

Comments

Chapter 62S-8

Statewide Flooding and Sea Level Rise Resilience Plan

General

1. Four scoring criteria “Tiers” are proposed without explanation of how they will be used. Will the first Tier be used as a first cut for eligible projects or will the four tiers be used to provide a combined score to rank the proposed projects?
 - A lot of stress is provided on regionally significant and number of critical assets. Shouldn’t it be based more on population served and overall benefits provided?
2. Should consider providing a benefit cost analysis (BCA) similar to provided for FEMA Hazard Mitigation projects. Projects with a more substantial BCA serving a greater community should obtain a higher score.
3. If a community’s FEMA flood mapping has not been updated recently, this community’s critical assets may not be properly identified within existing flood zones. There should be a means for a community to update the risk to its critical assets in lieu of relying of flood maps. Obtaining new FEMA flood maps is a long and arduous process, taking years to complete.
4. Scoring Percentage by Category – please refer to attached spreadsheet showing how points were divided to show scoring criteria emphasis, as follows:
 - 23.9% - Project criticality, critical assets served
 - 15.8% - Cost-effectiveness
 - 14.4% - Exceedance of design criteria – unclear what is the objective; this may be overemphasized; and difficult to achieve; see below
 - 11.3% - Natural system
 - 9.9% - Grant matching status
 - 9.0% - Disadvantaged communities – this may also seem a bit high and may need to be redefined; see below
 - 5.9% - Design readiness
 - 5.4% - Pre-planning
 - 4.5% - Location
5. Suggested changes in scoring criteria language:
 - General - There is no specific criteria for population served or population benefitting from the project. This should be a specific criteria to help prioritize projects that bring substantial benefits to very populated large watershed.
 - (2) Tier 1 b – regionally significant project
 - The definition of “regionally significant project” may create unintended consequences – see below long discussion below

- (3) Tier 2
 - a – Suggest change to project “benefits flood zone ...” instead of project is “located within flood zone” The project physical location should be secondary to the benefits it brings to the flood zones
 - c2 – Suggest change to project “benefits state or Federal critical habitat” instead of project is “located within state or Federal critical habitat”. Again physical location should be secondary to the benefits it brings to critical habitat
- (4) Tier 4
 - c – May be quite difficult to exceed design criteria because the definition of regionally significant project may increase design criteria as per Florida Building code
- Definition of “Regionally significant asset”: means **critical assets** that support the needs of **communities spanning multiple geopolitical jurisdictions**, including, but not limited to, **water resource facilities, regional medical centers, emergency operations centers, regional utilities, major transportation hubs and corridors, airports, and seaports**. This definition appears to include “water resources facilities” (very general) in the same list of emergency facilities, contrary to SFWMD policy, and expanding the original definitions in 380.090 FS (see PDF attached).

This definition lists water resource facilities in the same category as other ASCE 24 Class IV structures, see below description. Florida Building Code requires that buildings in the Special Flood Hazard Areas be designed by Flood Design Class, per ASCE 24. As per the paragraphs below from the Ardurra Coastal Study, this **definition may lump coastal control structures into a Class IV** vs their desire to classify most water resources into the Class III category as summarized in the Ardurra report; see below paragraphs. This means that the design standards and elevations will be higher than SFWMD intended by at a least adding an additional foot to the base flood elevation (BFE) or worse, designing to the 500-year storm event, if higher (see attached highlights of ASCE 24). Based on a quick perusal, we don’t believe that this was the original intent of 390.090 FS which specifically references the 100-year storm.

- The SFWMD has established that control structures are classified as **Flood Design Class III which ASCE-24** describes “buildings and structures that pose a high risk to the public of significant disruption to the community should they be damaged, be unable to perform their intended function after flooding, or fail due to flooding”. Facilities listed include “**water and sewage treatment facilities, telecommunication facilities, and other utilities** which, if their operations were interrupted by a flood, would cause significant disruption in day-to-day life or significant economic losses to the community”. As per the SFWMD, for coastal structures, the goal is to remain fully operational until

conditions worsen to the point that the structure cannot continue normal remote operations, at which point the gates should automatically open and critical equipment de-energized.

- Other SFWMD facilities, such as the safe room in a manned flood control pump station, should be designed as Flood Design Class IV which ASCE-24 defines as “essential facilities and services necessary for emergency response and recovery of pose a substantial risk to the community at large in the event of failure, disruption of function, or damage by flooding.” Flood Design Class IV includes hospitals, fire, rescue, emergency shelters, emergency response facilities, and similar facilities. Other flood control pump stations may warrant certain elements of their design to be considered Flood Design Class IV depending on the stage at which gravity bypass occurs.

Specific Comments

62S-8.003 Project Scoring Criteria (2) (c) 1. – What if the SFHA has not been updated recently? A community should have the other means to update and indicate their critical asset has a one percent or greater chance of being inundated.

62S-8.003 Project Scoring Criteria (2) (a) (c) 2. – Points are awarded by number of critical assets. There is no criteria for the size or importance of each asset. Would be better if based upon population served by the critical asset, etc.

62S-8.003 Project Scoring Criteria (3) (a) 2. - Again will there be a mechanism for local communities to address the fact that outdated flood maps may understate the risk to their critical assets?

62S-8.003 Project Scoring Criteria (3) (c) – Many highly effective projects to reduce vulnerability to critical assets have limited to no opportunity to incorporate environmental habitat enhancement or nature-based solutions.

62S-8.003 Project Scoring Criteria (3) (d) – Again a BCA requirement similar to FEMA’s 404 program may be more appropriate.