrviewer).

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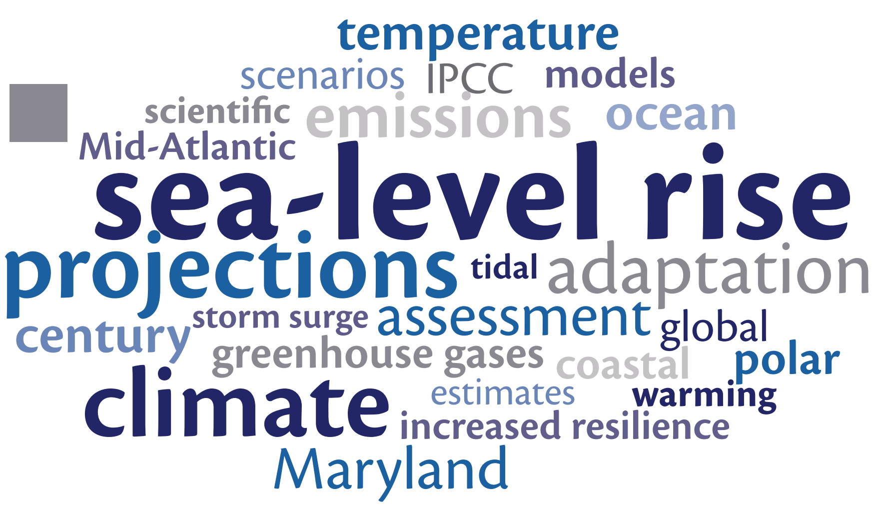
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Maryland

Exhibit C

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5th Floor, 209–215 Blackfriars Road, London SE1 8NL, United Kingdom
Telephone: +44 (0)20 7633 2388   Facsimile: +44 (0)20 7633 2389
E-mail: info@ipieca.org Internet: www.ipieca.org

Addressing adaptation in the oil and gas industry

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Contents

Executive summary

As responses to climate change impacts extend beyond greenhouse gas (GHG) emissions mitigation, governments and companies increasingly recognize the need to integrate adaptation planning and implementation into balanced risk management strategies. This report examines oil and gas industry awareness of climate change-related risks, and identifies appropriate responses and ways in which these responses are being integrated into broad risk management frameworks.

Summary of key observations

1. Risk management is integral to business decision-making frameworks in the oil and gas industry.
2. Adaptation in climate risk management involves:
   - identification and evaluation of risks;
   - development of risk mitigation and management strategies; and
   - implementation of strategies.
3. Oil and gas companies continue to adapt to climate risks.
4. The oil and gas industry assesses a range of current and future climate change-related risks to its operations, infrastructure and value chains. These include risks such as climate variability, floods, sea level rise, extreme events, species migration shifts, permafrost thawing and water availability.
5. As many impacts are local and projects unique, local adaptation assessments enable the identification of appropriate design and operational action.
6. Projections indicate that changes to climate and climate variability over the next 30–40 years will be similar regardless of mitigation scenarios. Over this timeframe, adaptation to climate change will likely take place in addition to, or regardless of, any mitigation efforts.
7 There is uncertainty over climate variability and significant divergence in projections beyond 2040–50. Flexible and robust design coupled with adaptive management practices will be critical for managing climate risks and adapting to a range of impacts.
8. Adaptation measures are being implemented by private actors; the private sector is best placed to adapt its own infrastructure and operations to manage climate risks.
9. Lessons learned, and long shared within companies, are now being reported externally via stakeholder disclosure processes. Sharing with other industries, governments and society can broaden recognition and understanding of climate change risks, and can highlight adaptation options which may be easer to implement.
10. Governments have an important role to play in developing and protecting critical infrastructure and land use, promoting research to enhance climate science understanding and engineering solutions, and strengthening observation networks for weather and climate variations.

Structured to provide an overview of the adaptation planning process, the report includes: examples of climate risks identified by the oil and gas industry; an outline of risk-evaluation processes related to specific potential impacts; and in-use examples of risk adaptation and management.

To help inform risk management processes across the industry, IPIECA organized a workshop that brought together experts from academia, the insurance industry, a GHG emissions disclosure organization, engineering consultants, government research organizations, and the oil and gas sector. Participants discussed the role of adaptation in climate risk management for society, ecosystems, and the oil and gas industry. This report builds on the workshop's findings.

