

Congress of the United States
House of Representatives
Washington, DC 20515-1501

April 22, 2015

The Honorable Roy Wright
Deputy Associate Administrator for Mitigation
Federal Emergency Management Agency
8 NE, 500 C Street SW
Washington, DC 20472-3100

RE: FEMA-2015-0006

Dear Mr. Wright:

We are writing to urge the Federal Emergency Management Agency (FEMA) to further extend the public comment period for the proposed "Revised Guidelines for Implementing Executive Order 11988, Floodplain Management" (Guidelines), as published in the Federal Register on February 5, 2015, beyond the current deadline of May 6, 2015 for stakeholders, constituents, state and local officials, and Congress to have adequate time to respond to the Guidelines.

Executive Order 13690, "Establishing a Federal Flood Risk Management Standard (Standard) and a Process for Further Soliciting and Considering Stakeholder Input," issued by President Obama on January 30, 2015, amends Executive Order 11988, "Floodplain Management," signed May 24, 1977, in an effort to improve the Nation's resilience to current and future flood risk.

To comply with E.O. 13690, at a minimum, federal agencies must implement the Standard through one of three approaches to the construction of federal buildings in the floodplain that include construction of a minimum of 2-3 feet above the current base flood elevation (BFE) or using the area subject to a 500-year Floodplain.

The Guidelines also require agencies to use one of these approaches in determining whether a "federal action" is in the floodplain. The definition of a "federal action" includes any "federally undertaken, financed, or assisted construction and improvements." It is not clear in the E.O. whether this includes the National Flood Insurance Program or mortgage loans insured or guaranteed by the federal government through programs such as Federal Housing Administration or Veterans' Administration. A delay would give FEMA more time to clarify the breadth of the impact of this Executive Order.

Because of the potentially significant implications of the Guidelines and subsequent federal regulatory changes, it is imperative that they not be finalized until after careful scrutiny is given to all aspects of the Guidelines and their implementation.

The current deadline fails to provide this opportunity. The Guidelines are lengthy, complex, and raise critical legal, policy, economic, and administrative issues that require additional review. The Guidelines

could potentially impact any home or business located in a floodplain. Further, they could add regulatory confusion to federal projects if different agencies apply different standards for implementation.

Finally, no scientific, cost/benefit or economic analysis was provided in the Federal Register notice, so Members and stakeholders will need additional time to determine potential implications of this oversight and provide meaningful input. Again, an extended comment period would also give FEMA an opportunity to fully disclose the research, data, and findings that led to these Guidelines.

We again urge you to further extend the public comment period so taxpayers and their representatives in Congress can more fully understand and comment on these proposed Guidelines.

