

Minimum Floodplain Management Standards Public Meeting #3 Transcript on December 15

This document contains the transcript from the third Public Meeting held on Dec. 15, 2021, on FEMA's Request for Information (RFI) on the National Flood Insurance Program's (NFIP) Minimum Floodplain Standards. This transcript is also available in Spanish on FEMA's [website](#).

Slide 1 - Title

Jennifer Salerno: Hello and thank you for joining us on the Request for Information (or RFI) on the National Flood Insurance Program, referred to as the NFIP, Minimum Floodplain Management Standards. My name is Jennifer Salerno, and I will be your moderator. This meeting is being recorded. Transcripts of this meeting in both English and Spanish will become part of the public record and posted at a later date on FEMA's website. Participation in this public meeting constitutes your consent that your name may appear on the official transcript for the public record.

Slide 2 - Welcome

Jennifer Salerno: This is a public comment forum, rather than a discussion forum. We are hosting this public meeting to gather input on the published notice in the Federal Register on October 12, 2021. The purpose of this meeting is to seek feedback on the National Flood Insurance Program's floodplain management standards for land management and use and gather input on the program's potential to better protect threatened and endangered species and critical habitat. Individuals cannot apply for assistance or receive information regarding a pending assistance request as part of this meeting. If you are an individual who has been impacted by a disaster and are seeking assistance from FEMA, please call the FEMA helpline listed here to apply or receive information on a pending request.

Slide 3 - Technical Housekeeping

Jennifer Salerno: First, some technical housekeeping information, followed by a preview of the agenda for today's meeting. Today's meeting is being offered in Spanish via simultaneous translation. To listen in Spanish, please use the teleconference line and passcode listed on the screen. Live captioning is also available and can be accessed by navigating to the website listed here: <https://www.captionedtext.com>. Enter the ID number 4959359 for English captions or 4959362 for Spanish captions in the upper right-hand corner on the website.



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Slide 4 – Technical Housekeeping (cont.)

Jennifer Salerno: On the bottom of your screen, you will find the meeting controls. Note that the chat box has been disabled. By default, participants are disabled from speaking during the presentation portion of this public meeting. The verbal comment portion of today's meeting will allow those who registered in advance an opportunity to provide comments on the RFI for a limited amount of time, up to three minutes. When your name is called, you will be invited to unmute. At the end of the meeting, as time allows, there'll be an open comment period for interested individuals to provide additional verbal comments. As noted on the registration page, anyone dialing in by telephone for this meeting will be unable to provide verbal comments. If there is time in the meeting for additional comments, and if you have joined by telephone and wish to provide a verbal comment, you will need to connect to the meeting via the WebEx link.

Slide 5 - Agenda

Jennifer Salerno: Let's take a moment to review today's meeting agenda. First, we'll provide a brief history on the National Flood Insurance Program, or NFIP, which provides flood insurance to more than 22,500 communities across the country. Second, we will describe the background of this RFI and review its purpose. After the overview information, we will explain the instructions for providing your written comments on the RFI during the comment period. FEMA recently announced an extension of the comment period by 45 days. Comments can be submitted until Jan. 27, 2022.

The majority of the remaining time of today's meeting is reserved for verbal comments for the record on the NFIP Minimum Floodplain Management Standards RFI. We will review the details about how to provide verbal comments before we unmute microphones to receive your comments. We will conclude with a few closing remarks from FEMA's Floodplain Management Division leadership. I'm going to hand things over to our presenter today, David Maurstad, FEMA Deputy Associate Administrator of the Federal Insurance & Mitigation Administration.

Slide 6 – History of the NFIP

David Maurstad: Thank you, Jennifer. Hello and thank you for joining this public meeting for the NFIP's Minimum Floodplain Management Standards RFI, which covers floodplain management standards for land use and management, and the opportunities to better protect threatened and endangered species and critical habitat. My name is David Maurstad, and I am the Deputy Associate Administrator for Federal Insurance & Mitigation Administration, and the Senior Executive of the National Flood Insurance Program.

Until 1978, actions related to flooding were primarily responses to significant flooding events, such as the Midwest major riverine flood disasters of the 1920s and 1930s. However, despite federal investments in federal flood control projects, loss to life and property continued. In recognition of continued flood loss, major steps were taken in the 1940s, '50s, and '60s to redefine the federal government's approach to providing flood disaster relief.

The National Flood Insurance Program (commonly referred to as the NFIP) and the Federal Insurance Administration were created in 1968 following devastating riverine floods in the 1950s and Hurricane Betsy in 1965. The National Flood Insurance Act of 1968, which created the NFIP within the Department of Housing and Urban Development, was developed to provide flood insurance in communities that voluntarily adopt and enforce floodplain management ordinances that meet NFIP requirements. The purpose of the NFIP, as identified in the legislation, is to help minimize

the long-term risks to persons and property, and protect the natural and beneficial functions of the floodplain, from the effects of flooding.

Slide 7 – The NFIP Today

David Maurstad: Flooding is the costliest natural disaster in the United States, resulting in deaths and billions in property damage each year. In spite of this, people continue to live in the nation's floodplains. Flood and coastal storm events are also increasing in frequency and severity with billion-dollar events up 50% by the end of 2020, compared to the previous decade. And 70% of those costs were incurred in the last three years.

By making flood insurance available in communities that adopt and enforce floodplain management ordinances, the NFIP is the national foundation to protect lives and homes from flood disasters. Through its implementation, it is estimated that floodplain management efforts save the nation roughly \$2.4 billion annually through avoided flood losses. Currently, there are more than 22,500 communities across the country that participate in the NFIP.

Slide 8 – Request for Information Background

David Maurstad: As identified in the RFI, FEMA received a rulemaking petition from the Association of State Floodplain Managers and the Natural Resources Defense Council requesting that FEMA revise the current floodplain management standards. Submitted in Jan. of 2021, the petition requested that FEMA consider adopting the higher minimum standards. These standards include the nationally applicable consensus model codes and standards from the International Codes Council and the American Society of Civil Engineers Flood Resistant Design and Construction Standard. The petition also requested that FEMA develop standards that include future conditions related to construction and land use standards within flood-prone areas.

FEMA is seeking input on ways to improve the minimum floodplain management standards for land use and management which better aligns the NFIP with the current understanding of flood risk and risk reduction approaches. While FEMA provides updates to NFIP policy and technical guidance, the minimum floodplain management standards have not been revised since 1976. FEMA is thoroughly reviewing the floodplain management standards, along with prior published studies and reports, to determine how these standards can best meet FEMA and stakeholder needs.

Slide 9 – Request for Information Background (cont.)

David Maurstad: Additionally, at the national level, FEMA is re-evaluating the implementation of the NFIP under the Endangered Species Act. As part of this effort, FEMA is working with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service. Section 7(a)(1) of the ESA requires agencies to promote the protection of listed species and critical habitat. In 2020, FEMA launched a nationwide NFIP ESA Section 7(a)(1) Conservation Action Program promoting the protection and conservation of listed species and critical habitat. FEMA developed an educational website, a new mapping tool, and two new Community Rating System (CRS) sub-elements.

