

June 19, 2017

Mr. Gary D. Cohn
National Economic Council
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear Mr. Gary Cohn:

Our organizations represent insurance businesses, engineers, fiscal conservatives, and non-profit organizations. We are deeply concerned by reports of an effort asking the Administration to repeal the Federal Flood Risk Management Standard (FFRMS). The FFRMS represents a pragmatic and prudent disaster risk management strategy that will safeguard the nation's infrastructure, protect businesses and communities, and conserve taxpayer resources. While our organizations represent diverse views on a number of issues, on the issue of FFRMS at least, we are of one mind. We believe it should be maintained.

The updated flood standard provides sound disaster and flood risk management guidance that involves assessing risks, avoiding them to the extent possible, and making appropriate financial arrangements, through insurance or otherwise, for risks that cannot be avoided. At its core, the FFRMS is a responsible, multi-layered risk management approach that ensures federal resources are spent wisely and efficiently. The pressing need for an updated approach to assessing and managing flood risk is borne out by an increasingly costly cycle of flooding and rebuilding that can and should be stemmed. From 1980 to 2013, flooding caused more than \$260 billion in damage in the U.S.

Without the FFRMS, 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. We simply cannot afford to allow this pattern to continue. When federal funds are used for development in flood-prone areas, it is simply common sense to consider and mitigate those risks upfront in order to ensure the investment will be long lasting. That in a nutshell is the aim of the FFRMS. Further, recent polling found that 82 percent of registered voters (Democrats: 92%, Independents: 78% Republicans: 74%) support a requirement that all federally funded infrastructure in flood-prone areas be constructed to better withstand the impacts of flooding.

When implemented, the FFRMS will help protect people and property, reduce federal expenses associated with rebuilding after tremendous flood losses, and make communities stronger. Repealing the FFRMS would be shortsighted and we ask the administration to keep this important policy in place.

Thank you,

Thomas Santos, Vice President, Federal Affairs
American Insurance Association

Tom Smith, Executive Director
American Society of Civil Engineers

Chad Berginnis, Executive Director
Association of State Floodplain Managers

Jonathan Bydlak, President
Coalition to Reduce Spending

Ken A. Crerar, President and CEO
Council of Insurance Agents & Brokers

Leslie Chapman-Henderson, President and CEO
Federal Alliance of Safe Homes

Julie Rochman, President and CEO
Insurance Institute for Business & Home Safety

Henry L. Green, Hon. AIA, President
National Institute of Building Sciences

Pete Sepp, President
National Taxpayers Union

Laura Lightbody, Director
Pew Charitable Trusts

Eli Lehrer, President
R Street Institute

Franklin W. Nutter, President
Reinsurance Association of America

Julie Shiyou-Woodard, President and CEO
Smart Home America

Ryan Alexander, President
Taxpayers for Common Sense

David Williams, President
Taxpayer Protection Alliance

Lynn Scarlett, Managing Director of Public Policy
The Nature Conservancy