



ASSOCIATION OF STATE FLOODPLAIN MANAGERS, INC.

575 D'Onofrio Drive, Suite 200, Madison, Wisconsin 53719
Phone: 608-828-3000 | Fax: 608-828-6319 | asfpm@floods.org | www.floods.org

Executive Director
Chad M. Berginnis, CFM

Deputy Director
Ingrid D. Wadsworth, CFM

Director Emeritus
Larry A. Larson, P.E., CFM

July 10, 2018

The Association of State Floodplain Managers and Association of State Wetland Managers continues to support the Coastal Barrier Resources Act (CBRA) program and the expansion of Coastal Barrier Resources System (CBRS) units. As stated in the federal register, this explanation would add approximately 136,268 acres to the CBRS in Delaware, Massachusetts, New Hampshire and New Jersey. This expansion will keep dynamic coastal areas in their natural states and help provide a buffer from coastal storms and flooding and sea level rise impacts, which would protect coastal communities and help increase their resilience to such events. This delineation of CBRS prevents the purchase of federal flood insurance in COBRA parcels (a Coastal Barrier Resource Area), and will ultimately save taxpayers millions of dollars in future claims. Additionally, COBRA zones are biologically diverse areas that help to support vulnerable coastal species and habitat. ASFPM and ASWM support maintaining these highly vulnerable coastal areas as natural flood barriers that will reduce the need to restore and rebuild coastal communities saving U.S. taxpayers millions of dollars.

ASFPM and ASWM applaud the map modernization efforts, specifically the use of digital mapping techniques. The revised mapping techniques will produce data that is more accurate and will allow for better community planning and decision making. The map modernization effort will help make it clearer what parcels are inside and outside of the CBRS boundaries. This will make it clearer what properties are eligible or ineligible for NFIP insurance and federal grants after a disaster declaration.

However, ASFPM and ASWM have grave concerns with the proposed language that would allow sand mining of CBRA units to generate sand that could be used to re-nourish beaches and coastal areas that are outside of the COBRA. Sand is becoming a limited resource and offshore sand extraction is expensive. In order for the COBRA area to remain an effective buffer, the sand needs to stay in the COBRA zone. The proposed language would undermine the COBRA, and run directly counter to its specific objectives to save federal tax dollars and conserve the resources of coastal areas included in the system. This language would significantly weaken the CBRA, which enjoys broad bipartisan support, saves federal tax dollars, promotes public safety, and conserves important coastal environmental resources.

Signed,

Chad Berginnis
ASFPM Executive Director

Jeanne Christi
ASWM Executive Director

Dedicated to reducing flood risk and losses in the nation.

Chair

Maria Cox Lamm, CFM
State Coordinator
SC Dept. Natural
Resources
803-734-3672
coxmd@dnr.sc.gov

Vice Chair

Brian Varrella, P.E., CFM
Hydraulics Team Lead
CO Dept. of
Transportation
970-219-6496
brian.varrella@state.co.us

Treasurer

Amanda Flegel, P.E., CFM
Project Engineer
IL State Water Survey
217-300-3468
aflegel@illinois.edu

Secretary

Rebecca Pfeiffer, CFM
Floodplain Regulatory Team Lead
VT Agency of Natural Resources
802-490-6157
rebecca.pfeiffer@vermont.gov