POSITION PAPER for

Collier County Coastal Storm Risk Management (CCCSRM) Feasibility Study

Prepared By: Collier County Coastal Advisory Committee (CAC)

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

Collier County has experienced ~~After~~ two significant hurricanes impacting the county in the last seven~~7~~ years and causing significant damage from coastal flooding. ~~i~~It is therefore critically important for the county and the county residents ~~which~~ live~~e~~ing within the areas susceptible to coastal flooding ~~to~~ implement a plan ~~whic~~that prevents or at ~~a minimum~~least effectively mitigates storm driven coastal flooding.

Through earlier~~the~~ efforts by~~of the county's c~~Coastal Z~~z~~one ~~m~~Management ~~staff~~, the county ~~has been able to~~ secured the participation of the U.S. Army Corps of Engineers (USACE) in~~terest in~~ a study to~~project and~~ develop ~~tentative~~ options to mitigate s~~torm driven coastal flooding~~uch damage. The first ~~part of the~~step is ~~projecta~~ 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.

~~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 and~~,~~ public meetings – some lead by the USACE ~~and County and USACE led in person and virtual public meetings,~~ - it is the CAC's opinion that the project ~~i~~as now portrayed will not ~~t trending towards the goal of~~ prevent widespread ~~ing~~damage ~~storm driven~~ from coastal flooding. This ~~ha~~is due to ~~occurred through~~ a series of delays, mis-information and special interest environmental groups outside the county co-opting the message. As a result, the project, if implemented as it now stands, would expose ~~Failure of this project to meet the goal exposes~~ significant portions of the county to ~~future~~ destruction of homes, businesses and~~,~~ critical infrastructure. That in turn, would ~~and its overall~~ impact ~~on~~ tourism and marine businesses and affect ~~, ultimately impacting t~~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~~include~~:

- Structural measures, so called "hardening", ~~for flood protection~~ have been completely eliminated from the feasibility study~~USACE project driven by~~. 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)
- ~~o~~ Construction cost inflation which has skewed the economics for "cost effective" options and (2) vocal environmental lobbying has driven a "nature-based only" solutions. ~~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 This is creating an driving nature based solutions as a unrealistic expectation that limited nature based solutions can be a cost effective alternative to structural measures into preventing coastal flooding. The limited depth of undeveloped shoreline and development along the inlets and waterways which prevent cannot from a practical approachimplementation of effective natural flood barriers prevent coastal flooding via unprotected coastal inlets and exposed shoreline.

- This would not be achievable with the current USACE plan.

- Marco Island and other portions of the county have been excluded from the USACE project, ensuring the plan will not be comprehensive.
- Time USACE TSP project schedule compression of the feasibility study means measures other than "nature based only" cannot be thoroughly examined. The time compression which is primarily driven by USACE project funding limitations is pushleading 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 foris to release the TSP to be released the public 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 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. We urge CAC is recommending the county commissioners to take a more proactive role to ensure the plan effectively 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 atmitigates the risk of coastal flooding but which are not part of the current USACE plan. In its current form – with hardening and large portions of the county excluded – widespread coastal protection cannot be assured.

The CAC proposes the followingOur Recommendations.

- The County elected officials convey mmunicate their dedication to the USACE project team that the county does not want to rush completion of the TSP,and the need to get this right from the beginning and the need for a 90 day comment period once the not rush to issue a TSP which does nis complete.ot meet the stated goal of preventing storm driven coastal flooding.
- 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 uniqueonce in a lifetime opportunity to reduce the risk of coastorm driven coastal flooding - but not with current technical support from USACE and substantial Federal fundingplan. Significant changes are needed. We cannot squander this opportunity.