

FIPATF Public Comments

1.

First, so glad someone is looking into flood insurance rates and practices.

Our house was flooded in Athens, PA in September 2011. Our home is located next to the Chemung River at the [REDACTED] but was flooded by the overflowing Susquehanna River a half mile across town.

We purchased our house (a new dwelling) in September 1981. This area of town was leveled after the flood of 1972. These properties were bought out by HUD. At some point, the properties were sold back to Athens Borough and the borough sold them for real development. We have often questioned how properties could be resold for development after declared as greenspace without further flood protection but we can't get anyone to answer that question. We've sent many letters to no avail.

Anyway, back then our flood insurance ran about \$100 annually. (Our home, understandably, was considered in a flood zone. When the Tioga-Hammond Dam was built that changed the flood maps and we were told that we were no longer in a flood plane and they no longer required us to have flood insurance through our mortgage company. We disagreed. We no longer worried about the Chemung River. We were always more concerned about the Susquehanna and it turns out for good reason.

We continued to carry flood insurance all the years we have owned our home. Each year the premiums have increased minimally until 2011 when the latest flood hit Athens. At that point, they have more than doubled up to around \$1000 annually. We've been told we're paying less because we have been grandfathered in for carrying it all these years!

Still, we were lucky we continued to carry the insurance. Many people here listened to what they were told and dropped the insurance. We could never have afforded to rebuild on what FEMA offers. Granted, it certainly helps but it's a drop in the bucket for what it costs.

Sorry, I feel FEMA has been mismanaged for years! Homes that get flooded once in forty years are paying for areas like New Orleans that tend to flood yearly with ever increasing insurance rates. If the money were put into flood control that is paid out for damages I think we could have a pretty nice setup.

Anyway, with that being said, my husband and I said we will not do it again. If our house ever floods while we still own it we will bulldoze it under. Can't keep throwing good money after bad!!! (Ken and Diane Owens)

2.

My husband and I purchased a property on a lake in 2020. We had our mortgage payment all worked out, but when we went into the closing, we were blindsided by the fact that we would need to carry flood insurance for the duration of the loan. We quickly got the first insurance we could find and couldn't believe how much it raised our payment. Since then, we have switched to another company and the policy is attached.

We have spoken to numerous other property owners on the lake and we are the only ones who are required to pay flood insurance. I have looked into getting my property assessed and the flood zone changed, but I don't want to spend \$1,000+ if I'm not going to be guaranteed to get out of paying flood insurance. The lake is in a FEMA zone A, meaning it is a generalized flood area and a 100-year base flood elevation (BFE) has not been calculated by FEMA.

Our friend across the lake is a retired engineer and has done all of the necessary calculations for the 100-year base flood elevation. He knew just looking at things and knowing lake rise that we are not in a floodplain and helped residents get out of flood insurance before he retired. He did quick calculations to see if it was worth pursuing getting an Elevation Certificate (EC) and applying for a LOMA to eliminate insurance. According to his very rough calculations, conservatively, the BFE is about 3.5 feet above the lake surface and we measured our first floor and it is 5 feet above the lake elevation. I got 2 quotes from surveyors to do the CE's but they don't do the BFE calculations and it has to be established. He can't do official calculations since he is retired and it would have to go through an engineering firm. Please see the attached calculations and resources that he provided me.

Please let me know if there is any way you can help me get out of flood insurance using your program. The address at my property is [REDACTED]

Abby Fisch

3.

Our neighborhood has been hit very bad repeatedly with heavy rains...

Which is causing flooding in the homes and leaks throughout these older homes ...

We gather on the 3rd Thursday of each month

6:30 pm

We'd appreciate your attendance ...

Please let me know when this would be possible as we will be inviting other organizations as well.

Doris Lynch Port Richmond Neighborhood Action

4.

Thank you so much for requesting public comment regarding flood insurance in Pennsylvania, I appreciate Governor Shapiro and the work he has done for PA.

