

Adrian Sevier
Regulatory Affairs Division
Office of Chief Counsel
Federal Emergency Management Agency
8NE, 500 C Street, SW
Washington, DC 20472-3100

Re: Seeking public comment on the draft Guidelines for Implementing the Federal Flood Risk Management Standard: Docket ID FEMA-2015-0006

Dear Mr. Sevier:

The undersigned are pleased to submit this letter of comment to the Federal Emergency Management Agency (FEMA) on the draft *Guidelines for Implementing the Federal Flood Risk Management Standard* (80 Fed. 6530, Feb. 5, 2015). We applaud the Administration's issuance of Executive Order 13690 to update federal flood protection standards, and agree that the federal government must act to improve our nation's resilience against flooding. As such, we support robust implementation of the Federal Flood Risk Management Standard and draft Guidelines as an effective approach to mitigate the future risks and costs of flooding exacerbated by the effects of climate change.

Climate change is increasing our nation's vulnerability to disastrous flood events. As sea levels rise and precipitation patterns change, coastal areas and riverine communities are becoming increasingly susceptible to flooding. Riverine communities throughout the country are entering a future in which flood events will not only become more frequent, but will also become more severe. For many coastal communities, flood risk is projected to increase substantially within the next 100 years. This projection portends serious consequences for U.S. coastal regions, which may face more than 30 or more days per year of flooding by 2050.

Traditionally, the federal flood protection standard required infrastructure to be built above the elevation of a 100-year flood. But reliance on this standard assumed that the so-called "100-year flood" only had a 1 percent chance of occurring in any given year. In fact, floods of this magnitude are occurring more frequently. Moreover, reliance on the 100-year flood risk assumed that past experience with flooding is representative of future conditions, an assumption that is incorrect given rising sea levels and changing precipitation patterns. It is critically important that the nation adopt a more protective set of standards.

The Federal Flood Risk Management Standard and draft Guidelines demonstrate significant improvement over their predecessor and establish a new level of protection in which agencies can select one of the following three benchmarks:

- Climate – Informed Science Approach: Use the best available climate science data to determine future flood conditions, and elevate structures above that future flood level (the preferred method for agencies to apply if the information is available);
- Freeboard Value Approach: Elevate structures and facilities two feet for standard projects and three feet for critical projects above the 100-year flood level;
- 500-Year Elevation: Elevate to the 500-year flood level (a flood with a 0.2 percent chance of occurring in any given year).

The three-option framework for determining the vertical flood level and corresponding flood hazard area provides a reasonable model for agencies to follow in order to best mitigate their flood risk. Each option ensures that the more frequent uncertainties associated with climate change and other future changes are adequately accounted for when federal agencies engage in an action that will affect the floodplain.

Additionally, the updated standard is a significant step forward for protecting our floodplains and preserving habitat. We strongly support the update that requires agencies, where possible, use natural systems and green infrastructure when developing alternatives to constructing in a floodplain. Proper floodplain management should have the dual goals of (1) flood loss reduction, and (2) the conservation and protection of the natural and beneficial functions of our water resources. Floodplain and coastal zones help stabilize our shorelines and riverbanks, provide important habitat for wildlife, control erosion, and improve water quality by filtering out pollutants. A bold interpretation of this amendment during finalization of the draft Guidelines is recommended.

As a whole, the Federal Flood Risk Management Standard and draft Guidelines will significantly benefit our nation. The updated standard directs federal agencies to build safer and smarter when operating in a floodplain, which makes for sound economic policy. Pre-disaster mitigation efforts, which include building to a higher standard, are proven to reduce the associated costs of post-disaster recovery. Long-term, the Federal Flood Risk Management Standard and draft guidelines will reduce the costs of future flooding, as it is cheaper to build safer today than it is to rebuild tomorrow.

Given the pressing nature of updating our federal flood protection standards, we recommend that the FEMA and partner agencies adopt the draft Guidelines for implementation of Executive Order 13690 in a timely manner, and do not bow to pressure to weaken their interpretation. Flood risks are rising in response to climate change and it is imperative we prepare our nation to be resilient in the face of this new reality.

Sincerely

(60 Organizations and their Representative(s) appearing on the following pages),

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