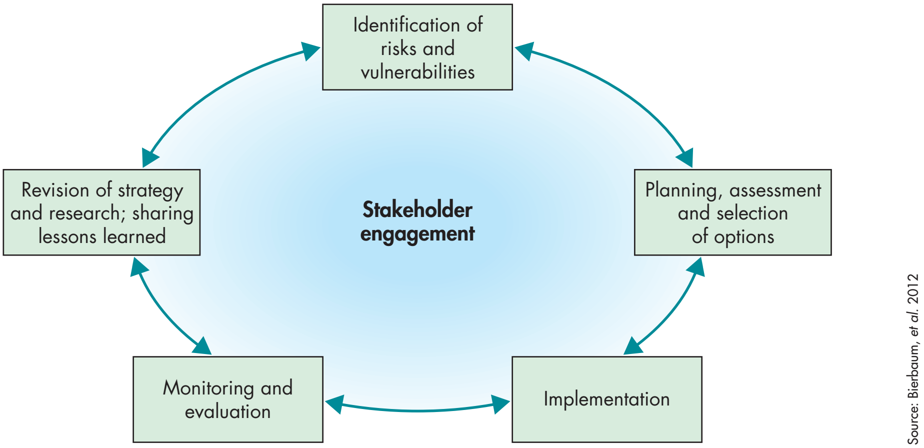
The workshop and this publication are part of IPIECA's long-term initiative to promote both climate change understanding and engagement in developing solutions for mitigating risks to society and to the oil and gas industry. The workshop presentations—and all other IPIECA publications on climate change—can be downloaded from the IPIECA website at www.ipieca.org.

Introduction

While a significant amount of attention surrounding climate change has been focused on mitigation strategies, a growing perspective has re-emerged on the necessary role of adaptation for climate risk management, in the context of society, infrastructure and ecosystems. Understanding climate change risks and opportunities, and ways to incorporate them into broader risk management systems, is an integral part of the oil and gas industry's framework for business decisions.

Developing an adaptation plan as part of a climate risk management strategy requires first identifying and evaluating the projections of potential impacts, the uncertainty involved, and how these projections modify current operating environments (see Figure 1). At the company level, a multidisciplinary team of stakeholders must be engaged in understanding vulnerabilities, evaluating risk, and providing feedback on the applicability of the proposed implementation plans. Whilst uncertainty surrounding projections from climate science will likely remain for the foreseeable future, investment decisions will need to be made by industry in the interim. With appropriate information, the oil and gas industry can conduct an assessment to evaluate where climate risks expose vulnerabilities in business operations and assets. Understanding these vulnerabilities leads to the development and implementation of adaptation strategies aimed at managing the risks. Subsequent efforts to monitor and evaluate risks, as well as apply adaptive management responses, allow for the continual management and mitigation of risk. In practice, there may be iteration between these steps as learning increases about the risks and the effectiveness of the plans and actions.

Figure 1 *Generalized adaptation process*



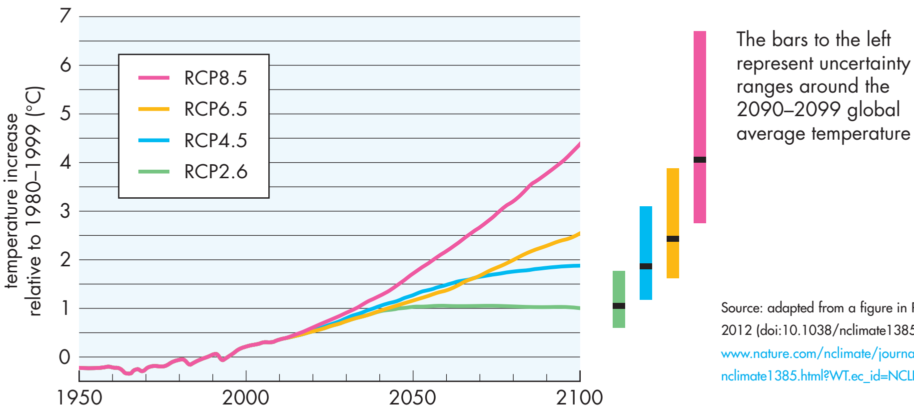
Risk identification

Climate change poses risks to society, infrastructure and ecosystems that vary across regions and arise from a diverse set of climate factors. Despite uncertainty in climate variability and diversity of future projections, indications are that additional changes to climate and its variability over the next three to four decades are inevitable regardless of mitigation scenarios (see Figure 2). Over this timeframe, adaptation to changing climates is likely to take place anyway irrespective of, or in addition to, any mitigation efforts. Identifying the risks of climate change to industry operations and assets provides an opportunity to develop business plans aimed at minimizing disruptions.