Our house at [REDACTED] Yardley Pa suffered about \$36,000 worth of damage during the flood of July 2023. In addition to the house damage, we also lost a truck that was in very good condition. The truck was totaled and even though we had the truck less than a year and paid \$10,000. Our insurance

company would only provide \$5500. We have not been able to replace it for that amount of money. In fact, we had to use the car insurance money to make our house liveable.

We do not live in a flood zone and I do have the financial ability to pay for flood insurance. In fact, when we looked to purchase a home (we recently relocated back to PA from AZ), we decided against a home on River Road because it was in flood zone, required flood insurance, and would be an additional \$400 per month. I am past retirement age and would very much like to retire at the end of this year. My concern is what all of this has done to my property value. We will have to disclose that the house was damaged by flood when we sell and that flood insurance will be required. Surely, the impact of that disclosure will affect our ability to sell the house and recoup the money we have invested.

This house flooded because our township failed to maintain the infrastructure. Small creeks and drains were full of debris - old branches and leaves that have piled up over the years because of neglect. The other reason there was flooding is because, in order to increase the tax base in the township, variances have been approved and there has been loss of open space that previously could handle the rain water. This area had never flooded since it was built in 1962 and now it has flooded 4 times in the last 10 years. This past year being the worst. In fact, as our house sits up a little higher than most, this house has never flooded until July.

We have no interest in living here if flood insurance becomes required and we don't feel that we have the ability to pay for it. The township needs to do its job and make its primary objective to be the safety of the people that live here. Making our area a flood zone now is not an acceptable option.

Thank you for the opportunity to be heard.

5.

To whom it may concern: Today I received an email from my State Representative, Perry Warren, about the above task force requesting constituent input. When Governor Shapiro signed House Bill 735 into law (Act 22 of 2023), I reached out to Perry and my State Senator, Steve Santarsiero, with the email message below. Mr. Little of Floodproofing.com LLC is more than happy to assist the task force. I would recommend that you review their website to confirm my representation that they are the nationwide leader in flood mitigation and flood insurance issues and give Tom a call.

Richard Mulcahey

6.

I live along [REDACTED] in Lower Makefield Township. My home is not located in a flood zone, but a portion of my driveway does. I have applied to numerous insurance underwriters since we bought our home for private flood insurance and been repeatedly denied. I have worked with brokers as well. Consistently denied at underwriting.

This home endured 2 FEMA claims in the 1990s. Again, not flood zone so not required by insurance and therefore not eligible for FEMA preferred rates.

I have been advised the ONLY flood insurance option we can obtain is Non-Preferred through FEMA for \$4000 per year and would ONLY see a payout if multiple homes are affected. There is only one other home in my area with a low enough elevation to be as easily affected as my own. Others would request a catastrophic storm that would likely entail declaration of a natural disaster, including potential grants. I have therefore been advised to NOT proactively protect my home.

I currently have a SBA disaster relief loan due to structural hydrostatic pressure damage. The loan amount we accepted was \$25k, and paid an additional \$25k out of pocket for repairs and mitigation efforts. We consistent need to take actions to secure our home and attempt to mitigate potential flooding when storms are predicted. Thankfully those efforts have proven to leave very minimal additional impact thus far, but waters continue to come close to breaching our home with more frequency, including in December when we had evidence of overnight flooding in our driveway & garage, thankfully not breaching our basement.

Imagine not being able to travel from home or constant worry about your home in a rain storm AND not being able to protect and insure your home?! This is the anxiety we live with. Our appliances are on pallets. Everything is on shelves & in totes. We move our vehicles to side roads with higher elevation.

I have addressed concerns with multiple members of my local municipality that will speak with me for 1-2 conversations and never finalize discussions... I keep getting ghosted IF I even receive a response.

Having access to reasonably priced flood insurance would provide peace of mind. Not waking every 1-2 hours during a storm to check on your home. Not avoiding going to work or not attending a dinner with friends for fear of the safety of your home while you're away.

Kim Hopkins

7.

