



February 5, 2025

Senate Committee on Natural Resources and Wildfire
Salem, Oregon

Re: SB 504, Bioengineering: Opposed

Dear Sen. Golden and Committee Members:

Oregon Coast Alliance is an Oregon nonprofit corporation whose mission is protection of coastal natural resources and working with coastal residents to increase community livability.

We write you today about SB 504, which would require the Department of Land Conservation and Development to adopt rules incorporating “soil bioengineering systems” into requirements for shoreline stabilization and restoration. This is a perennial bill introduced by Sen. Smith at least three times before this 2025 legislative session.

Though it contains a welcome emphasis on mimicry of natural systems by use of natural items such as trees, logs and woody debris, the bill requires the new rules to be “separate and distinct” from existing rules and definitions for shoreline stabilization. Likewise, though it would require that all “soil bioengineering systems” conform with state land use planning goals and practices, the bill would introduce an alien term, definition and set of requirements not currently in statute.

Goal 18 and related statutory language already contain preferences for natural solutions to shoreline stabilization. If this bill were to be amended in ways that would remove the term “soil bioengineering systems,” which does not mesh with existing statutory language, it could be better shaped to strengthen a coastwide focus on natural systems in stabilization. Prioritizing engineered, nature-based solutions to shoreline erosion in the land use laws would be helpful, as more and more landowners are seeking hard-armoring as property protection measures. But there are several other items this bill does not currently address:

1. Materials allowed should include sand and clay;
2. Planting, density, and similar implementation guidance, the details of which could be directed to the rule-making process;
3. Penalties for lack of compliance, including failure of maintenance once a nature-based structure is in place.

In its current form, ORCA opposes SB 504. It will only add to confusion to state requirements around coping with shoreline erosion, by introducing a new term, and imposing new requirements not integrated with existing requirements.

Thank you,

Cameron La Follette
Executive Director

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