

November 30, 2023



Ms. Portia Ross
Director
Policy and Integration Division
Office of Environmental Planning and Historic Preservation, Resilience, DHS/FEMA
400 C Street, SW, Suite 313
Washington, DC
20472-3020

RE: Comment on FEMA Docket ID: FEMA-2023-0026 – Federal Flood Risk Management Standard (FFRMS) Proposed Policy

Dear Ms. Ross,

We at Taxpayers for Common Sense (TCS), an independent, nonpartisan voice for responsible taxpayer spending, write to express our support for the proposed Federal Emergency Management Agency (FEMA) policy regarding the Federal Flood Risk Management Standard (FFRMS). This policy marks a significant step in enhancing flood resilience in communities and safeguarding federal assets.

The FFRMS, established through Executive Order 13690 and reaffirmed by Executive Order 14030, represents a proactive approach to flood risk management. By mandating the use of the Climate Informed Science Approach (CISA), the Freeboard Value Approach (FVA), or the 0.2 Percent Annual Chance Flood Approach (0.2PFA), the policy ensures that floodplain determinations are based on the best available hydrologic and hydraulic data, incorporating current and future climate change impacts.

Historically, federal disaster management, particularly flooding, has been reactive, often leading to increased expenditures and loss of lives. The FFRMS policy signifies a shift towards a more proactive and comprehensive strategy. This aligns with our ethos at TCS, where we advocate for responsible and foresighted use of taxpayer dollars.

By incorporating future flood risks into federally funded projects, the FFRMS not only increases the resilience of these projects but also represents a financially sound strategy. As we often say, investing in resilience now will undoubtedly result in significant savings by reducing the need for costly emergency responses and reconstruction efforts post-disaster. Moreover, it will potentially save lives by mitigating the risks associated with flooding.

Furthermore, the policy's emphasis on considering natural features and nature-based approaches as alternatives in flood risk management is important. This not only supports sustainable solutions but also ensures that federal floodplain policy does not inadvertently encourage development practices that contribute to catastrophic events.

As an organization dedicated to ensuring responsible government spending, TCS supports this policy for its potential to save taxpayer dollars and lives. We urge its swift adoption and implementation.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "SE" followed by a stylized surname, likely "Ellis". The signature is written in a cursive, fluid style.

Stephen Ellis

President