FEMA is currently working with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service on the implementation of the NFIP under Section 7(a)(2) of the ESA. FEMA plans to complete a revised National Programmatic Biological Evaluation and will re-examine NFIP actions.

Slide 10 – Request for Information Purpose

David Maurstad: In the last 45 years, we have learned a lot about the changing nature of flood risks, and now we have the opportunity to reevaluate the NFIP minimum standards. FEMA published this RFI to solicit input from the public on how to align the minimum floodplain management standards with the current understanding of flood risk and risk reduction approaches; potential improvements to the minimum floodplain management standards that would help communities become safer, stronger, and more resilient; and how the NFIP can better promote protection of and minimize any adverse impact to threatened and endangered species, and their critical habitat.

Through this RFI, FEMA will gather stakeholder input to inform potential revisions that make communities more resilient, protect species and habitat, and reduce needless disaster suffering.

Slide 11 – Providing Comments

David Maurstad: FEMA is seeking useful information, data, and perspectives that you have on the benefits and burdens of the NFIP's minimum floodplain management standards, flood hazard mapping, protection of threatened and endangered species, and other NFIP changes. You may submit written comments, identified by Docket ID: FEMA-2021-0024, through the Federal eRulemaking Portal at www.regulations.gov. All submissions must include the FEMA Docket ID for this notice. Visit the docket to review background documents or comments received at www.regulations.gov and search the Docket ID. Written comments are requested on or before Jan. 27, 2022. Late-filed comments will be considered to the extent practicable. By providing your input today or by submitting written comments, we have the opportunity to hear directly from you. Thank you in advance for your participation. I will invite our moderators to facilitate the verbal comment portion of this meeting.

Slide 12 – Verbal Comments

Jennifer Salerno: Thanks, David. Members of the public will now have an opportunity to provide comments. Those during registration who indicated an interest in providing verbal comments today will speak first, and then we'll open the comments up to all attendees depending on the time. We will be using a timer to stay on track. Two names will be called at a time. The first will be the current speaker and the second will be the speaker on-deck.

When your name is called, please use the "Raise Hand" function located to the right of your name in the Participants Panel, to indicate your readiness to speak. The hosts are using the "Raise Hand" function to identify speakers to be unmuted, so please leave your hand raised until you see the small lock icon on your microphone disappear. You will then be able to unmute. Once you are unmuted, please state your name for the record and that you are ready to speak. Each speaker will have three minutes to speak, and the timer will begin after you have been acknowledged by the moderator, me, to speak. I will say "we hear you, and your time for verbal comments begins now." If time allows after all registered speakers provide verbal comments, we will invite other meeting participants who have not yet spoken to indicate an interest in speaking by clicking the same "Raise Hand" icon.

Unfortunately, as was stated earlier, anyone dialing in by telephone will be unable to provide verbal comments at this time. If you have dialed into this meeting by telephone and wish to provide a comment, you will need to be connected via WebEx and click on the "Raise Hand" icon. You can also submit a written comment online at the eRulemaking Portal at <http://www.regulations.gov> and insert "FEMA-2021-0024" in the search function.

A reminder that FEMA will not be responding to comments during the webinar. We have a lot of speakers signed up today and we request that you limit your comments to no more than three minutes. When you have 15 to 30 seconds remaining, I will return to the video screen as an indicator that your speaking time is coming to an end. Given the registered number of speakers, I will unfortunately need to interrupt you if your comments are over three minutes so we can proceed to the speaker. Lindsey, can you share the names of our first two speakers?

Lindsey Reitingner: Absolutely, up first we have Cynthia Neely, please raise your hand. Following Cynthia, we will have Sheelah Bearfoot. They will be our first two speakers today.

Jennifer Salerno: Thank you Lindsey. Cynthia Neely, are you here?

Cindy Ewing: Can you hear me now?

Jennifer Salerno: Is that you Cynthia?

Cindy Ewing: I think it is! It's Cindy Ewing.

Jennifer Salerno: Ah, alright, I'm looking for Cynthia Neely.

Cindy Ewing: Oh! Sorry.

Jennifer Salerno: You're good. I'm not seeing Cynthia Neely on the participant list so we'll move on to Sheelah Bearfoot. If you are here, please raise your hand. Lindsey, while we wait for Sheelah, can you please give us the names of the next two speakers?

Lindsey Reitingner: Absolutely, after Sheelah we will have Terri Straka, followed by Danielle Ruddy.

Jennifer Salerno: Thank you. Sheelah Bearfoot? I'm not seeing Sheelah's name on the participant list so Terri Straka? If you're here, please have your hand raised and we will unmute you. I'm not seeing Terri Straka. We'll look for Danielle Ruddy. Danielle, if you're here please raise your hand. As we wait for Danielle, Lindsey could you please name our next two speakers that are registered to speak?

Lindsey Reitingner: After that we will have Nicholas Rehberg and David Congland.

Jennifer Salerno: I'm not seeing Danielle with a raised hand. Next, we have Nicholas Rehberg – hopefully I'm pronouncing that properly – Nicholas if you are here, please raise your hand. I'm not seeing Nicholas so we will move on to David Congland. While we wait for David, I'll ask again Lindsey if you could please name the next two speakers who have registered to provide comments.

Lindsey Reitingner: After Mr. Congland, we have Anna Weber and Woody Jackson.

Jennifer Salerno: Thank you. David Congland, if you're here I'm not seeing your hand raised. We'll move on to Anna Weber. If you're here, Anna, can you please – oh! Anna's hand is raised. Anna, are you there?

Anna Weber: Yes, hello. This is Anna. Can you hear me?

Jennifer Salerno: I can Anna. We hear you and your time starts now.

Anna Weber: Great, thank you so much. My name is Anna Weber, and I'm a Senior Policy Analyst at the Natural Resources Defense Council. I'm glad to have the opportunity to speak here today. I'd like to address the RFI's question about repeatedly flooded properties. Last year, our team at NRDC published an interactive data tool illustrating the most flood-prone properties covered by the NFIP: the severe repetitive loss or SRL properties.

These properties have flooded five times each on average. Across the nation, nearly 40,000 properties have qualified as SRL since the creation of the NFIP, but fewer than one-third of them have received assistance for reducing their flood risk. In fact, more SRL properties have dropped out of the flood insurance program altogether than have seen any action to reduce their risk. Meanwhile, increasing flood risk means that more homes are added to this list every year.

While repeated flooding is a financial liability to the NFIP, it is much worse for flood survivors and their families. Research shows that disasters like flooding are associated with increases in mortgage delinquencies and foreclosures as well as lower credit scores and increased wealth inequality. Lower income communities and communities of color both bear the brunt of flooding impacts and have the least access to the resources and support needed to reduce those impacts. In September 2020, the Department of Homeland Security's Office of Inspector General found that FEMA's Flood Mitigation Assistance Program "provides neither equitable, nor timely relief" to the applicants and the same can be said for other federal grants. Changes to the NFIP could help address repeated flooding.

First, FEMA should increase the amount of funding available for flood risk mitigation through increased cost of compliance coverage and make it more flexible. FEMA should increase ICC funding to at least \$60,000 with optional coverage to \$100,000 and allow ICC funds to be used toward home buyouts, elevation of utilities, and other flood resilience measures.

