

The Honorable Pete T. Gaynor
Director
Federal Emergency Management Agency
500 C Street, NW
Washington, DC 20024

May 11, 2020

Submitted electronically on regulations.gov

RE: Comment on Proposed Building Resilient Infrastructure and Communities Policy (FEMA-2019-0018)

Dear Director Gaynor:

The Theodore Roosevelt Conservation Partnership (TRCP) is a national coalition of 60 hunting, angling, conservation, and outdoor industry organizations that seeks to ensure all Americans have access to quality places to hunt and fish. We aim to unite and amplify the voices of America's more-than 40 million sportsmen and women whose activities help sustain the \$778 billion outdoor recreation economy.

We appreciate FEMA's decision to make technical assistance an eligible type of assistance under the Building Resilient Infrastructure and Communities (BRIC) Program and for the inclusion of capability- and capacity-building support for state, local, tribal, and territorial governments (SLTTs) in the program principles. This will help improve the resiliency of communities across the country. However, as the agency works to finalize its policy in order to implement the BRIC Program, TRCP urges FEMA to add the following principles to its BRIC policy.

1. Encourage the use of natural infrastructure approaches.
2. Promote the use of best available science in project design.
3. Promote multi-jurisdictional planning and cooperation to reduce risk and increase sustainability and resiliency.

We also request long-term monitoring be included in the list of eligible activities for BRIC funding. Finally, when considering projects that include potential buyouts, we urge the agency to work with grantees to prioritize buyouts that provide maximum natural hazard risk reduction and additional environmental benefits.

Please see our detailed rationale for the inclusion of these additional principles and additional activities below.

Add a principle that encourages the use of natural infrastructure approaches

Natural infrastructure helps protect communities from natural disasters, including hurricanes, drought, and flooding events, and it provides substantial co-benefits such as enhanced fish and wildlife habitat, increased recreational opportunities, and improved water quality. For example, from the 1970s to the late 1990s, Napa County residents had experienced nearly \$550 million in flooding damage; however, starting in 1998, Napa County along with other local, state, federal, and NGO partners, began putting in place a “living river” plan to reduce flood damages along the flood-prone Napa River.¹ The project restored over 650 acres of high-value tidal wetlands, while also providing protection for 2,700 homes, 350 businesses, and over 50 public properties. The project helped to revitalize a long-declining downtown while also providing \$26 million in flood damage reduction costs each year.²

A significant number of the stakeholders who submitted comments during FEMA’s comprehensive stakeholder engagement process wrote in support of prioritizing natural infrastructure; however, FEMA’s proposed BRIC policy document does not mention natural infrastructure or nature-based solutions. We encourage FEMA to include a principle in its BRIC policy encouraging the use of natural infrastructure approaches in order to reduce risk from flooding, drought, and other natural hazards. In the Disaster Recovery Reform Act of 2018 (DRRA), FEMA is directed to “fund activities that maximize net benefits to society.” Since natural infrastructure can provide the infrastructure solutions that communities need while also providing a wide range of co-benefits, FEMA’s BRIC policy should highlight nature-based solutions in order to encourage communities’ use of these types of projects.

Add a principle that promotes the use of best available science in project design

Communities across the country must contend with increasingly intense flooding, droughts, wildfires, and storms. Damage from flooding alone has continued to increase and now causes more than \$6.5 billion in damage every year. Because of these factors, FEMA should include a principle in its BRIC policy requiring state and local governments to use the best-available science in the design of any BRIC funded project in order to help grantees address long-term threats from climate change, sea-level rise, and increasingly intense weather events. This will ensure communities make secure, sustainable investments and federal dollars are used effectively for long-term benefits. Further, if state and local grantees fail to account for how conditions change over time, mitigation projects will not be designed to withstand future storm events, leading to increased disaster costs and putting local communities at risk.

Due to the substantial number of stakeholder engagement process respondents who expressed concerns about limited access to up-to-date risk models, including models that integrate future

¹ County of Napa. Creating Flood Protection. Retrieved on from County of Napa website <https://www.countyofnapa.org/1096/Creating-Flood-Protection>.

