

**Mayor Harry Simmons Presentation to CERB
On behalf of ASBPA**

Thank you, General Riley, for giving me this opportunity to present the views of the American Shore and Beach Preservation Association to this group. We are especially grateful that you have chosen to hold your semi-annual meeting in concert with our 80th Anniversary Conference here in Long Branch, New Jersey and appreciate the comments you made to us earlier today.

The strength of the Corps is its ability to plan and construct water resource projects. Its civil works program is unlike the mission of any other federal entity. Other agencies produce studies and make recommendations. The Corps does both of these, but it also builds those projects which meet a variety of national interest tests, including a benefit-cost ratio that is unique among federal programs.

The budget of the Corps is also unique in that nearly every dollar is earmarked by Congress for specific studies and projects. This is not a political aberration. It is the way the Executive Branch and Congress have decided over the years that they want the program to work.

The Coastal Engineering Research Board has begun a number of initiatives which have been helpful to coastal projects, and shore protection projects in particular. Within the past decade, none has been more important than CERB's regional sediment management initiative. Stripped to its core, this initiative will help the nation conserve, and make wiser use of, scarce supplies of sand, a vital resource.

ASBPA proudly sponsored the RSM authority language that is in the Senate-passed version of the Water Resources Development Act now in conference. In the fervent hope that WRDA 2006 is enacted into law, we call upon CERB to task an appropriate group of its members as well as stakeholders to develop specific recommendations for implementation of both the RSM study and construction authority that WRDA will provide.

A related challenge facing the Corps is how to make shore protection projects function even more effectively than they do now. Simply put, we have to find a way to reduce wave strength and retain more sand in the nearshore system. This is as true for new shore protection projects as it is for existing ones. No matter how much money is appropriated by Congress for shore protection projects, it is important that CERB initiate an effort to make every dollar go further. We ask that you initiate a one-year study that will make recommendations for the steps that must be taken to evaluate and improve the effectiveness of shore protection projects, ideally to enable lengthening the interval between nourishment cycles.

One step that we hope CERB will recommend is that greater emphasis be placed on the so-called Section 227 program that tests alternative shore protection technologies under actual conditions. Once again, ASBPA is proud to have assisted the Senate Environment and Public Works Committee in drafting the language that will make this program both permanent and more flexible and give it the level of authorized funding it needs. The Corps' Coastal Hydraulics Lab at Vicksburg has done a marvelous job with the Section 227 program despite a variety of political and fiscal obstacles. Now, it is time for the Corps to make this program a centerpiece of its shore protection initiatives.

Research, especially applied research, is critical to the future health of coastal America. A year ago, ASBPA spoke before this Board and focused on the dwindling number of university-based coastal engineering programs in this country. From beaches to ports and inlets, we have enormous economic, environmental and recreational assets that are at serious risk in the United States. Well-trained scientists working with elected officials and stakeholder interest groups need to address these risks and develop science-based solutions that can achieve broad community support. ASBPA strongly supports more funding for the Corps coastal R&D efforts. However, we believe that an increased level of funding can only be achieved if CERB recommends that the Corps re-institute its cooperative research relationships with universities.

In the wake of the U.S. Ocean Commission report and the President's Ocean Action Plan, ASBPA continues to urge implementation of the National Coastal Data Bank and the Integrated Ocean Observing System. It is critical that the Corps, as well as the nation's coastal management and engineering communities, have access to a centralized database of information that will foster collaboration, robust research, and efficiency. We encourage CERB to support the continued development of this comprehensive data-sharing framework and other efforts that enhance data collection.

Unfortunately, since 1995, shore protection studies and projects have been a low priority budget item at best and unbudgetable at worst. While CERB cannot challenge the attitude of the Office of Management and Budget directly, there are actions that can be taken that will make it harder for OMB to sustain its position. I have already referred to two initiatives that CERB can take that will help: (1) Assure the effective implementation of RSM and (2) Institute a program to develop ways to make shore protection projects work more effectively.

