



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Al Lawson
United States House of Representatives
1406 Longworth House Office Building
Washington, DC 20515

Representative Lawson:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
- The NFIP Should be Transparent
- The NFIP Should be Fair
- The NFIP Should be Multi-Faceted and Comprehensive

For the past several years, our organizations have advocated for limited and reasonable program changes that include financial solvency, map modernization, rate transparency, flood mitigation and above all affordability. At a minimum, we believe the following provisions should be included in the next NFIP reauthorization bill:

- Reasonable Premium Caps
Prior to 2012, FEMA had the authority to increase rates by no more than 10 percent per year. Under the 2014 Homeowners Flood Insurance Affordability Act (HFIAA), renewal premiums for certain properties (grandfathered and Pre-FIRM) will experience rate increases

of between 18 percent and 25 percent until the full risk rate is reached. We recommend that a more reasonable cap – between five and 10 percent – should apply to all properties. This cap would provide stability and financial predictability for property owners.

- Broaden the Base of Policy Holders – Spread the Risk

According to FEMA, people located outside of mapped high-risk flood areas file more than 20 percent of all flood claims and receive one-third of Federal disaster assistance for flooding. Recognizing that nearly all properties have some risk of flooding, incentives should be created to encourage participation in the NFIP for property owners not located in high risk flood zones. Additionally, Congress should strengthen enforcement requirements for maintaining NFIP policies on all federally-backed mortgages. These actions will not only help protect those who are surprised by unpredicted flooding but also increase the financial solvency of the program.

- Ensure Rates are Consistent for all Properties

HFIAA repealed the portions of an earlier law that removed Pre-FIRM subsidies on properties purchased after July 6, 2012; however, the repeal only applies to primary residences. Non-primary residences (i.e., vacation rentals, investment properties, and businesses) will receive annual 25 percent premium increases until full-risk rates are achieved. Recognizing that most of these properties lend great support to the local and regional economies – and to ensure fairness – all properties should be treated the same and rated according to their ability to withstand risk, not their use or ownership status.

- Increase Mitigation Grant Funding

In order to accelerate NFIP solvency, FEMA needs to aggressively buy down the risk associated with properties that have had the largest number of flood claims – namely, repetitive loss (RL) and Severe Repetitive Loss (SRL) properties. According to the Government Accountability Office, National Flood Program in March 2004, about one percent of the 5.1 million properties currently insured by the program are considered repetitive loss properties – properties for which policyholders have made two or more \$1,000 flood claims. However, about 38 percent of all program claim costs have been the result of repetitive loss properties, at a cost of about \$4.6 billion since 1978. While Congress has created funding programs that provide mitigation grants for owners of both repetitive and non-repetitive loss properties, funding cannot keep pace with demand. For example, in Florida, there is a waiting list of property owners who want to mitigate their properties but do not have the resources to do so. Accordingly, Congress should increase funding for FEMA's mitigation programs to help buy down the NFIP risk.

- Means Tested Affordability Program
Congress should create a comprehensive, means-tested affordability program to ensure flood insurance is affordable for low- and middle-income families.
- Mitigation Loan Program
Congress should create a low-interest mitigation loan program that provides property owners upfront costs to mitigate their properties. Ideally, the loan, or a portion of the loan, would be paid back with a portion of the premium savings.
- Establish Tax Credits to Provide Mitigation Incentives
Congress should evaluate the feasibility of a flood mitigation tax credit program. A tax credit to property owners who undertake flood mitigation would not only create an incentive to encourage loss reduction efforts, but it would: (1) reduce risk; (2) lower insurance rates; (3) help stabilize the NFIP; and, (4) decrease the need for other federal assistance associated flood disasters (i.e., temporary housing, debris removal). Such a credit program could be modeled after those used for energy efficiency initiatives, such as the Federal Residential Energy Efficiency Tax Credit Program.
- Encourage Growth in the Private Flood Insurance Market.
While it should be remembered that NFIP was established to fill a void created when the private market abandoned flood risk, the private market today could serve as a complement to NFIP and provide consumers with more choices.
- Improve and Accelerate the Mapping Process
Nationwide, NFIP flood maps are generally outdated and don't measure a community's flood risk accurately. Efforts should be made to (1) work directly with communities in the map revision process, ensuring locally-generated data and/or models are considered in map revisions, and (2) ensure individual property data (i.e., Finished Floor Elevations) are accounted for when maps are developed/revisted.
- Risk Rating 2.0
According to FEMA, Risk Rating 2.0 will fundamentally change the way FEMA rates a property's flood risk and prices insurance. Unfortunately, the agency has been developing this process with no input from states or local governments. In fact, other than a brief description on its website, FEMA has provided no information and asked for no input from counties and cities. While we recognize that the agency has announced it will delay program implementation by one year, we believe future legislation could be negatively impacted if the program is not more transparent and inclusive. Accordingly, we recommend that Congress require FEMA to consult with states and local governments over the next 12 months

regarding the development and application of Risk Rating 2.0. We also recommend that Congress create an appeal process, where counties, cities and policy holders can appeal any changes that they find do not reflect a property's flood risk

Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



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VIA ELECTRONIC MAIL

The Honorable Bill Posey
United States House of Representatives
2150 Rayburn House Office Building
Washington, DC 20515

Representative Posey:

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United States House of Representatives
2182 Rayburn House Office Building
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Representative Mast:

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Commissioner, Leon County



Isaac Salver,
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Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Daniel Webster
United States House of Representatives
1210 Longworth House Office Building
Washington, DC 20515

Representative Webster:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

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VIA ELECTRONIC MAIL

The Honorable Darren Soto
United States House of Representatives
1507 Longworth House Office Building
Washington, DC 20515

Representative Soto:

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We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Debbie Wasserman Schultz
United States House of Representatives
1114 Longworth House Office Building
Washington, DC 20515

Representative Wasserman Schultz:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
- The NFIP Should be Transparent
- The NFIP Should be Fair
- The NFIP Should be Multi-Faceted and Comprehensive

For the past several years, our organizations have advocated for limited and reasonable program changes that include financial solvency, map modernization, rate transparency, flood mitigation and above all affordability. At a minimum, we believe the following provisions should be included in the next NFIP reauthorization bill:

- Reasonable Premium Caps
Prior to 2012, FEMA had the authority to increase rates by no more than 10 percent per year. Under the 2014 Homeowners Flood Insurance Affordability Act (HFIAA), renewal premiums for certain properties (grandfathered and Pre-FIRM) will experience rate increases

of between 18 percent and 25 percent until the full risk rate is reached. We recommend that a more reasonable cap – between five and 10 percent – should apply to all properties. This cap would provide stability and financial predictability for property owners.

- Broaden the Base of Policy Holders – Spread the Risk

According to FEMA, people located outside of mapped high-risk flood areas file more than 20 percent of all flood claims and receive one-third of Federal disaster assistance for flooding. Recognizing that nearly all properties have some risk of flooding, incentives should be created to encourage participation in the NFIP for property owners not located in high risk flood zones. Additionally, Congress should strengthen enforcement requirements for maintaining NFIP policies on all federally-backed mortgages. These actions will not only help protect those who are surprised by unpredicted flooding but also increase the financial solvency of the program.

- Ensure Rates are Consistent for all Properties

HFIAA repealed the portions of an earlier law that removed Pre-FIRM subsidies on properties purchased after July 6, 2012; however, the repeal only applies to primary residences. Non-primary residences (i.e., vacation rentals, investment properties, and businesses) will receive annual 25 percent premium increases until full-risk rates are achieved. Recognizing that most of these properties lend great support to the local and regional economies – and to ensure fairness – all properties should be treated the same and rated according to their ability to withstand risk, not their use or ownership status.

- Increase Mitigation Grant Funding

In order to accelerate NFIP solvency, FEMA needs to aggressively buy down the risk associated with properties that have had the largest number of flood claims – namely, repetitive loss (RL) and Severe Repetitive Loss (SRL) properties. According to the Government Accountability Office, National Flood Program in March 2004, about one percent of the 5.1 million properties currently insured by the program are considered repetitive loss properties – properties for which policyholders have made two or more \$1,000 flood claims. However, about 38 percent of all program claim costs have been the result of repetitive loss properties, at a cost of about \$4.6 billion since 1978. While Congress has created funding programs that provide mitigation grants for owners of both repetitive and non-repetitive loss properties, funding cannot keep pace with demand. For example, in Florida, there is a waiting list of property owners who want to mitigate their properties but do not have the resources to do so. Accordingly, Congress should increase funding for FEMA's mitigation programs to help buy down the NFIP risk.

- Means Tested Affordability Program
Congress should create a comprehensive, means-tested affordability program to ensure flood insurance is affordable for low- and middle-income families.
- Mitigation Loan Program
Congress should create a low-interest mitigation loan program that provides property owners upfront costs to mitigate their properties. Ideally, the loan, or a portion of the loan, would be paid back with a portion of the premium savings.
- Establish Tax Credits to Provide Mitigation Incentives
Congress should evaluate the feasibility of a flood mitigation tax credit program. A tax credit to property owners who undertake flood mitigation would not only create an incentive to encourage loss reduction efforts, but it would: (1) reduce risk; (2) lower insurance rates; (3) help stabilize the NFIP; and, (4) decrease the need for other federal assistance associated flood disasters (i.e., temporary housing, debris removal). Such a credit program could be modeled after those used for energy efficiency initiatives, such as the Federal Residential Energy Efficiency Tax Credit Program.
- Encourage Growth in the Private Flood Insurance Market.
While it should be remembered that NFIP was established to fill a void created when the private market abandoned flood risk, the private market today could serve as a complement to NFIP and provide consumers with more choices.
- Improve and Accelerate the Mapping Process
Nationwide, NFIP flood maps are generally outdated and don't measure a community's flood risk accurately. Efforts should be made to (1) work directly with communities in the map revision process, ensuring locally-generated data and/or models are considered in map revisions, and (2) ensure individual property data (i.e., Finished Floor Elevations) are accounted for when maps are developed/revisted.
- Risk Rating 2.0
According to FEMA, Risk Rating 2.0 will fundamentally change the way FEMA rates a property's flood risk and prices insurance. Unfortunately, the agency has been developing this process with no input from states or local governments. In fact, other than a brief description on its website, FEMA has provided no information and asked for no input from counties and cities. While we recognize that the agency has announced it will delay program implementation by one year, we believe future legislation could be negatively impacted if the program is not more transparent and inclusive. Accordingly, we recommend that Congress require FEMA to consult with states and local governments over the next 12 months

regarding the development and application of Risk Rating 2.0. We also recommend that Congress create an appeal process, where counties, cities and policy holders can appeal any changes that they find do not reflect a property's flood risk

Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Francis Rooney
United States House of Representatives
120 Cannon House Office Building
Washington, DC 20515

Representative Rooney:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
- The NFIP Should be Transparent
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Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Gus Bilirakis
United States House of Representatives
2227 Rayburn House Office Building
Washington, DC 20515

Representative Bilirakis:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
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- Broaden the Base of Policy Holders – Spread the Risk

According to FEMA, people located outside of mapped high-risk flood areas file more than 20 percent of all flood claims and receive one-third of Federal disaster assistance for flooding. Recognizing that nearly all properties have some risk of flooding, incentives should be created to encourage participation in the NFIP for property owners not located in high risk flood zones. Additionally, Congress should strengthen enforcement requirements for maintaining NFIP policies on all federally-backed mortgages. These actions will not only help protect those who are surprised by unpredicted flooding but also increase the financial solvency of the program.

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While it should be remembered that NFIP was established to fill a void created when the private market abandoned flood risk, the private market today could serve as a complement to NFIP and provide consumers with more choices.
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- Risk Rating 2.0
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Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable John Rutherford
United States House of Representatives
1711 Longworth House Office Building
Washington, DC 20515

Representative Rutherford:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
- The NFIP Should be Transparent
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For the past several years, our organizations have advocated for limited and reasonable program changes that include financial solvency, map modernization, rate transparency, flood mitigation and above all affordability. At a minimum, we believe the following provisions should be included in the next NFIP reauthorization bill:

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of between 18 percent and 25 percent until the full risk rate is reached. We recommend that a more reasonable cap – between five and 10 percent – should apply to all properties. This cap would provide stability and financial predictability for property owners.

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According to FEMA, people located outside of mapped high-risk flood areas file more than 20 percent of all flood claims and receive one-third of Federal disaster assistance for flooding. Recognizing that nearly all properties have some risk of flooding, incentives should be created to encourage participation in the NFIP for property owners not located in high risk flood zones. Additionally, Congress should strengthen enforcement requirements for maintaining NFIP policies on all federally-backed mortgages. These actions will not only help protect those who are surprised by unpredicted flooding but also increase the financial solvency of the program.

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While it should be remembered that NFIP was established to fill a void created when the private market abandoned flood risk, the private market today could serve as a complement to NFIP and provide consumers with more choices.
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We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to be 'N. Maddox' with a stylized flourish at the end.

Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County

A handwritten signature in black ink, appearing to be 'I. Salver' with a long horizontal line above it.

Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Kathy Castor
United States House of Representatives
2052 Rayburn House Office Building
Washington, DC 20515

Representative Castor:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

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According to FEMA, Risk Rating 2.0 will fundamentally change the way FEMA rates a property's flood risk and prices insurance. Unfortunately, the agency has been developing this process with no input from states or local governments. In fact, other than a brief description on its website, FEMA has provided no information and asked for no input from counties and cities. While we recognize that the agency has announced it will delay program implementation by one year, we believe future legislation could be negatively impacted if the program is not more transparent and inclusive. Accordingly, we recommend that Congress require FEMA to consult with states and local governments over the next 12 months

regarding the development and application of Risk Rating 2.0. We also recommend that Congress create an appeal process, where counties, cities and policy holders can appeal any changes that they find do not reflect a property's flood risk

Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Lois Frankel
United States House of Representatives
2305 Rayburn House Office Building
Washington, DC 20515

Representative Frankel:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
- The NFIP Should be Transparent
- The NFIP Should be Fair
- The NFIP Should be Multi-Faceted and Comprehensive

For the past several years, our organizations have advocated for limited and reasonable program changes that include financial solvency, map modernization, rate transparency, flood mitigation and above all affordability. At a minimum, we believe the following provisions should be included in the next NFIP reauthorization bill:

- Reasonable Premium Caps
Prior to 2012, FEMA had the authority to increase rates by no more than 10 percent per year. Under the 2014 Homeowners Flood Insurance Affordability Act (HFIAA), renewal premiums for certain properties (grandfathered and Pre-FIRM) will experience rate increases

of between 18 percent and 25 percent until the full risk rate is reached. We recommend that a more reasonable cap – between five and 10 percent – should apply to all properties. This cap would provide stability and financial predictability for property owners.

