



New York State Floodplain and Stormwater Managers Association
Post Office Box 1785, Schenectady, NY 12301-1785

September 24, 2021

Chad Gorman
Acting Regional Administrator, FEMA Region II
26 Federal Plaza, Suite 1337
New York, NY 10278

Dear Mr. Gorman:

The New York State Floodplain and Stormwater Managers Association is a professional organization with over 500 public and private sector members from throughout New York State. After monitoring the proposed changes to the National Flood Insurance Program (NFIP), **we are requesting a pause in the rollout of Risk Rating 2.0.**

Risk Rating 2.0 is a significant overhaul of the insurance rating process of the NFIP that is scheduled to take effect on October 1, 2021. Unfortunately, FEMA's engagement with floodplain managers and the public about Risk Rating 2.0 has been very limited and we are still unable to anticipate the short- or long-term impacts on New York communities. Many insurance agents also remain confused about the process for rating new NFIP policies and are unable to advise their clients. FEMA staff are unable to provide answers to many of the questions that have been raised about Risk Rating 2.0 and are still working out the details of this new rating process.

The proposed rate structure is complex, and we do not know how it will affect flood insurance affordability. Although data about initial (year 1) rate changes have been published, FEMA has not released information about future full risk rates, which can impact the future ability of property owners to pay premiums and to sell property. It appears that aspects of the rating process are not equitable. For example, there are significant cost differences based on construction date, building occupancy, building value, and foundation type (with higher costs for older buildings and elevation techniques typically used for non-coastal construction).

Risk Rating 2.0 is based on information about flood risks that is hidden from policy holders, flood risk professionals, and the public. This lack of transparency means that local governments (which have previously been the first point of contact for information about any aspect of the NFIP) are no longer able to provide residents with tangible options for reducing flood risk and lowering insurance premiums. We are not aware of any vetting of either the flood risk information or the rating procedures by independent experts.

We ask that FEMA delay the transition to Risk Rating 2.0. The public, flood risk professionals, and insurance agents need additional information, training, and resources before these changes are implemented. A pause would allow time for academic and/or public sector experts to vet both the location-based flood risk information and the proposed rating factors, which is needed to provide confidence that flood insurance premiums are equitable and accurately reflect the risk of flood damage. A pause would also give FEMA time to refine the information and procedures to enable a smooth transition. Thank you.

Sincerely,

Ricardo Lopez-Torrijos, CFM, GISP
Chair

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Cc: New York State Congressional Delegation

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