

November 1, 2013

The President
The White House
Washington, DC 20500

Dear Mr. President:

The undersigned organizations write to you to express serious concerns over dramatic increases in flood insurance premiums as a result of recent changes to the National Flood Insurance Program (NFIP). Provisions included in the Biggert-Waters Act of 2012 will make flood insurance unaffordable for working Americans who have built homes and businesses to code and followed the law every step of the way. We urge you to delay implementation of certain portions of Section 205 and all of Section 207 until FEMA submits its congressionally-mandated affordability report under Section 236. This affordability study is imperative to understand the full scope of impact, and a federal agency should not pick and choose which parts of a law it can or will implement.

The Biggert-Waters Act of 2012 phases-in full actuarial rates on non-primary residences and businesses built before the first flood maps were established (pre-FIRM). It also requires that home buyers escalate immediately to the full rate upon purchasing a pre-FIRM primary residence. The Biggert-Waters Act will also phase out grandfathering. This means that properties built in accordance with all FEMA required elevations and applicable codes at that time may now be considered out of compliance, through no fault of their own, due to new flood mapping. FEMA has begun the phase-in for pre-FIRM properties, including homes purchased after enactment, and already we are seeing rate quotes for unaffordable increases and a chill in local real estate markets. In numerous instances, homes and businesses built to code and with no history of flooding are facing 2,000-3,000% increases in annual premiums. This drastic increase in premiums will cause property values and assessments to drop, bank mortgages to go into default, local tax bases to erode, and economies to be eviscerated. Ironically, while these increases were intended to make the NFIP solvent and protect taxpayers, it could have the opposite effect if business and homeowners are forced to drop flood insurance completely or face foreclosure as a result.

Severe repetitive loss designated properties notwithstanding, we respectfully urge you to administratively delay implementation of rate increases on all pre-FIRM businesses, non-primary residences, and homes purchased after enactment of the Biggert-Waters Act of 2012, as well as the purchase provision on all pre-FIRM primary residences. We also respectfully urge you to delay Section 207 in its entirety until the congressionally-mandated FEMA affordability study is completed and its recommendations are considered by Congress. Finally, please consider urging FEMA to hold a summit of industry stakeholders to consider long-term solutions to the sustainability of the National Flood Insurance Program.

The undersigned organizations support a fully authorized, sustainable, and fiscally responsible NFIP. However, fiscal sustainability must be balanced with protecting the businesses and homes built according to code and following all applicable laws. We understand and support the intent of the Biggert-Waters Act, but unintended consequences of the reforms threaten to harm the very people the program was designed to protect.

