

August 30, 2021

Mr. David I. Maurstad  
Deputy Associate Administrator for Federal Insurance and Mitigation,  
Senior Executive of the National Flood Insurance Program  
Federal Insurance and Mitigation Administration  
500 C Street S.W.  
Washington, D.C. 20472

Thank you once again for meeting with our real estate coalition on April 26, 2021 to share information about the Risk Rating 2.0 program and its expected impact on the multifamily and commercial real estate market. As you know, the National Flood Insurance Program (NFIP) plays an incredibly important role in helping multifamily rental and commercial property owners mitigate the risk posed by flood events to their properties, residents and operations.

We write today to follow up on our meeting and our request for data outlining the direct impact on multifamily and commercial property owners. We ask that this data be made publicly available in advance of Risk Rating 2.0's implementation date of October 1, 2021. To date, FEMA data on the Risk Rating 2.0 program focuses exclusively on its impact on the single-family residential market. Where multifamily and commercial properties are included, they are combined with single-family and don't shed full light on what our sector may face upon implementation. While incredibly important, the current publicly available data sets have not allowed the owners and operators of multifamily and commercial properties to assess and prepare for the impact of the new rating structure of the NFIP. Without the ability to forecast these changes properly, owners and operators may be pressed into responses that impact the affordability and availability of housing for our nation's renters.

We'd like to ask your assistance once again in providing this critical information to our industry and its stakeholders. In particular, we would benefit from learning of any premium and policy impacts of Risk Rating 2.0 on the following NFIP policy types both nationally and by state:

- Residential (2-4 Family Homes)
- Other Residential Building (Multifamily/apartment properties consisting of properties with 5+ units)
- Non-Residential Business (Commercial/Mixed Use Properties)
- Renter Contents (Residents of Multifamily Properties)

Of course, if there is additional information that you believe would be helpful, we'd certainly welcome it as the industry prepares for the implementation of Risk Rating 2.0. We continue to share your goal of protecting the long-term viability and success of the NFIP. Ensuring that all rental properties continue to have access to affordable,

quality flood insurance through the NFIP is a top priority for our membership to not only protect their property investment but to help manage the increasing costs of providing housing that is affordable. We look forward to continuing our important work together.

Sincerely,



Douglas M. Bibby  
President  
National Multifamily Housing Council



Robert Pinnegar  
President & CEO  
National Apartment Association

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cc:  
Members, House Financial Services Committee  
Members, Senate Banking Committee