



Wednesday, May 6, 2015

Federal Emergency Management Agency
8NE, 500 C Street SW
Washington, DC 20472

RE: Docket ID FEMA-2015-0006

Comments on the Revised Guidelines (*Guidelines*) for Implementing Executive Order 11988, Floodplain Management

The Colorado Association of Stormwater and Floodplain Managers (CASFM) is a non-profit organization of 800 professionals living and working in Colorado. Our members represent employees of private industry, public service and academia, all working to reduce the loss of human life and property from flood and storm damage.

CASFM is generally supportive of the changes to Executive Order 11988. We echo the sentiments of our colleagues at the Colorado Water Conservation Board (CWCB) and the Urban Drainage and Flood Control District (UDFCD) in this support. We especially appreciate the renewed focus on the nature-based approach to floodplain management, the incorporation of resiliency language into the *Guidelines*, and the change in language from “flood control” to holistic “flood risk management.”

We have questions about the climate-informed science approach encouraged as the primary method for defining floodplains in all states through the draft *Guidelines*. The State of Colorado and some local governments have already mapped erosion hazards and calculated runoff volumes that account for fully-developed conditions within watersheds, especially within the UDFCD boundary. The flash flooding and debris slides, severe erosion, and drinking water quality degradation impacts of wildfire in our state are identifiable and quantifiable. We recommend these considerations be equally valuable to planning and mitigation efforts as climate-informed science.

CASFM supports vertical freeboard of 2 feet for non-critical actions and 3 feet for critical actions. The horizontal projection of Section 1.2.B of the *Guidelines*, however, is neither reasonable nor achievable. The proposed methodology will be difficult to map and apply without substantial upfront investment in hydraulic modeling and topographic mapping. The 2013 Flood in northeastern Colorado reminded us that rivers and streams in our state are dynamic, and prone to lateral migration, vertical degradation and aggradation, and avulsion; it is more prudent to finance studies

OFFICERS

Chair Brian Varrella, PE, CFM Olsson Associates 5285 McWhinney Blvd, Ste. 160 Loveland, CO 80538 (970) 342-1536 bvarrella@olssonassociates.com	Vice Chair Shea Thomas, PE Urban Drainage & Flood Control District 2480 West 26 th Ave., Suite 156-B Denver, CO 80211 (303) 455-6277 stthomas@udfcd.org	Secretary Jason Messamer, PE Olsson Associates 4690 Table Mountain Dr., Ste. 200 Golden, CO 80403 (303) 237-2072 jmessamer@olssonassociates.com	Treasurer Brad Bettag, PE CH2M HILL 9193 S. Jamaica St. Englewood, CO 80112 (720) 286-5326 bbettag@ch2m.com
---	---	--	--



identifying geomorphological and erosion hazards than to apply a one-size-fits-all standard of horizontal projection to federal actions.

The 8-Step Decision-Making process is overly complex but can be simplified. The public outreach and engagement focus is well intended but difficult to navigate and time-intensive. This may lead to a process that requires more time and taxpayer expense than benefits provided. We recommend the process be streamlined by collapsing Steps 3 and 4 into a single step, absorbing Step 6 into Step 5, and defining the final step as Execution rather than Decision-Making. These measures would create a 5-Step Decision-Making model with Execution as the post-decision outcome.

Clarity is needed to determine if federal “actions” include transportation and utility infrastructure construction and maintenance. The State of Colorado, through many agencies responding to 2013 Flood recovery, has developed a beneficial relationship with the public based on a showing of good science, stakeholder engagement, and a commitment to public trust. The execution of the *Guidelines* during the upcoming rulemaking process must protect and enhance this trust to prevent infrastructure activities from becoming too contentious to be effective, and this cannot be achieved until the impact of proposed “actions” on infrastructure is understood.

Finally, CASFM would respectfully request our organization be involved in rulemaking processes by federal agencies required by the *Guidelines*. Our members are subject matter experts in policy and practice in Colorado, and we collaborate continuously with our federal partners. Please let us know how our volunteers can be an asset to our partnering agencies so that we can affect beneficial change in Colorado.

Thank you for considering these thoughts, ideas and recommendations, and we look forward to participating in a future process that creates a Colorado that is more resilient to natural hazards.

Sincerely,

Brian K. Varrella, PE, CFM
Chair, CASFM.org

Stormwater and flood hazard mitigation information is available on the CASFM website at www.CASFM.org, or by contacting CASFM directly at casfm@casfm.org. The Colorado Association of Stormwater and Floodplain Managers is a non-profit organization of more than 800 professionals working in and around Colorado's watersheds, floodplains and urban runoff areas working to reduce the loss of life and property damage from storm and flood damage.

OFFICERS

Chair Brian Varrella, PE, CFM Olsson Associates 5285 McWhinney Blvd, Ste. 160 Loveland, CO 80538 (970) 342-1536 bvarrella@olssonassociates.com	Vice Chair Shea Thomas, PE Urban Drainage & Flood Control District 2480 West 26 th Ave., Suite 156-B Denver, CO 80211 (303) 455-6277 stthomas@udfcd.org	Secretary Jason Messamer, PE Olsson Associates 4690 Table Mountain Dr., Ste. 200 Golden, CO 80403 (303) 237-2072 jmessamer@olssonassociates.com	Treasurer Brad Bettag, PE CH2M HILL 9193 S. Jamaica St. Englewood, CO 80112 (720) 286-5326 bbettag@ch2m.com
---	---	--	--