While temperature variations are the primary concern associated with climate change, the impacts associated with these changes, which include water scarcity, flooding, extreme weather and temperature events, sea level rise and food security, will likely be some of the most important effects for the oil and gas industry and society at large. The uncertainty in

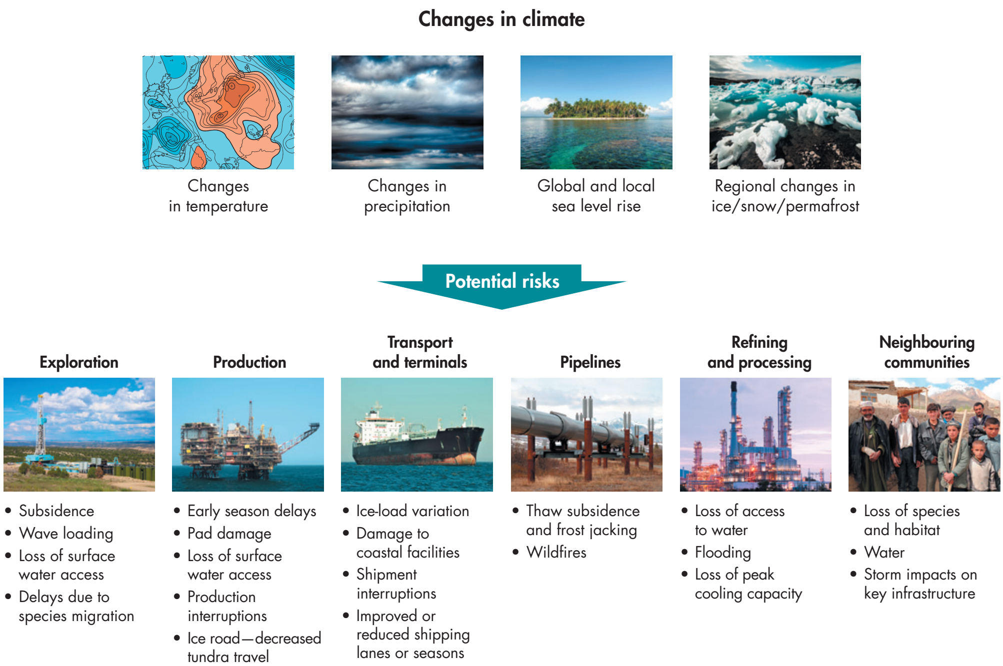
projecting future climate change, including changes in temperature and weather extremes, remains substantial, particularly for work that seeks to inform adaptation options on a local scale. Identification of climate risks therefore requires utilizing the range of projected outcomes, which may or may not have a common directionality to it (and which will vary by region of interest), to formulate a management plan.

Figure 2 *Historical and projected global surface temperatures for a range of future emissions scenarios*



Source: adapted from a figure in Rogelj *et al.*, 2012 (doi:10.1038/nclimate1385): www.nature.com/nclimate/journal/v2/n4/full/nclimate1385.html?WT.ec_id=NCLIMATE-201204

Figure 3 *Potential risks to oil and gas operations from changing climate*



Source: adapted from Jan Dell's presentation

The oil and gas industry is identifying a range of risks from current and future climate variability (e.g. floods, sea level rise, extreme events, migratory shifts of species, permafrost thawing, water availability, etc.) to their operations, supporting infrastructure and the value chain (Figure 3). Examples include:

- reduced window of time for tundra travel due to increased permafrost melting;
- increased lightning strikes in northern latitudes, potentially causing damage to infrastructure and impacts on communities, particularly where electrical grounding is lacking or there is a greater susceptibility to wildfires;
- increased coastal erosion leading to a degradation of coastal barriers;
- changes in storm strength leading to increased wind speed and wave loading on offshore facilities;
- regional changes in precipitation pattern and frequency, altering the availability of water resources for operations and susceptibility to flooding of infrastructure; and
- reduced certainty regarding assumptions made about the efficiency of equipment, such as gas turbines.