Second, FEMA should ensure that its flood maps reflect the best available science to allow for climate-smart decision making at the local level. FEMA should incorporate the best available science regarding sea level, precipitation, and intensity of hurricanes in any revision or update of NFIP flood maps. FEMA should incorporate data on sea level rise directly into the modeling and calculations it uses for vulnerable areas.

Third, as a nation, we need to stop building in harm's way. According to NRDC's SRL analysis, about one in seven of these properties was built after the publication of local flood maps and adoption of floodplain management standards. In other words when we should've known better. And new development in risky areas is still increasing. As a recent U.S. Government Accountability Office report pointed out, increased mitigation support won't be enough if the NFIP continues to incentivize risky action. I think all of us here can agree that the best way to stop repeated flooding is not to let it start in the first place. Thank you.

Jennifer Salerno: Thank you Anna for your comments. Our next speaker is Woody Jackson. As we wait for Woody to raise his hand using the "Raise Hand" function, Lindsey, the next two speakers please.

Lindsey Reitingger: The next two speakers will be David Southgate and Shana Udvardy.

Jennifer Salerno: Thank you. Do we see Woody's hand raised? I'm not seeing Woody here so we'll move on to David Southgate. David, are you here? Please raise your hand.

David Southgate: Yes, I am here.

Jennifer Salerno: Excellent, we hear you David. Your three minutes starts now.

David Southgate: Excellent, thank you so much. Greetings Director Maurstad and listeners from FEMA. My name is David Southgate from the historic Caribbean coastal city of Ponce, Puerto Rico. I am a distinguished graduate fellow at Rutgers University's M.S. PhD program in Public Affairs as well as a long-time community development practitioner. I presently collaborate with a community-based organization in Playa de Ponce called Un Nuevo Amanecer. We are one of three Puerto Rico-based chapters of the national nonprofit Anthropocene Alliance, a growing social force of flood survivors from Alaska to Puerto Rico.

I'm going to respond to question number one posed in the FEMA RFI on cumulative, substantial damage. But first, I'd like to tell you about my neighbor, Doña Miriam [REDACTED]. She deals with flooding, mixed with sewer water, lapping at her doorstep every time a heavy rain transforms her street into a river. The smell is unbearable and the damage constant. For six years, we've been trying to help Doña Miriam and her neighbors on her street.

We've been clamoring for action and nothing, sadly, because they live in what Puerto Rico calls a special community where informal homes may or may not have title to the land underneath them. Insurance is out of reach. Not to mention the cost. On behalf of people like Doña Miriam, we ask FEMA to use, at a minimum, the replacement cost value for repeat flooded homes when calculating benefits and that substantial damage take into account repeated flood disasters. Ideally, the agency would calculate the socioecological and intergenerational cost benefits of returning present-day settled flood sites back to the wild through strategies that facilitate climate migration and ecosystem restoration. That would be the right thing to do for this moment and into the future.

But in the absence of federal action around flood adaptation, some of my neighbors are taking matters into their own hands. Some raise their homes with improvisation. Others cover their yards with cement pushing floodwaters onto their neighbors. Others have packed up and left. In the past decade, 31% of this highly vulnerable neighborhood have abandoned their homes. Doña Miriam stayed, along with several of her neighbors, and they continue to suffer.

What is happening here is morally repugnant given the vast resources of the United States and the historic, systematic inequities that our government perpetuates. The data and the experience shows that the problems will only continue to grow. And we ask you and we ask our nation to do better. Thank you very much.

Jennifer Salerno: Thank you David for your comments. Next up, we have Shana Udvardy, if your hand is raised. Before we allow you to speak, Lindsey, if you could please give us the names of the next two speakers?

Lindsey Reitinger: Absolutely. Up next we will have Francisca Acuna followed by Doris Brown.

Jennifer Salerno: Thank you. Shana, are you here?

Shana Udvardy: Yes, I am. Thank you so much. Good afternoon everyone, my name is Shana Udvardy. I'm the senior Climate Resilience Policy Analyst with the Union of Concerned Scientists, and on behalf of UCS I'm pleased to provide very brief comments today. We know that updates and changes to the minimum floodplain management standards under NFIP are decades overdue, so we very much welcome FEMA's RFI.

The intent of Congress was to ensure that these minimum floodplain standards incentivize local and state governments to reduce flood risk by how and where they build; however, much more needs to be done to reduce flood risk. We know that communities fail to implement and enforce minimum standards, and that FEMA fails to ensure that these regulations are in place.

We know, First Street Foundation estimated that there are nearly 4.3 million homes across the United States, inland and coastal, with substantial flood risk today, and that the costs of expected annual loss of properties will grow by as much as 61% within the next year, 30 years due to climate change. Extreme weather and climate change-related flood impacts are causing major hardships across the United States and territories, especially for those historically disadvantaged and frontline communities. As FEMA works to update the minimum floodplain management standards, the agency must consider the 100-year floodplain as a benchmark for flood risk. FEMA must also work to ensure that climate change is integrated into all aspects of the program and standards.

Beyond these two major recommendations, I'll mention just a few additional thoughts on how FEMA can improve the minimum floodplain management standards. So first, FEMA should consider requiring communities to include climate change, a climate change overlay on local floodplain maps as a minimum standard. Should also consider how to incorporate Justice40 to help target resources to communities of color and low-income communities who bear disproportionate burden from flood impacts and related disasters.

I think also that there ought to be an adherence to a flood standard, similar to the flood risk management standard. And that communities ought to develop comprehensive planning that integrates climate change projections. While currently FEMA requires that communities include future projections in the hazard mitigation plan, a new requirement is needed to ensure that the different plans are being integrated into this plan, into this comprehensive plan. Also need to ensure that there are resources in place so that households move, so that the communities can help households who have been repeatedly flooded, move out of those flooded homes.

We also need new standards to protect critical infrastructure and critical lifelines, such as hospitals, fires and police stations, and as well as drinking, and drinking water plants. And we finally we need additional policies in place to ensure that disclosure of past flood damages is a mandate, um, to prospective buyers as well as that prospective buyers are educated on the projected flood risk due to climate change. So thank you again for the opportunity to provide initial thoughts and we'll be sure to submit more robust comments to the Federal Register.

Jennifer Salerno: Thank you Shana. I appreciate that comment. Our next speaker is Francisca Acuna. I see your hand is raised so we will unmute you. Francisca?

Francisca Acuna: Thank you very much for your time. My name is Francisca Acuna. I'm a resident of [REDACTED] in Austin, Texas. I have been responding to flood disasters in my neighborhood since 2013. Our residents have been dealing with trauma, mental health, loss of property, and even loss of life since way before that. We are already learning and teaching residents on how to anticipate, prepare, and respond to a disaster and we can help you do a better job

helping communities recover from flooding and mitigate future disasters. The city and the government seemed to be going backward; as residents are learning, they keep getting hit with barrier after barrier to survive.

I urge you to place strict restrictions on development happening along flooding areas and along creeks and rivers that may cause flooding in downstream neighborhoods. Don't build where, uh, where it floods. Stop recycling flooded properties. Disclose flood risks. Protect our, protect or restore ecologies that reduce flooding.

