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Shawn Hamilton
Department of Environmental Protection
3900 Commonwealth Blvd.
Tallahassee, Fl. 32399

RE: Statewide Rulemaking on criteria for Statewide Flooding and Sea Level Rise Resilience Plan Grants.

Dear Secretary Hamilton,

Thank you for the opportunity to provide comments on the Florida Department of Environmental Protection's (Department) Statewide Flooding and Sea Level Rise Resilience Plan grant rulemaking pursuant to section 380.093, F.S. Rising seas, booming coastal development and population growth combined with the increasing intensity of tropical storms puts both Florida's people and structures at risk from flooding and storm surges. This rulemaking effort is an important step in linking climate change vulnerability to amplifying local government and regional resilience.

Audubon Florida has reviewed the draft rule outlining criteria and scoring for evaluating and ranking grant requests under 62S-8 F.A.C. for advancing resilience to coastal and storm flooding due to sea level rise and increased tropical storm intensities. Audubon appreciates the opportunity to comment on these criteria and shares the following recommendations and comments.

Audubon recommends implementing a more coordinated approach in the rule in order to set projects up for success. As written, there is no incentive under the scoring criteria for projects that are within the footprint of a regional climate compact or for municipalities that are a part of a compact. Regional approaches to climate challenges are a powerful, effective way to catalyze local action, build community and climate resilience, and connect, strengthen, and support local leaders.

We also recommend prioritizing natural solutions, like coastal wetlands and mangroves, dunes, and barrier islands, or blends of gray and green infrastructure, like living shorelines in this scoring framework. Gray infrastructure is an inflexible solution to a dynamic problem and an insufficient response to the state's many flooding concerns. Instead, natural solutions create living systems that can respond to the ever-changing climate impacts we are facing and will continue to face. Natural solutions offer co-benefits that cannot be matched by traditional infrastructure. While providing natural flood and erosion control, natural solutions also improve air and water quality, enhance habitats for birds, fish and other wildlife, increase recreational opportunities and land values, recharge groundwater, and sequester carbon pollution. Audubon recommends maximizing point values for projects that incorporate environmental solutions.

The following are a few specific recommendations for inclusion in the draft rule:

- Much more emphasis should be placed on regional coordination. Tier 4 should include explicit incentives to involve and encourage participation in regional resilience or climate compacts.
- Increase program focus on coordinated resilience planning, including for eventual managed retreat of urban communities away from coastal high hazard areas. This, too, could be facilitated by greater involvement of regional resiliency compacts and coalitions, guided by academic, professional, state and national planning and technical resources.
- As written, the point system's rationale is unclear and opaque. Resiliency outcomes that are highest priority should receive highest scores. Audubon urges more transparency in linking outcomes to the scoring for grants applications.

- Coastal and climate storm and flood risk modeling tools should guide prioritization of resilience strategies, including determining areas where resilience investments will be successful, areas where retreat will be necessary, and the spectrum of strategies in between. Resilience grants should prioritize proposals that use best available science, data and modeling to guide locations and strategies.
- The current draft point system appears to minimize nature-based solutions and should have greater expectations for applicants to employ these win-win solutions. Audubon urges these strategies receive much higher emphasis in the scoring mechanism.
- Poorer and minority communities do and will experience disproportionate climate impacts in the face of sea level rise, storms and flooding. Without intentional efforts to overcome these system disadvantages, the same communities may not share equally in society-wide efforts to adapt and increase resilience. These grant criteria must place a stronger priority on environmental justice outcomes including more emphasis on planning and resilience for such disadvantaged communities.

Audubon Florida is fully supportive of the Flooding and Sea Level Rise resilience goals of these grant criteria. We offer these suggestions to further share our staff's expertise in collaboratively refining these specific criteria to best achieve their intended purposes for all of Florida's people and nature.

Sincerely,

Julie Wraithmell
VP and Executive Director
Audubon Florida

A handwritten signature in blue ink that reads "Julie Wraithmell". The signature is written in a cursive style with a large, looping initial "J".