



## ASSOCIATION OF STATE FLOODPLAIN MANAGERS, INC.

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### ASFPM's PRELIMINARY COMMENTS ON FEMA PROPOSED RULE ON FFRMS

#### DOCKET FEMA-2015-0006

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ASFPM is pleased to submit comments on FEMA's proposed rule to implement the Federal Flood Risk Management Standard as required by Executive Order 13690. ASFPM, a professional non-profit, represents 36 chapters and more than 17,000 state and local officials, as well as the private sector and other professionals engaged in all aspects of floodplain management and flood hazard mitigation. All ASFPM members are concerned with reducing our nation's flood-related losses. For more information on the association, its 14 policy committees and 36 state chapters, visit [www.floods.org](http://www.floods.org).

**ASFPM applauds the Federal Emergency Management Agency** for producing a draft document that lays out how the FFRMS will be applied to FEMA actions. FEMA is showing leadership among federal agencies to protect taxpayer investments from repeat and future damage from flooding. We hope that ASFPM comments contained herein will be useful to advance wise floodplain management and improve community resilience throughout the nation.

It is important agencies and the public understand the difference between Climate-Informed Science Approach (which is simply the hydrologic method used to identify the floodplain), and FFRMS (the eight-step process an agency will use to decide which alternative will be selected for that particular action). A detailed explanation of CISA was the subject of the [2015 Gilbert White Forum](http://www.asfpmfoundation.org/ace-files/forum/Meeting_the_Challenge_of_Change.pdf) on "Addressing the Challenge of Change" ([http://www.asfpmfoundation.org/ace-files/forum/Meeting\\_the\\_Challenge\\_of\\_Change.pdf](http://www.asfpmfoundation.org/ace-files/forum/Meeting_the_Challenge_of_Change.pdf)).

#### Overall comments

1. ASFPM expresses strong overall support of the FEMA action to move ahead in implementation of FFRMS. This action is very important to protect taxpayer investments in taxpayer-funded disaster costs and mitigation actions. This is especially important in light of more intense storms and changing conditions that are leading to more intensive flooding and damages from extreme events such as those we have seen in the past 12 months in Iowa, Minnesota, Texas, South Carolina, Wisconsin, West Virginia and Louisiana and elsewhere. Approaches to reverse or stop the increase in damage are needed to reverse the loss of lives we are seeing when we do not plan for these increasing flood events.
2. We applaud FEMA for continuing to use local and state standards in the application of FFRMS where those standards are more restrictive. It is extremely divisive when federal actions in a community do not meet standards the community requires for all other actions they approve.

*Dedicated to reducing flood risk and losses in the nation.*

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3. ASFPM has a major concern that the proposed rule allows critical facilities to be constructed in coastal high hazard areas if the project is elevated to the freeboard elevation. Critical facilities should never be constructed in Coastal high hazard areas unless **accessibility and operability are ensured during extreme events**. Katrina, Sandy and other big events are the poster children that showed this must happen to protect lives and make response viable.
4. It is important to institute a standard that establishes a preference for a CISA when applicable data is available, and that this be done sooner rather than later. Current FEMA language is not strong enough in establishing that preference. We must plan for the future in such a way that clearly articulates and provides for a preferred protocol when new or better data or methods are available. A simple statement that if a better method is available it should be used is inadequate. We must safeguard against becoming too lackadaisical in using freeboard when better methods for estimating future risks become available. Existing data sets can be adjusted using climate trends and future conditions to provide estimates of future flood risk, and methods for incorporating these considerations exist (both riverine and coastal) and are being used in different areas across the United States.
5. When determining horizontal floodplain extent, FEMA's proposed rule indicates it may use good information from applicant or other federal agencies. This should indicate FEMA will also use it from states.
6. ASFPM is concerned that the proposed rules do not strongly emphasize avoidance of flood hazard areas. The huge increase in flood damage we have seen in the past few decades is related to the current national approach of "identify the floodplain and then we will show you how to build in it." This is predicated on the false belief all development can be protected, even in high risk areas.
7. In response to the request in the proposed rule, ASFPM supports FEMA calculating CISA, freeboard and 0.2 percent flood for critical facilities and using the highest of those determinations.

This is the first high level comments ASFPM is submitting on FEMA's proposed rules to implement FFRMS. ASFPM will submit additional detailed comments before the Oct. 21st deadline. For questions on these comments, please contact Chad Berginnis, ASFPM Executive Director, at [cberginnis@floods.org](mailto:cberginnis@floods.org), or Larry Larson, ASFPM Senior Policy Advisor, at [larry@floods.org](mailto:larry@floods.org).