

## POSITION PAPER for

### Collier County Coastal Storm Risk Management (CCCSR) Feasibility Study

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

**Date:** REVISED DRAFT May 8, 2024

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

Collier County has experienced two significant hurricanes impacting the county in the last seven years and causing significant damage from coastal flooding. It is therefore critically important for the county and the county residents living within the areas susceptible to coastal flooding implement a plan that prevents or at least effectively mitigates storm driven coastal flooding.

Through earlier efforts by 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 is a feasibility study to be completed in 2025. If approved, that would lead to a cost sharing program with the USACE to further develop the plan and implement the project.

Unfortunately, based upon the CACs participation in planning sessions and public meetings – some lead 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 outside the county 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. It should be noted that the current plan is addressing environmental justice areas of the county affected during Ian.

CAC's basis for this opinion is as follows:

- Structural measures, so called "hardening", have been completely eliminated from the feasibility study. Good engineering practice recognizes that hardening (for example, groins jetties, floodgates, etc) is necessary to prevent widespread flooding. Such measures have been eliminated because (1) Construction cost inflation which has skewed the economics for "cost effective" options and (2) vocal environmental lobbying has driven a "nature-based only" solutions. This is creating an unrealistic expectation that limited nature based solutions can be a cost effective alternative to structural measures in preventing coastal flooding. The limited depth of undeveloped shoreline and development along the inlets and waterways prevent implementation of effective natural flood barriers.
- 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 time compression is primarily driven by USACE project funding limitations leading to accelerated completion of the Tentatively Selected Plan (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 calls for the TSP to be released in September 2024 and to allow a 30 day comment period, hardly enough at a time when a large part of the population is away and when hurricane season is at its peak. 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 TSP, it will be too late. We urge the county commissioners to take a more proactive role to ensure the plan effectively mitigates the risk of coastal flooding. In its current form – with hardening and large portions of the county excluded – widespread coastal protection cannot be assured.

The CAC proposes the following.

- County elected officials convey to the USACE project team that the county does not want to rush completion of the TSP, the need to get this right from the beginning and the need for a 90 day comment period once the TSP is complete.
- The County's engineering experts, including those in advisory groups, 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 (hardened and nature based).
- 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 CAC believes the county has a unique opportunity to reduce the risk of storm driven coastal flooding - but not with current USACE plan. Significant changes are needed. We cannot squander this opportunity.