

October 2nd, 2017

To the Honorable Members of the 115th Congress -

Hurricanes Harvey, Irma, Maria and Jose were, and continue to be, life-changing events for millions of Americans. As communities throughout the impacted coastal zone begin to recover and rebuild, their focus should be on building back better and smarter than before thereby ensuring the next storm will do less damage and people in a storm's path will be better able to cope. Congress can help communities by funding recovery that increases resilience and uses natural coastal infrastructure such as beaches, dunes and wetlands to reduce flood risk.

While local coastal managers are still assessing damage, we are again seeing that natural coastal infrastructure did its job – beaches, dunes and wetlands protected property and lives at the expense of displaced sand and eroded coastlines. Following Hurricane Sandy, federal beach and dune projects were determined to have prevented \$1.9 billion in damages¹ and coastal wetlands prevented \$625 million in damages². We expect towns and counties in Texas, Florida and other impacted states that maintained wide beaches and high dunes to have less direct damage to their coastal infrastructure and properties than those whose coastline was allowed to deteriorate.

Funding to rebuild and protect coastal communities

As Congress develops an emergency hurricane supplemental appropriations bill, we request that you:

- 1) *Provide the US Army Corps of Engineers (USACE) enough supplemental Flood Control and Coastal Emergencies (FCCE) funding to rebuild all beach and dune shore protection systems that were eroded by the 2017 hurricanes.*
 - a. *Additionally, include the following report language directing the USACE to rebuild projects to, at minimum, replace the sand eroded by the storm and bring the project to its design level of protection if it wasn't at design level prior to the storm:*
 - i. "Section 3029(a)(2)³ of the Water Resources Reform and Development Act (WRRDA) 2014 directs the USACE to rebuild projects damaged or destroyed by natural disasters to be more effective than when the storm hit. It directs the USACE to bring the project back to "design level of protection" and the project "may include modifications to... address major deficiencies or implement nonstructural alternatives". This was intended for USACE to rebuild projects after a storm to a standard as good or better in reducing flood risk, than before the storm. However, for beach projects that still had advance fill in place and had not yet eroded to the

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<http://www.nad.usace.army.mil/Portals/40/docs/ComprehensiveStudy/Estimate%20of%20Sandy%20damages%20avoided.pdf>

² <https://www.nature.com/articles/s41598-017-09269-z>

³ See the implementation guidance: http://www.usace.army.mil/Missions/Civil-Works/Project-Planning/Legislative-Links/wrrda2014/wrrda2014_impguide/

minimum level of protection designated by “design level” prior to the storm, rebuilding to design level leaves them worse off than before the storm. For these projects, USACE should replace all the sand eroded by the storm.

“Furthermore, when calculating sand losses between pre- and post-storm surveys, the losses should be counted within the entire beach profile template (including design berm and advanced nourishment berm).”

Following Hurricane Matthew, the USACE had internal disagreement over the interpretation of their own implementation guidance on Section 3029(a)(2) of WRRDA 2014. This report language will help clarify the intent of Congress and ensure USACE FCCE funding is being used as Congress intended – to, at minimum, build projects back to the way they were, and ideally increase the resilience of coastal projects with updated modifications and minimum design level of protection.

- 2) *Appropriate funding for all federally authorized but unconstructed coastal risk reduction and hurricane storm damage risk reduction projects along coastlines impacted by Hurricanes Harvey, Irma, Jose and Maria.*

Coastal communities have been left vulnerable due to Congress’s unwillingness to invest in risk reduction measures. Federally authorized risk reduction projects have gone through extensive benefit-cost-ratio analyses showing that the economic benefits from risk reduction outweigh the costs. Investing in these projects saves money in the long run. Congress should look at the region impact by the 2017 hurricanes and ensure that all previously authorized coastal projects have the funding they need to be constructed.

Funding to develop coastal plans and protect coastal communities

As impacted communities recover with federal support, resilience must go beyond the shoreline. In Hurricane Harvey, inland flooding from excessive rain was far more destructive than the initial storm surge showing that resilience planning must be systemic and watershed-based. Bayside flooding in both Harvey and Irma was as destructive as oceanfront flooding. Proper planning – including assessing vulnerability to increased hurricane and storm damage as a result of sea level rise, and adopting regional sediment management practices to sustainably maintain or enhance current levels of storm protection – throughout the Southeast and Gulf Coast will ensure the entire region is better prepared when the next Hurricane comes.

In an emergency hurricane supplemental appropriations bill, we request that you:

- 3) *Fully fund, at full federal expense, the South Atlantic Coastal Study (SACS) authorized in the WIIN Act (Sec. 1204).*

Following Hurricane Sandy, the North Atlantic Coast Comprehensive Study was fully funded at full federal expense, so funding a SACS would simply mirror the regional study from the Northeast and Mid-Atlantic. The South Atlantic Coast Study covers the coast of Mississippi up through the North Carolina coast and includes Puerto Rico and the U.S. Virgin Islands. The U.S. Caribbean island territories would, perhaps, benefit from this study most of all.

Funding to understand storm impacts on coasts and protect coastal communities

Beaches, dunes and wetlands are the first line of defense against storm surge and coastal storm damage, but coastal flood and storm protection takes multiple lines of defense. During Hurricanes Harvey and Irma, evacuations saved lives, elevated and hardened homes saved property, and flood risk reduction projects

limited public and private damages. These were all possible because of coastal research and modeling, which led to forecasts that gave people time to prepare, flood maps that identified who would get inundated, and details on coastal project design that improved their effectiveness. The federal government can support communities by investing in coastal research, data collection, modeling and forecasting.

We request you:

- 4) *Ask each federal coastal agency (including USACE, US Geological Survey [USGS], National Oceanic and Atmospheric Agency [NOAA], Bureau of Ocean Energy Management [BOEM], and others) what coastal and hurricane research and development needs they have, which could lead to communities that are better able to withstand future hurricanes. These requests should then be funded in supplemental appropriations legislation.*

As seas rise and coastal storms intensify, post-storm restoration must be looked at systemically and with the goal of increasing resilience throughout the watershed. Federal support will be necessary to help local communities while ensuring efficient and systemic recovery and restoration that decreases future risk, not just piecemeal rebuilding. The federal government should provide funding to restore and rebuild, and should help communities become better prepared for the next storm by promoting resilience and investment in natural coastal infrastructure such as beaches, dunes and wetlands.

In summary, our specific requests are:

1. Rebuild beach and coastal projects impacted by the 2017 Hurricanes to at least the level before the storm, if not better;
2. Fund the construction of authorized but unbuilt coastal projects on coastlines impacted by the 2017 Hurricanes;
3. Fund, at full federal expense, the South Atlantic Coast Study;
4. Fund coastal research at federal agencies that will improve community preparedness for future hurricanes.

Thank you for your consideration and please let us know if you have any questions.

Regards,

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President

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ABOUT ASBPA: Founded in 1926, the ASBPA is a 501(c)3 nonprofit that advocates for healthy coastlines by promoting the integration of science, policies and actions that maintain, protect and enhance the coasts of America.

ABOUT FSBPA: Florida Shore and Beach Preservation Association (FSBPA) was organized in 1957 and functions as a league of coastal local governments on beach and coastal issues in the state of Florida.