Municipalities I have been around for 75 years have been doing nothing for flooding problems. I have watched floods that could have been fixed with minor repairs but still nothing is accomplished .what I have spent on flood insurance over my years I could have fixed some of the problems. Lowering flood insurance would be a great help and improving the deductibles . In reality fix the problem

Some municipalities are doing nothing to fix flooding problems even if it's a small repair. Im 75 years old some municipality are slow and pretty much doing nothing to fix flood plains

8.

I have a few short comments about the new House Bill 735. I received an email from the PA Association of Floodplain Managers about this new bill that has been signed into law that establishes a Flood Insurance Task Force.

Professionally, i have been acting Flood Plain Manager for my municipality, York City Pennsylvania, for the last year or so. I begun to take classes to ensure that our city and its residents have someone who can work through the floodplain and flood insurance process. I failed the certification the first time and haven't had the funds to re-take the exam, but i plan to in the future. Assuming this role has been

difficult. We had to pass new ordinances for fees, rules, and updates to our floodplain ordinance. We also have a new Planner so she and i have been working together when plans come in that are in a special flood hazard area. Thankfully, York City is protected by a US Army Corps levee system throughout the city. However, we all know that storms are becoming more intense and the levee system is aged and can only hold but so much. Considering i am at the beginning of this program, i haven't had the time or resources for public education. I have tied some of the information about floodplains with my stormwater MS4 public education but haven't touched the insurance aspect of it, except for a few social media posts. Help for Municipalities who do not have a designated flood insurance expert would be beneficial for us, or someone who could work with me/the city in getting information out to our property owners etc.

Personally, i am also a first time home buyer. I have owned my home for 6 years now and i have requested quotes for flood insurance from a few different carries as few different times throughout those 6 years. However, even for me, a single person with a house and all its responsibilities, i wasn't able to afford the up front yearly payment. Granted, the price was ok (it has gone up considerably since i first started looking for quotes) but having to pay outright for the year up front was prohibitive for me. I would like maybe a quarterly payment or even a monthly payment. Even better, if we could add this to our escrow, the same way i do with my homeowners insurance. I think that paying up front for most policies is also what holds some folks back. But i wish more people knew that the price isn't too bad. And that even though you don't live in a special flood hazard area, flooding can happen ANYWHERE!

Thank you for your time in opportunity for comments. I hope my message makes some sense. Please feel free to contact me with further questions or clarifications.

Lettice Brown

9.

I am a resident of the Pittsburgh area providing public comment to the Flood Insurance Premium Assistance Task Force. They are as follows:

Residents of Pennsylvania are no strangers to inclines and grades. Many homes are built on hillsides, and as such rain water runs down those hillsides into yards, foundations, and basements across the Commonwealth. It is often unclear if damage from water moving through a house in this fashion, or water that causes exterior damage to a house in this fashion, counts as damage for home insurance or flood insurance purposes, at least to a consumer such as myself. I do not live in a low-lying or flood-prone part of the Commonwealth (per USGS maps), so I was discouraged from buying flood insurance as an unnecessary expense. However, I'm still very much vulnerable to the moving water that comes with living here. I don't know if I'm actually protected from that or not.

Many homes in the Commonwealth's urban areas, or at least in Pittsburgh, so that the downspouts for the gutters drained into the local sewer system. At some point this practice was forbidden and the connections were severed. However, this means that the downspouts all essentially drain into homes' foundations. These houses were never built with the idea in mind that they would need to drain anywhere else, and so the downspouts come down onto concrete, usually into the street, and go into

the sewer system anyway. All the policy change has accomplished is to open homes up to more damage before the water gets where it's going anyway. Any comprehensive policy on flood insurance needs to incorporate causes of water damage in homes such as this because otherwise the homeowners will be caught between home insurance and flood insurance providers, both proclaiming they do not have responsibility to pay because it's the other insurance provider who should be doing it, or worse yet, it's just tough luck. But it's not luck. It's deliberate policy decisions resulting in foreseeable outcomes.

