



February 17, 2023

Oregon State Legislature  
Senate Committee on Natural Resources  
Salem, Oregon

Re: SB 873: Allowing “Bioengineering” to be used by DLCD and ODOT

Via email

Dear Chair Golden and Members of the Committee,

SB 873, before you today, would allow the Department of Land Conservation and Development of Department of Transportation to use “bioengineering practices” that incorporate natural materials like trees, plants, logs and woody debris into projects on “coastal resources.”

Oregon Coast Alliance, is a coastal land use organization whose mission is protection of coastal natural resources and working with residents to ensure community livability. For the record, we support non-structural solutions to coastal flooding and erosion: things like dynamic revetments, cobble berms, and burritos. State law also already strongly prefers these kinds of solutions.

We oppose SB 873 because it is completely unnecessary. Its inclusion in the statutes would complexify existing statutory frameworks for protection of coastal resources.

This bill would place a term not currently in Oregon law, “bioengineering,” into the statutes and rules. As this term is not defined, nor is there any language directing any agency to define it, it would greatly confuse the statutory framework. What one person calls “bioengineering,” another person would call riprap – a hard structural solution using big boulders that vastly increases beach erosion.

There is also no need for this bill. Goal 17, which covers coastal shorelands, contains an **explicit** preference for non-structural solutions to erosion and flooding in its Implementation Requirements: “Land-use management practices and non-structural solutions to problems of erosion and flooding shall be preferred to structural solutions.”

Goal 18, which creates the framework for coastal resources protection on beaches and dunes, contains an implicit preference for using natural solutions in projects involving mitigation, restoration, stabilization and similar efforts.

Overall, SB 873 is redundant, unnecessary, and poorly designed. It purports to encourage non-structural solutions to shoreline problems, but this is a preference *already* strongly encouraged in state law.

ORCA urges a “No” vote against SB 873.

Sincerely,

*/s/ Cameron La Follette*

Cameron La Follette  
Executive Director

