

**County of Monroe**  
**The Florida Keys**



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*Sent via email: Resilience@FloridaDEP.gov*

May 31, 2022

Krista Shipley  
Florida Department of Environmental Protection  
Office of Resilience and Coastal Protection  
3900 Commonwealth Blvd  
Tallahassee, FL 32399

***Re: Comments on Proposed Rule 62S-8, F.A.C.: Section 380.093, F.S., relating to the Statewide Flooding and Sea Level Rise Resilience Plan***

Dear Ms. Shipley:

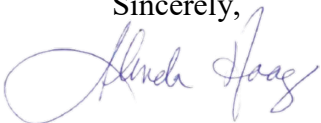
Please accept these comments submitted on behalf of Monroe County, FL in the Florida Keys, regarding the development of Rule 62S-8, F.A.C.: Section 380.093, F.S., relating to the Statewide Flooding and Sea Level Rise Resilience Plan, undertaken by the Florida Department of Environmental Protection (DEP). Monroe County appreciates the opportunity to participate in this rule development process. We participated in the rule development workshop that took place on May 26, 2022 and these comments are provided as a follow-up to that presentation and discussion.

For ease of review, we have attached our comments in strike/underline-track changes format in the attachment to this correspondence. In summary, our comments relate to the following key issues:

1. The Rule would benefit from some additional **definitions** to help clarify intent.
2. There should be clarification about the **ranking criteria for the scoring system** in the various Tiers consistent with Section 380.093(5) (h), F.S. In particular:
  - a. Eligible entities that have vulnerability assessments that do not yet comply with the criteria should still be able to receive some level of points in Rule 62S-8.003(2), F.A.C. As of now, it is only possible to receive those points once a comprehensive vulnerability assessment is completed meeting all of the Section 380.093(3), F.S. criteria.
  - b. The same section of the Rule (Rule 62S-8.003(2), F.A.C.) would benefit from a methodology to calculate the percentages of critical assets that are vulnerable so that there is some standardization in the methodology. This is important given the differences of the size and scope of the different types of critical assets defined in Section 380.093(2) (a), F.S.

We appreciate the DEP's efforts to finalize a clear and transparent rule for the scoring system outlined in Section 380.093, F.S. related to the Statewide Flooding and Sea Level Rise Resiliency Plan. We look forward to providing input and comments as the process continues for rule development. For any further questions, please do not hesitate to contact me at (305) 395-9928 at or via email at [haag-rhonda@monroecounty-fl.gov](mailto:haag-rhonda@monroecounty-fl.gov).

Sincerely,

A handwritten signature in blue ink that reads "Rhonda Haag". The signature is written in a cursive style with a large, looping initial "R".

Rhonda Haag  
Chief Resilience Officer