

Altenburg, Grace

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Sent: Thursday, March 31, 2022 11:08 AM
To: Resilience; Shipley, Krista
Cc: Mike Coates
Subject: FDEP Resiliency Draft Rule - Comments
Attachments: 62S-8 pre-workshop draft_PRRWSA Comments.docx

EXTERNAL MESSAGE

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Good Morning –

In accordance with the Resilient Florida Program’s request for comments on the 62S-8 Statewide Flooding and Sea Level Rise Resilience Plan draft rule language, please find attached an MS Word file containing the Peace River Manasota Regional Water Supply Authority’s (Authority) comments in tracked changes mode. In addition, the following general comments are provided with respect to the draft scoring criteria language:

- As an Independent Special District (189.012 FS) – The Authority would not be required to complete a “local government vulnerability assessment” and (per Section 62S-8.003(2)(a) of the draft rule), any proposed project not included in a local government vulnerability assessment would need to be identified in the comprehensive statewide flood vulnerability and sea-level rise assessment. As a regional drinking water facility, (meeting definitions in 380.093 FS - critical infrastructure and regionally significant assets), what is the process for projects to get identified in the comprehensive statewide flood vulnerability and sea-level rise assessment? What avenue do Special Districts have to meet this requirement?
- In general, the scoring criteria primarily focus on flood reduction and mitigation projects – however, sea-level rise will create challenges related to water quality – not just quantity. Many of the comments contained in the attached document address the inclusion of sea-level rise considerations into the rule. Saltwater intrusion/incursion due to sea-level rise is a real and significant threat to Florida’s drinking water sources – projects that mitigate these risks will not rank high given the current verbiage in the rule’s scoring criteria.

We appreciate the opportunity to provide feedback on suggested changes/considerations to the draft rule language at look forward to participating in the Statewide Flooding and Sea Level Rise Resilience Plan.

If you should have any questions or require any additional information, please contact us.

Thank you -


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 American Water Works Association

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