February 11, 2010

Jo Ellen Darcy
US Army Corps of Engineers
108 Army Pentagon, Room 3E446
Washington, DC 20310-0108

Dear Ms. Darcy:

The Association of State Floodplain Managers, Inc. (ASFPM) and its 29 Chapters represent over 14,000 state and local officials and other professionals who are engaged in all aspects of floodplain management and hazard mitigation, including flood risk management, mapping, engineering, planning, community development, hydrology, forecasting, emergency response, water resources, and insurance. Many of our members work with Federal Executive Order 11988 to reduce the risk of flooding caused by federal actions. We are writing to support your efforts to update EO 11988, and to update you on our activities in this regard.

There have been several news articles indicating that the current administration, as was intended by a number of previous Administrations, intends to issue a revision to the 1977 Executive Order on Floodplain Management. Many of the articles and a number of letters that have been sent to the Administration have had incorrect or misleading information about the proposed revisions to the Executive Order or demonstrate a lack of understanding about the content or intent of the current Executive Order.

ASFPM developed the attached paper to address this incorrect and misunderstood information surrounding the Executive Order. From our point of view, one of the most important aspects of the Executive Order update is the fundamental paradigm shift in how we thought about floodplains – the science of identifying them, the dynamic characteristics of them, and the evolving concept of flood risk and frequency of occurrence. A number of key factors have changed since the 1977 EO was written. Not only does technology allow us to more quickly and accurately determine impacts of actions, but it is now clear that watershed development and climate change can exacerbate those actions. The fact that flood damages continue to increase in the nation and floodplain resources continue to be lost, points out that we need to do more to turn this around.

Attached is a copy of our paper. ASFPM plans to circulate this document to ASFPM members and partners, federal agencies, congressional staff, and other organizations in order to address the misleading information regarding the proposed revision to Executive Order 11988.

If you have any questions or need further information, please contact me at (608) 274-0123 or at larry@floods.org.

Sincerely,

Larry Larson, P.E., CFM
ASFPM Executive Director

Greg Main, CFM
ASFPM Chair