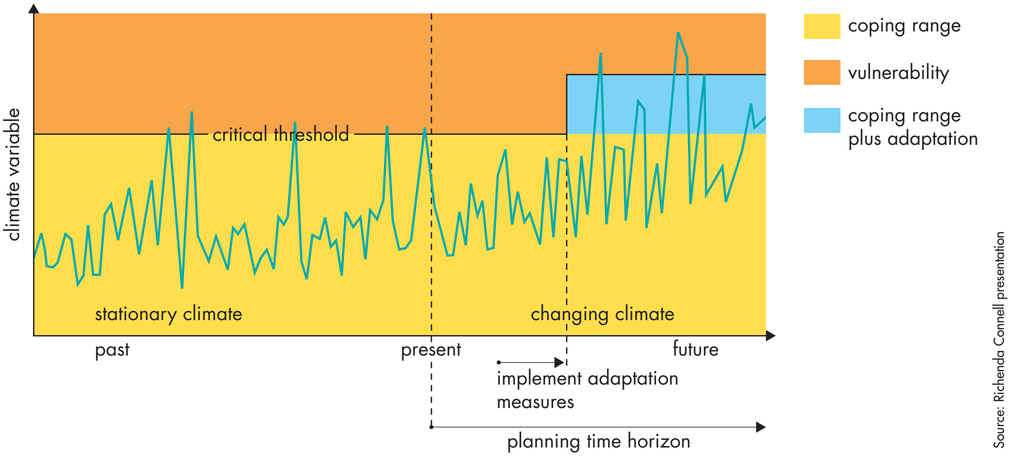
An important consideration is to understand the climate risks to neighbours and communities who are outside the fence of a given company's operations and facilities. Oil and gas operations can be reliant on community infrastructure, including electricity systems and infrastructure for water, transportation and communication at regional and urban scales. Investments to adapt inside the fenceline may have limited value if surrounding communities and infrastructure are not resilient. Working with local government in identifying vulnerabilities in the surrounding communities is also important from a staffing perspective, as this is where employees and their families usually reside.

Risk evaluation/assessment

Climate projections suggest that the future climate will be one in which various thresholds (e.g. temperature) will be exceeded on a more regular basis (Martin Parry's presentation—IPIECA, 2012; NOAA, 2012), thereby putting society at a greater risk of experiencing various outlier[1] events. (See Figure 4.) The oil and gas industry currently operates in a range of environments that are subjected to extremes (e.g. the arctic, deep water, hot arid regions, etc.). Therefore, it is valuable for the industry to assess how climate change may alter the risks presented by these already challenging environments.

While climate change may have local benefits in some regions, adaptation planning is generally focused on understanding the risks from potentially hazardous situations. The process of risk assessment will involve understanding how

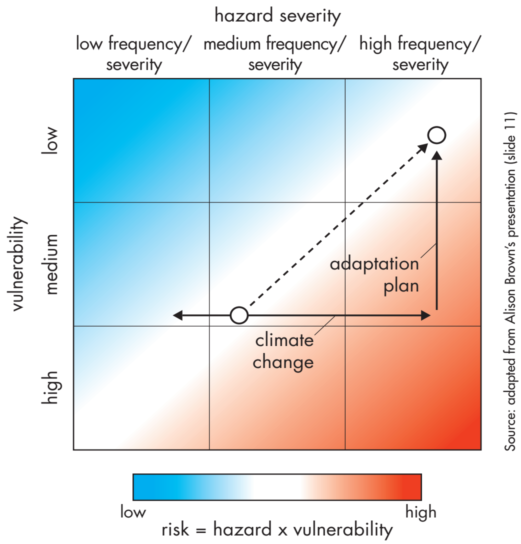
Figure 4 *Coping ranges, critical thresholds and vulnerability*



[1] Outlier events are those considered to be beyond the extreme, i.e. events that are greater than two or three standard deviations from the average. An example would be the 2003 European summer heatwave, with temperatures a full six standard deviations from the norm.

climate change will alter the severity of a given hazard by changing its severity frequency and/or intensity (see Figure 5). The remaining component of such an assessment is the determination of a project's vulnerability to the hazard. The climate risk is then characterized by combining the hazard severity due to climate change with the asset's vulnerability to this hazard. The associated adaptation response would therefore attempt to reduce the risk due to a change in climate by reducing the vulnerability of an operation or facility.

