



ASSOCIATION OF STATE FLOODPLAIN MANAGERS, INC.

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Oct. 6, 2017

The Honorable Mick Mulvaney
Executive Office of the President
Director, Office of Management and Budget
Washington DC 20503

Re: ASFPM Comments on Administration Proposal for NFIP Debt Relief and NFIP Changes

Dear Mr. Mulvaney:

The Association of State Floodplain Managers has reviewed the Administration proposal and we provide the following comments:

ASFPM has long pressed Congress to forgive the debt in the National Flood Insurance Program since Congress designed a program that was not intended to financially handle catastrophic events. However, we cannot in good conscious support this proposal by the Administration.

We are deeply disappointed that the Administration has chosen to tie debt forgiveness to major reforms to the NFIP outside of the normal reauthorization process, which will be completed soon. There are several reform ideas that could have profound negative consequences and undermine the long-term future of the NFIP, as well as to communities and property owners who need flood risk protection.

These expansive concepts need to be considered in the context of total NFIP reauthorization. The NFIP is the nation's comprehensive flood-risk management program and must not be dealt with in a piecemeal process.

The idea that taxpayer costs will decrease if the NFIP cannot sell flood insurance on new properties or on commercial properties is a misguided idea. What will actually happen is many of these properties will end up without flood insurance because owners cannot purchase it, so taxpayer costs will increase because of disaster relief. And at the same time, property owners will not be paying any part of those costs for living in flood risk areas.

ASFPM would support a clean disaster supplemental that includes debt relief for the NFIP. Congress SHOULD forgive the \$24.6 billion in debt that has amassed before Hurricanes Harvey, Irma and Maria, which was a direct result of losses accumulated before Congress gave FEMA any

Dedicated to reducing flood risk and losses in the nation.

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Association of State Floodplain Managers, Inc.

October 10, 2017

tools to better manage the financial risk of the NFIP in the aftermath of catastrophic flood events.

ASFPM and its 36 chapters represent more than 17,000 state and local officials, as well as other professionals engaged in all aspects of floodplain management and flood hazard mitigation, including management of local floodplain ordinances, flood risk mapping, engineering, planning, community development, hydrology, forecasting, emergency response, water resources development and flood insurance. All ASFPM members are concerned with reducing our nation's flood-related losses.

Again, we urge you to oppose inclusion of these ill-advised private flood provisions outside of the context of comprehensive NFIP reauthorization legislation. Simple modifications are needed to preserve the comprehensive flood risk management functions of the NFIP. Thank you for seriously considering these recommendations from ASFPM. If you have questions, please contact me at (608) 828-3000 or Merrie Inderfurth, ASFPM Washington Liaison, at (703) 448-0245.

Very sincerely,



Chad Berginnis
ASFPM Executive Director

cc: Honorable Mitch McConnell, Majority Leaders
Honorable Paul Ryan, Speaker of the House
Honorable Charles E. Schumer, Senate Minority Leader
Honorable Nancy Pelosi, House Minority Leader
Honorable Michael Crapo, Chairman, Senate Committee on Banking, Housing and Urban Affairs
Honorable Sherrod Brown, Ranking Member, Senate Committee on Banking, Housing and Urban Affairs