



NATURAL  
CAPITAL  
COALITION

Natural Capital Coalition  
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EC2R 7EF

October 21, 2016

Mr. Adrian Sevier  
Regulatory Affairs Division, Office of Chief Counsel  
Federal Emergency Management Agency  
8NE – 1604, 500 C Street, SW Washington, DC 2-472-3100

Re: Comment on the Proposed Guidelines for Implementing the Federal Flood Risk Management Standard: Docket ID FEMA-2015-0006-0374

Dear Mr. Sevier,

I appreciate the opportunity to submit this letter of comment to the Federal Emergency Management Agency (FEMA), on the draft guidelines for Implementing the Federal Flood Risk Management Standard (80 Fed. 6530, Feb. 5, 2015).

I am the Executive Director of the Natural Capital Coalition. The Coalition brings together over 200 global organisations, including 39 who are headquartered in the United States and many more with U.S. operations.

Together, we collaborate to standardize approaches to natural capital, and inform better business decisions through applications of the Natural Capital Protocol – a decision making framework which allows organizations to identify, measure and value their direct and indirect impacts and dependencies on natural capital.

While I agree that the Freeboard management technique is vital in promoting the effective resilience of property and infrastructure in the United States, such techniques can be further enhanced by applying natural capital approaches, for instance those supported by the Natural Capital Protocol.

Exploring natural solutions to climate related risks such as flood damage and extreme weather events can provide cost effective solutions for businesses and governments, while generating a host of economic, environmental and societal co-benefits cost free.

As FEMA and other agencies explore methods of enhancing U.S. resiliency from flooding, and strive to bring policy in line with current scientific understandings of climate and environment, we urge further consideration of natural capital tools and techniques including:

- Exploring how the Natural Capital Protocol can inform flood management decisions at local and national levels – for instance by guiding cost-benefit analyses.



- Identifying how the protection and enhancement of natural capital, through techniques such as land restoration, living shorelines, and reforestation, can be incorporated into the decision making of U.S. Executive Partnerships and Agencies.
- Conducting research regarding the benefits of natural capital approaches as a means to mitigate the impacts of climate-related risks such as flood damage.
- Generation and analysis of natural capital data, in order to inform governmental decision making.

I believe that the proposed Order is an important next step towards a natural mitigation strategy that addresses risks that the United States faces from severe weather events and flooding, and support its implementation.

I would be happy to answer any questions or provide further information or clarification regarding any of the comments provided, or on other issues that may be deemed relevant to this discussion, and am grateful for the opportunity to comment.

Please feel free to contact me any time at [mark.gough@naturalcapitalcoalition.org](mailto:mark.gough@naturalcapitalcoalition.org), or on:  
+44 (0) 7876035947.

Sincerely,

A handwritten signature in black ink, appearing to read "M. S. Gough".

Mark Gough  
Executive Director  
Natural Capital Coalition