



National Association of Conservation Districts

January 27, 2022

Administrator Deanne Criswell
Federal Emergency Management Agency
500 C Street SW
Washington, DC 20472

Submitted electronically via [regulations.gov](https://www.regulations.gov)
Docket FEMA-2021-0024-0001

Dear Administrator Criswell,

The National Association of Conservation Districts (NACD) represents America's nearly 3,000 locally-led conservation districts, working with millions of landowners and operators to help them manage and protect land and water resources on private and public lands. Established under state law, conservation districts share a single mission: to work cooperatively with federal, state, and local resource and land management agencies, as well as private sector interest groups, to provide technical, financial, and other assistance to help landowners and operators apply conservation to the landscape. Because conservation districts were created to be the link between the federal government's various natural resource agencies and local communities across the country, conservation districts work hand in hand with all levels of government to ensure that local resource needs help inform major decisions. In turn, conservation districts can help lend credibility to decisions made at the federal level because the public knows that their needs and inputs were considered by local leaders.

NACD is pleased to submit formal comments responding to the Federal Emergency Management Agency's (FEMA) request for information (RFI) regarding the National Floodplain Management Standards. For more than 75 years, conservation districts have been leaders in locally-led efforts, ensuring the sound stewardship of our nation's lands and waters. Conservation districts, such as those involved in the Missouri River Conservation Districts Council (MRCDC), have experienced challenges with current National Floodplain Management Standards.

Conservation districts across the country install Best Management Practices (BMPs), such as riparian buffer plants and stream exclusion fencing, in proximity to floodplains. Current National Floodplain Management Standards can be difficult for conservation districts to interpret locally and can slow and dissuade work on these projects. NACD requests FEMA to develop clear and nationally consistent guidance for conservation districts and their communities regarding the installation of common BMPs, such as those listed above, in and near floodplains.

Local leaders are often the best equipped to assess the needs of their communities. In order for conservation projects to succeed, flexibility for local leaders is key. NACD requests FEMA



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consider changes to regulations to ensure they are flexible enough to expedite and minimize the consultation requirements to ensure smooth and swift implementation of conservation projects.

Thank you for the opportunity to participate and submit comments on this RFI. We appreciate your consideration and look forward to continuing to work with you in the future on the development of the regulatory actions that strengthen American resources management.

Sincerely,

A handwritten signature in black ink that reads "Michael Crowder".

Michael Crowder
President, National Association of Conservation Districts