

Congress of the United States
House of Representatives
Washington, DC 20515-1806

May 11, 2021

The Honorable Alejandro Mayorkas
Secretary
U.S. Department of Homeland Security
3801 Nebraska Avenue NW
Washington, D.C. 20016

Dear Secretary Mayorkas:

We write to urge you to delay the implementation of the Risk Rating 2.0 rate calculation changes to the National Flood Insurance Program (NFIP) until such a time that Congress can address the longstanding structural and affordability problems within the program.

Based upon the information released to date, Risk Rating 2.0 is expected to be implemented for new policyholders on October 1, 2021, and for existing policyholders on April 1, 2022. These changes will result in premium increases for nearly 400,000 families and policyholders in Louisiana alone. While we strongly support efforts to increase awareness of flood risk and to improve the fairness of policy premiums, draft information on Risk Rating 2.0 misses the mark. Much of Louisiana does have an actual risk of flooding, but as we have seen in recent years much of this flood risk is a result of actions of the federal government, other states, or other countries – not the citizens of Louisiana.

Our state sits at the bottom of the third-largest watershed in the world. The Mississippi River System drains 31 states and two Canadian provinces.¹ Since the 1930s the emergency discharge plan for excess water on the Mississippi River System has been operational only 14 times. Five of these emergency discharges through the Bonnet Carre spillway have occurred in just the last ten years.² Louisiana's flood risk is largely implicated by drainage from other states and Canada. Recent trends in river flow and volume over the last decade suggest the additional drainage from other states is increasing and our citizens are being charged for it through higher NFIP premiums.

Coastal Louisiana has lost a record 2000 square miles of coastal lands and wetlands. The Government Accountability Office found that 90 percent of coastal wetlands loss in the

¹ <https://www.mvn.usace.army.mil/Missions/Mississippi-River-Flood-Control/Mississippi-River-Tributaries/Mississippi-Drainage-Basin/>

² <https://www.mvn.usace.army.mil/Missions/Mississippi-River-Flood-Control/Bonnet-Carre-Spillway-Overview/Historic-Operation-of-Bonnet-Carre/>

continental United States occurred in our state and “expose the state’s coastal areas to the devastating effects of hurricane storm surges”.³ One of the primary causes of the loss of Louisiana’s coast is the actions of the federal government through the construction of levees in south Louisiana and locks and dams in the upper Mississippi River System blocking the sediment needed to sustain our coastal region.⁴ These unmitigated actions through the U.S. Army Corps of Engineers will also result in higher NFIP premiums through the Risk Rating 2.0 proposal.

While this new premium model may work for other states, it is a failure of two key goals in Louisiana: fairness and equity. As you know, NFIP policies are mandated on millions of homes. You cannot charge policyholders for something they have no responsibility, control, or authority over; however, this is exactly what Risk Rating 2.0 does to hundreds of thousands of homeowners in our state.

Lastly, a key flaw to the strategy the Federal Emergency Management Agency is pursuing through Risk Rating 2.0 is the failure to integrate a proper comprehensive strategy comprised of both offense and defense. The solution here is not to charge unaffordable NFIP premiums, rather we need to be working together to protect our citizens from flooding. The NFIP should be a “safety net”. The absence of Corps of Engineers’ programs; disaster recovery and other flood mitigation programs; incentives through FEMA’s Hazard Mitigation Grant Program and the new Building Resilient Infrastructure and Communities programs; eliminating federal barriers to pooling resources to advance flood protection projects; expansion of the Increased Cost of Compliance program; and other solutions lacks the comprehensive vision that must urgently be brought to the table.

During the last administration and a Republican Congress, we made one of the largest investments in resiliency and flood protection in history. We also made fundamental reforms to resiliency, adaptation, and disaster policies to pivot from the unaffordable reactive approach to disasters and floods to one of being more proactive. We strongly urge you to rescind the Risk Rating 2.0 changes and to build upon the success we initiated.

Sincerely,



Garret Graves
Member of Congress

Cc Acting Administrator Bob Fenton

³ <https://www.gao.gov/assets/gao-08-130.pdf>

⁴ <https://lacoast.gov/reports/rtc/1997/5.htm>