Sincerely,

American Shrimp Processors Association

Community Associations Institute

Independent Community Bankers of America

National Association of Counties

National Association of Home Builders

National Association of REALTORS®

National Levee Issues Alliance

National Waterways Conference

Alabama Bankers Association

Alabama Gulf Coast Chamber of Commerce

Algiers Economic Development Foundation
New Orleans, LA

Apartment Association of Greater New Orleans
& Louisiana

Arkansas Bankers Association

Ascension Parish President Tommy Martinez
Ascension Parish, LA

Associated Risk Managers International, Inc.
Itasca, IL

Baton Rouge Area Chamber
Baton Rouge, LA

Bay Area Houston Economic Partnership
Houston, TX

Bayou Board of REALTORS®
Houma, LA

Bayou Industrial Group
Thibodaux, LA

BayTran
Houston, TX

Berkeley Township Taxpayers Coalition
Bayville, NJ

Bismarck Mandan Home Builders
Bismarck, ND

Bonita Springs Area Chamber of Commerce
Bonita Springs, FL

Bonita Springs Estero Economic Development
Council
Bonita Springs, FL

Bridge City Mayor Kirk Roccaforte
Bridge City, TX

Broad Channel Civic Association
Queens, NY

Builders and Remodelers Association of Greater
Boston
Waltham, MA

Builders Association of Minnesota

Business Alliance for a Sound Economy
Wilmington, NC

Calcasieu Police Jury President Shannon Spell
Calcasieu Parish, LA

Cameron Parish Police Jury President Darryl
Forque
Cameron Parish, LA

Central Fort Bend Chamber
Rosenberg, TX

Central Louisiana Board of REALTORS®
Alexandria, LA

Chamber Southwest Louisiana
Lake Charles, LA

Charleston Mayor Joseph P. Riley Jr.
Charleston, SC

CNS Farming Company
Concordia Parish, LA

Coastal Alabama Partnership

Colorado Bankers Association

Concordia Chamber of Commerce
Concordia Parish, LA

Concordia Economic & Industrial Development
District
Concordia Parish, LA

Community Advocacy Network
Margate, FL

Dawson Insurance
Fargo, ND

Dickinson Mayor Julie Masters
Dickinson, TX

Eastern Shore Chamber of Commerce
Daphne, AL

East St. Tammany Chamber of Commerce
Slidell, LA

Eden Isles Homeowners Association
Slidell, LA

New York City Council Member Eric Ulrich
New York City

Fargo Moorhead Area Association of
REALTORS®
Fargo, ND

Fargo Moorhead West Fargo Chamber of
Commerce
Fargo, ND

Fargo Mayor Dennis Walaker
Fargo, ND

Flood Maps Projected Insurance Hikes
Opposition Group
St. Charles Parish, Louisiana

Florida Association of Counties

Florida Bankers Association

Florida REALTORS®

Forx Builders Association
Grand Forks, ND

FSC Interactive
New Orleans, LA

Galveston City Manager Michael Kovacs
Galveston, TX

Galveston Mayor Lewis Rosen
Galveston, TX

George Kasimos Real Estate, LLC
New Jersey

Greater Baton Rouge Association of
REALTORS®, Inc.
Baton Rouge, LA

Greater Fort Polk Area REALTORS®
Leesville, LA

Greater New Orleans Foundation
New Orleans, LA

Greater New Orleans, Inc.

New Orleans, LA

Greater Tampa Chamber of Commerce
Tampa, FL

Gulf Shores & Orange Beach Tourism
Gulf Shores, AL

Habitat for Humanity of Louisiana State Support
Organization, Inc.

Hammond Area Economic & Industrial
Development District
Hammond, LA

Hammond Industrial Development Board
Hammond, LA

Hancock Bank
Mobile, LA

Harvey Canal Industrial Association
Harvey, LA

Historic Charleston Foundation
Charleston, SC

Home Builders Association of Fargo-Moorhead
Fargo, ND

Home Builders Association of Greater New
Orleans
New Orleans, LA

Home Builders Association of Mississippi

Houma-Terrebonne Chamber of Commerce
Houma, LA

Independent Insurance Agents & Brokers of
Louisiana

Independent Insurance Agents of Mississippi

Indiana Bankers Association

Jean Lafitte Mayor Timothy P. Kerner
Jean Lafitte, LA

Jefferson Chamber of Commerce
Jefferson, LA

Jefferson Parish Economic Development
Commission
Avondale, LA

Jefferson Parish President John Young
Jefferson, LA

Lafourche Advocates for Flood Insurance
Reform
Lafourche, Louisiana

Lafourche Chamber of Commerce
Lafourche Parish, LA

Lafourche Parish President Charlotte Randolph
Lafourche Parish, LA

Livingston Parish President Layton Ricks
Livingston Parish, LA

Livingston Board of REALTORS®
Denham Springs, LA

Long Island Association, Inc.

Louisiana Association of Chamber of Commerce
Executives

Louisiana Bankers Association

Louisiana Floodplain Management Association

Louisiana Home Builders Association

Representative Greg Cromer
Chairman, Louisiana House of Representatives
Insurance Committee