Thank you for this opportunity to provide comment on such an important topic. May your New Year be off to a pleasant start.

Connor Woods

10.

We purchased our home in [REDACTED] Yardley, PA April 27th. We were thrilled that it was not in a flood zone.

The amount of runoff water that sits in the yards of the homes between Taylorsville Road and Meadow Road during even an average rainfall is disturbing. The stormwater drainage in the [REDACTED] development has been an on going concern with many proposals and projects ongoing. We had been in discussion with township about our concerns, inquiring about the possibility of abandoned septic /cesspools or underground water.

Though nothing could have prepared for July 15th when we were flooded and lives were lost in UMT. State Farm is our H/O insurance provider and said no H/O insurance company would cover over ground flood water and/or "acts of God". Our damage was over \$20,000 that we have had to pay out of pocket.

We have since been active in LMT Board discussions, LandStudies Assessment and have started to make improvements to our property to mitigate future risks with recommendations from LMT , Watershed Conservation organizations and our neighbors.

We also have been able to purchase a separate flood policy through Neptune insurance for an additional \$500/ year in case the home itself were to be flooded again.

Lisa Domenic

11.

Greetings my public comment is below for your review and consideration pertaining to the flood insurance program in Pennsylvania:

The funds and their purpose are not to be used as they have before. Times have changed, now - but the one function of "buyout" and removal of the damaged structures, especially from repetitive claims is sort of what the program should become. Not an overnight outcome of course. And use the funds in a pre-emptive effort. Sort of in the popularity of disaster resistance and resiliency merging with sustainability principles is the guidance as follows.

All floodplains mapped appropriately should be free of structures that lead to claims and result in death sometimes. This is an avoidance of the disaster, expenses to replace damaged structures is a waste of

money. Not to mention the funders behind the expenses: from the policy holdholder, the corporation of insurance provider, and any taxes we pay that go thru the government subsidy to go toward structure replacement costs is wasteful. Why do we(as a group) agree to pay for a person's foolhardy move to live in a hazard area? That can change.

A calculation of getting structures and their respective owners out of a ranked floodplain hazard, say - via floodway, zones A, zones AE whatever can gauge the years and funds needed. But, funds of "buyout" are provided to all (not voluntarily either*) that then are to help the move of the structure holder to a programmed outcome. Or, in some cases even move the structure. That would be a gold star in recycling.

The programmed outcome occurs to be options/alternatives, that by the way helps save money compared to paying for claims. Over and Over again. And rather than it be likened to a move some in East Palestine, OH; are still angsty with since they moved do to train wreck that happened in an very unpredictable way. This programmed outcome does it in a 'heading off the train wreck' of flood buy outs in a positive successful for all outcome. The program, aside from a buyout participant finding a new safe, flood zone free place is the standard step. But, given a locality does not want to loose (property) tax base from relocation of their buyout resident [home or commercial] funds also should be available to get places bought to build new structure on there. There in that locality. If possible. This leads to land use coordination either thru zoning adjustments to get an approved location out of a mapped floodplain, etc.

Private property owners stand to gain with getting unused area to be valued as replacement area out of flood hazards to become an outcome still cheaper than paying for hazard claims. Structure Owners that relocate don't have to be paying that flood insurance extra premium amount, etc. So, of course it is a private/public partnership. As a voluntary effort, a sort of "bid proposal" format could be applied to seek land owners to provide area to build new structures with funds paid to them in market value, etc. This is likened to using the conservation easement valuations paid to owners of lands that are taken out of development, here in reverse to get area o.k. to build structures on out of floodplains. And not a closed market to floodplain structure owners, but also open to any others to add into the new place that can make it a community. What about new roads for this new place. Well, roads to be closed in the flood hazard may add up to some credit provided in the funding structure go towards new road(s) to be built. You can look into the place in Illinois that relocated a whole town out of their floodplain. Lots of options can help all the utilities, roads and various and sundry attributes happen if you are to take on this concept. Anyway, this is a decades time frame to happen.

