

## POSITION PAPER

### **Objections by the Coastal Advisory Committee (CAC) to the Coastal Storm Management Feasibility Study**

After two significant hurricanes impacting the county in the last 7 years and causing significant damage from coastal flooding, it is critically important that the county and county residents implement a plan that prevents or at least mitigates damage from storm-driven coastal flooding.

Through earlier efforts by the Coastal Zone Management, the county secured the participation of the U.S. Army Corps of Engineers (USACE) in a study to develop options to mitigate such damage. The first step was a feasibility study to be completed in 2025. If approved, that would lead to a cost-sharing program with the USACE to flesh out the plan and implement the project.

Unfortunately, based on the CAC's participation in planning sessions and public meetings – some led by the USACE – it is the CAC's opinion that the project as now portrayed will **not** prevent widespread damage from coastal flooding. This is due to a series of delays, misinformation, and special-interest environmental groups coopting the message. As a result, the project, if implemented as it now stands, would expose significant portions of the county to destruction of homes, businesses and critical infrastructure. That, in turn, would impact tourism and marine businesses and affect the county's economy.

CAC's basis for this opinion is as follows.

- Structural measures, so-called “hardening,” have been completely eliminated from the feasibility study. That is a recipe for disaster. Widespread coastal engineering experience teaches that at least **some** hardening – groins, seawalls, jetties, floodgates – is necessary to prevent widespread flooding.
- Such measures have been eliminated because (1) construction cost inflation has skewed the economics for “cost effective” options and (2) vocal environmental lobbying has driven “nature-based only” solutions.

- Marco Island and other portions of the county have been excluded from the USACE project, ensuring the plan will not be comprehensive.
- Time compression of the feasibility study means measures other than “nature-based only” cannot be thoroughly examined.
- The current USACE schedule calls for the tentatively selected plan (TSP) to be released in September 2024 and to allow only a 30-day comment period, hardly enough at a time when a large part of the population is away and when the hurricane season is at its peak.

If we wait to act until the USACE releases its TSP, it will be too late. We urge the county commissioners to take a proactive role to ensure the plan is not dead on arrival. In its current form – with hardening and large portions of the county excluded – **widespread coastal protection cannot be ensured.**

The CAC proposes the following.

- County officials should convey to the USACE that their ongoing support is contingent on not rushing approval of a TSP. A 90-day comment period is recommended. Let’s get this right from the beginning.
- County engineering experts, including those in advisory groups, should become actively involved in devising models that ensure widespread protection. That includes a better understanding of flood zones and elevations, as well as flood impacts. It also involves modeling of selective hardening, dune heights and plantings.

In conclusion, the CAC feels Collier County has a realistic chance to reduce the risk of damage from future storms – but not with the current USACE plan. Significant changes are needed. Let’s not squander this opportunity.

Joe Burke, chairman  
Coastal Advisory Committee