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Sent: Friday, April 1, 2022 12:34 AM
To: Resilience
Subject: Rulemaking - Comments
Attachments: asce24-14_highlights_jan2015.pdf; FDEP_RuleMaking62S-8_CommentsSFWMD.docx; FDEP Resiliency Grant Scoring Analysis.xlsx

EXTERNAL MESSAGE

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Dear All,

Please find below and attached our comments to the Resilient Florida Rulemaking.

Thanks

Carolina

Overall Comments:

A lot of emphasis is provided on regionally significant and number of critical assets. It should also be based on population served. There is so much discussion of the number of "critical assets" – but our structures are the critical asset and the potential impact supported is not easily measured.

There is no specific criteria for population served or population benefitting from the project. This should be a specific criteria to populated large watershed.

(2) (a) In addition of looking at the number of critical assets (which is actually already accounted for under 2b and 2c) or simple to characterize the degree to which the project addresses risk. The degree can be measured by establishing a baseline for con calibrated). For instance, a sea wall can reduce X% of the inundation of its immediate area. If a plan identified the total % of are risks in the area. The Flood Protection Level of Service Program produces overland flood inundation scenarios, which might be sea level rise/ storm surge inundation scenarios and a project alternative might reduce x% of the innundated area. Cost risks/inundated areas. If the degree of flood reduction can be directly estimated as part of each project request, that categor 1). Another alternative to determine a level of protection is the total number of years the project is providing protection for... 30 years of protection). Number of impacted population should also be factored in. Fina

It would be important to add a language to establish an standard scenario range to determine vulnerability. For instance, there versus a NOAA Intermediate High SLR Curve. A suggested way to address is to add: identified by applying the SLR (2) (b) The degree needs to be quantitatively determined with support of modeling tools and definition of value references. It sl thresholds/value references, the highest degree of protection should be assigned more points (up to 10 - 25% of Tier 1). Project 10 points. To determine a level of protection, thresholds should be established (e.g. - number of years the project is providing p approximately 30 years of protection).

(2) (c) FEMA efforts, including determinarion of SFHA, only accounts for current conditions.

(2) (d) The degree needs to be measured (it should not be Yes/No option). Idem to above comments.

(3) (a) One year is a too short period of time. For large magnitude and extension of flood events, to identify and implement best

(3) (a) 3 years is a short period of time. Idem above

(3) (a) This scoring section based on FEMA zones doesn't take into consideration a type project that pulls water west and away from
account for our type of refurbishment projects (e.g. major drainage canal system hardening or forward pump station) that could
zone in the future . IN addition, if a community's FEMA flood mapping has not been updated recently, this community's critical assets
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
to complete.

(3) (a) Use 1 or other1!! This is how we set up our Criteria at SFWMD – either current flood (by either FEMA, observations, etc) or analysis showing future conditions. Allow points to be added by OR (does not impact statutory language)

3 (b) Readiness to proceed

3(b) (1) 5 pts - design

Partial design – 1 pt

Signed and sealed drawings 3.75 – 90% design comments!!!!!!

3(b) (2) 2.5pts - permits

(3) (d) Benefit Cost Analysis should be included. If included and >1 , get max points. In addition, it would be important to consider FEMA Hazard Mitigation projects. Projects with a more substantial BCA serving a greater community should obtain a higher score.



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will be subject to review by the public unless exempt by law.