- Broaden the Base of Policy Holders – Spread the Risk

According to FEMA, people located outside of mapped high-risk flood areas file more than 20 percent of all flood claims and receive one-third of Federal disaster assistance for flooding. Recognizing that nearly all properties have some risk of flooding, incentives should be created to encourage participation in the NFIP for property owners not located in high risk flood zones. Additionally, Congress should strengthen enforcement requirements for maintaining NFIP policies on all federally-backed mortgages. These actions will not only help protect those who are surprised by unpredicted flooding but also increase the financial solvency of the program.

- Ensure Rates are Consistent for all Properties

HFIAA repealed the portions of an earlier law that removed Pre-FIRM subsidies on properties purchased after July 6, 2012; however, the repeal only applies to primary residences. Non-primary residences (i.e., vacation rentals, investment properties, and businesses) will receive annual 25 percent premium increases until full-risk rates are achieved. Recognizing that most of these properties lend great support to the local and regional economies – and to ensure fairness – all properties should be treated the same and rated according to their ability to withstand risk, not their use or ownership status.

- Increase Mitigation Grant Funding

In order to accelerate NFIP solvency, FEMA needs to aggressively buy down the risk associated with properties that have had the largest number of flood claims – namely, repetitive loss (RL) and Severe Repetitive Loss (SRL) properties. According to the Government Accountability Office, National Flood Program in March 2004, about one percent of the 5.1 million properties currently insured by the program are considered repetitive loss properties – properties for which policyholders have made two or more \$1,000 flood claims. However, about 38 percent of all program claim costs have been the result of repetitive loss properties, at a cost of about \$4.6 billion since 1978. While Congress has created funding programs that provide mitigation grants for owners of both repetitive and non-repetitive loss properties, funding cannot keep pace with demand. For example, in Florida, there is a waiting list of property owners who want to mitigate their properties but do not have the resources to do so. Accordingly, Congress should increase funding for FEMA's mitigation programs to help buy down the NFIP risk.

- Means Tested Affordability Program
Congress should create a comprehensive, means-tested affordability program to ensure flood insurance is affordable for low- and middle-income families.
- Mitigation Loan Program
Congress should create a low-interest mitigation loan program that provides property owners upfront costs to mitigate their properties. Ideally, the loan, or a portion of the loan, would be paid back with a portion of the premium savings.
- Establish Tax Credits to Provide Mitigation Incentives
Congress should evaluate the feasibility of a flood mitigation tax credit program. A tax credit to property owners who undertake flood mitigation would not only create an incentive to encourage loss reduction efforts, but it would: (1) reduce risk; (2) lower insurance rates; (3) help stabilize the NFIP; and, (4) decrease the need for other federal assistance associated flood disasters (i.e., temporary housing, debris removal). Such a credit program could be modeled after those used for energy efficiency initiatives, such as the Federal Residential Energy Efficiency Tax Credit Program.
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Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Mario Diaz-Balart
United States House of Representatives
404 Cannon House Office Building
Washington, DC 20515

Representative Diaz-Balart:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

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Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Matt Gaetz
United States House of Representatives
1721 Longworth House Office Building
Washington, DC 20515

Representative Gaetz:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
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Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Neal Dunn
United States House of Representatives
316 Cannon House Office Building
Washington, DC 20515

Representative Dunn:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
- The NFIP Should be Transparent
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For the past several years, our organizations have advocated for limited and reasonable program changes that include financial solvency, map modernization, rate transparency, flood mitigation and above all affordability. At a minimum, we believe the following provisions should be included in the next NFIP reauthorization bill:

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of between 18 percent and 25 percent until the full risk rate is reached. We recommend that a more reasonable cap – between five and 10 percent – should apply to all properties. This cap would provide stability and financial predictability for property owners.

- Broaden the Base of Policy Holders – Spread the Risk

According to FEMA, people located outside of mapped high-risk flood areas file more than 20 percent of all flood claims and receive one-third of Federal disaster assistance for flooding. Recognizing that nearly all properties have some risk of flooding, incentives should be created to encourage participation in the NFIP for property owners not located in high risk flood zones. Additionally, Congress should strengthen enforcement requirements for maintaining NFIP policies on all federally-backed mortgages. These actions will not only help protect those who are surprised by unpredicted flooding but also increase the financial solvency of the program.

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Sincerely,



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Commissioner, Leon County



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November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Ross Spano
United States House of Representatives
224 Cannon House Office Building
Washington, DC 20515

Representative Spano:

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While it should be remembered that NFIP was established to fill a void created when the private market abandoned flood risk, the private market today could serve as a complement to NFIP and provide consumers with more choices.
- Improve and Accelerate the Mapping Process
Nationwide, NFIP flood maps are generally outdated and don't measure a community's flood risk accurately. Efforts should be made to (1) work directly with communities in the map revision process, ensuring locally-generated data and/or models are considered in map revisions, and (2) ensure individual property data (i.e., Finished Floor Elevations) are accounted for when maps are developed/revisted.
- Risk Rating 2.0
According to FEMA, Risk Rating 2.0 will fundamentally change the way FEMA rates a property's flood risk and prices insurance. Unfortunately, the agency has been developing this process with no input from states or local governments. In fact, other than a brief description on its website, FEMA has provided no information and asked for no input from counties and cities. While we recognize that the agency has announced it will delay program implementation by one year, we believe future legislation could be negatively impacted if the program is not more transparent and inclusive. Accordingly, we recommend that Congress require FEMA to consult with states and local governments over the next 12 months

regarding the development and application of Risk Rating 2.0. We also recommend that Congress create an appeal process, where counties, cities and policy holders can appeal any changes that they find do not reflect a property's flood risk

Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Ted Deutch
United States House of Representatives
2447 Rayburn House Office Building
Washington, DC 20515

Representative Deutch:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
- The NFIP Should be Transparent
- The NFIP Should be Fair
- The NFIP Should be Multi-Faceted and Comprehensive

For the past several years, our organizations have advocated for limited and reasonable program changes that include financial solvency, map modernization, rate transparency, flood mitigation and above all affordability. At a minimum, we believe the following provisions should be included in the next NFIP reauthorization bill:

- Reasonable Premium Caps
Prior to 2012, FEMA had the authority to increase rates by no more than 10 percent per year. Under the 2014 Homeowners Flood Insurance Affordability Act (HFIAA), renewal premiums for certain properties (grandfathered and Pre-FIRM) will experience rate increases

of between 18 percent and 25 percent until the full risk rate is reached. We recommend that a more reasonable cap – between five and 10 percent – should apply to all properties. This cap would provide stability and financial predictability for property owners.

- Broaden the Base of Policy Holders – Spread the Risk

According to FEMA, people located outside of mapped high-risk flood areas file more than 20 percent of all flood claims and receive one-third of Federal disaster assistance for flooding. Recognizing that nearly all properties have some risk of flooding, incentives should be created to encourage participation in the NFIP for property owners not located in high risk flood zones. Additionally, Congress should strengthen enforcement requirements for maintaining NFIP policies on all federally-backed mortgages. These actions will not only help protect those who are surprised by unpredicted flooding but also increase the financial solvency of the program.

- Ensure Rates are Consistent for all Properties

HFIAA repealed the portions of an earlier law that removed Pre-FIRM subsidies on properties purchased after July 6, 2012; however, the repeal only applies to primary residences. Non-primary residences (i.e., vacation rentals, investment properties, and businesses) will receive annual 25 percent premium increases until full-risk rates are achieved. Recognizing that most of these properties lend great support to the local and regional economies – and to ensure fairness – all properties should be treated the same and rated according to their ability to withstand risk, not their use or ownership status.

- Increase Mitigation Grant Funding

In order to accelerate NFIP solvency, FEMA needs to aggressively buy down the risk associated with properties that have had the largest number of flood claims – namely, repetitive loss (RL) and Severe Repetitive Loss (SRL) properties. According to the Government Accountability Office, National Flood Program in March 2004, about one percent of the 5.1 million properties currently insured by the program are considered repetitive loss properties – properties for which policyholders have made two or more \$1,000 flood claims. However, about 38 percent of all program claim costs have been the result of repetitive loss properties, at a cost of about \$4.6 billion since 1978. While Congress has created funding programs that provide mitigation grants for owners of both repetitive and non-repetitive loss properties, funding cannot keep pace with demand. For example, in Florida, there is a waiting list of property owners who want to mitigate their properties but do not have the resources to do so. Accordingly, Congress should increase funding for FEMA's mitigation programs to help buy down the NFIP risk.

- Means Tested Affordability Program
Congress should create a comprehensive, means-tested affordability program to ensure flood insurance is affordable for low- and middle-income families.
- Mitigation Loan Program
Congress should create a low-interest mitigation loan program that provides property owners upfront costs to mitigate their properties. Ideally, the loan, or a portion of the loan, would be paid back with a portion of the premium savings.
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Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
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Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Val Demings
United States House of Representatives
217 Cannon House Office Building
Washington, DC 20515

Representative Demings:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
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regarding the development and application of Risk Rating 2.0. We also recommend that Congress create an appeal process, where counties, cities and policy holders can appeal any changes that they find do not reflect a property's flood risk

Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Marco Rubio
United States Senate
284 Russell Senate Office Building
Washington, DC 20510

Senator Rubio:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
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regarding the development and application of Risk Rating 2.0. We also recommend that Congress create an appeal process, where counties, cities and policy holders can appeal any changes that they find do not reflect a property's flood risk

Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Rick Scott
United States Senate
716 Hart Senate Office Building
Washington, DC 20510

Senator Scott:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

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Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Michael Waltz
United States House of Representatives
216 Cannon House Office Building
Washington, DC 20515