Figure 5 *Climate risk assessment matrix*



Impacts are local and projects are unique, hence risk assessments and adaptation planning should be performed at the local level to identify design and operational actions. Important parameters that can go into an assessment of climate risks include:

- the location of the operation and/or facility;
- the type of facility (e.g. offshore platform, pipeline, refinery);
- facility design (e.g. appropriateness of codes and standards);
- the project lifetime;
- current environmental baseline conditions (e.g. ecosystem status; water availability);
- historical and current observations of climate variability; and
- the projected change in climate and environmental conditions, and the rate at which this will occur.

For example, a local change in precipitation frequency in the future may alter local water availability and the potential for flooding, but if the project lifetime is short, the associated risk may be lower than a specified threshold. Alternatively, the current change in lightning strikes at high latitudes, coupled with a lack of electrical grounding or susceptibility to wildfires, may be identified as a high risk to regional operations for a relevant location and timescale.

Assessment of climate risks allows companies to place the potential for business interruptions due to changes in climate alongside the other risks inherent in the oil and gas industry. The potential for overlap in these business and climate-related risks may make an integrated approach preferable. However, whether these assessments are run concurrently with other standard risk assessments, or as a stand-alone climate assessment, should be decided by the individual company.

With the arrival of new science, the assessment of climate risks will continue to be updated in the context of the criteria listed above. An important connection could be made between the atmospheric and oceanographic scientific communities and the classification societies (e.g. Det Norske Veritas—DNV) to facilitate how the science may influence rules and standards for infrastructure that could apply across the industry.

Risk management

The oil and gas industry develops and deploys risk management practices for many of the risks, both above and below ground, that are ubiquitous in business operations. Changes in climate could add another dimension of complexity to these risks. Climate risk management therefore looks to develop adaptation plans that will mitigate and manage the risks identified and evaluated as being hazardous to business operations and facilities.

The process of identifying and assessing climate risks associated with a project can lead to a determination of 'no-regrets'[2] adaptation plans. These no-regrets plans can define low cost actions to design resiliency into new projects and existing operations. As already noted, the uncertainty ranges of future climate projections increase significantly beyond the next three to four decades. Therefore, flexible but robust designs, together with adaptive management

2 'No-regrets' activities are those which offer mitigation of the risk, but would still be a chosen option even if the risk does not materialize.

Figure 6 *Incorporating climate change risk into key business decisions and practices*

Source: Michelle O'keeffe (CDP) presentation, based on CDP Questionnaire response. Qualitative responses were analysed for a set of commonly identifiable 'practices', then the number of occurrences of each practice counted across all responses. NB: any single company response may have mentioned a number of different practices.

practices will be critical for managing climate risks and adapting to a range of impacts.

The oil and gas industry continues to adapt to climate risks by employing a myriad of risk management strategies (Figure 6), for example identifying alternative personnel and supply transportation methods to avoid disruptions. A broader form of energy supply diversification is occurring across the oil and gas industry with the development of new shale gas and tight oil resources, in a wider number of geographical areas, that can mitigate supply disruptions associated with severe weather events offshore.

Project design planning for offshore infrastructures could incorporate 'metocean' projections of future climate conditions (e.g.

wave and wind speed conditions) at the outset of development. These could inform not only the design of the assets, but also their most appropriate location and the emergency protocols required to keep personnel safe and avoid incidents. Insurance against weather-related risks may be a viable option for smaller oil and gas companies. Risk management systems can incorporate protocols and procedures to deal with unforeseen incidents and to periodically re-evaluate climate risks.

Companies responding to the Carbon Disclosure Project (CDP) disclose the strategies, both undertaken and in development, to deal with current and future climate variability. According to the 2011 results, 75% of responding oil and gas companies identified (one or more) significant physical climate change risks, with 96% of those physical risks being seen to have an impact on the companies' own operations (and the rest on the supply chain). Physical risks from cyclones, sea level rise, and snow and ice were most commonly identified as high significance risks. Oil and gas companies stated that they integrate climate risks into their business strategy, although most of the companies did not specifically mention 'adaptation'.

Reflection

The oil and gas industry is continuing to adapt its operations, facilities and risk management practices to deal with climate risks. Climate risk management and implementation of adaptation actions will require increasing internal capability, as well as enhancing the knowledge base of management personnel, design engineers and contractors. In addition, it may also require significant capital investments (for example plant modifications), particularly in the longer term. Adaptation planning for climate risk management involves identifying and evaluating risks, developing strategies to mitigate and manage risks, and subsequently implementing these strategies. Given the uncertainty and evolution of knowledge regarding climate impacts, the industry will continue to re-evaluate its preparedness to manage climate risks alongside the other inherent risks the oil and gas industry faces on a day-to-day basis.

