

COASTAL STATES ORGANIZATION



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May 28, 2024

Kristin Ludwig
Assistant Director for Resilience Science and Technology
White House Office of Science and Technology Policy
1650 Pennsylvania Avenue
Washington, D.C. 20504

Re: Federal Flood Standard Support Tool

Dear Dr. Ludwig,

The Coastal States Organization (CSO) respectfully submits these comments to the Office of Science and Technology Policy regarding its request for comments on behalf National Climate Task Force Flood Resilience Interagency Working Group (IWG) regarding the beta version of the Federal Flood Standard Support Tool.¹

Since 1970, CSO has served as the collective voice for the nation's coastal states, commonwealths, and territories on policy issues relating to coastal, Great Lakes, and ocean management. CSO's governor-appointed delegates – representing state and territory coastal management programs – coordinate with coastal communities, state agencies, federal government, tribal governments, industry, and non-profit organizations for the effective management, protection, beneficial use, and development of the coastal zone through the federal-state partnership established under the Coastal Zone Management Act. Coastal programs across the nation support resilient communities by working on the ground on planning, stakeholder engagement, and project implementation; developing and delivering coastal data; and communicating guidance on federal and state funding sources to develop application-ready projects.

CSO appreciates the opportunity to review the new tool, as a resource both to federal agencies complying with the requirements of the Federal Flood Risk Management Standard (FFRMS)² as well as to state and local practitioners. CSO offers these comments based on the experience and expertise of coastal programs, in addition to and in support of comments submitted by individual states and territories.

1. The IWG should make the FFRMS floodplains developed for this tool available as shapefiles. The information would be valuable to state and local government end users for planning and interagency coordination. Additionally, for the purposes of reviewing and providing feedback on the beta version, it is difficult to make a robust comparison between the tool's underlying data and hazard data available from other sources, including state-generated information, by sampling individual project footprints.
2. The tool website notes in the manual section that sources such as state-generated information or data generated by Tribes, local jurisdictions, or flood control districts may, in many cases, be the most accurate and actionable data for the project-specific proposed location. The tool should present a similar caveat in the reports generated by the tool. The IWG should consider reaching out to state geographic information officers and floodplain programs to provide links to relevant state hazard data resources directly from within generated reports.

¹ Off. Sci. & Tech. Pol., *Notice of Availability and Request for Comments; Federal Flood Standard Support website and Tool Beta Version*, 89 Fed. Reg. 25,674 (Apr. 11, 2024).

² Exec. Order No. 13,690, 80 Fed. Reg. 6425 (Feb. 4, 2015).

3. Based on the FFRMS Job Aid, the tool and associated guidance asserts that the science in the Atlantic and Gulf Coasts, excluding areas with steep bluffs or armored shorelines, “is sufficiently mature to provide actionable flood risk information” using a simplified Climate Informed Science Approach (CISA) approach of adding a localized sea level rise estimate to base flood elevation.³ It would be helpful to provide any analysis of whether this approach generates a FFRMS floodplain that is more or less conservative (i.e., covering a greater or lesser area) than using methods required by states (e.g., the Maryland Coast Smart Climate Ready Action Boundary).
4. In coastal regions for which a CISA report is not generated (West Coast and Great Lakes), it may be helpful for the tool to provide a note or cross reference to the section of the manual addressing how and where the tool uses the simplified CISA. In areas with significant wave energy where wave runoff and overtopping is a significant component of BFEs, such as the open coast, the tool should caveat that the Freeboard Value Approach may produce a less extensive FFRMS floodplain than would be indicated using methods which consider SLR (e.g., U.S. Geological Survey Coastal Storm Modeling System).

Please feel free to contact John Ryan-Henry (jryan-henry@coastalstates.org) to follow up on these comments.

Sincerely,



Derek Brockbank
Executive Director

³ Flood Resiliency Interagency Working Group, *Federal Flood Risk Management Standard (FFRMS) Floodplain Determination Job Aid*, 10 (Aug. 2023).