

August 26, 2019

Ambassador John R. Bolton
National Security Advisor
The White House
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

Mick Mulvaney
Director
Office of Management and Budget
725 17th Street, N.W.
Washington, DC 20503

Dear Mr. Bolton and Mr. Mulvaney,

Our organizations represent fiscal conservatives, emergency management agencies, insurance businesses, architects, engineers, design professionals, public works professionals, and non-profit organizations. We are writing to urge the Administration to develop a flood-ready standard to protect federal infrastructure investments from the devastating impacts and costs of flood-related disasters.

Two years ago, the Federal Flood Risk Management Standard, an executive order meant to protect taxpayer dollars spent in flood-prone areas, was repealed. Ten days later, Hurricane Harvey brought historic rainfall and catastrophic flooding throughout southeast Texas and parts of Louisiana. In the aftermath of Harvey, the Administration stated its intent to put in place new standards that would ensure we rebuild smarter and stronger following disasters.¹ Unfortunately, a replacement has yet to be announced or put in place.

Over the past two years, Congress and the Administration have taken steps toward better protecting our communities and infrastructure when building and rebuilding. Last October, the President signed the Disaster Recovery Reform Act, which will increase investment in pre-disaster mitigation and better incentivize the adoption and enforcement of modernized building codes and standards. The Department of Defense, at the direction of Congress, is now required to consider future risks in the design of military facilities and the development of master plans for major military installations.

While these efforts are significant, more still needs to be done.

More than 100 flooding-related Presidential Disaster Declarations have been declared across 43 states since Hurricane Harvey, and Congress has allocated over \$150 billion through disaster supplemental appropriations.^{2,3,4} Last fall, Hurricane Florence closed more than 1,600 roads in North Carolina that impeded communities from receiving emergency responders and aid.⁵ And as recently as this spring, the Midwest experienced billions of dollars in catastrophic losses and damages to roadways, levees, dams, and other infrastructure.⁶

The Congressional Budget Office estimates that, under the current policy regime, hurricane winds and storm-related flooding cost taxpayers at least \$17 billion in losses and assistance per year.⁷ Clearly, we cannot afford to allow this costly cycle of loss and rebuilding to continue.

¹ https://www.washingtonpost.com/politics/after-harvey-the-trump-administration-reconsiders-flood-rules-it-just-rolled-back/2017/09/01/c3a051ea-8e56-11e7-8df5-c2e5cf46c1e2_story.html

² <https://www.fema.gov/media-library/assets/documents/28318>

³ https://www.everycrsreport.com/files/20180320_R45084_8e27f78352133d0887dbfd7c7126d97524ad96e7.pdf

⁴ <https://www.congress.gov/bill/116th-congress/house-bill/2157/text>

⁵ <https://governor.nc.gov/news/floodwaters-recede-state-focuses-recovery>

⁶ <https://www.ncdc.noaa.gov/billions/events>

⁷ <https://www.cbo.gov/publication/55019>

Without comprehensive federal action and a new standard to reduce flood risk, disaster relief and recovery policies will allow for and even encourage unprepared communities to build unwisely and subsequently rely upon federal help when flood disasters hit. When federal funds are used for development and rebuilding in flood-prone areas, it should be common sense to consider and mitigate those risks upfront to ensure the investment will be long lasting.

A flood-ready standard for federally funded building and rebuilding projects will help protect people and property, reduce public and private expenditures after tremendous flood losses, and make communities stronger. We respectfully request that the Administration deliver on its promise and help prepare communities across the country to withstand the next big flood. We would welcome the opportunity to work with the Administration on such a standard.

Thank you,

American Institute of Architects

American Planning Association

American Property Casualty Insurance Association

American Public Works Association

American Society of Civil Engineers

American Society of Landscape Architects

Association of State Floodplain Managers

Coalition to Reduce Spending

ConservAmerica

Council of Insurance Agents & Brokers

Enterprise Community Partners

Federal Association for Insurance Reform

FreedomWorks

International Association of Emergency Managers - USA

International Code Council

Insurance Institute for Business & Home Safety

National Association of Mutual Insurance Companies

National Ground Water Association

National Emergency Management Association

National Ready Mixed Concrete Association

National Institute of Building Sciences

National Taxpayers Union

Portland Cement Association

R Street Institute

Reinsurance Association of America

SBP

Smart Home America

Taxpayers for Common Sense

Taxpayers Protection Alliance

The Alliance for National & Community Resilience

The Pew Charitable Trusts

U.S. Chamber of Commerce

U.S. Green Building Council

U.S. Resiliency Council