Make flood insurance fair. We have low-income residents living in flooding areas where we don't see wealthy people. With the Risk Rating 2.0, my flood insurance increased from \$450 to \$1,893. If I was struggling to pay for my flood insurance before, how is this going to make it any better? We have been asking for a flood insurance monthly premium, which will be more accessible for communities that are more impacted, but since the, since this payment, if this could happen, the payments will be lowered and you would have more residents covered with flood insurance. We need more community engagement and information as well as accountability.

Provisions must be made to protect communities from present and future harms due to more intense storms, rising high sea levels, subsidence, bad development and flooding. We need support transparency, inclusiveness, and accountability to grassroots organizers and organizations. We have experienced flooding because we get flooded just about every two years in my community. So please talk to us. Thank you.

Jennifer Salerno: Thank you Francisca, we appreciate your comments. Our next speaker is Doris Brown; Doris if your hand is raised, please do so now. Lindsey can you please share with us the next speakers?

Lindsey Reitingner: Yep, absolutely. We have Cynthia Neely with us, who we called earlier but I see she's joined now, so we can go to Cynthia next after Doris. Following that, we have Wanda Rios.

Jennifer Salerno: Thank you. I'm not seeing Doris on the participant list, so Cynthia if you are interested please - I see your hand is raised, we'll unmute you. Are you there Cynthia?

Cynthia Neely: Hello? Hello?

Jennifer Salerno: Hi Cynthia, your three minutes -

Cynthia Neely: I'm here. I am hearing impaired, so, I want to make sure I'm doing this right. Um, can you hear me?

Jennifer Salerno: We can hear you Cynthia. Please -

Cynthia Neely: Okay. I'm Cynthia Neely in Houston, Texas, and represent the nonprofit group Residents Against Flooding. And people here are not safe from stormwater because somebody somehow is making a profit. I'm an eyewitness to engineers who ignored evidence of a false flood map revision. That revision permitted a 600-home development in a floodway.

I'm an eyewitness to a citizen investigation revealing that a road reconstruction project might cause major flooding. A freeway drainage connection appears to be secretly planned, which would benefit the developer's property. I'm an eyewitness to homes that are not in floodplains but are flooding anyway because developers are using loopholes, grandfathering, bending rules to avoid putting in enough drainage.

We need the federal government to clamp down on county and city government and say, here's the deal. No exception to flood prevention. None. We need the federal government to tell these local governments, to step in, because they are trying not only to discredit us, but not act on information that we are providing that is, that is proven evidence.

We are citizens, but we're not just advocates for flood prevention, we are engineers, attorneys, professionals, but most of all, we're flood survivors. And the people, the citizens desperately need a direct way to reach FEMA with our evidence, a way to go over the head of those in power here who are influenced by politics, campaign contributions, and power. Filing a claim to your website doesn't work. It's been over two years for us, and we're still waiting. Citizens, regular people, see causes for concern. We live it. We're at Ground Zero. We have neighbors who have died from it. Yet, getting attention to our proof beyond our local government has been impossible.

The unscrupulous know how to bend rules. And we know an official who has been made aware of this malpractice, but would rather cover, cover their own behind that let it happen, than make it right. Until FEMA cracks down on Houston and Harris County and says "no exceptions," Americans everywhere will continue to pay to rescue us. Flood and repeat, flood and repeat. And please, give us a way to go over the heads of those in our government who may, just may be contributing to our problem. Thank you.

Jennifer Salerno: Thank you Cynthia. We appreciate your comments. Next, our speakers, we have... oh I'm sorry – it's not Doris Brown, I'm sorry, it's Wanda Rios. I'm sorry, I lost track because we went back to Cynthia. Wanda Rios, if you're here, please have your hand raised. Alright, while we're waiting for Wanda, Lindsey, can you please read off the next two speakers?

Lindsey Reitinger: Sure, following Wanda, we have Michele Insinga and Doroteo Garcia Jr.

Jennifer Salerno: Excellent. I'm not seeing Wanda, so we will move to Michele Insinga. I see your hand is raised. We will unmute you.

Michele Insinga: Thank you. Can you hear me?

Jennifer Salerno: We can hear you. Your three minutes begins now.

Michele Insinga: Thank you very much. I am the Executive Director of a nonprofit called Adopt a House. It was founded after Sandy so yes, I have been at this for almost 10 years. I agree with almost everything everyone said, not because I agree with them now. It's because I agreed with them 10 years ago. Unfortunately, where I am, which is in New York, which is on Long Island, what we have consistently seen, and we have spoken with many, many officials, we've been through Biggert-Waters, the HFIAA Act, Risk [Rating] 2.0.

I worked nationally on policy since all this time. But what we have actually seen is constant development in a floodway. What I mean by that is, where there was never a house, not even a single family house, empty lots in a floodway, maybe a restaurant, we have seen so much overdevelopment in the form of apartments. One of my biggest concerns with this is that this keeps happening over and over and over again.

And just to give, to cite of a few different examples: we had one with 260 apartments built over a creek and now it floods to their north. What we have been suggesting since about 2014, because we had at that time coined a

phrase that even Senator Gillibrand had used – because I worked with her – “rain is the new hurricane” and it is. So now, these properties to the north are flooding more. Another example is that we've seen, um because we were involved with a lot of things after Sandy, houses that were bought by developers, flood insurance was dropped, and now I had people coming to me that they want \$5,000 for the flood insurance on a policy that was dropped from a developer.

People cannot afford this. And I can tell you right now, the area is not worth that, not \$5,000 a year. What we are asking is that municipalities, as I've heard many others say, this practice needs to be stopped. The overdevelopment in floodways and floodplains needs to be stopped. Because what we're seeing is that our people are paying more and more for flood; they're paying nothing towards the system. Nothing, and we're seeing more floods happening. Another example that we've had in my town alone: we've had six projects done and floodplains that went empty lots prior, completely empty. They were just open five acres and now there's apartments in them.

So, what exactly is FEMA going to do about this overdevelopment? Are developers going to hold flood insurance policies? Are they also going to tell their residents that they have, in fact, moved into a flood zone? Will there be required rental insurance for contents coverage? Because we've seen that lost too.

I also was involved with, with Ida and that goes to an example of literally what I said, rain is the new hurricane, yet I've seen and had people in my own family who flooded, do not hold a flood insurance policy, but my Sandy people are paying \$3,000 a year. They have flooded once, twice, including my own son and my daughter-in-law and their basements, excuse me and my sister in law, and they hold no flood insurance policy. In fact, my sister in law took money from FEMA in Irene.

Jennifer Salerno: I don't mean to interrupt, Michelle. I'm so sorry, but your three minutes are up. I encourage you to please provide your comments in writing so that they can be reviewed by FEMA.

Michele Insinga: Yeah, you know what, I think I'm going to write a whole entire thing down because obviously I have an awful lot to say and a huge background in this, and three minutes of my time is hardly, you can tell, will not be enough.