Representative Waltz:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

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Congress should create a low-interest mitigation loan program that provides property owners upfront costs to mitigate their properties. Ideally, the loan, or a portion of the loan, would be paid back with a portion of the premium savings.
- Establish Tax Credits to Provide Mitigation Incentives
Congress should evaluate the feasibility of a flood mitigation tax credit program. A tax credit to property owners who undertake flood mitigation would not only create an incentive to encourage loss reduction efforts, but it would: (1) reduce risk; (2) lower insurance rates; (3) help stabilize the NFIP; and, (4) decrease the need for other federal assistance associated flood disasters (i.e., temporary housing, debris removal). Such a credit program could be modeled after those used for energy efficiency initiatives, such as the Federal Residential Energy Efficiency Tax Credit Program.
- Encourage Growth in the Private Flood Insurance Market.
While it should be remembered that NFIP was established to fill a void created when the private market abandoned flood risk, the private market today could serve as a complement to NFIP and provide consumers with more choices.
- Improve and Accelerate the Mapping Process
Nationwide, NFIP flood maps are generally outdated and don't measure a community's flood risk accurately. Efforts should be made to (1) work directly with communities in the map revision process, ensuring locally-generated data and/or models are considered in map revisions, and (2) ensure individual property data (i.e., Finished Floor Elevations) are accounted for when maps are developed/revise.
- Risk Rating 2.0
According to FEMA, Risk Rating 2.0 will fundamentally change the way FEMA rates a property's flood risk and prices insurance. Unfortunately, the agency has been developing this process with no input from states or local governments. In fact, other than a brief description on its website, FEMA has provided no information and asked for no input from counties and cities. While we recognize that the agency has announced it will delay program implementation by one year, we believe future legislation could be negatively impacted if the program is not more transparent and inclusive. Accordingly, we recommend that Congress require FEMA to consult with states and local governments over the next 12 months

regarding the development and application of Risk Rating 2.0. We also recommend that Congress create an appeal process, where counties, cities and policy holders can appeal any changes that they find do not reflect a property's flood risk

Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Stephanie Murphy
United States House of Representatives
1710 Longworth House Office Building
Washington, DC 20515

Representative Murphy:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
- The NFIP Should be Transparent
- The NFIP Should be Fair
- The NFIP Should be Multi-Faceted and Comprehensive

For the past several years, our organizations have advocated for limited and reasonable program changes that include financial solvency, map modernization, rate transparency, flood mitigation and above all affordability. At a minimum, we believe the following provisions should be included in the next NFIP reauthorization bill:

- Reasonable Premium Caps
Prior to 2012, FEMA had the authority to increase rates by no more than 10 percent per year. Under the 2014 Homeowners Flood Insurance Affordability Act (HFIAA), renewal premiums for certain properties (grandfathered and Pre-FIRM) will experience rate increases

of between 18 percent and 25 percent until the full risk rate is reached. We recommend that a more reasonable cap – between five and 10 percent – should apply to all properties. This cap would provide stability and financial predictability for property owners.

- Broaden the Base of Policy Holders – Spread the Risk

According to FEMA, people located outside of mapped high-risk flood areas file more than 20 percent of all flood claims and receive one-third of Federal disaster assistance for flooding. Recognizing that nearly all properties have some risk of flooding, incentives should be created to encourage participation in the NFIP for property owners not located in high risk flood zones. Additionally, Congress should strengthen enforcement requirements for maintaining NFIP policies on all federally-backed mortgages. These actions will not only help protect those who are surprised by unpredicted flooding but also increase the financial solvency of the program.

- Ensure Rates are Consistent for all Properties

HFIAA repealed the portions of an earlier law that removed Pre-FIRM subsidies on properties purchased after July 6, 2012; however, the repeal only applies to primary residences. Non-primary residences (i.e., vacation rentals, investment properties, and businesses) will receive annual 25 percent premium increases until full-risk rates are achieved. Recognizing that most of these properties lend great support to the local and regional economies – and to ensure fairness – all properties should be treated the same and rated according to their ability to withstand risk, not their use or ownership status.

- Increase Mitigation Grant Funding

In order to accelerate NFIP solvency, FEMA needs to aggressively buy down the risk associated with properties that have had the largest number of flood claims – namely, repetitive loss (RL) and Severe Repetitive Loss (SRL) properties. According to the Government Accountability Office, National Flood Program in March 2004, about one percent of the 5.1 million properties currently insured by the program are considered repetitive loss properties – properties for which policyholders have made two or more \$1,000 flood claims. However, about 38 percent of all program claim costs have been the result of repetitive loss properties, at a cost of about \$4.6 billion since 1978. While Congress has created funding programs that provide mitigation grants for owners of both repetitive and non-repetitive loss properties, funding cannot keep pace with demand. For example, in Florida, there is a waiting list of property owners who want to mitigate their properties but do not have the resources to do so. Accordingly, Congress should increase funding for FEMA's mitigation programs to help buy down the NFIP risk.

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- Risk Rating 2.0
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regarding the development and application of Risk Rating 2.0. We also recommend that Congress create an appeal process, where counties, cities and policy holders can appeal any changes that they find do not reflect a property's flood risk

Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Charlie Crist
United States House of Representatives
215 Cannon House Office Building
Washington, DC 20515

Representative Crist:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
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of between 18 percent and 25 percent until the full risk rate is reached. We recommend that a more reasonable cap – between five and 10 percent – should apply to all properties. This cap would provide stability and financial predictability for property owners.

