



American Shore & Beach Preservation Association

Advocating for healthy coastlines

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The Honorable Thomas R. Carper
Chair, Environment and Public Works Committee
United States Senate

The Honorable Shelley Moore Capito
Ranking Member, Environment and Public Works Committee
United States Senate

Dear Chairman Carper and Ranking Member Capito,

The American Shore and Beach Preservation Association (ASBPA) commends your leadership in advancing the biannual Water Resources Development Act (WRDA) process. ASBPA's membership, representing over a thousand members from coast to coast, recognizes the significance of this legislation for civil works stakeholders and appreciates the opportunity to share our priorities for this important legislative action. As you are aware, since 1926, ASBPA has been dedicated to preserving, protecting and enhancing our coasts by merging science and public policy. Our role is to be a team player in addressing climate change and increasing resiliency of the nation's coastlines. We are grateful for this Committee's willingness to include many of ASBPA's priorities in previous WRDA bills.

First and foremost, passing a WRDA bill every congress is essential to effective coastal management, allowing the U.S. Army Corps of

Engineers (USACE) to better work with states and local partners to plan, design, build, and manage critical coastal projects. Previous WRDA bills, including WRDA 2020, included numerous provisions to improve the resiliency of our nation's coastlines. Several of those provisions are undergoing USACE implementation guidance and we are eager to see those provisions put into meaningful action before requesting further modifications. In particular, WRDA 2020 Section 125(c) regarding Implementation Guidance, Dredge Material Management Plans, if applied appropriately could have far reaching benefits for ASBPA members and the nation. As well, we share the Administration's priorities of combating climate change and advancing equity and we commend the Committee for being proactive on these critical issues in WRDA 2020. How the USACE will address them has been identified by ASBPA members as an area that may require further collaboration and we look forward to being a valued partner in that process.

ASBPA has long advocated for policies that advance:

- **Funding for coastal protection, restoration, and research** needs due to climate change and **increasing** concern for sea-level rise and other factors as a primary mission for USACE;
- **Regional Sediment Management (RSM)** and the **Beneficial Use of Dredged Material (BUDM)**;
- A modification of the USACE **Benefit-Cost-Ratio (BCR)** process, and;
- **Natural and Nature Based Infrastructure (NNBI)** use for flood risk reduction.

In deliberations within our organization and conversations with our coastal partners, we think the following should be advanced in the WRDA 2022 bill:

Identifying dredged material disposal sites for beneficial use and standard disposal

- a. Beneficial use disposal sites: As states and USACE districts look to use a greater percentage of their dredged sediment in a beneficial manner, some local stakeholders are challenged by the availability of acceptable sites for beneficial placement. Currently the onus is on local communities to identify placement sites. We would encourage USACE to be more active partners in identifying beneficial placement sites.
- b. Standard disposal sites: Some states with their own dredging programs are having trouble finding standard disposal areas, particularly in areas (e.g., N.C.) where the USACE has some of the ‘best’ disposal areas already. We would encourage USACE to support state efforts to identify new disposal areas.

Benefit to Cost Ratio Flexibility and Reform

To aid small harbors and communities where dredging is essential for navigation and resiliency efforts, the BCR should better account for all benefits from natural and nature-based infrastructure (NNBI) projects.

Budgeting for Natural and Nature Based Infrastructure projects

- a. As the USACE works to advance more NNBI projects, the USACE annual budget process needs to be aligned to reflect the longer-term monitoring and adaptive management needs of these projects. At present the USACE budgeting process does not include this post-construction element of NNBI projects. Monitoring should focus on NNBI project outcomes, and adaptive management should focus on maintaining or improving those outcomes through the execution of project modifications and additional funding when necessary.
- b. While not exclusive to NNBI projects, states are hesitant to move forward in planning large scale NNBI projects that will evolve over time, not knowing if USACE funding will continue to support the project over its expected lifespan. Directing the USACE to prioritize long-term funding for NNBI in their annual budget requests would send a strong signal to states that NNBI efforts will be supported at the federal level.

USACE Sec. 1122 pilot projects for Beneficial Use of Dredged Material

Beneficial Use of Dredged Material (BUDM) projects are being delayed due to unclear implementation guidance. Sec. 1122 projects were meant to serve as pilots for innovative BUDM; however, some Districts are interpreting the USACE guidance to mean that projects must have the same positive cost-benefit analysis as a CAP 204 project. This confusion is causing unnecessary delays for a pilot program that has the potential to yield tremendous results. We request that language be included in WRDA 2022 to clarify that Sec. 1122 projects are not to be held to the same cost-benefit analysis as a CAP 204 project.

ASBPA is grateful for the direct dialogue and sustained collaboration that you have established for development of the Water Resources and Development Act of 2022. Thank you for including ASBPA as a valued partner on coastal issues. We applaud the past bi-partisan and bicameral commitment to WRDA, and we stand ready to assist the Committee in passing a fifth consecutive WRDA.

Sincerely,



Anthony Pratt, President