Jennifer Salerno: We can tell, we just have lots of other speakers, but thank you. Thank you very much. Next, we have Doroteo Garcia. Doroteo Garcia, if you are here, please raise your hand. While we wait for Doroteo, Lindsey can you please read off the next two speakers?

Lindsey Reiting: Absolutely, up next we have Andrew Isbell and Jeff Ryan.

Jennifer Salerno: Excellent. I'm not seeing Doroteo. Andrew Isbell, if you are here can you please raise your hand so we can unmute you? Excellent I see your hand. Andrew, can you hear us? Oh, I saw Andrew's hand. Is Andrew here? I see Andrew's back. Andrew, are you there?

Andrew Isbell: Yes, I was just muted.

Jennifer Salerno: Alright Andrew we can hear you now; you have three minutes.

Andrew Isbell: Just so I'm make sure I'm doing the right thing here. My information was this had to do with ESA compliance and flood zone regulation.

Jennifer Salerno: Yeah, it does. There is a component that includes ESA.

Andrew Isbell: Okay, so my comments are just this, that, um, if FEMA intends to assist the local governments that are enforcing the floodplain regulations and they want more done at the local level from, on ESA compliance, or even in wetlands compliance areas, some resources are going to have to be devoted to the Corps of Engineers and the Federal Fish and Wildlife so that they have the resources to actually look into these projects. Or, alternatively, provide some sort of certifications to the private sector so that projects can get reviewed and approved in a timely fashion. So, that that would be my input as far as ESA requirements related to flood projects.

I know that the, the gist of it is that you're trying to figure out a way to make sure that that the ESA is being complied with when projects are being done in the floodplain and, and that's great. It's just that in order to not have a bottleneck, you're either going to have to have the staff to review those projects at the federal level, or you're going to have to allow the private sector to fill that by allowing certifications so that private sector companies can come in and fill that gap. That's it. Thank you.

Jennifer Salerno: Thank you Andrew. Next up we have Jeff Ryan. Jeff, if you are here, please raise your hand. While we wait for Jeff, Lindsey, if you could please give us the names of our next two speakers?

Lindsey Reiting: Following Mr. Ryan, we have John Wiener and Deborah Cheddar.

Jennifer Salerno: Thank you. Jeff, if you're here, please raise your hand.

Jeff Ryan: Can you hear me?

Jennifer Salerno: I can hear you Jeff. Your three minutes starts now.

Jeff Ryan: Thank you very much. Again, my name is Jeff Ryan. Uh, thank you for the opportunity to comment. I'm the chairman of the Lewis and Clark Conservation District based here in Helena, Montana. Uh, we also will be submitting more detailed written comments later as will other organizations representing all of Montana's 58 conservation districts. My main comments today will involve threatened and endangered species.

As you may know, Montana is home to several threatened and endangered species and that their continued existence is contingent on providing high-quality habitat, uh, and for many of those species that involves riparian and, and aquatic habitat. That then brings us to the problem I want to talk about. It sounds like it's probably a little different what you've heard, but our problem is that current floodplain permitting regulation, the regulation itself, is adversely affecting stream restoration projects that can create or enhance this critical habitat that the species needs.

The current one-size-fits-all regulation is so onerous, time-consuming, and expensive to comply with that many stream and bank restoration projects are being downscaled, delayed, or even abandoned. Uh, the regulation really needs to give credit to projects that actually improve floodplain function. So, with that, what can be done?

Well, I think here, in Montana, we've all already taken the first steps. We formed the Montana Stream Restoration Committee to work on this regulation problem. The Committee has made up of numerous governmental and non-governmental folks. But we really need FEMA's participation on the Committee. All of our suggested solutions are moot without FEMA's concurrence. Uh, this Montana committee again really needs FEMA's help. In fact, Montana 2021 legislature passed, almost unanimously, a resolution, SJR6, asking FEMA to work with the Stream Restoration Committee to develop solutions to our stream restoration floodplain permitting problems.

And the final thought: this is not just a Montana problem. We are aware of similar problems in other states. In fact, FEMA's Region 10 issued a memo a few years ago that helped alleviate permitting problems for restoration projects. Unfortunately, it was recently rescinded. Again, thank you for your time, and especially your consideration. And again, we need your help. Thank you very much.

Jennifer Salerno: Thank you for your comments. Our next speaker is John Wiener. John if you are here, oh I see John's hand is raised. Before we let John speak, Lindsey can you please – I know we have Deborah Cheddar lined up – can you give the next two names after Deborah Cheddar?

Lindsey Reiting: Absolutely, after Deborah Cheddar we will have Cynthia Ewing and Hilton Kelly.

Jennifer Salerno: Perfect, thank you. John, we'll unmute you now.

John Wiener: Hello?

Jennifer Salerno: Hi John we can hear you. Your three minutes starts now.

John Wiener: Thank you. Wonderful to hear from so many people. I wanted to mention that one of the biggest problems we face in mitigation of hazard is the denial of the reality of FEMA's floodplain maps. They are not intended to map the actual flood risk. They are intended to help set insurance rates. This is completely different from telling people "this is where the risk is." This is telling people "this is where you do or do not have to, under current regulations and policies, buy insurance."

People are using the flood maps, the FEMA maps, as if they were serious efforts to find the risk and identify it. Not only is this retroactive and failing to account for the future, it's also remarkably destructive because people are telling each other and permitting activities on the basis of these maps, which are not really scientific at all for the risks involved.

It's a screwy situation but developers and city councils are all telling each other "it's out of the floodplain," when in fact, it is not at all out of the floodplain. The future will be worse, especially if we continue to rely on USGS Bulletin 17C, to use obsolete data for any purposes by federal agencies. Thanks for the opportunity to comment.

Jennifer Salerno: Thank you very much for your comments. Our next speaker is Deborah Cheddar. If you are here, please raise your hand. I'm not seeing Deborah on the participant list so we will move now to Cynthia Ewing. Cynthia, I know you were here earlier – we unmuted your line before it was your turn – if you are still here, please raise your hand.

Cynthia Ewing: Hey there!

Jennifer Salerno: I hear you now. You have three minutes.

Cynthia Ewing: Okay. My name is Cindy Ewing. I live on Sullivans Island. It's a barrier island across the harbor from Charleston, South Carolina, and I want to thank FEMA and everyone here, uh, for the opportunity to make comments. And it's been wonderful to hear everyone's comments. So just briefly to give you an update, Sullivan's Island is very lucky to be rich in natural resources. We have a beautiful maritime habitat that is part of a migratory bird pathway. Sullivan's Island has been accreting since the 1940's and since then it has grown into 190-acre ecosystem that has been protected twice, and yet its trees and shrubs are under constant pressure of being destroyed to increase ocean views by millionaires and billionaires that live adjacent to them.

So today I want to focus on how FEMA can help my community save our green infrastructure of maritime wetlands, shrubland, and forests so we can be responsible citizens and protect ourselves from hurricanes, storm surge, flooding, and sea level rise. Um, everyone here is aware of what, how to recover from a storm. Hurricane Hugo passed over this island in 1989; what people are not aware of is how we can mitigate before a storm to protect ourselves.

