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March 10, 2015

Mr. Roy Wright
Deputy Associate Administrator for Mitigation
Federal Emergency Management Agency
U.S. Department of Homeland Security
500 C Street SW
Washington DC 20472

RE: Docket FEMA-2015-0006
Guidelines for Implementing Executive Order 11988, Floodplain
Management, as Revised
REQUEST FOR AN EXTENSION OF TIME

Dear Mr. Wright:

I am writing in my capacity as the President of the Western Coalition of Arid States [WESTCAS], an association of over 100 public water resources agencies, consulting engineering firms, and law firms. The mission of our organization is to support sound water policy for the Arid West. It is with this goal in mind that I write to you with regard to the Notice published in the Federal Register on February 5, 2015, seeking comment on the proposed "Revised Guidelines for Implementing Executive Order 11988, Floodplain Management." This Notice directs that comments must be submitted by April 6, 2015.

I respectfully request that FEMA extend the time to submit comments by a minimum of ninety (90) days. WESTCAS wishes to be an informed participant in your process, but this will be virtually impossible if FEMA retains its April 6 rule-making deadline for submitting comments.

The Voice of Water Quality in the Arid West

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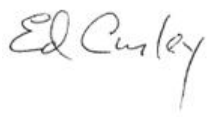
The FFRMS draft guidelines impose sweeping changes applicable to all federal action located in or affecting a floodplain. This goes far beyond simple federal facilities construction and improvements and applies to a broad range of activities, including the issuance of federal permits, licenses, and approvals, including Clean Water Act permits, the requirement for which would be expanded under the currently pending “Waters of the United States” rule-making; disaster preparedness assistance; and emergency repair and rehabilitation assistance; USDA agricultural subsidies; federal highways aid and U.S. DOT TIGER grants; housing programs and loans administered by HUD, VA, and FHA; consultation requirements under Section 7 of the Endangered Species Act, and numerous other requirements.

These are just some examples of the concerns identified through our initial review. The only way that the FEMA goal of improving our Nation’s protection to current and future flood risk can be accomplished is to provide sufficient time for local stakeholders such as the members of WESTCAS to fully review your proposal. This cannot be achieved if the public comment period closes on April 6. I believe our request for a 90 day extension would help all parties to better understand the challenge that lies before us.

In closing, I wish to express my concern over the ambitious timeframe established by Executive Order 13690 to implement the FFRMS. This is particularly the case with Section 3(c) which provides that within 30 days of the closing of the public comment period agencies shall submit their implementation plans to the National Security Council. I appreciate that these agencies would not actually issue or amend their existing regulations or procedures until after the final guidelines are issued. However, this extremely short period of time does not permit the various agencies involved from fully reviewing and evaluating the public comments, much less being able to merge this 5a more realistic schedule that provides a real opportunity for public input into the Executive Order.

Thank you for your consideration of my request. Should you need additional information concerning the WESTCAS perspective, please do not hesitate to contact me at the address and telephone number listed on this letterhead.

Respectfully submitted,



Ed Curley, President
Western Coalition of Arid States

The Voice of Water Quality in the Arid West

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