

March 12, 2020

The Honorable Nita Lowey
Chairwoman
House Committee on Appropriations
H-307 The Capitol
Washington, D.C. 20515

The Honorable Kay Granger
Ranking Member
House Committee on Appropriations
1016 Longworth House Office Building
Washington, D.C. 20515

The Honorable Lucille Roybal-Allard
Chairwoman
Subcommittee on Homeland Security
House Committee on Appropriations
2006 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Chuck Fleischmann
Ranking Member
Subcommittee on Homeland Security
House Committee on Appropriations
1016 Longworth House Office Building
Washington, D.C. 20515

Dear Chairwoman Lowey, Ranking Member Granger, Chairwoman Roybal-Allard, and Ranking Member Fleischmann:

The SmarterSafer Coalition (SmarterSafer) writes to express our views on select measures under consideration in the Fiscal Year 2021 appropriations process. SmarterSafer is a diverse coalition of conservation and environmental groups, taxpayer-focused organizations, insurance and reinsurance interests, and housing advocates. We are united by our support for fiscally sound, environmentally responsible approaches to natural catastrophe policy.

The threat of floods and other natural catastrophes leaves American families in harm's way and American taxpayers exposed to billions of dollars in losses each year. By providing access to insurance protection in areas where the private market would not write and at rates that are not fiscally sustainable, the National Flood Insurance Program (NFIP) proactively and repeatedly incentivizes Americans to put their communities, environment, property, and lives at risk.

SmarterSafer was formed more than a decade ago in part to urge policymakers to enact meaningful reforms of misaligned federal flood policies. As such, our coalition believes it important that the House Appropriations Committee take steps to foster a more reasonable and fiscally responsible approach to pre-disaster mitigation and improved Federal Emergency Management Agency (FEMA) mapping.

Pre-disaster Mitigation Efforts. The federal government currently spends much more on post-disaster cleanup and rebuilding than on pre-disaster mitigation. That equation must change if we want to better protect our communities from future storms. While Congress typically provides mitigation funding in disaster packages, more must be done within the NFIP to ensure greater investment in pre-disaster mitigation efforts. Mitigation efforts not only offer added protection to

individuals living in floodplains, but also cost-effective approaches to protect taxpayer dollars. Every \$1 spent on mitigation efforts is estimated to save \$7 on post-disaster spending.

Congress should invest in fiscally-sound and proven mitigation strategies—both at the community and property levels—for those areas most at-risk for future disasters. Mitigation should include multiple options for intervention, such as strengthening natural features that help buffer storms, buyouts and preservation of green space, and elevation of structures above base-flood levels. As you know, pre-disaster mitigation funding is now set to flow through the budget set aside for the Building Resilient Infrastructure and Communities (BRIC) program. We would highlight that the president’s FY 2020 budget proposal requests appropriations to fund full-time employees to implement and manage BRIC.

In addition to shifting to pre-disaster spending, Congress should make changes to disaster assistance, including stronger requirements for communities and states. Furthermore, federal disaster assistance funds should be spent on projects that promote resiliency – on building *smarter* and *safer* – and not on construction that will not withstand disasters. These changes will protect American people, communities, and federal resources.

FEMA Floodplain Mapping. The inaccuracy of floodplain mapping is one of the most widely recognized problems within the NFIP. A 2017 report from the Department of Homeland Security Office of the Inspector General estimated that only 42 percent of FEMA floodplain maps were up to date. As an example, when Hurricane Matthew hit the coast of North Carolina in 2016, damages amounted to \$25 billion and more than 2,600 homes applied for disaster assistance under the Community Development Block Grant Disaster Recovery program. North Carolina officials, however, found that more than 77 percent of those homes were not in a FEMA-designated floodplain.

To address such serious inaccuracies, FEMA funding should prioritize measures that use floodplain mapping with greater engineering confidence and property-level elevation information gathered through Light Detection and Ranging, or LIDAR, surveys, a proven technique to develop accurate high-resolution maps. Without more reliable mapping, homeowners will continue to be misled on flood risk and burdened by having to obtain expensive elevation certificates and go through a time-consuming appeals process with FEMA.

It is time for Congress to focus FEMA funding on fiscally-responsible pre-disaster mitigation and accurate floodplain mapping. These initiatives will help save taxpayer dollars, protect the environment, and better prepare Americans for the risks they face today and in the future. Thank you for your consideration of these requests. Members of our coalition look forward to working with you and your colleagues in Congress to advance meaningful reform of federal flood policies.

Sincerely,

SmarterSafer Coalition

MEMBERS

Environmental Organizations

American Rivers
Center for Climate and Energy Solutions (C2ES)
ConservAmerica
Defenders of Wildlife
Natural Resources Defense Council
National Wildlife Federation
Surfrider Foundation

Consumer and Taxpayer Advocates

Coalition to Reduce Spending
National Taxpayers Union
R Street Institute
Taxpayers for Common Sense
Taxpayers Protection Alliance

Insurer Interests

Association of Bermuda Insurers and Reinsurers
The Chubb Corporation
Liberty Mutual Group
National Association of Mutual Insurance Companies (NAMIC)
National Flood Determination Association
Reinsurance Association of America
SwissRe
USAA

Mitigation Interests

Natural Hazard Mitigation Association

Housing

Habitat for Humanity
National Housing Conference
National Leased Housing Association

ALLIED ORGANIZATIONS

Allianz of America
American Consumer Institute
Center for Clean Air Policy
Friends of the Earth
Institute for Liberty
Property Casualty Insurers Association of America
Zurich