

**Alabama Rivers Alliance • American Bottom Conservancy • American Rivers
Arkansas Wildlife Federation • Ceres • Choctawhatchee Riverkeeper, Inc.
Citizens Against Widening the Industrial Canal • Clean Water Action • Clean Water Network
Delaware Riverkeeper Network • Endangered Habitats League
Environmental Action Committee of West Marin • Freshwater Future • Friends of the Central Sands
Friends of the Rivers of Virginia • Friends of the Santa Clara River • Friends of the Weskeag
Georgia River Network • Great Egg Harbor Watershed Association
Great Rivers Environmental Law Center • Gulf Restoration Network • Kansas Wildlife Federation
Kentucky Resources Council • Labadie Environmental Organization
Minnesota Conservation Federation • Missouri Coalition for the Environment
National Committee for the New River • New York/New Jersey Baykeeper
North Carolina Coastal Federation • Ohio Environmental Council • Ohio River Foundation
Ohio Valley Environmental Coalition • Potomac River Association • Raritan Riverkeeper
River Alliance of Wisconsin • Rivers Unlimited • Sea Turtle Conservancy • Save the Bay
South Carolina Coastal Conservation League • Spokane Riverkeeper • The River Project
Water-Culture Institute**

Dr. Sandra Knight
Deputy Associate Administrator for Mitigation
Federal Emergency Management Agency
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November 2, 2012

Dear Dr. Knight:

Throughout the United States, climate change is increasing the likelihood and severity of natural disasters. As climate change continues, we can expect to see more extreme weather similar to Super Storm Sandy, which has cost our country dozens of lives and billions of dollars in damage. Extreme high temperatures, rising sea levels, intense precipitation events, and frequent droughts and wildfires present grave challenges to our communities, our businesses, and our health.

Due to the impacts of climate change, these natural hazards have imposed greater and greater costs on Americans over the last several decades. Last year, U.S. property and casualty insurers incurred \$44 billion in losses from heat waves, drought, wildfires, and other weather-related disasters.¹ Super Storm Sandy, this summer's drought and record high temperatures are yet other reminders of the far-reaching impacts that are to come.

Fortunately, these costs can be reduced through smart planning. By taking climate change into account when making plans for the future, communities will be better prepared to invest in cost-effective, proactive mitigation strategies.

¹ Mindy S. Lubber, Ceres, President and Founding Board Member, "Insurers Brace for Stormy Weather as the World Warms" (Mar. 2, 2012), http://www.huffingtonpost.com/mindy-s-lubber/insurers-brace-for-stormy_b_1314284.html.

The Federal Emergency Management Agency must do its part in reducing our country's vulnerability to disasters by requiring states to consider climate change impacts in their Hazard Mitigation Plans. Currently, most states' plans omit climate considerations and base their assessments of future threats on past experiences. Yet our changing climate means that past risk is no longer a good indicator of future risk. States that exclude climate change considerations from their plans will be unprepared for the volatility of future hazard events. FEMA's failure to require states to consider *all* of their vulnerabilities leads to insufficient planning and puts people and property at risk.

As a result, we support the petition by the Natural Resources Defense Council and National Wildlife Federation asking FEMA to require states to consider climate change in Hazard Mitigation Plans. Please grant this petition in order to help states prepare for future disasters – and to save money, property, and lives.

Sincerely,

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Great Egg Harbor Watershed Association

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Attorney
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cc:

FEMA Rules Docket

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