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regarding the development and application of Risk Rating 2.0. We also recommend that Congress create an appeal process, where counties, cities and policy holders can appeal any changes that they find do not reflect a property's flood risk

Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Vern Buchanan
United States House of Representatives
2427 Rayburn House Office Building
Washington, DC 20515

Representative Buchanan:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
- The NFIP Should be Transparent
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For the past several years, our organizations have advocated for limited and reasonable program changes that include financial solvency, map modernization, rate transparency, flood mitigation and above all affordability. At a minimum, we believe the following provisions should be included in the next NFIP reauthorization bill:

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Prior to 2012, FEMA had the authority to increase rates by no more than 10 percent per year. Under the 2014 Homeowners Flood Insurance Affordability Act (HFIAA), renewal premiums for certain properties (grandfathered and Pre-FIRM) will experience rate increases

of between 18 percent and 25 percent until the full risk rate is reached. We recommend that a more reasonable cap – between five and 10 percent – should apply to all properties. This cap would provide stability and financial predictability for property owners.

- Broaden the Base of Policy Holders – Spread the Risk

According to FEMA, people located outside of mapped high-risk flood areas file more than 20 percent of all flood claims and receive one-third of Federal disaster assistance for flooding. Recognizing that nearly all properties have some risk of flooding, incentives should be created to encourage participation in the NFIP for property owners not located in high risk flood zones. Additionally, Congress should strengthen enforcement requirements for maintaining NFIP policies on all federally-backed mortgages. These actions will not only help protect those who are surprised by unpredicted flooding but also increase the financial solvency of the program.

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In order to accelerate NFIP solvency, FEMA needs to aggressively buy down the risk associated with properties that have had the largest number of flood claims – namely, repetitive loss (RL) and Severe Repetitive Loss (SRL) properties. According to the Government Accountability Office, National Flood Program in March 2004, about one percent of the 5.1 million properties currently insured by the program are considered repetitive loss properties – properties for which policyholders have made two or more \$1,000 flood claims. However, about 38 percent of all program claim costs have been the result of repetitive loss properties, at a cost of about \$4.6 billion since 1978. While Congress has created funding programs that provide mitigation grants for owners of both repetitive and non-repetitive loss properties, funding cannot keep pace with demand. For example, in Florida, there is a waiting list of property owners who want to mitigate their properties but do not have the resources to do so. Accordingly, Congress should increase funding for FEMA's mitigation programs to help buy down the NFIP risk.

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Congress should create a comprehensive, means-tested affordability program to ensure flood insurance is affordable for low- and middle-income families.
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While it should be remembered that NFIP was established to fill a void created when the private market abandoned flood risk, the private market today could serve as a complement to NFIP and provide consumers with more choices.
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According to FEMA, Risk Rating 2.0 will fundamentally change the way FEMA rates a property's flood risk and prices insurance. Unfortunately, the agency has been developing this process with no input from states or local governments. In fact, other than a brief description on its website, FEMA has provided no information and asked for no input from counties and cities. While we recognize that the agency has announced it will delay program implementation by one year, we believe future legislation could be negatively impacted if the program is not more transparent and inclusive. Accordingly, we recommend that Congress require FEMA to consult with states and local governments over the next 12 months

regarding the development and application of Risk Rating 2.0. We also recommend that Congress create an appeal process, where counties, cities and policy holders can appeal any changes that they find do not reflect a property's flood risk

Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to be 'N. Maddox', written in a cursive style.

Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County

A handwritten signature in black ink, appearing to be 'I. Salver', written in a cursive style with a long horizontal line above the name.

Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Gregory Steube
United States House of Representatives
2427 Rayburn House Office Building
Washington, DC 20515

Representative Steube:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

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Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Alcee Hastings
United States House of Representatives
2353 Rayburn House Office Building
Washington, DC 20515

Representative Hastings:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

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In order to accelerate NFIP solvency, FEMA needs to aggressively buy down the risk associated with properties that have had the largest number of flood claims – namely, repetitive loss (RL) and Severe Repetitive Loss (SRL) properties. According to the Government Accountability Office, National Flood Program in March 2004, about one percent of the 5.1 million properties currently insured by the program are considered repetitive loss properties – properties for which policyholders have made two or more \$1,000 flood claims. However, about 38 percent of all program claim costs have been the result of repetitive loss properties, at a cost of about \$4.6 billion since 1978. While Congress has created funding programs that provide mitigation grants for owners of both repetitive and non-repetitive loss properties, funding cannot keep pace with demand. For example, in Florida, there is a waiting list of property owners who want to mitigate their properties but do not have the resources to do so. Accordingly, Congress should increase funding for FEMA's mitigation programs to help buy down the NFIP risk.