Adaptation actions are being taken up by private actors, and the oil and gas industry is best placed to adapt their own infrastructure and operations to manage climate risks. Lessons learned and best practices are being shared within companies, and are now being reported externally via stakeholder disclosure processes (for example the Carbon Disclosure Project). Sharing with other industries, governments and society can broaden each organization's recognition and understanding of climate risks, and avoid missing easy adaptation options.

Beyond private actors, governments will also have important roles in adaptation planning. Certain critical infrastructure (for example roads, bridges, water infrastructure) and land use development are in the domain of government regulation, and will therefore requiring planning, coordination and implementation by the relevant government authorities. Scientific research (receiving both governmental and non-governmental support) should prove valuable for enhancing understanding in climate science as well as developing engineering solutions. Continued support of observational networks of weather and climate variables should be important for both short- and long-term predictability of climate-related risks.

Addressing adaptation in the oil and gas industry

An IPIECA Workshop, London, UK, 9 October 2012

Workshop programme

- **Welcome**

  Chair: Rebecca Heaton, Shell

- **Introduction**

  Workshop Chair: Billy Landuyt, ExxonMobil

- **Session 1: Adaptation and climate change risk management**

  Chair: Billy Landuyt, ExxonMobil

  - Impacts of climate change and the challenge for adaptation (Martin Parry, Grantham Institute, Imperial College)
  - Economics of adaptation (Richard Tol, University of Sussex)
  - Discussion

- **Session 2: Assessing risks and opportunities for the oil and gas sector**

  Chair: Laura Verduzco, Chevron

  - Impacts to industry and oil and gas (Jan Dell, CH2M Hill)
  - Impacts and strategies for energy infrastructure (Tom Wilbanks, Oak Ridge National Laboratory)
  - Discussion

- **Session 3: Managing risks to the oil and gas sector**

  Chair: Mark Johnston, BP

  - Risks of physical climate change (Andreas Spiegel, SwissRe)
  - Approaches to adaptation (Michelle O'Keeffe, Carbon Disclosure Project)
  - Building climate resilience in the oil and gas industry: practical experiences (Richenda Connell, Acclimatise UK)
  - Adapting to climate change: a regional climate model study of the Caucasus (Ralf Toumi, Imperial College)
  - Discussion

- **Session 4: Industry case studies**

  Chair: Rebecca Heaton, Shell

  - Gulf coast and arctic asset studies (Karl Fennessey, ConocoPhillips)
  - Research and development initiatives on impact vulnerability adaptation (Chris Campos, Petrobras)
  - Assessment of risk of impacts to assets (Alison Brown, Shell)

- **Discussion panel**

  Chair: Arthur Lee, Chevron

  - Participants: Alison Brown, Shell; Chris Campos, Petrobras; Richenda Connell, Acclimatise UK; Jan Dell, CH2M Hill; Karl Fennessey, ConocoPhillips; Richard Tol, University of Sussex; Tom Wilbanks, Oak Ridge National Laboratory.

All presentations are available from the workshop webpage:
www.ipieca.org/event/20120621/addressing-adaptation-oil-and-gas-industry

References

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Bierbaum, Rosina *et al.* 2012. A comprehensive review of climate adaptation in the United States: more than before, but less than needed. *Mitigation and Adaptation Strategies for Global Change*, March 2013, Volume 18, Issue 3, pp 361-406. http://rd.springer.com/article/10.1007%2Fs11027-012-9423-1#

IPIECA

IPIECA is the global oil and gas industry association for environmental and social issues. It develops, shares and promotes good practices and knowledge to help the industry improve its environmental and social performance, and is the industry's principal channel of communication with the United Nations.

Through its member led working groups and executive leadership, IPIECA brings together the collective expertise of oil and gas companies and associations. Its unique position within the industry enables its members to respond effectively to key environmental and social issues.

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IPIECA also has an active global network of oil and gas industry association members. Please refer to our website for a full list.

IPIECA
5th Floor, 209–215 Blackfriars Road, London SE1 8NL, United Kingdom
Telephone: +44 (0)20 7633 2388 Facsimile: +44 (0)20 7633 2389
E-mail: info@ipieca.org Internet: www.ipieca.org