And so, when I read the new policy that FEMA will now be focusing more on nature-based systems to provide resilience, I was elated. But, my question, and it won't be answered today, is how on earth is FEMA going to give the community the tools to protect what we already have, uh, and in from being taken out? So, I don't know if FEMA has a way to say to a town: "Listen, you already have a green wall that is protecting you from storm surge. Now you've cut it out. We're not going to, we're going to increase your storm, or your insurance." So, I will encourage other people on the island - there's a very active group - that we are trying to get this turned around because it's just completely irresponsible way for a very wealthy community to be managing its land. Um, and I thank you for your time. And, um, that's it.

Jennifer Salerno: Thank you very much. I will be moving on to Hilton Kelley; I see your hand is raised. Before Hilton speaks, Lindsey, can you please give us the names of our next two speakers so they can have their hands raised?

Lindsey Reitinger: Our next two speakers after Mr. Kelley will be Ali Biglari and Sylvia Williams.

Jennifer Salerno: Thank you. Hilton Kelley, are you there? I saw Hilton's hand raised. There you are Hilton. Can we unmute Hilton's line?

Hilton Kelley: Yes.

Jennifer Salerno: There you are Hilton, welcome. You have three minutes.

Hilton Kelley: Okay, thank you. My name is Hilton Kelley, Founding Director of the Community In-Power and Development Association located in Port Arthur, Texas on the Gulf Coast. I'm also a member of the Anthropocene Alliance. Um, what we have learned here in the city of Port Arthur, Texas and in other communities along the Gulf Coast is that many people were forced to live in low-lying areas. Many people were forced to live in these flood zone areas, the floodplains, due to systemic racism.

When the Emancipation Proclamation was signed in 1863, many African Americans were free to go, but free to go where? We were forced in marginalized communities, we were forced to live in places like the Mississippi deltas, the

marsh areas well, way within the rim of Texas. Where I grew up on the other side of the railroad track, right up against the marshes, where the mosquitoes and the alligators were plentiful. And so, with that being said, as time progressed, what we found is that federal laws, state laws, and local laws helped to maintain that status quo well into the 1970's and many of the properties that sit in these low-lying areas were passed down from our great-great-grandparents to grandparents to our mothers and now to the present population that still live in those areas, in those communities.

And now we are being told that we have to pull ourselves up by bootstraps and move out. When many years prior to the waters that have risen to the height that that has risen now, we had, we should've had opportunities a long time ago to move out of those areas.

But now, due to climate change, the waters are rising higher and now we're being told we can't get the necessary assistance to either elevate or relocate from federal, state, or local governments. We feel this is wrong because we were not, we were not, we did not plan to live in those areas. African Americans were forced by systemic racism if you look through the history books. So, what we're saying to FEMA is be fair about your distribution of funds, be fair about your distribution to the assistance in the 77640 area [zip] code, 77642 where you have predominantly African American residents with very little representation and this not only, this [is] not just Port Arthur, but this goes all the way into Florida, where assistance is needed this way.

Systemic racism has put us and kept us in harm's way, and the system helped to keep us there for many, many years. So, we feel that FEMA should do all they can to assist the African American communities and marginalized communities that still exist in those low-lying areas for years, which the history, which history shows that our federal and state governments have always known these were low-lying areas.

And also, I would just like to add that whenever there's a hurricane in these areas, we feel that FEMA gives more assistance to people in more affluent communities than in the moderate to low-income people of color communities. Why is this? And they also should take a look at the training mechanism for which the people come out and do the assessment. Many of them aren't even qualified in construction.

How can they come out and tell you what your house needs, what needs to be done in your house, what didn't happen when they haven't even been trained in flood mitigation? These people are just being given a job. They flood our communities with people that are just pulled off the street to come into our community and put on a FEMA jacket. We feel that you have to vet these people a little bit better so that they could be qualified to come out and tell you what you really qualify for when it comes to assistance. Thank you.

Jennifer Salerno: Thank you sir. Our next speaker is Ali Biglari. While we wait to see if Ali is here to raise their hand, can you please give us the next two names, Lindsey?

Lindsey Reiting: Our next two speakers will be Sylvia Williams and Molly Masters.

Jennifer Salerno: Thank you. I'm not seeing a hand raised for Ali Biglari so I'll move on to Sylvia Williams. Sylvia, if you are here, please raise your hand. Sylvia Williams? [Sylvia Williams did not respond.] Molly Masters – I see your hand is raised. Before we go to you, Lindsey, can you please provide the next two speakers after Molly Masters?

Lindsey Reiting: After Molly Masters, we will have Danny Cleous and Denise Ross.

Jennifer Salerno: Molly Masters, I see your hand is raised. If we could have Molly unmuted please. Molly, are you there? Molly? Molly, are you speaking? Are you there, Molly? I can see you're trying to get off mute. Molly? Molly, we're going to come back to you given the number of speakers –

Molly Masters: I understand. Can you hear me now?

Jennifer Salerno: Oh there you are Molly, we can hear you. You can go now Molly.

Molly Masters: Oh thank you, sorry about that.

Jennifer Salerno: No you're fine. You have three minutes.

Molly Masters: Thank you so much on behalf of the Missouri River Conservation Districts Council, an organization made of 15 conservation districts along the Missouri River in Montana that are devoted to conservation of the River's natural resources through grassroots collaboration, education, incentives and voluntary action. I have the following four comments regarding FEMA's floodplain management plan.

So first, stream restoration projects enhance aquatic and riparian habitat that are critical to many threatened and endangered species. Montana is home to six federally listed threatened species and five endangered species. Many of these listed species of Montana rely on waterways and riparian habitat for survival. Being able to improve floodplains in the riparian area where needed is essential to these species' survival.

Second, current federal floodplain regulations are a one-size-fits-all. Larger rural areas should have additional regulatory options that complement restoration project permitting and completion. Large landowners are stewards of the land, and stream restoration projects that can be contained on one parcel of land should be considered in the regulation.

Third, current floodplain regulation is very rigorous and the engineering analysis can be very expensive and time-consuming for stream restoration projects. Projects are being downscaled, delayed, or even abandoned because of this.

Fourth, the Montana Stream Restoration Committee, which consists of numerous governmental and non-governmental organizations was formed to try to identify viable or alternatives to existing regulations that still meet statutory obligations. FEMA's participation on this Committee would enhance these efforts.

So, in summary, FEMA's current floodplain permit standards for restoration projects needs to be modified to reduce the required expensive engineering analysis. This expense has caused restoration projects that are a benefit to streams and floodplains to be downscaled, delayed, or even abandoned. This result, this results in reduction or elimination of habitat features that are critical to threatened and endangered species. Thank you for your time.

Jennifer Salerno: Thank you. Our next speaker is Danny Cleous. If you're here, please raise your hand. After Danny, I believe we have Denise Ross, and if you could name the next speaker after that Lindsey, that would be fantastic.

Lindsey Reiting: Following Denise Ross, we have Gloria Horning.

Jennifer Salerno: Thank you. Danny Cleous, if you're here, please raise your hand. If you wouldn't mind doing that and raising your hand, we'll unmute you Danny Cleous. Mr. Cleous, if you're there, please raise your hand again.

Danny Cleous: Hello?