- Means Tested Affordability Program
Congress should create a comprehensive, means-tested affordability program to ensure flood insurance is affordable for low- and middle-income families.
- Mitigation Loan Program
Congress should create a low-interest mitigation loan program that provides property owners upfront costs to mitigate their properties. Ideally, the loan, or a portion of the loan, would be paid back with a portion of the premium savings.
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Congress should evaluate the feasibility of a flood mitigation tax credit program. A tax credit to property owners who undertake flood mitigation would not only create an incentive to encourage loss reduction efforts, but it would: (1) reduce risk; (2) lower insurance rates; (3) help stabilize the NFIP; and, (4) decrease the need for other federal assistance associated flood disasters (i.e., temporary housing, debris removal). Such a credit program could be modeled after those used for energy efficiency initiatives, such as the Federal Residential Energy Efficiency Tax Credit Program.
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While it should be remembered that NFIP was established to fill a void created when the private market abandoned flood risk, the private market today could serve as a complement to NFIP and provide consumers with more choices.
- Improve and Accelerate the Mapping Process
Nationwide, NFIP flood maps are generally outdated and don't measure a community's flood risk accurately. Efforts should be made to (1) work directly with communities in the map revision process, ensuring locally-generated data and/or models are considered in map revisions, and (2) ensure individual property data (i.e., Finished Floor Elevations) are accounted for when maps are developed/revise.
- Risk Rating 2.0
According to FEMA, Risk Rating 2.0 will fundamentally change the way FEMA rates a property's flood risk and prices insurance. Unfortunately, the agency has been developing this process with no input from states or local governments. In fact, other than a brief description on its website, FEMA has provided no information and asked for no input from counties and cities. While we recognize that the agency has announced it will delay program implementation by one year, we believe future legislation could be negatively impacted if the program is not more transparent and inclusive. Accordingly, we recommend that Congress require FEMA to consult with states and local governments over the next 12 months

regarding the development and application of Risk Rating 2.0. We also recommend that Congress create an appeal process, where counties, cities and policy holders can appeal any changes that they find do not reflect a property's flood risk

Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Frederica Wilson
United States House of Representatives
2445 Rayburn House Office Building
Washington, DC 20515

Representative Wilson:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
- The NFIP Should be Transparent
- The NFIP Should be Fair
- The NFIP Should be Multi-Faceted and Comprehensive

For the past several years, our organizations have advocated for limited and reasonable program changes that include financial solvency, map modernization, rate transparency, flood mitigation and above all affordability. At a minimum, we believe the following provisions should be included in the next NFIP reauthorization bill:

- Reasonable Premium Caps
Prior to 2012, FEMA had the authority to increase rates by no more than 10 percent per year. Under the 2014 Homeowners Flood Insurance Affordability Act (HFIAA), renewal premiums for certain properties (grandfathered and Pre-FIRM) will experience rate increases

of between 18 percent and 25 percent until the full risk rate is reached. We recommend that a more reasonable cap – between five and 10 percent – should apply to all properties. This cap would provide stability and financial predictability for property owners.

- Broaden the Base of Policy Holders – Spread the Risk

According to FEMA, people located outside of mapped high-risk flood areas file more than 20 percent of all flood claims and receive one-third of Federal disaster assistance for flooding. Recognizing that nearly all properties have some risk of flooding, incentives should be created to encourage participation in the NFIP for property owners not located in high risk flood zones. Additionally, Congress should strengthen enforcement requirements for maintaining NFIP policies on all federally-backed mortgages. These actions will not only help protect those who are surprised by unpredicted flooding but also increase the financial solvency of the program.

- Ensure Rates are Consistent for all Properties

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regarding the development and application of Risk Rating 2.0. We also recommend that Congress create an appeal process, where counties, cities and policy holders can appeal any changes that they find do not reflect a property's flood risk

Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Debbie Mucarsel-Powell
United States House of Representatives
114 Cannon House Office Building
Washington, DC 20515

Representative Mucarsel-Powell:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

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For the past several years, our organizations have advocated for limited and reasonable program changes that include financial solvency, map modernization, rate transparency, flood mitigation and above all affordability. At a minimum, we believe the following provisions should be included in the next NFIP reauthorization bill:

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Taken together, these provisions would significantly enhance the regulatory structure of the NFIP, while ensuring Florida policy holders have access to reasonable and affordable flood insurance.

We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Donna Shalala
United States House of Representatives
1320 Longworth House Office Building
Washington, DC 20515

Representative Shalala:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

Our recommendations for NFIP reauthorization and reform are driven by reasonable guiding principles that reflect the needs of our state and the complexities of the program. These include the following:

- The NFIP Should be Reauthorized for the Long-Term
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We look forward to working with you to address these issues in a long-term NFIP reauthorization. Should you have any questions, please contact Eric Poole at the Florida Association of Counties at epoole@fl-counties.com or Allison Payne at the Florida League of Cities at apayne@flcities.com. Thank you for your work on this important issue.

Sincerely,



Nick Maddox
President, Florida Association of Counties
Commissioner, Leon County



Isaac Salver,
President, Florida League of Cities
Councilman, Bay Harbor Islands



November 8, 2019

VIA ELECTRONIC MAIL

The Honorable Ted Yoho
United States House of Representatives
1730 Longworth House Office Building
Washington, DC 20515

Representative Yoho:

On behalf of Florida's 67 counties and 412 municipalities, we are writing in support of legislation creating a long-term National Flood Insurance Program (NFIP) reauthorization. While we recognize that H.R. 3167, the National Flood Insurance Program Reauthorization Act of 2019, (the Waters-McHenry package), includes laudable provisions, including a five year extension, we believe the legislation should include other provisions to protect Florida's 1.7 million policy holders.

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