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**The
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Foundation**

October 21, 2019

Susan L. Conner
Chief, Planning and Policy Branch
Norfolk District
U.S. Army Corps of Engineers

Dear Ms. Conner:

The undersigned organizations appreciate the opportunity to provide feedback on the “Back Bay” Coastal Storm Risk Management Feasibility study and look forward to reviewing the full Environmental Impact Statement. We are grateful for the Corps’ efforts to work with our region to achieve improved resiliency from storm surge. However, we have concerns about some of the proposals presented to the community thus far. Considering the dire need for flood mitigation support in our region, we want to ensure that projects selected have significant economic, environmental and community benefits. We hope that the below comments help to guide the Corps to a proposal that meets all stakeholders’ objectives.

We therefore ask that the concerns and comments below be considered in the selection of a tentatively selected plan in addition to previous scoping comments that have been provided.

Ensure Projects Will Do No Harm to Existing Communities and Infrastructure

While we have yet to receive detailed design criteria that would be applied to the proposed surge barriers, we have grave concerns about the incompatibility of these large concrete floodwall features placed in the interior of our community neighborhoods. Some of the proposed structures have the potential to disrupt neighborhoods, community-supported projects and livability.

We are further concerned that some of the proposed flood walls could impact our current storm water management system or increase flood risk on the eastern side of the flood barriers. Our storm water system is already under significant strain due to sea-level rise, and any evaluation must consider whether these proposals have unintended consequences that could make routine flooding in the region worse. While we understand that this project’s scope is limited to storm surge, any proposed project to address storm surge should include not exacerbate other regional flooding challenges. At a minimum, remediation strategies should be included in this project’s scope so not amplify existing challenges.

Define and Expand Community Vulnerability Considerations

We greatly appreciate the daunting task undertaken given the broad scope of this feasibility study and appreciate the use of the social vulnerability index in the identification of geographic priority areas for the non-structural features. However, it is unclear whether these criteria were also applied to structural features. We ask for clarity on how the structural project priority areas were chosen, and we ask that all features reviewed indicate the number of residents, income and race demographics that would be protected so we can ensure equitable protection of our community.

Expand Review of Critical Infrastructure

It is also important to understand how the risks of critical infrastructure are being assessed in order to prioritize them appropriately. We have been unable to confirm that key wastewater management plants were included on the critical infrastructure list, which if true, is a potentially egregious oversight. There are many brownfields and other contaminated sites in Miami-Dade County. Flooding of these areas may produce pollution risk that has widespread public health, environmental, and economic impacts for our community. These sites should be identified and considered for inclusion in this project scope.

Further, we suggest that evacuation routes and evacuation centers be included in the planning for storm surge vulnerabilities. Fortifications to these areas are critical for the community.

Focus on Projects with Multiple Benefits

While U.S. Army Corps of Engineers (Corps) is constrained to evaluation of storm surge benefits, we urge the Corps to recognize the needs of our local community and to address these preferred options more comprehensively. Alternatives should fully consider groundwater influences, aquifer protection, sea-level rise, cultural and social influences, and environmental impacts. We urge the Corps to weigh these considerations in your analysis so that the local sponsor can evaluate their opportunity for a locally preferred alternative.

We also see a missed opportunity to consider a redesign the existing salinity control structures along our rivers and canals that are operated by the South Florida Water Management District (SFWMD) so that they could achieve dual benefits for storm surge in addition to their current function. The complex nature and comingling of canals, restoration projects, groundwater and sea level rise challenges will require that the Corps work closely with the SFWMD and local municipalities to design and implement any of the proposed projects.

Evaluate Green Infrastructure Projects

We are disappointed to see an extremely limited use of green infrastructure in the proposed projects. We believe living shoreline opportunities, coral reef and dune restoration, and construction of mangrove barrier islands were prematurely screened out of the process. The public expressed their clear preference for these types of projects in the multiple public meetings held and comment letters. We

recognize there are permitting challenges, but the Corps now has a long history of experience with environmental restoration that can achieve multiple benefits for this region. We urge the Corps to do robust modeling to determine whether the benefit of these proposals is economically and environmentally feasibility. For example, in terms of cost-benefit ratios, coral reef restoration or dune construction may be on par with, if not better than, some of the proposed projects. There is ample local support for exploring these options, and we feel that the potential to implement these locally preferred options were not fully considered.

Focus on the Proposals with Local Support

As we know that the Corps' capacity to evaluate multiple alternatives is limited by time and budget, we strongly urge the Corps to focus further analyses and locally preferred alternatives. It would, therefore, be our preference to have more alternatives presented, including those that would require enhanced local sponsor investment as locally preferred options for storm surge mitigation. At a minimum, we ask that the Corps re-evaluate project options in light of these suggestions before selecting the preferred alternative.

We look forward to continuing to work through these challenges with you.

Warm regards,



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