Respectfully,



Rod L. Blum
Member of Congress



Ralph Abraham, M.D.
Member of Congress



Cheri Bustos
Member of Congress



Tom Cole
Member of Congress



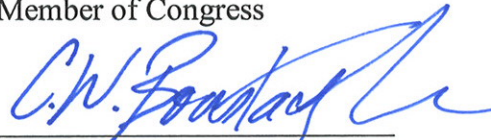
Rodney Davis
Member of Congress



Mario Diaz-Balart
Member of Congress



Dave Loebsack
Member of Congress



Charles W. Boustany, Jr., M.D.
Member of Congress



Emanuel Cleaver II
Member of Congress




Rick Crawford
Member of Congress



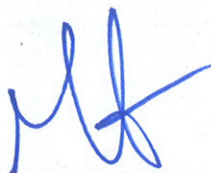
Jeff Denham
Member of Congress



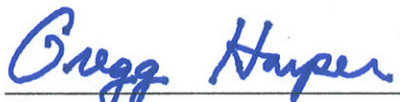
Bill Flores
Member of Congress



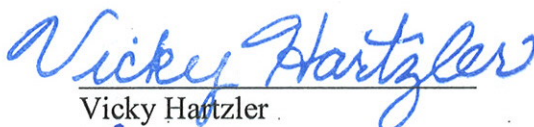
Paul A. Gosar
Member of Congress



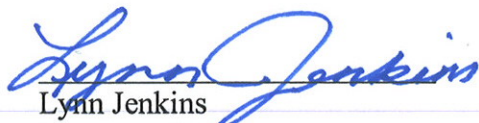
Garret Graves
Member of Congress



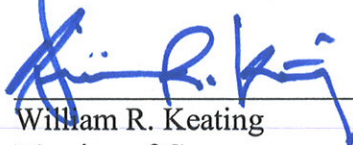
Gregg Harper
Member of Congress



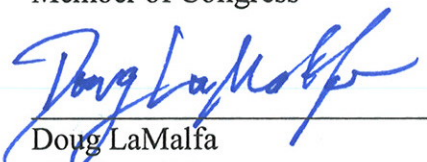
Vicky Hartzler
Member of Congress



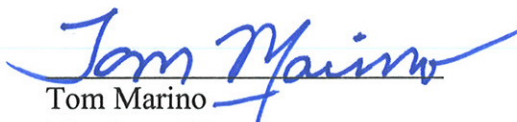
Lynn Jenkins
Member of Congress



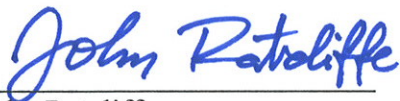
William R. Keating
Member of Congress



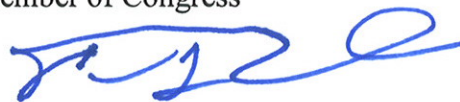
Doug LaMalfa
Member of Congress



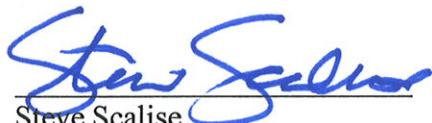
Tom Marino
Member of Congress



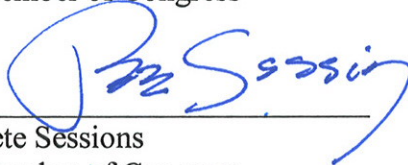
John Ratcliffe
Member of Congress



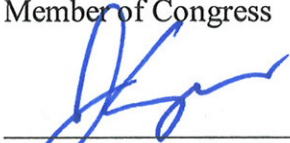
Cedric Richmond
Member of Congress



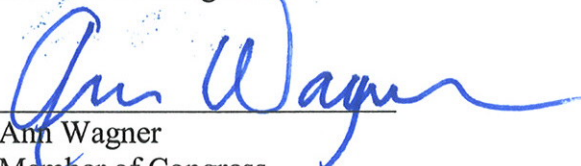
Steve Scalise
Member of Congress



Pete Sessions
Member of Congress



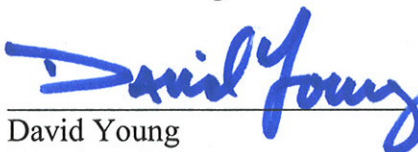
John Shimkus
Member of Congress



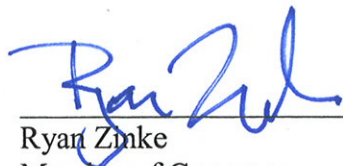
Ann Wagner
Member of Congress



Bruce Westerman
Member of Congress



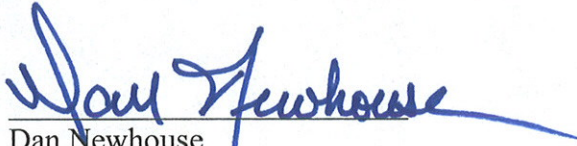
David Young
Member of Congress

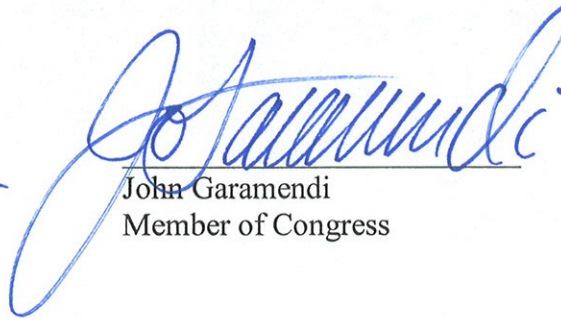


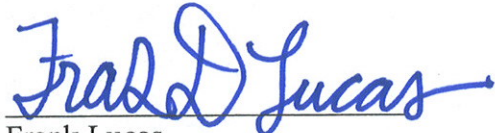
Ryan Zinke
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Ami Bera, M.D.
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John Garamendi
Member of Congress


Frank Lucas
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