



Great Rivers Habitat Alliance Comments on FEMA Proposed Rule on FFRMS

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Great Rivers Habitat Alliance (GRHA) is pleased to submit commentary on Federal Emergency Management Agency's (FEMA) proposed rule to enact the Federal Flood Risk Management Standard as required by President Obama's Executive Order 13690. GRHA is a non-profit, conservation organization dedicated to preserving the floodplain and habitat of the Confluence-area around the meeting place of the Mississippi, Missouri, and Illinois rivers.

We strongly support the implementation of these new rules. Requiring projects with federal funding to meet higher flood safety standards in relocation, construction, etc. is a well-justified and beneficial change. Preventing certain federally-funded facilities such as nursing homes and schools from being within the floodplain is also a much-needed change to the rules. These types of projects have no business being built within the floodplain, and these new standards will help insure greater safety for people, better stewardship of our natural resources, and more efficient use of tax dollars.

It is our hope that FEMA, the Army Corps of Engineers, and other government agencies will go further and dramatically alter our country's floodplain management priorities. It is time that we move away from a focus on levees and dams to control rivers for the heavily-subsidized benefit of the barge and agricultural industries. The scientific studies demonstrate that the use of levees results in increased flood height and damage, so the real change we need is a move away from reliance on levees. At a minimum, there should be a moratorium on the construction of any new 100-year or 500-year levees in the United States. While a new levee may make the flood control situation better for those immediately behind the new levee, that same levee makes flooding more dangerous for everyone else. Because levees are also very expensive and paid for by tax dollars, changing our flood control policies is also beneficial to taxpayers.

The strategy favored by many engineers appears to be "build bigger and higher levees." That strategy is making flooding worse and destroying our wetlands and river habitat. Many scientific studies have proven the counterproductiveness of levees to fight floods. Due to the overbuilding of levees in America, we know flooding is more frequent as river heights increase,¹ flooding is more severe as river constriction increases water speed,² and large rivers, like the Mississippi, are now flooding more like the dangerous flash flooding usually seen in much smaller rivers.³

We need a wider strategy of natural flood prevention by not building at all in the places water is intended to go by nature and geography, and that prohibition should include levees.

The steps taken as part of this executive order are still beneficial and should be adopted by the federal government. If we cannot change the overall levee policies of the Army Corps of Engineers, at least

reducing construction and limiting certain “at risk” populations from being within the floodplains are a strong and positive public policy change.

Thank you for the opportunity to submit comments on these proposed changes. Great Rivers Habitat Alliance appreciates the work that FEMA and other regulatory agencies do to prevent flood damage in our country.

¹ Pinter, Nicholas, et al, “Modeling Residual Flood Risk Behind Levees, Upper Mississippi River, USA”, *Environmental Science and Policy*, Vol. 58, 2016.

² Belt, Jr., C.B., “The 1973 Flood and Man’s Constriction of the Mississippi River”, *Science*, Vol. 189, No. 4204, August 1975.

³ Criss, Robert, and Luo, Mingming, “River Management and Flooding: The Lesson of December 2015-January 2016 Central USA”, *Journal of Earth Science*, Vol. 27, No. 1, February 2016.