² San Francisco Chronicle (2017) ‘Living river’ rejuvenates Napa, brings needed flood control. Retrieved from <https://www.sfchronicle.com/politics/article/Living-river-rejuvenates-Napa-brings-11109403.php#photo-12805051>.

climate projections, FEMA should either provide successful applicants with funding and technical assistance to develop their own risk data or make such data available to grantees. This will enable the agency to signal to state and local grantees that investments in mitigation projects are “future-proofed” to account for increasing risks due to climate change and sea-level rise.

Add a principle that promotes multi-jurisdictional planning and cooperation to reduce risk and increase sustainability and resiliency

As FEMA notes in its Multi-Jurisdictional Mitigation Planning Guide created for state and local governments, multi-jurisdictional hazard planning helps to better share costs and resources and avoid duplication of efforts.³ Furthermore, planning around natural boundaries such as watersheds and coastal sediment systems can lead to better outcomes for the communities. FEMA should encourage local governments to make risk-informed decisions and to undertake regional approaches in order to improve their mitigation efforts.

Utilizing a multi-jurisdictional approach has helped Harris County (Texas) reduce long-term vulnerability and save taxpayer money. In 2015, the county updated its mitigation plan, which was originally adopted in 2005. The updated plan includes 33 jurisdictions (up from 26 jurisdictions in its 2005 plan). The current plan is able to better meet the needs of the entire community and targets hundreds of projects that will help to reduce vulnerability in the county. Collaborating with local jurisdictions and stakeholders has also allowed Harris County to complete the entire mitigation planning process in-house, saving about \$120,000.⁴

Include long-term monitoring on the list of eligible activities for BRIC funding

Long-term comprehensive performance monitoring of both pilot and full deployment projects is needed to carry innovative natural infrastructure techniques into the engineering mainstream. Current funding available for long-term and comprehensive monitoring is limited. Allowing long-term monitoring to be included on the list of eligible activities for BRIC funding, using uniform data standards set by FEMA in coordination with partners and stakeholders, would improve understanding of engineering specifications, comparative levels of protection, and maintenance requirements of natural infrastructure projects.

³ FEMA (2006) Multi-Jurisdictional Mitigation Planning State and Local Mitigation Planning How-To Guide Number Eight. Retrieved from https://www2.illinois.gov/iema/Mitigation/Documents/Plan_FEMA_HTG8.pdf.

⁴ FEMA (2015) Collaborative Community Resilience: Multi-Jurisdictional Hazard Mitigation Planning. Retrieved from https://www.fema.gov/media-library-data/1439557134446-297af7636e8ea1a2e4b0ba7287eed55b/Collaborative_Comm_Resilience_Mitgation_Planning_web.pdf.

When considering projects that include potential buyouts, urge grantees to carry out buyouts that provide maximum flood risk reduction and that provide additional environmental benefits

The use of buyouts to return flood-prone land to its natural state can significantly improve a community's ability to withstand future disaster events, and FEMA's mitigation grant programs have a long history of funding strategic buyouts. BRIC should continue to fund that work. Strategic buyouts are often an important part of local, state, and federal governments' disaster preparedness and response and they are an essential tool to help relocate residents living in vulnerable flood-prone areas. The BRIC policy document should be updated to include a principle that encourages the buyout of properties in floodplain areas, which will help state and local grantees reduce flood losses, protect vulnerable communities, and increase the long-term solvency of the National Flood Insurance Program.

Many states and communities already have comprehensive buyout programs in place that have improved flood resilience and restored fish and wildlife habitat. In North Carolina, the City of Charlotte and Mecklenburg County have overseen a regional floodplain buyout program since 1999 that pairs buyouts with stream and wetland restoration. The program has allowed more than 700 families and businesses to relocate from flood prone areas while simultaneously improving or preserving approximately 30 miles of streams and 18 acres of wetlands. The program has spent \$67 million to acquire properties, which has avoided approximately \$25 million in property damage and prevented \$300 million in future losses. Strategic buyouts are a great example of how local and state governments can improve their resilience to disasters by helping residents relocate out of areas especially vulnerable to repetitive natural hazards like flooding and wildfire.

Thank you for the opportunity to comment on the proposed BRIC policy and we ask for your consideration of these priorities as you finalize this policy document.

Respectfully submitted,

Kimberly Jensen
Director, Center for Water Resources
Theodore Roosevelt Conservation Partnership