March 8, 2017

The Honorable Dennis Ross  
Member of Congress  
436 Cannon House Office Building  
Washington, DC 20515

The Honorable Kathy Castor  
Member of Congress  
2052 Rayburn House Office Building  
Washington, DC 20515

Dear Representatives Ross and Castor:

The National Multifamily Housing Council (NMHC) and National Apartment Association (NAA) write to thank you for your work in introducing the Flood Insurance Market Parity and Modernization Act. We applaud you both for working to expand access to flood insurance coverage beyond the National Flood Insurance Program (NFIP), reduce taxpayer liability and provide affordable coverage options to property owners where none currently exist.

For more than 20 years, the National Multifamily Housing Council (NMHC) and the National Apartment Association (NAA) have partnered to provide a single voice for America’s apartment industry. Our combined memberships are engaged in all aspects of the apartment industry, including ownership, development, management and finance. NMHC represents the principal officers of the apartment industry’s largest and most prominent firms. As a federation of nearly 170 state and local affiliates, NAA encompasses over 72,000 members representing more than 8.8 million apartment homes throughout the United States and Canada.

The Flood Insurance Market Parity and Modernization Act is a critical piece of legislation that would expand coverage options for at-risk property owners by clarifying that flood insurance offered by private carriers outside of the NFIP meets the mandatory purchase requirements in place today. Of particular note is the bill’s language that ensures both private and NFIP coverage satisfies the federal government’s requirement of “continuous coverage” and protects policyholders from seeing rate hikes should they wish to return to the NFIP coverage at a later date.

NMHC/NAA appreciates the bipartisan work done in the last Congress to improve the legislation to foster a more robust private flood insurance market in a balanced manner. Protecting the ability of the NFIP to continue its collaboration with the private sector to ensure that affordable flood insurance is available at all times, in all market conditions and for every at-risk rental property is a top priority of our membership. NMHC/NAA strongly support increasing market competition and making coverage more affordable for multifamily firms across the nation.

Thank you for considering the views of the multifamily industry as you work to expand access to affordable flood insurance coverage, reduce taxpayer liability, increase private
sector flood coverage options and reauthorize the NFIP. Again, thank you for your collective leadership on this issue.

Sincerely,

Douglas M. Bibby
President
National Multifamily Housing Council

Robert Pinnegar
President & CEO
National Apartment Association

cc: Chairman Jeb Hensarling
Ranking Member Waters
Members of the House Financial Services Committee