

April 22, 2015

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

Re: Docket ID FEMA-2015-0006

To Whom It May Concern:

SmarterSafer, a coalition of environmental organizations, taxpayer advocates, insurance representatives, housing and mitigation groups is pleased to submit comments on the Federal Flood Risk Management Standards. SmarterSafer supports the adoption of standards designed to protect taxpayer investments when federal funds are used in flood hazard areas and looks forward to working with the Administration as the standards are implemented.

Natural disasters wreak havoc on communities and their residents. The scale and cost of natural disasters has been on the rise; so too has the federal share of disaster costs and the amount the federal government spends to clean up and rebuild after a disaster strikes. Unfortunately, while the federal spending post-disaster has dramatically increased over the last few decades, spending on proven, pre-disaster planning and mitigation still falls woefully short of what is needed to better protect people and their property. We know that mitigation, and smarter safer building protects facilities and people and their property. For every one dollar spent on disaster mitigation, four dollars are saved on post-disaster recovery and rebuilding. Investing in strengthening communities today is cost-effective and proven to reduce damage and resulting costs post-disaster.

The Federal Flood Risk Management Standards seek to better protect people from harmful flooding in areas that face flood risks. By establishing standards that incorporate the best science on flooding, and requiring federal funds only be used to build at safe elevations, not only are people and property better protected, but federal investments are protected for the long-run. When federal funds are being used to build or rebuild structures or to subsidize structures, the government should ensure the taxpayer investments are being made in safe, resilient ways.

The Federal Flood Risk Management Standards, coupled with a renewed focus on mitigation, including nature-based approaches, could help protect taxpayers' investments from having to be spent to repair that facility again in the next event. SmarterSafer, supports the adoption of these standards, however, we urge you consider flexibility in application of the standard to ensure that communities can best prepare for changing requirements. In addition, it is critical that implementation take into account the increased cost on low-income communities and low-income families, if these standards are applied to affordable housing programs and funding.

Thank you for considering our comments,

SmarterSafer
(list of members attached)

MEMBERS

Environmental Organizations

American Rivers
Center for Climate and Energy Solutions (C2ES)
Ceres
ConservAmerica
Defenders of Wildlife
Natural Resources Defense Council
National Wildlife Federation
Sierra Club
The Nature Conservancy

Consumer and Taxpayer Advocates

Coalition to Reduce Spending
R Street
National Taxpayers Union
Taxpayers for Common Sense
Taxpayers Protection Alliance

Insurer Interests

Allianz of America
Association of Bermuda Insurers and Reinsurers
The Chubb Corporation
Liberty Mutual Group
National Association of Mutual Insurance Companies (NAMIC)
National Flood Determination Association
Reinsurance Association of America
SwissRe
USAA

Mitigation Interests

Natural Hazard Mitigation Association
National Fire Protection Association

Housing

National Housing Conference
National Leased Housing Association

ALLIED ORGANIZATIONS

American Consumer Institute
Association of State Floodplain Managers
Center for Clean Air Policy
Friends of the Earth
Institute for Liberty
Property Casualty Insurers Association of America
Union of Concerned Scientists
Zurich