



ASSOCIATION OF STATE FLOODPLAIN MANAGERS, INC.

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April 11, 2019

The nation's coastal zone is facing multiple threats, including sea level rise, impacts from hurricanes, intense coastal flooding and over development. Coastal areas in their natural state offer natural buffering and resilience that help protect nearby coastal communities, as well as provide fishing, recreation and tourism activities that are vital to local, regional and national economies. ASFPM continues to support the Coastal Barrier Resources Act program and the expansion of Coastal Barrier Resources System units. This expansion ensures dynamic coastal areas stay in their natural states, which allow buffering from coastal storms and flooding and sea level rise impacts. Additionally, CBRS units are biologically diverse areas that help support vulnerable coastal species and habitat. ASFPM supports maintaining these highly vulnerable coastal areas as natural flood barriers that will reduce the need to restore and rebuild coastal communities, saving U.S. taxpayers \$9.5 billion from 1989 to 2013. These savings are expected to grow in the future, ranging from \$11 billion to \$108 billion by the year 2068 ([Journal of Coastal Research](#)).

ASFPM supports the addition of 310 CBRS units encompassing a total of 141,072 acres in Connecticut, Maryland, New York (Long Island), Rhode Island and Virginia. Through the U.S. Fish and Wildlife Service's map modernization process, it was identified that more than 600 structures were found to have been incorrectly included in the CBRS and will be removed from the CBRS designation. ASFPM applauds these map modernization efforts, specifically the use of digital mapping techniques, which produce data that are more accurate and will allow for better community planning and decision making. Map modernization is making it clearer which parcels are inside versus outside of the CBRS boundaries, clarifying which properties are eligible for National Flood Insurance Program insurance and federal recovery grants after a presidential disaster declaration.

However, ASFPM has heard there are outside interests with desires in allowing mining of CBRS units for sand that could be used to re-nourish beaches and coastal areas located outside of the CBRS. Beach-compatible sand is a limited resource and offshore sand extraction is expensive. Nevertheless, **sand deposits located within CBRS units must remain in place for these vital**

Dedicated to reducing flood risk and losses in the nation.

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landforms to continue to function as effective buffers against storms and sea level rise.

Allowing such sand mining would undermine the CBRA, and run directly counter to Congress' original intent and stated objectives to save federal tax dollars and conserve the resources of coastal areas included in the system. If mining were approved, it would significantly weaken the CBRA, which enjoys broad bipartisan support, saves billions of federal tax dollars, promotes public safety and conserves important coastal environmental resources. While this action is not stated in the current registry, ASFPM encourages the USFWS to look at strengthening the language that requires sand must only be used in ways the current law allows and thus keeping it in the CBRA areas.