



February 5, 2025

RE: SB 504

Dear Chair Golden, Vice Chair Nash, and members of the Senate Committee on Natural Resources and Wildfire,

On behalf of the [Oregon Shores Conservation Coalition](#) and our thousands of members statewide, we appreciate the opportunity to testify and provide recommendations to improve SB 504. Oregon Shores supports the general intent of SB 504 and we are presently neutral. However, we ask that committee members oppose the bill as written and support an amendment to the bill to adjust language relating to “bioengineering systems,” include Tribal voices and restoration practitioners, and ensure co-benefits are considered.

Oregon Shores has been a leading voice in coastal land use for over 50 years, starting with the famous Beach Bill of 1967. Our mission is to educate and empower people to protect our coastal ecosystems and communities. We do this, in part, by advocating for policies that safeguard resilient and dynamic coastlines, ensure public access to the beaches, and maintain ecosystem integrity. Addressing irresponsible [shoreline armoring](#) and encouraging the use of less-harmful alternatives to structural stabilization are absolutely central to our work. We have long advocated for Oregon Parks and Recreation and the Department of Land Conservation and Development to better account for non-structural alternatives to structural shoreline armoring (such as riprap and seawalls)--aimed to protect our coastline from flooding and erosion. In essence, we believe the intention behind this bill is good and could prove very useful for alleviating conflict in shoreline management.

However, there are some language changes that are needed to ensure this legislation doesn't unnecessarily cause confusion or misinterpretation, which could harm habitats beyond just the ocean shore, including estuaries and riparian zones. First, the phrase “soil bioengineering systems” ought to be removed from the bill. Used more frequently in coastal management and ecology terminology, “nature-based solutions” is more applicable for a variety of non-structural uses where natural features may be used to stabilize shorelines, protect infrastructure, and enhance habitat in a range of coastal ecosystems. “Bioengineering” is far too broad and has multiple meanings in different contexts and to different professions. Retaining this inaccurate language could cause misalignment with permitting agencies and coastal land use plans, confuse the public, and open the door for future “bioengineering” technologies to be employed inappropriately in the wrong places.

Next, there are many positive benefits that “non-structural nature-based solutions” can offer ecosystems and human communities, which should be maximized wherever possible to simultaneously address multiple state objectives. For example, these solutions can provide habitat, store carbon, clean water, and provide aesthetic and recreational benefits. It is essential that this mandate consider and incentivize these co-benefits whilst protecting cultural resources and maintaining public access. Doing so is a win-win for the state.

Last, advisory members listed in Section 1.2 must include Tribal representatives. It is essential that the state not only honor Tribal sovereignty, but consult Tribal nations wherever a management decision may affect the ecological resources that support their livelihoods and culture. Furthermore, Tribal perspectives are needed in this conversation, as indigenous people have been stewarding our coastal lands and shoreline since time immemorial and have immense wisdom to offer regarding traditional ecological knowledge in shoreline management. Likewise, restoration practitioners must have a seat at the table, as they are on the frontlines in implementing non-structural and nature-based solutions. We recommend both groups be added to the advisory board to inform rulemaking.

Thank you for considering this testimony. We urge you to support an amendment incorporating the above changes.

Sincerely,

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Oregon Shores Conservation Coalition

In Oregon, the beaches belong to the people.

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