



Association of State Floodplain Managers • Natural Resources Defense Council

R Street Institute • Reinsurance Association of America

Dear Representative,

We, the undersigned groups, representing professional floodplain managers, insurance companies, fiscal conservatives, and environmental groups oppose inclusion of Section 236 in the Transportation, Housing, and Urban Development (THUD) appropriations bill that will waste federal taxpayer dollars by putting federally owned or funded facilities in harm's way.

Section 236 would effectively block the Department of Housing and Urban Development (HUD) from implementing Executive Order 13690, which updated the federal flood protection standard to better prepare and protect the Nation from future floods and coastal storms. The federal flood protection standard, also referred to as the Federal Flood Risk Management Standard, will ensure that federal taxpayer-funded facilities and infrastructure are built with a higher level of resilience to flood-related damages either through locating them outside of areas vulnerable to flooding, or taking other measures like building to a higher elevation or floodproofing.

As written, Section 236 would force HUD to map every floodplain in the United States before it could implement this commonsense flood protection measure. This mapping requirement would not only be extremely costly to the American taxpayer, but would be redundant and unnecessary. The Federal Emergency Management Agency (FEMA) already provides floodplain maps for communities in the nation and according to the Association of State Floodplain Managers, the total cost to provide up-to-date flood maps for all communities is between \$4.2 and \$7.5 billion.¹ Section 236 would impose the same if not greater cost on HUD to carry out essentially the same task, which would be compounded by HUD's lack of flood mapping expertise.

Thus, Section 236 is a ploy to block HUD's implementation of the flood protection standard. Blocking implementation of the standard hurts taxpayers and increases the nation's vulnerability to costly and environmentally damaging flood events. In contrast, implementation of the flood protection standards and E.O. 13690 would save taxpayer dollars by requiring federally-funded infrastructure to be more resilient to future flooding and reducing the amount spent to repair, rebuild, and replace public facilities post-disaster.

¹ Association of State Floodplain Managers, Flood Mapping for the Nation: A Cost Analysis of the Nation's Flood Map Inventory, pg. 1 (2013)

Since 1998, FEMA has spent \$25.6 billion on Public Assistance grants to repair or rebuild public facilities, buildings, and infrastructure that have been damaged by floods and coastal storms.² Costs to repair and rebuild would be lessened in the future under E.O. 13690 and the flood protection standard and, most importantly, we would ensure that federally funded facilities and infrastructure are built with escalating future flood risks in mind.

Flooding is the most common and costly natural disaster in the United States. Dollar losses due to tropical storms and other flood events have tripled over the past 50 years, and currently comprise more than half of all natural disaster losses. Flood losses in the United States are projected to worsen in the coming decades, putting more people and property at risk. Unfortunately, while the federal spending post-disaster has dramatically increased over the last few decades, spending on proven, pre-disaster planning and mitigation still falls woefully short of what is needed to better protect people and their property. We know that mitigation, and smarter and safer building protects people and their property. For every one dollar spent on disaster mitigation, four dollars are saved on post-disaster recovery and rebuilding.

The flood protection standard will better protect people and property from harmful flooding in areas that face flood risks. The standards will require Federal agencies to incorporate the best science on flooding in making siting decisions, and require structures receiving federal funds to build to safer levels of flood protection and resilience. Under the flood protection standards, federal investments will be better designed, better built, and better protected from floods today and in the future. When federal funds are being used to build, rebuild or subsidize structures, the government owes a duty to the taxpayer that investments are being made in safe, sustainable, and resilient ways. HUD's implementation of the standards, and other agencies' implementation, will help meet that duty.

Pre-disaster mitigation efforts, which include building to a higher standard, are proven to reduce the associated costs of post-disaster recovery. Agency implementation of the federal flood protection standards will yield enhanced protection to people and property, result in cost savings on damages avoided, and lead to environmental improvements. Thus, we urge you to join is in opposing inclusion of Section 236 in the final THUD appropriations bill.

Sincerely,

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² See "The Need for Flood Protection Standards" at <https://www.nrdc.org/resources/need-flood-protection-standards>.