



American Coastal Coalition

January 22, 2025

Mr. Edward E. Belk, Jr
Director of Civil Works
U.S. Army Corps of Engineers
441 G Street, NW
Washington, DC, 20314

Dear Mr. Belk:

On behalf of the American Coastal Coalition, there are three provisions in the Thomas R. Carper Water Resources Development Act of 2024 that we believe deserve firm implementation guidance.

First, Section 1103 modifies the Corps' SMART planning procedures by increasing the total cost limit from \$3,000,000 to \$5,000,000 and extending the study time from 3 years to 4 years. These increases affect communities recovering from disasters, often struggling financially. While we recognize that labor costs have risen, we urge the Corps to remain committed to completing studies as quickly and economically as possible. In our experience, the Corps tends to use the full allotted time, regardless of the study's size. We ask that guidance be issued to encourage the Corps to limit costs and timelines where possible, ensuring not every study costs \$5,000,000 or takes 4 years.

Next, Section 1217 addresses New Jersey's hot spot erosion mitigation. Many coastal areas across the nation experience "hot spots" where federal coastal storm risk management projects suffer from severe erosion due to navigation channels. Although the sponsoring Member of Congress likely had specific areas in mind, there are other areas in New Jersey that might benefit from similar guidance from Corps Headquarters. The American Coastal Coalition is keen to see how this provision is implemented, with an interest in potentially expanding its application beyond New Jersey in future WRDA legislation.

Finally, Section 1336 introduces the Delaware Coastal System Program, applying a "systems approach" to manage Delaware's coastal projects.

"The purpose of this section is to provide for the collective planning and implementation of coastal storm risk management and hurricane and storm risk reduction projects in Delaware to provide greater efficiency and a more comprehensive approach to life safety and economic growth."

This provision includes at least one navigation project among others. We believe this approach could benefit many coastal states where individual projects have been planned based on their benefits and costs but could be managed more efficiently and safely with a comprehensive strategy. This could

reduce environmental impacts on borrow sources, decrease dredge mobilizations, and thus lower taxpayer costs.

Furthermore, in Delaware, only one Corps District is involved in this comprehensive system approach. Other states such as New Jersey and California have multiple districts within their coastal jurisdiction but share the need for an approach that transcends political boundaries for efficient and environmentally sound project management. This provision could also demonstrate better uses of sand and highlight any gaps in water resources projects, whether federal or non-federal.

We urge you to include Sections 1103, 1217, and 1336 on the list for which Corps Headquarters will develop implementation guidance.

Sincerely,

Dan Ginolfi
Executive Director
American Coastal Coalition