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*2/22/2024*  
*Comments*

**POSITION PAPER for**  
**Collier County Coastal Storm Risk Management (CCCSRM) Feasibility Study**

**Prepared By:** Collier County Coastal Advisory Committee (CAC)

**Date:** ~~DRAFT~~ February 19, 2024

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**TOPIC:** CAC input on current progress by US Army Corps of Engineers (USACE) on the CCCSRM Project

After two significant hurricanes impacting the county in the last 7 years causing significant damage from coastal flooding it is critically important for the county and the county residents which live within the areas susceptible to coastal flooding to implement a plan which prevents or at a minimum mitigates storm driven coastal flooding. Through the efforts of the county's coastal zone management staff, the county has been able to secure the USACE interest in a project and develop tentative options to mitigate storm driven coastal flooding. The first part of the project is the preparation of a Tentatively Selected Plan (TSP) based on cost-benefit driven flood protection/mitigation measures identified by USACE. USACE brings a wealth of experience and expertise and important federal funds to help pay for the design and construction to potentially be implemented by the County through a cost sharing agreement.

Unfortunately based upon the CACs participation in various planning sessions, public meetings and County and USACE led in person and virtual public meetings, it is CAC's opinion that the project is not trending towards the goal of preventing storm driven coastal flooding. This has occurred through a series of delays, mis-information and special interest environmental groups outside the county co-opting the message. Failure of this project to meet the goal exposes significant portions of the county to future destruction of homes, businesses, critical infrastructure and its overall impact on tourism, ultimately impacting the county economy. CAC's basis for this opinion include:

- Structural measures for flood protection have been eliminated from the USACE project driven by:
  - Construction cost inflation which has skewed the economics for "cost effective" available coastal flood prevention measures.
  - USACE has indicated its the county's preference for "nature based" solutions which cannot from a practical approach prevent coastal flooding via unprotected coastal inlets and exposed shoreline. Vocal environmental lobbying is driving nature based solutions as a realistic alternative to structural measures to prevent coastal flooding. *but that is an unrealistic*  
This would not be achievable with the current USACE plan. *- delete? Reword?*
- Marco Island and other portions of the county have been excluded from the USACE project.
- USACE TSP project schedule compression which is primarily driven by funding limitations is pushing accelerated completion of the TSP without adequate understanding of the economics being used to screen available prevention or mitigation measures.
- As currently proposed, the project appears to be headed towards a beach renourishment and mangrove planting project for limited areas of the county. This will not prevent coastal flooding.
- The current USACE schedule is to release the TSP to the public in September 2024 and allow a 30 day comment period as required by Federal law. However, USACE and Collier County have failed to note that this is the minimum federal requirement period for public comment.

Furthermore the comment period will be at a time when the County's population is at the lowest during the year and occurs during the height of hurricane season. A comment period of at least 90 days is necessary for the public, engineering professionals and other parties to adequately review and comment on the TSP.

If the county waits to act until USACE releases their Tentatively Selected Plan (TSP) it will be too late. CAC is recommending the county commissioners take a more proactive role in shepherding this project with clear communication that the county is in support of the project and is willing to do more to protect areas and communities which are at risk of coastal flooding but which are not part of the current USACE plan.

*CAC's*  
~~Our Recommendations~~ *are:*

- The County elected officials communicate their dedication to the USACE project and the need to get this right from the beginning and not rush to issue a TSP which does not meet the stated goal of preventing storm driven coastal flooding.
- The County's engineering experts become more directly involved in understanding the economic models being used, the resultant flood elevation, the defined areal flood zone for the model, and post flood impacts for each proposed flood mitigation measure.
- The County work with USACE on screening additional mitigation measures for improvements in areas currently not in the USACE plan or for improvements to USACE proposed mitigation measures (eg dune height increase, inlet protection, etc).

In conclusion the county has a once in a lifetime opportunity to reduce the risk of coastal flooding with technical support from USACE and substantial Federal funding. We cannot squander this opportunity.