Louisiana Mortgage Lenders Association

Louisiana Municipal Association

Louisiana REALTORS®

Senator Dan Morrish
Louisiana State Senate Insurance Committee

Mariner Village Townhome Association
Pasadena, TX

Marshfield Citizens Coastal Coalition
Marshfield, MA

Massachusetts Association of REALTORS®

Massachusetts Bankers Association

Minnesota Association of REALTORS®

Minot Area Chamber of Commerce
Minot, ND

Minot Association of Builders
Minot, ND

Minot Mayor Curt Zimbelman
Minot, ND

Mississippi Association of REALTORS®

Mississippi Bankers Association

Mississippi Gulf Coast Business Council

Mississippi Gulf Coast Chamber of Commerce

Mobile Area Chamber of Commerce
Mobile, AL

Morgan's Point Mayor Michel Bechtel
Morgan's Point, TX

Mayor Larry 'Butch' Brown
Natchez, MS

Natchitoches Board of REALTORS®
Natchitoches, LA

NC 20, Inc.
North Carolina

New Hamilton Beach Civic Association
Queens, New York

New Jersey Bankers Association

New Jersey State Chamber of Commerce

New Orleans Mayor Mitch Landrieu
New Orleans, LA

New Orleans Metropolitan Association of
REALTORS®
New Orleans, LA

North Dakota Association of Builders

North Dakota Association of REALTORS®

Representative Roscoe Streyle
North Dakota State House of Representatives

North Lafourche Levee District
Thibodaux, LA

Northeast Louisiana Association of REALTORS®
Monroe, LA

Northshore Area Board of REALTORS®
Folsom, LA

Northshore Business Council
Slidell, LA

Northwest Louisiana Association of REALTORS®
Shreveport, LA

Ortey Beach Voters Taxpayers Association
New Jersey

Pass Christian Mayor Leo “Chipper” McDermott
Pass Christian, MS

Plaquemines Association of Business & Industry
Belle Chase, LA

Plaquemines Parish President Billy Nungesser
Plaquemines Parish, LA

Port Monmouth, NJ - Flood Relief Group

Port of South Louisiana

Rapides Parish Police Jury
Rapides Parish, LA

REALTOR® Association of Acadiana
Lafayette, LA

Red Hook Civic Association
Brooklyn, LA

RE/MAX Commercial Brokers, Inc.

Rellim Surface Management, LLC

Restore or Retreat
Thibodaux, LA

River Region Chamber of Commerce
LaPlace, LA

Saints Board of REALTORS®
Laplace, LA

Save Our Communities 2013
Brick, NJ

Scituate Coastal Coalition
Scituate, MA

Seabrook Mayor Glenn Royal
Seabrook, Texas

Simonton City Council
Simonton, TX

Simonton Mayor Daniel McJunkin
Simonton, TX

Skippers Cove Association, New Jersey

Slidell Economic Development Association
Slidell, LA
South Baldwin Chamber of Commerce
Baldwin, AL

South Central Industrial Association
Houma, LA

South Lafourche Levee District
Galliano, LA

South Louisiana Bank
Houma, LA

South Louisiana Economic Council

South Shore Chamber of Commerce
Rockland, MA

Southwest Louisiana Association of REALTORS®
Lake Charles, LA

St. Bernard Chamber of Commerce
Chalmette, LA

St. Bernard Economic Development Foundation
St. Bernard, LA

St. Bernard Parish President Dave Peralta
St. Bernard Parish, LA

St. Charles Parish Assessor Tab Troxler
St. Charles Parish, LA

St. Charles Parish Economic Development
Council

St. Charles Parish President V.J. St. Pierre, Jr.
St. Charles Parish, LA

Stop FEMA Now - Cape May County

Stop FEMA Now – Florida

Stop FEMA Now – Georgia

Stop FEMA Now – Hawaii

Stop FEMA Now – Louisiana

Stop FEMA Now – New Jersey

Stop FEMA Now – New York

St. James Parish President Timothy P. Roussel
St. James Parish, LA

St. John the Baptist Parish President Natalie
Robottom
St. John the Baptist Parish, LA

St. Martin Parish President Guy J. Cormier
St. Martin Parish, LA

St. Mary Parish President Paul P. Naquin, Jr.
St. Mary Parish, LA

St. Petersburg Area Chamber of Commerce
St. Petersburg, FL

St. Tammany Economic Development
Foundation
Mandeville, LA

St. Tammany Parish President, Pat Brister
St. Tammany Parish, LA

St. Tammany West Chamber of Commerce
Covington, LA

Sullivan, Garrity and Donnelly Insurance
Agencies, Inc
Worcester, MA

Wrightsville Mayor David L Cignotti
Wrightsville Beach, NC

Tangipahoa Parish President Gordon Burgess
Tangipahoa Parish, LA

Terrebonne Parish President Michel Claudet
Terrebonne Parish, LA

Thibodaux Chamber of Commerce
Thibodaux, LA

Tybee Island Mayor Jason Buelterman
Tybee Island, GA

Valley Stream Community Association, New
York

Vermilion Parish Police Jury President Nathan
Granger
Vermilion Parish, LA

Vermont Bankers Association

Vermont Flood Insurance Reform

West 12th Road Block Association
Queens, NY

Vidalia Mayor Hiram Copeland
Vidalia, LA

Waveland Mayor David A. Garcia
Waveland, MS

Whitney Bank
New Orleans, LA

Williston Area Builders Association
Williston, ND