

## Altenburg, Grace

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**From:** Maran, Ana Carolina <cmaran@sfwmd.gov>  
**Sent:** Wednesday, June 1, 2022 8:31 PM  
**To:** Shipley, Krista  
**Cc:** Bouza, Eddy; Resilience  
**Subject:** FW: Resilient Florida Rulemaking Updates --- Please provide comments by 5PM Today

### EXTERNAL MESSAGE

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Krista,

Thanks for the opportunity to review the draft rule.

Most of our comments submitted during the first round of review were well addressed.

Please find below our questions / comments for the Round 2 Review.

Thanks,

Carolina

Resilient Florida - Chapter 62S-8 Statewide Flooding and Sea Level Rise Resilience Plan Rulemaking - SFWMD Comments:

- 1) How do you measure the degree to which a project addresses the risks posed by flooding and sea level rise? Neither 1. Or 2. Under (2) (a) includes specification and mention only: *“risks posed by flooding or sea level rise to critical assets either specifically identified in an existing comprehensive vulnerability assessment that shall be submitted to the Department with the proposal, or in the comprehensive statewide flood vulnerability and sea level rise assessment”*. Does modeling reports need to be provided, to validate the “risk reduction” assumption (and/or support measuring the degree of risk reduction) in the entire project impact area and downstream areas? An assessment of potential increase in flood risks to areas outside of the project impact area needs to be accounted for. The same consideration applies to Tier 1 (b) and Tier 1 (c) Criteria, under (2).
- 2) Consideration needs to be given to Comprehensive Vulnerability Assessments to be provided by Water Management Districts Under (2 – Tier 1) (a), as some of the language defined in F.S. 380.093 does not apply to WMDs
- 3) How do you define Medium or High Vulnerability – % of Critical Assets Under (2 – Tier 1)(c)? Is this associated with the adopted scenarios? Perhaps a criteria needs to be associated with the Medium or High Vulnerability definition.
- 4) Would flood reports in the last 5 years be only based on documented observations under (3 – Tier 2) (a) ? Hydrologic models have the ability to estimate flooding at certain areas for a 5-year rainfall return period under current and/or future conditions, and these results might also be used to characterize flood recurrence.
- 5) Total population within project impact area might be included as part of ranking criteria, along with number and/or percentage of critical assets.
- 6) Consideration might be given to projects that provide regional benefit beyond to a regionally significant asset, e.g. project impact area encompassing 3 or more municipalities or counties.



*Ana Carolina Coelho Maran, P.E., Ph.D.*

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