



# The Association of State Wetland Managers, Inc.

“Dedicated to the Protection and Restoration of the Nation’s Wetlands”

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May 11, 2020

Peter Gaynor

Administrator

Regulatory Affairs Division, Office of Chief Counsel,  
Federal Emergency Management Agency,  
8 NE Ste. 1007, 500 C Street SW,  
Washington, DC 20472-3100

Re: Hazard Mitigation Assistance: Building Resilient Infrastructure  
and Communities (docket ID FEMA-2019-0018)

Dear Administrator Gaynor,

The Association of State Wetland Managers (ASWM) submits the following comments in response to the Federal Emergency Management Agency’s (FEMA) Hazard Mitigation Assistance: Building Resilient Infrastructure and Communities, for inclusion in docket ID FEMA-2019-0018.

ASWM is a nonprofit professional organization that supports the use of sound science, law, and policy in development and implementation of state and tribal wetland programs. Since 1983, our organization and our member states and tribes have had long standing positive and effective working relationships with federal agencies in the implementation of regulatory programs designed to protect our nation’s aquatic resources, including floodplains and wetlands and the communities connected to them.

The *Building Resilient Infrastructure and Communities Policy* appears to provide a solid framework for states, tribes, territories, and local governments to follow in accessing and implementing Building Resilient Infrastructure and Communities (BRIC) funding. In particular, ASWM is pleased to see capability and capacity building identified as the first principle in the policy. This funding will support state, tribal, and local governments in their ability to participate in the program and to take the lead in mitigation in the future. ASWM is also pleased to see FEMA provide additional cost share support for small impoverished communities since meeting matching fund requirements can often be a critical barrier to such communities.

One area of concern in the proposed policy is the lack of any apparent prioritization of traditional, non-structural flood reduction measures such as structure elevation, acquisition, flood-proofing, relocation, or managed retreat. Large infrastructure projects such as levee systems or dams can already be funded under other federal programs. Were such large and costly infrastructure projects funded under BRIC, less funding would be available for non-structural projects which are highly effective, faster to implement, and provide lasting risk reduction.

*ASWM strongly recommends that FEMA include criteria for prioritization of non-structural and nature-based approaches as preferred mitigation solutions.*

ASWM is also worried by the absence of any language in the policy that addresses the importance of considering future conditions and long-term benefits of a project. Changes in sea level rise and rainfall intensity and frequency must be included in project assessment and scoring to help communities achieve efficient outcomes and lasting resiliency.

*ASWM recommends that FEMA include language that addresses the critical need for consideration of future conditions and long-term benefits.*

ASWM appreciates the opportunity to comment on FEMA's BRIC policy. While these comments have been prepared by ASWM with input from the ASWM Board of Directors, they do not necessarily represent the individual views of all states and tribes; we therefore encourage your full consideration of the comments of individual states and tribes and other state associations. Please do not hesitate to contact me should you wish to discuss these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Marla J. Stelk". The signature is fluid and cursive, with a long horizontal stroke at the end.

Marla J. Stelk  
Executive Director  
Association of State Wetland Managers