

October 21, 2016



Regulatory Affairs Division  
Office of Chief Counsel  
Federal Emergency Management Agency  
8NE-1604, 500 C Street, SW.  
Washington, DC 20472-3100

RE: Docket ID: FEMA-2015-0006

To Whom It May Concern:

Wetlands Watch is a nonprofit based in Norfolk, Virginia, that works to conserve and protect wetlands by offering solutions to tidal wetlands' largest threat, sea level rise. We work with local government staff to promote sea level rise adaptation; a significant portion of this work occurs through local government floodplain management. Wetlands Watch supports the Federal Flood Risk Management Standard (FFRMS) and has stated its support in writing and at the public listening session held in Hampton Roads.

As we have seen since January, 2015, when Executive Order 13690 was issued and the FFRMS was proposed, our past estimates of flood risk are rapidly changing. In Charleston, South Carolina, Boulder, Colorado, Baton Rouge, Louisiana and here in Hampton Roads, Virginia flood risk is expanding outside the 100-year floodplain. This supports the FFRMS expansion of coverage beyond the 100-year floodplain. Regulating development in this new floodplain is essential to protecting our communities against the increased flooding resulting from sea level rise.

Wetlands Watch supports the proposed rule's requirement to use *natural systems, ecosystem processes, and nature-based approaches in the development of alternatives for all actions proposed in a floodplain*. Keeping development out of floodplains, while promoting the natural functioning of our floodplains to absorb floodwaters creates shorelines and communities resilient to the impacts of sea level rise.

Wetlands Watch supports the comments made by the American Society of Floodplain Managers (ASFPM) in response to FEMA's proposed rule outlining its implementation of the FFRMS. We agree with those comments and concerns delineated in ASFPM's submittal, with specific attention to the following issues.

Consistency with local government's existing floodplain management requirements and regulations is especially critical in coastal Virginia. In the face of increased flooding due to sea level rise, higher regulatory standards, such as freeboard, are widely adopted. The adherence of federal investments to a more restrictive local standard creates consistency, which aids local governments manage critical infrastructure and services.

Implementation of the Climate Informed Science Approach (CISA) provides essential flexibility for those regions with unique challenges, such as unusually high rates of subsidence, combined with unusually high rates of relative sea level rise. As the ASFPM's comments request, providing a clear definition of a lifecycle use for

non-critical structures will identify an important standard that local governments could potentially adopt, furthering the federal governments leadership in setting the tone of adaptation in our communities.

We remain in strong support of an even broader interpretation of “federal action” to include regulatory and indirect financial support such as loans and loan guarantees. We will continue to press for this broader interpretation of the coverage of Executive Order 13690 and The FFRMS, but are in full support of the current notice of proposed rulemaking.

Sincerely,

A handwritten signature in cursive script that reads "William A. Staley, Jr." The signature is written in dark ink and is positioned to the left of the typed name.

Executive Director  
Wetlands Watch