Feb. 29, 2016

Dear Chairman Hensarling and Luetkemeyer and Ranking Members Waters and Cleaver:

This week the House Financial Services Committee will mark-up H.R. 2901 legislation to facilitate development of a more robust private market for private flood insurance. The Association of State Floodplain Managers understands the interest in development of more private flood insurance options, which would add to the numerous private options that are presently available and co-exist with the National Flood Insurance Program.

We do, however, note the importance of maintaining the basic structure and availability of the NFIP. There are important reasons for this. There will, no doubt, be many structures and properties for which the private sector will not wish to offer insurance. Further, federal flood insurance must be available when private market calculations lead them to pull out of certain areas. ASFPM believes that whatever direction private flood insurance takes in the future, a strong and viable NFIP must be available as well.

Private insurance companies benefit from the flood risk maps and local floodplain management ordinance monitoring and technical assistance that are funded through a policy fee associated with NFIP policies. ASFPM suggests an equivalent policy fee be associated with private market policies to contribute to ongoing support for these functions that private insurers have acknowledged to be very important.

Likely due to increased NFIP premium rates and the surcharges imposed under the Homeowners Flood Insurance Assistance Act (HFIAA), the NFIP policies in force have declined from 5.5 million to about 5.1 million. FEMA anticipates further decline due to these reasons and to movement toward private market policies. We suggest that it is important to plan ahead to ensure adequate continued support for the mapping and floodplain management functions of the NFIP.

Dedicated to reducing flood risk and losses in the nation.

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ASFPM is an association of 17,000 state and local officials, as well as professional engineers and planners who assist states and localities in reducing flood related losses. Our 37 chapters cover 41 states. Thank you for considering our concern and suggestion as you work on H.R. 2901 and reauthorization of the NFIP.

Very sincerely,

Chad Berginnis, CFM
ASFPM, Executive Director

Ceil C. Strauss, CFM
ASFPM, Chair

cc: Members of the Housing and Insurance Subcommittee