Jennifer Salerno: Hi, we can hear you! Your three minutes starts now.

Danny Cleous: Danny Cleous, Lemmon Valley, Nevada. Um, my biggest thing is with the insurance, there's two words in there: it says soil differential. That doesn't work in our area because we live on silt. Even if it's caused by the flooding, uh, the insurance does not cover it, which needs to change because everybody in this area is basically in a floodplain.

The other part is our officials, our county, city, and state officials, keep allowing building and effluent water coming into our basin here. We live in a closed basin where after it goes there, it doesn't go anywhere else. And we've only flooded in 2017. Finally got rid of the almost all the water by this year. It took one 24-hour storm and now it's back up to full. And here we are, this is December. Our wet season doesn't come until January or February or March.

The biggest problem we have with the city officials: they say they're working with FEMA to get their properties out of the floodplain and putting in big warehouses and high-density housing. And then all of us people that live and been here forever – I've been here since 1973 – we get the brunt of it. All that water that they bring in comes right to my house. And they say they're working with FEMA, but still we get the brunt of it. That's all I got to say. Okay.

Denise Ross: Hi can I hijack –

Jennifer Salerno: Thank you for your comments sir.

Denise Ross: This is Denise Ross. Can I hijack on the end of his, on his phone?

Jennifer Salerno: Sure, but let me restart – I need to restart our timer for you Ms. Ross. I'll give you three minutes starting now.

Denise Ross: Okay. Our great flood was in 2017. It was around Swan Lake in Lemmon Valley, that's north of Reno. Extensive buildout equaling more impervious area since the 2000, since the 2017 flood. Our unusual soil does not allow for percolation in our closed basin. It's comparable to the Great Salt Lake City, Great Salt Lake. Loopholes within our government are directed to assist developers, allowing the Reno Stead Water Reclamation Facility to increase the amount of effluent water that is discharged into the lake from 1.2 million gallons a day to 4.8 million gallons a day. Not to forget the additional effluent put into the lake from the Lemmon Valley sewer treatment plant itself whose ponds are sitting in the lake waters itself.

Since the flood of 2017, due to more development, more stormwater runoff is directed into the normally dry lake that pollutes the so-called animal sanctuary that was the original premise for effluent discharge into the normally dry lake during drought times. In this area, floodplain designation and the process for LOMR [Letter of Map Revision] and CLOMR [Conditional Letter of Map Revision] need to be very tightly regulated.

Plans for building houses and warehouses on lands that remained under approximately 2 feet of water for over two years after the 2017 flood need to be seriously looked at by FEMA and carefully take into consideration what information they are given by the local government that is dumping the effluent water that is in the, causes additional flooding to our local residents. Um, we have a difficult time finding out if CLOMRs and LOMRs have been applied for by these local developments, and, um, we, we need some help with this. So, thank you very much for your time. I appreciate it.

Jennifer Salerno: Thanks Denise. Alright, our next speaker is Gloria Horning who I do see – I saw her hand was raised earlier. Before we get to Gloria, can we please have the next two speakers Lindsey?

Lindsey Reiting: After Gloria Horning, we have Cedar Bushue and Susan Liley.

Jennifer Salerno: Thank you. Gloria, are you still there? Gloria? I saw your hand raised earlier. Oh, there you are.

Gloria Horning: Hi folks, can you hear me?

Jennifer Salerno: We can hear you Gloria. Your three minutes starts now.

Gloria Horning: Thank you so much. Gloria Horning, I'm an environmental social justice advocate and have my PhD and such. Um, and I am a proud member of Anthropocene Alliance and Higher Ground, and I'm the Center of Higher Ground Pensacola. What everyone has said here today is Pensacola. From environmental injustice to constant flooding in certain neighborhoods but not other neighborhoods, and just imagine the demographics. My home is constantly surrounded by seawater, freshwater, and sewage every time it rains. Um, and the city administrations, and I mean administrations, uh, just continue to say, "well, it always floods down there; it's always been a problem," but they don't do anything about it.

And now, what's happening in my historical community, which was, uh, originally a very diverse community with, we were, we're right on the Bay, um, and the old wooden ships would come in and we had Brazilians and African Americans and Hispanic and Latino. And so, we were very, very diverse. Now, we've become very whitewashed. And our, the, properties in my community, which usually go for about \$50-60,000, up to maybe \$120,000, and we're only talking about 800 square feet at the max.

Now, we have huge homes going in and they're going for \$1 million down to \$650,000. And they are [on] top of a floodplain. And just recently a build went in on the corner of one of our streets that's right on top of, uh, Washer Woman's Creek but they've, they've, they covered it, and they're building up that property more than 4 feet around the surrounding properties. And the city is allowing it. And I don't understand why FEMA's not here with their regulations of saying, "you can't impact property next to you." And this is a constant in my community, which now everybody wants to live in. I live in a 1918 house. Very minimal stuff.

Sadly, I had 3 ½ feet of water in my house. Saltwater, freshwater, and sewage. And every time it rains, we have a sewage count above 25,000. Above 25,000 fecal matter parts per million. The highest it can be to swim in or play in is 70. Now, listen to those numbers. 70 is where we kick everybody out of the water. At my house at the beach, uh, that I can see from my house, it's gone up from 22 to 25 to 28,000.

Jennifer Salerno: Dr. Horning, I'm sorry to interrupt you, but your three minutes are up. So, I would like to encourage you to please put your comments in writing. Thank you very much.

Gloria Horning: Alright, thank you.

Jennifer Salerno: Our next speaker is Cedar Bushue. While we're waiting for Cedar's hand to raise, I believe we have Susan Liley next. And who are our additional speakers, Lindsey?

Lindsey Reiting: After Susan Liley, our last preregistered speaker is Harriet Festing.

Jennifer Salerno: Thank you. Cedar, if you are here, please raise your hand? I'm not seeing a hand raised for Cedar, so we'll move on to Susan Liley. Susan, if you are here – I see your hand is raised.

Susan Liley: Hi, my name is Susan Liley. I'm from Desoto, Missouri. Um, not all flood communities are coastal. We flood from a tiny creek named the Joachim that is usually two foot high and it has threatened our historical district. The thing about our, our flood is we don't know how much it's gonna rain or when it's gonna rain half the time. And so, uh, three inches, four inches can put a lot of our people under water or make them wash away. We've lost several people, including a young father in the middle of town as he washed through a drainage tube. I have been fighting this since 2016. I did everything I know how to.

I don't know how we can get our species, our endangered species, out of the water when humans are in the middle of it. So, first, we have to get people moved. We tried to do that. We just recently applied for 22 buyouts. And that really didn't happen. We didn't come back with enough federal points even though we have 15 dams above us in five miles, one being a Class 2 Hazard dam. We need more alarms. Our emergency people are in the water too. They fled too. We're not getting much help from our government.

We have repetitive loss homes and there are no, when the homes go into bankruptcy, they erase the history. There's no history of these homes. So other people move in and buy them. There's people that, they were EPA [Environmental Protection Administration] sites where they go in and they dig the yards out but they leave the foundations of the homes for more people to move into. It doesn't make any sense to me. We have high cancer rates in town.