In addition, we ask CERB to implement a program of public awareness of coastal systems and the risks our nation faces of losing critical coastal resources. The users and beneficiaries of these resources, the media, and elected officials need to know about the challenges and solutions to coastal issues. The scientific knowledge of the Corps and its private sector allies needs to be conveyed in an understandable manner to the public.

The antipathy of OMB toward shore protection projects is only one part of its gross lack of support for the Corps' civil works program. Of immediate concern to ASBPA is the negative impact on the morale of Corps personnel that OMB's persistent efforts have had. This in turn has led to the retirement of seasoned personnel who have been key to planning shore protection projects and managing the overall shore protection program, particularly at the District level. It also has made it extremely difficult to recruit and hold onto new coastal engineering talent.

The Corps has responded to this by dropping the barriers among districts so that some key components of a project located in one District may be performed by other Districts. However, for a variety of reasons, many proposed shore protection projects appear to be getting harder to analyze and plan. The Corps has wisely established what we refer to in shorthand as the Shoreline Center of Expertise as one of a few such Centers of Expertise. ASBPA urges this Board to recommend that the Shoreline Center of Expertise have the explicit authority and funding to provide Districts and local sponsors with the human resources they need to develop effective solutions to problems encountered during the study as well as PED phases. We are grateful for the recent directive that General Riley has issued in support of the Centers for Expertise. It is critical that the Corps make use of its experienced personnel, no matter in what Division or District they may be stationed, to study and formulate a project. In addition, we urge CERB to look beyond the Corps to qualified personnel in other federal and state agencies, as well as in other countries, in developing not only new projects but also new approaches to dealing with coastal resource issues.

It is important that CERB realizes how frustrating it is for local sponsors to deal with the Corps during the feasibility study phase. The Corps study process is both overly long and excessively costly. ASBPA is well aware that many issues of both time and money are not within the control of the Corps. However, the future of the Corps' coastal program requires that CERB look at those aspects of the study process that are within the Corps' control to find ways of significantly reducing the length and cost of feasibility studies.

Regrettably, it is common for communities to come to the Corps seeking help only after coastal erosion has become a serious problem. By that time, local elected officials need to respond in a timely manner to valid community concerns about the impact of that erosion. For a Mayor or County Commissioner to learn that it will take at least six years of study and several more years before sand will be placed is a hard pill to swallow. Drawn-out periods between initiation of a study and construction are already leading some communities to seek solutions that do not involve the federal government. What concerns ASBPA most about these non-federal alternatives is that some may not be done

to the quality standards of the Corps and others may not provide the level of public access associated with federal projects. In addition, coastal property owners in some areas may resort to seawalls that protect property at the expense of losing a beach. ASBPA urges CERB to take the initiative to streamline the Corps' feasibility study process.

In the formulation of a shore protection project, it is critical that all benefits and risks be fully incorporated into the study process. Since WRDA '86, the Corps' policies have downgraded the importance of recreational benefits. While some say this is required by either legislation or the Principles and Guidelines, there is no barrier to the Corps presenting the full benefits of increasing recreational opportunities by nourishing a beach.

ASBPA views these recreational benefits as far more than the methodology used by the Corps to determine how much beach users value their experience. We view these as economic development benefits since beach users buy food at or near the beach, use automobiles and airplanes to get to the beach, and stay at hotels and motels. These expenditures create direct federal tax benefits that are not accounted for in the project formulation process.

While storm damage reduction benefits are the basis for determining the benefit-cost ratio of a proposed shore protection project, here again the analysis comes up short. There are a variety of risks that range from public inconvenience to public safety that the Corps process does not take into account adequately. ASBPA recommends that CERB develop a means to take full account of both benefits and risk-based data.

General Riley, to you and your distinguished colleagues on this Board, the American Shore and Beach Preservation Association pledges to provide the scientific and policy expertise at our disposal to help you implement the action items I have cited.

Thank you again for the privilege of addressing this Board.