

Board of Directors

Ken Russell
Chairman
Commissioner, City of Miami

Neisen Kasdin
Vice-Chairman
State Cabinet Representative
Akerman LLP

Eileen Higgins
Commissioner, District 5
Miami-Dade County

Alicia Cervera Lamadrid
Cervera Real Estate

Philippe Houdard
Pipeline Workspaces

Danet Linares
Blanca Commercial Real Estate

Richard Lydecker
Lydecker | Diaz

Nitin Motwani
Miami Worldcenter Group

Alan Ojeda
Rilea Development Group

Gary Ressler
Tilia Companies

Marta Viciedo
Urban Impact Lab

Greg West
ZOM Living

Suzanne M. Amaducci-Adams
Bilzin Sumberg

T. Spencer Crowley III
Akerman

Franklin Sirmans
Pérez Art Museum Miami

Executive Staff

Alyce M. Robertson
Executive Director

Christina Crespi
Deputy Director

November 8, 2019

Susan L. Conner, Chief Interim President & CEO
Planning and Policy Branch
U.S. Army Corps of Engineers
803 Front Street
Norfolk, VA 23510-1096

Dear Ms. Conner,

The Miami Downtown Development Authority (Miami DDA) is an independent agency of the City of Miami which represents the economic engine, cultural and recreational hub of South Florida. Emphasizing our regional significance, the market value of the properties in Downtown and adjacent neighborhoods is more than \$39 billion, which represents more than 50 percent of the City of Miami's taxable property value. With a current population of more than 92,000 that is expected to exceed 110,000 by 2021, Downtown is growing at the rapid rate of 4 percent. Furthermore, our daytime population of more than 250,000 underscores the importance of protecting our built and human assets.

On behalf of the Board of the Miami DDA, we submit the following comments regarding the US Army Corps of Engineers' "Back Bay" Study and its most recent recommendations to address storm surge in Greater Downtown. We believe these comments should be addressed in order to ensure strong and unconditional support from downtown stakeholders for the Feasibility Study, the Chief Engineer's Report, and the subsequent authorization and appropriation process with Congress.

- It is critical that the feasibility study recommend a continuous floodwall downtown along Biscayne Bay from Edgewater to Brickell.
 - For example, the current proposed location of the floodwall in Brickell would leave a large area of low-lying property and infrastructure in that neighborhood vulnerable to storm surge. Additionally, the open fetch across Biscayne Bay is longer here than any other area of downtown Miami. Moving the proposed floodwall to the east along the Brickell waterfront would help protect these vulnerable areas which were significantly impacted during Hurricane Irma.
 - Similarly, there is currently no floodwall proposed in the CBD area of downtown. This area contains critical infrastructure (mass transit, sanitary sewer pump station) and should be protected from storm surge.

- These floodwalls should integrate with the proposed Storm Surge Barrier and Pump Station at the mouth of the Miami River near Brickell Avenue.
- The feasibility study should recommend Natural and Nature Based Features in the Tentatively Selected Plan as a way to strengthen and extend the life of the proposed infrastructure, while also increasing public access to Biscayne Bay.
 - The USACE's Engineering with Nature Strategic Report, provides that: "Shared visioning and steering of project design, planning, and construction have been successfully incorporated to identify, reduce, and mitigate potential barriers to progress and accelerate completion of projects." In tandem, structural and nature-based features will extend the life of the seawall, reduce storm impacts and restore some of our disappearing ecosystems.
 - Such features should include nearshore artificial reefs and living shorelines.
 - These features should be evaluated as part of the NEPA/EIS process so that the environmental benefit of such features are thoroughly considered and vetted.
 - These features should be analyzed as alternatives which would enable extension of the downtown Baywalk promenade into Biscayne Bay, thus enhancing protection of infrastructure and property, and increasing public access to Biscayne Bay.
 - Specific examples of how these benefits can be achieved are provided in the attached Urban Land Institute Advisory Services Panel report on bolstering Miami's Urban Waterfront.
- The Miami-Dade Back Bay Study should be more closely coordinated with the feasibility study examining reauthorization of the Miami-Dade County Beach Erosion Control and Hurricane Protection Project.
 - If these studies are more closely coordinated in a substantive manner, they can result in recommendations which will better protect vulnerable areas and valuable property from damages associated with coastal storm surge.
 - The Miami-Dade Back Bay Study should also be coordinated with the South Atlantic Coastal Study and the Miami Harbor Navigation Improvement Study to ensure a holistic approach and integrated solutions that comprehensively reflect all of the USACE's efforts in the area.
- Incorporate resilience section (pages 30-41) of the attached Miami Baywalk/Riverwalk Guidelines into the design of any coastal floodwalls and ensure that Natural and Nature-Based Features are included as part of the structural solution.
- Develop the proposed structural solutions (floodwalls and storm surge barriers) in coordination with the public and private landowners so that they are harmonized with existing development and expand the economic vitality of our community. Specifically, ensure that any structural solution which is constructed does not create new or unnecessary obstacles to our residents' view shed and access to Biscayne Bay.
- Leverage public rights of way to the fullest extent possible so that improvements to our streets are made in conjunction with the barriers and can address sea level rise and sunny day flooding, as already experienced in our region.

Thank you for taking the time to understand our concerns. We know that Miami represents a growing urban area that involves complex challenges, however we are confident that the USACE will work collaboratively with our stakeholders to ensure infrastructure investments reflect the needs of our thriving population and help bolster our economic resilience long into the future. We

look forward to working with you as you advance the Back Bay Study recommendations to construction. In the meantime, please contact the Miami DDA with any questions.

Sincerely,

Ken Russell
Chairman

cc: Honorable Rick Scott, US Senator
Honorable Marco Rubio, US Senator
Honorable Fredrica Wilson, US Congresswoman, 24th District of Florida
Honorable Mario Diaz-Balart, US Congressman, 25th District of Florida
Honorable Donna Shalala, US Congresswoman, 27th District of Florida
Honorable Carlos A. Gimenez, Mayor, Miami-Dade County

Attachments: The Miami Baywalk/Riverwalk Guidelines
The Urban Land Institute Advisory Services Panel Report: "Bolstering Our Urban Waterfront"