There's arsenic and lead in our yards that they're digging up but not buying the homes. They're not moving the people out. These families are living right in the middle of homes that have been abandoned so there are squatters that come in. There's drug dealers that come in and there's young families trying to raise their children in these repetitive loss homes or else they're bought by landlords. And the landlord doesn't tell them. Um, it's, it just has to stop.

FEMA has to become more educated. We've all seen these horrible tornadoes and I see the people begging, "FEMA help us, FEMA help us." And it's not happening. We have to have a more hands-on approach. Maybe getting some of us leaders that have worked so hard, and through the years, to help fight. Listen to us. Thank you for letting me speak.

Jennifer Salerno: Thank you very much for your comments. Our last registered speaker is Harriet Festing. Harriet, if you are here, we'll unmute your phone line.

Harriet Festing: Hello, I am here. Can you hear me?

Jennifer Salerno: We can hear you, Harriet. Your three minutes starts now.

Harriet Festing: Wonderful. Thank you so much. So, my name is Harriet Festing and I'm the Executive Director of Anthropocene Alliance. About 10 of our members have submitted comments today. Um, we are the nation's largest coalition of frontline communities fighting for climate and environmental justice. We represent 108 members in 35 U.S. states and territories and about 80% of our members are impacted by flooding.

I wanted to describe to you perhaps one of the most common stories we hear from our members and the residents that they represent, and these come from residents who have lived in their homes; they may or may not be in the floodplain. And they have viewed their home as a place of safety and security. And then, what's happened is that there's been a large-scale either housing development or industrial development that's taken place adjacent to them, often on agricultural land, wetlands, or forest land. It's often raised and so they see this journey of truck after truck bringing dirt fill into the community, and then those homes are raised several feet higher.

These residents are not engineers, they're not hydrologists, but they intuitively understand that there's a problem with that. They can actually get a strong sense that those raised homes are now going to be displacing floodwaters onto them. And so, what they do is go to the city and the city or county pat them on the head and says "it's just fine – our hydrologists say there's not a problem" but they know differently. And, of course, the rain comes. And often, I mean, it's just so often, even before the development has been built, the flooding starts as soon as the land is cleared.

And so they raised the alarm back to the city; the city shows sympathy and says that there's nothing they can do. Their homes continue to flood every time it rains. They have to spend, move into repair, construction costs, the insurance costs go up. And then the big flood happens and for homes that were mildly flooding are now underwater.

You're starting to talk about boat evacuations and our members going from hotel to hotel, endless calls to FEMA, and life then starts to fall to pieces. Some of the members that we represent have some financial means. It means that they might be able to move. They don't, they know that a buyout – despite the fact that their home is, is flooding repetitively – they know that a buyout could take between five and seven years and they're not likely to get that much money for it, and so they move. And there's no, no disclosure, and so that home is then sold on to a new set of residents.

The homes flood and so their case is repetitive flooding. The people with no means can't afford just to, to move. They can't afford to repair their home. They can't afford to stay. They're just stuck. Many just up and leave and actually abandon their homes. Just two days ago, I was speaking to someone whose home flooded during Hurricane Matthew. She had, she was displaced permanently from her home. So, she then borrowed money to live in a trailer and that trailer was flooded after Hurricane Florence. She's now living in just terrible conditions. Terrible circumstances, in a warehouse with her husband and family.

Jennifer Salerno: Ms. Festing, I don't mean to interrupt you but your three minutes are up. So, I please encourage you to provide your comments in writing so FEMA can review them.

Harriet Festing: Thank you.

Jennifer Salerno: Thank you. With that, our registered speakers, we have come to the conclusion. For those of you who are interested in speaking who haven't had a turn and didn't register, we encourage you to raise your hands and we will see if we can take a few more before the end of our meeting. So, if you are interested in speaking, please raise your hand, and we will go in the order we can identify them. Lindsey, are you seeing folks who are interested in speaking?

Lindsey Reiting: I am. I see that Kathleen Sullivan has raised her hand. If we want to start with her?

Jennifer Salerno: That'd be fantastic. Kathleen, we'll unmute your line.

Kathleen Sullivan: Hi, I'm Kathleen Sullivan. I am from Elmhurst, Illinois, and I represent Stop Elmhurst Flooding. Um, about 10% of the residents in our town, our homes, um, have been flooding. Um, starting about 10 years ago, our city actually started to address it. So in many ways, I know that we're a fortunate community but we've learned an awful lot along the way.

Even though most of us don't live anywhere close to a creek or stream or river or ocean, we, nonetheless flood because, um, the community didn't build out their sewers to handle that. So we ourselves purchase FEMA insurance just so that, should the water go instead of eight or nine feet in our basement – which we personally experienced in 2010 – in 2013 we had FEMA insurance, so that if the water did actually enter the first floor that we could at least protect ourselves.

But having seen what my community did, I mean, the 500-year flood happened here in 1987, and so they started on a big building campaign and also addressed the sump pump board by pumping more water to the sewers. And so, federal standards for what you can do with regards to development are extremely important because the communities themselves are governed by politicians and most of the funds that they receive for their campaigns, come from developers, builders, plumbers, electricians, the whole nine yards. So they rely on the developers to fund their campaigns so that they can run the government and approve development.

So, what we need is federal standards, federal help to keep these kind of things, um, not only from happening, but also giving us means in our communities to allow for us to get help and resources. And not just to communities like mine, which maybe is a little bit more affluent and has addressed some of their issues but to all the communities because I know that what happened to us wasn't fair and I know what happens in some of these other communities where the government is just not responsive at the local level is not fair at all. Thank you.

Jennifer Salerno: Thank you for your comments. Again, we're opening up the phone lines, or the WebEx line if you will, for any additional comments. If you would like to speak, please click the “Raise Hand” button on your computer screen. In the participant list, if you go to your name, you can “raise your hand.” Again, any additional speakers please click the “Raise Hand” button next to your name. Lindsey, are you seeing any additional speakers?

Lindsey Reiting: I am not, Jenn.

Jennifer Salerno: This is a final call then for any additional verbal comments from any of our participants. Please click the “Raise Hand” icon and we will allow you to speak. Lindsey, one last check. Well, if there are no other comments, I'd like to turn it over to Eric Letvin for some closing remarks. Eric?

Slide 12 – Closing Remarks

Jennifer Salerno: Eric, are you there?

Eric Letvin: Yes, thank you. Can you hear me?

Jennifer Salerno: We can.

Eric Letvin: Thank you. Okay. Great. Great.

Eric Letvin: So, thank you everybody for joining today's public meeting and for those who provided their verbal comments. The comments FEMA received today will be very helpful in shaping National Flood Insurance Program changes and improvements. If you have not already done so, please remember to provide written comments via the eRulemaking Portal at <http://www.regulations.gov> using Docket ID FEMA-2021-0024.

The public comment period will end on Jan. 27, 2022. FEMA will carefully consider all relevant comments received during this meeting, and during the remainder of the comment period. As mentioned earlier, a transcript of this meeting will be available and posted at a later date. Thank you again; this concludes today's public meeting for the FEMA National Flood Insurance Program Minimum Floodplain Management Standards Request for Information.