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Advocating for healthy coastlines
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RE: Recognition of Non-Federal Engineered Beaches in H.R. 4669

Dear Chairman Graves and Ranking Member Larsen,

The American Shore and Beach Preservation Association (ASBPA) and Coastal States Organization (CSO) commend your leadership in advancing the Fixing Emergency Management for Americans (FEMA) Act of 2025. ASBPA's membership, representing over a thousand members from coast to coast, and CSO, representing the 34 coastal states and territories, recognize the significance of this bipartisan legislation to reform FEMA and the disaster recovery process by focusing on speed, efficiency, and empowering states. As you are aware, since 1926, ASBPA has been dedicated to preserving, protecting, and enhancing our coasts by merging science and public policy; since 1970, CSO has served as the collective voice for the nation's coastal states, commonwealths, and territories on policy issues relating to coastal, Great Lakes, and ocean management. We are grateful for the Committees' willingness to include many of ASBPA and CSO's priorities in previous bills.

ASBPA and CSO laud the goals of the bipartisan H.R. 4669, but we encourage the bill to **maintain post-disaster FEMA support for states and coastal communities investing in engineered beaches**. Without this, a crucial part of our national coastal infrastructure could be at risk.

FEMA's Public Assistance (PA) Program and Policy Guide defines an **engineered beach** as a long-term beach nourishment program with a detailed management plan that includes periodic maintenance funded and administered by a state and/or local community (i.e., non-federal).

H.R. 4699 can further *empower state and local governments* by retaining post-disaster support for non-federal engineered beaches. These partnership projects exemplify the efforts the Administration supports to protect the U.S. coastline. They rely on state and local funds for upkeep, with federal support activated only under disaster declarations, and FEMA does not provide full funding.

For decades, FEMA has played a crucial role in protecting coastal infrastructure by recognizing the importance of engineered beaches in safeguarding lives and property. Although categorized as Recreation in FEMA's PA program, engineered beaches are evaluated using criteria similar to those of the U.S. Army Corps of Engineers for Coastal Storm Risk Management projects. This practice acknowledges that engineered beaches are critical infrastructure and aligns disaster support eligibility *across federal agencies*.

Proposed changes to FEMA Public Assistance funding for non-federal engineered beaches are outlined in Item #4 of the OMB memo "Actions to Rebalance FEMA's Role in Disasters." The memo classifies ports, harbors, and transit facilities as critical infrastructure, exempting them from the Recreational definition. We advocate for engineered beach restoration projects to receive similar recognition and exemption.

There is precedent *within* FEMA to classify engineered beaches as critical infrastructure and restore them with federal funds. FEMA's Flood Mitigation Assistance (FMA) program includes engineered beaches, defined as beach nourishment activities that mitigate flood risk to insured structures, as eligible projects. Furthermore, 44 CFR 206.226(j) gives FEMA statutory authority to restore engineered beaches in the aftermath of disasters.

We urge Congress to ensure that the final version of H.R. 4669 **retains post-disaster mitigation funding for non-federal engineered beaches sponsored by coastal states and communities**. This is not a request for new or increased funding for pre-disaster mitigation. Instead, we hope that the effective partnership model provided by FEMA's historic Public Assistance program is preserved.

In closing, we commend the intent and scope of H.R. 4669 and ask that the committee explicitly acknowledge the value and necessity of maintaining support for engineered beaches. By doing so, Congress will reinforce a proven, collaborative approach that empowers states and communities to take bold action in defense of their shores while ensuring continued federal partnership when disaster strikes.

Thank you for your attention to this important matter.

Sincerely,

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