

**Public Comments on the U.S. Commission on Ocean Policy's
Preliminary Report**

Topic Area: Hazards

Comments Submitted by:

- Harry Simmons, American Shore and Beach Preservation Association
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American Shore and Beach Preservation Association

Dedicated to the preservation and sound development of shores and beaches

Online at www.asbpa.org

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To Whom It May Concern:

The American Shore and Beach Preservation Association (ASBPA; www.asbpa.org) commends the U.S. Commission on Ocean Policy for your comprehensive and detailed Preliminary Report that calls on the federal government to place a greater emphasis on national ocean policy. It is time for our country to stop ignoring the oceans, whose health affects all of America, and we applaud the greater focus that this report will hopefully bring to their sustainability.

We thank the Commission for highlighting the economic benefits of tourism that is driven by our coastal regions. As the Preliminary Report states so well, “Every year, hundreds of millions of Americans and international visitors flock to the coasts to enjoy the oceans, spending billions of dollars and directly supporting more than a million and a half jobs. In fact, tourism and recreation constitute some of the fastest-growing business sectors—enriching economies and supporting jobs in communities virtually everywhere along the coasts of the continental United States.” It is clear that tourism drives much of the American economy, and ASBPA believes, as the Commission does, that more money must be spent to preserve and sustain our coastal resources for our economic health as well as for future generations of Americans.

We would also like to praise the Commission for the prominence it has given to regional sediment management (RSM) in the report. RSM is not new to the coastal planners of the country, but even with a greater recent emphasis, there is still no “national strategy for managing sediment on a multi-project, regional basis” that will “promote greater beneficial uses of sediment.”

ASBPA has long understood the importance of knowing how one project may affect its surrounding environs. As such, ASBPA has promoted RSM to Congress, most recently by lobbying for the introduction and passage of H.R. 3154, legislation that would give the Corps of Engineers greater authority to plan and

implement RSM water projects. Senator Hilary Clinton (NY) has also requested similar legislative language be included in the Senate's version of the Water Resources Development Act of 2004. ASBPA is delighted the Commission has highlighted RSM and that it may get increased attention with the release of the Preliminary Report.

We do have some concerns with portions of Chapter 10 in the Preliminary Report. This may be due to a simple lack of clarity, and therefore we hope the Commission will explain the intent of this section in its final report. In particular, the Commission mentions that "traditional, engineering-oriented USACE projects... create incentives for additional human development in high-risk regions."

It is not whether the Commission's report includes beach nourishment projects in its criticism of Corps projects in this section. We trust that is not the case. Federal beach projects are sound from a coastal engineering point of view. They also meet strict environmental and economic tests. At the same time, I would like to note that ASBPA most certainly supports smart growth policies in coastal regions. ASBPA also favors efforts at the federal and local levels to encourage intelligent development of regions that are currently undeveloped along the coast. In general, we do not support the use of hard structures along our nation's shores except where engineers decide such structures are the best way to curb erosion. We fully agree with the Commission, and we have found that the Corps of Engineers does as well, that such structures must not be used where they will cause erosion in another sector of the coast.

We hope that we have the opportunity to work with the Commission in the development of its final report and the implementation of its recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "Harry Simmons", with a long, sweeping horizontal stroke extending to the right.

Harry Simmons
President

The American Shore and Beach Preservation Association is dedicated to the sound, far-sighted and economical development and preservation of the shores of our oceans, lakes and rivers which will aid in placing their benefits within the reach of the largest possible number of people in accordance with the ideals of a democratic nation.



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Association of State Floodplain Managers Resolution

Resolution on U.S. Commission on Ocean Policy Preliminary Report

WHEREAS, the Oceans Act of 2000 acknowledged the importance of the oceans to this country and directed the President to appoint a U.S. Commission on Ocean Policy (the "Commission") to establish findings and develop recommendations for new comprehensive national ocean policy; and

WHEREAS, the Commission issued a Preliminary Report (the "Report") assessing U.S. ocean policy and outlining a vision for the future of ocean management, which seeks public input; and

WHEREAS, the Report includes a chapter 10 titled "Guarding People And Property Against Natural Hazards", Chapter 9 "Managing Coasts and Their Watersheds" and Chapter 11 "Conserving and Restoring Coastal Habitat"; and

WHEREAS, the Association of State Floodplain Managers (ASFPM) is an organization dedicated to reducing flood losses in the nation and enhancing natural hazard lands functions; and

WHEREAS, ASFPM has devoted significant effort over the past twenty years to improve coastal hazard awareness and to minimize loss of life and property damages resulting from coastal hazards, as part of the ASFPM mission; and

NOW, THEREFORE, be it resolved that the ASFPM fully supports the recommendations outlined in the Report, including Chapters 9, 10 and 11 of the Report, as these recommendations are consistent with ASFPM goals for reducing flood losses in coastal areas; and

BE IT FURTHER resolved that ASFPM encourages the Commission to recommend that state Coastal Zone Management Programs should be designated as the lead agency for states and should receive increased financial assistance through the Federal Coastal Zone Management Act grants in order to facilitate coordinated action on specific recommendations; and

BE IT FURTHER resolved that ASFPM encourages the Commission to recommend that state Coastal Management Programs to work cooperatively with their counterpart state hazards management and natural resource agencies, as well as the National Oceanic and Atmospheric Administration (NOAA), the Department of Homeland Security-Federal Emergency Management Agency (FEMA), the United States Geological Survey (USGS), the U. S. EPA and the United States Army Corps of Engineers (USACOE) to implement recommendations contained in the Report; and

BE IT FURTHER resolved that ASFPM advise the Commission and Congress of the long-term benefits that will accrue from improved ocean and coastal management, as recommended in the Report.

APPROVAL: 5/15/2004 ATTEST: 
Date ASFPM Secretary

Dedicated to reducing flood losses in the nation.