May 11,2026

To whom it may concern,

I am writing to provide feedback on the FEMA Review Council adopted Final Report, with specific comments on Recommendation #7 regarding reform of the National Flood Insurance Program (NFIP). I appreciate several elements in the report, including the continued implementation and refinement of Risk Rating 2.0, improved flood risk mapping and transparency, stronger mitigation incentives, better land-use policies, targeted solutions for repetitive loss properties, and updates to Write Your Own (WYO) compensation. These steps would meaningfully strengthen the program. However, I must express strong opposition to the recommendations that promote a shift toward a private flood insurance marketplace and the gradual depopulation of existing NFIP policies. A voluntary "take-out" program and centralized clearinghouse model risk adversely selecting against the NFIP by moving lower-risk policies to the private market. This would leave the NFIP with a more concentrated pool of high-risk properties, increasing financial instability and long-term taxpayer exposure. I believe the NFIP should remain the reliable backbone of flood insurance coverage rather than being gradually replaced, especially in areas where private market capacity is limited or unavailable.

I also strongly believe the NFIP needs significantly broader nationwide participation to achieve a healthier spread of risk across the country. Currently, the program has approximately 4.7 million policies in force. With roughly 149 million total housing units in the United States, this represents only about 3% national penetration. Requiring a flood insurance policy as a condition of every real estate transaction — both residential and commercial — would dramatically expand participation. Over time, this mandatory point-of-sale requirement would bring millions more properties into the risk pool, reduce adverse selection, improve actuarial soundness, and lower the per-policy burden on the program. It is one of the most straightforward and effective ways to transform the NFIP into a truly national, sustainable program.

I also recommend significantly strengthening mitigation credits under the Community Rating System (and any new individual policy incentives) to better encourage property owners to invest in and implement flood mitigation features. Premium discounts tied directly to completed mitigation actions (such as elevation, flood vents, barriers, or resilient rebuilding) would provide a powerful, ongoing financial incentive for homeowners to pay for and complete these improvements themselves. While I support targeted assistance for the most vulnerable households, broad new subsidies for mitigation should be secondary to robust, actuarially sound premium credits.

Additionally, I strongly support increasing the current NFIP coverage limits, which are outdated and insufficient for residential, commercial, and condominium properties. The existing caps of $250,000 for residential building coverage and $100,000 for contents, $500,000 for commercial building and contents, and the RCBAP limit of $250,000 per unit (or the building's replacement cost value, whichever is less) leave far too many property owners, businesses, and condominium associations significantly underinsured given today's construction and replacement costs. Raising these statutory limits across all policy types — including the per-unit RCBAP cap — would provide meaningful protection, better support business continuity, and multi-family housing recovery after floods, and reduce reliance on a fragmented private excess market.

In summary, I urge the Council to prioritize reforms that strengthen and modernize the NFIP as the primary provider of flood insurance, rather than accelerating a transition to private markets. Preserving broad access, consumer protections, and program stability should remain the core focus.

Thank you for your important work on these critical issues. I would welcome any opportunity to discuss these concerns in greater detail.

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