

**TESTIMONY OF DAN GINOLFI, EXECUTIVE DIRECTOR OF  
THE AMERICAN COASTAL COALITION  
HOUSE SUBCOMMITTEE ON WATER RESOURCES & ENVIRONMENT  
HEARING ON WRDA 2026: STAKEHOLDER PRIORITIES  
DECEMBER 17, 2025**

Mr. Chairman and Ranking Member Larsen, thank you for this opportunity to provide the Committee with the views of the American Coastal Coalition on priorities for the Water Resources Development Act of 2026.

The American Coastal Coalition represents America's coastal communities with federal beach nourishment projects and other coastal sustainability needs. Along America's developed coasts, beach nourishment is the most effective means for protecting against coastal storms and flooding. Many of the provisions in WRDA have impacts on our members and their coastal projects, and we are pleased to offer this testimony to help the committee craft water resources policy to better serve our nation's coastal communities.

**3x3x3 Process**

In WRDA 2014, the 3x3x3 "SMART Planning" process was established, meaning that all Corps studies should require 3 years, cost a maximum of \$3 million, and involve all 3 levels of the Corps. When it comes to beach nourishment projects, some are complex while some are quite simple to plan and implement. However, \$3 million dollars and 3 years of time quickly became the *baseline* for all types of studies and modifications, including Limited and General Revaluation Reports, regardless of their complexity.

Prior to WRDA 2024, the Corps already had a process to allow studies to exceed the 3x3x3 framework when necessary. Nonetheless, Section 1103 of WRDA 2024 expanded studies to allow them to take up to 4 years and cost \$5 million. This expansion was driven by demands from higher levels of the Corps to achieve a design level closer to 100% before moving into Pre-construction Engineering and Design (PED) and Construction.<sup>1</sup>

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<sup>1</sup> The Committee has previously received testimony from both the Assistant Secretary of the Army and the Chief of Engineers which has tangentially dealt with the time and cost issue. Secretary Telle wants to assure that studies get completed more quickly, and the Chief has expressed his desire that the level of planning design of feasibility studies be increased so that Congress and non-Federal interests can have a more accurate idea of the final cost of projects. Those two goals are inherently at odds since it will take more time and money to get to a higher level of design. Once again, proper study management by all three levels of the Corps is the best answer to managing both study duration and cost.

Despite that WRDA provision, current Corps policy still adheres to the 3x3x3 baseline. The American Coastal Coalition's position is that the duration and cost of a study should not be dictated by legislation.

The true solution is proper study management by all three levels of the Corps. While we acknowledge that some Corps studies are justly long and expensive, legislating their cost and duration, though well-intentioned, has proven to be an error. We urge the Committee to correct this in WRDA 2026 by simply deleting the previous legislative provisions.

### **Funding for District Staff**

District staff salaries are paid primarily through study funding. Relying on project studies to fund Corps personnel is neither good policy nor an effective strategy. We urge the appropriators to provide for a dedicated funding stream for Corps personnel to enable the agency to deliver its services at the highest level possible.

### **Planning Centers of Expertise**

The ACC and its members often rely on the expertise provided by the Corps' Coastal Planning Center of Expertise (PCX). Many years ago, the Corps created PCXs for its various Business Lines. Coastal storm risk management projects are currently categorized under the flood control business line, but a separate Coastal PCX was created and has successfully overseen much of the coastal project portfolio.

Unfortunately, it has now been determined that each PCX must be moved from its Division home to a District. The ACC believes this is a bad idea, at least for the Coastal PCX, which is proposed to be moved to the New York District from the North Atlantic Division.

The PCX performs essential planning, engineering, and project management functions and cannot effectively maintain a national capacity when relocated to the district level. The Coastal PCX should function as an arm of Corps Headquarters with a national scope, rather than inheriting the limited vision of a single district whose staff salaries are tied primarily to specific local projects.

We respectfully urge this Committee to include a Sense of Congress statement that the Coastal Planning Center of Expertise should perform its advocacy and oversight role for all coastal studies nationally.

Thank you for your attention to our testimony.