from above as: dirty word eminent domain is 'not voluntary.' Well to say that here is about as bad as this gets. The eminent domain used to remove health hazard could be applicable as last resort. Local governments on up the line look at eminent domain as though very foreign as much as raising taxes that lead their losing office. But, no one lost office from eminent domain used to ruin neighborhoods of many residences and businesses for road and highway installations from days of yore. Well, the concept to get residences and businesses out of hazardous locations is an eminent domain goal as well as finding area to relocate those moved out, also found via eminent domain (as a last resort) could be a new hybrid use of the unspeakable. Eminent domain. My taxes as a one time expense used toward a road or area for flood hazard migrants to relocate and be safe, where do I send my money to!

Floodplain outcome. Easy peasey. It returns to it's natural function. Following the Ian McHarg - 'DESIGN WITH NATURE' concept the whole of this overview pertaining to streams, rivers, and lakes would be so

much better for nearby residents, tourists, business operators eating lunch to visit and see nature. Property values will sky rocket based on nearness to that natural setting. Just like a view of the Empire State Building from an apartment closet window gets a higher rent in NYC, compared to no view. This would apply to viewing the natural setting of the floodplain returning to its function in the landscape! The habit there would be as if going to the zoo for free. Some beavers in some areas return. Finally. The skunks and raccoons will stay near their water habitat rather than swing by trash containers. The return of hawks and eagles will show up. But watch out for missing small lap dogs, the ones that like to help drive their owner's car, as they may be light enough to get carried off by a returning hawk. Especially the little dogs walking around not on a leash. Somehow they forget to look up...

Cliff Kanz

12.

I think it's important to make it more affordable, less of a struggle for ordinary people to protect their homes as the effects of climate change grow.

Nicola Coohill

13.

Hello, I have been paying flood insurance for the last 30 years due to a small Creek behind my house. I live in North Scranton. This past September 9th 2023 we did experience flood damage. When the adjuster came out he told us our contents coverage was not applicable because there were 2 steps leading into the basement. I have been paying for \$10,000 in contents coverage. No one ever came to inspect the home when the policy was purchased. I did file a complaint with this organization but have not been replied to. This insurance is extremely expensive. I wonder what will be next year's cost After placing a claim, the money we were given was not enough to even cover the new heating and hot water system let alone all of the contents we lost.

Andrea Phillippe

14.

The premiums are skyrocketing. We had to take money from our 401k to pay the premium of \$1004 this year. There needs to be an option to make monthly payments. I know that Congress is the only ones who can authorize this. Even if I max out my deductible it doesn't really help minimize the cost. Also, I live in South Wilkes Barre and where my house sits hasn't been affected by flood waters since 1972. The levee is doing its job. We've had to evacuate a couple times since then but water never got close. So why is my premium still going up so much? I don't think it's fair that my premiums are going up just to cover areas that are always affected by natural disasters. We pay a levee fee every year in Luzerne county, but not all of the county pays the fee if they aren't directly affected. Flood insurance should be the same way.

Joe Frischman

15.

Why not provide a discount for Senior Citizens.

As far as preventing floods why not dredge the river and make it deeper. Why not build a levy similar to the one in Morrisville to protect people in Yardley.

16.

My name is Lynn Guiser. My husband, Tom Guiser, and I live on [REDACTED] Beach Lake PA. Wayne Cty.

IN 2018, when we purchased this home (950 sq feet) on the Upper Delaware River, we got a mortgage. Even though the house-built in 1955, has never been flooded, we are forced to purchase flood insurance.

In Sept 2018, our annual flood insurance cost was \$1000.00.

In 2023, 5 yrs later, the cost is \$1850.00.

The bank states the FEMA map shows the house / a part of it, is in the flood zone. The property, when searching on the FEMA website, states it is not in the flood zone.

The FEMA flood zone and the cost of flood insurance-even though the house has not been affected by past flooding) is inaccurate and the cost to insure excessive.

17.

Years ago I inquired about flood insurance and they told me that the premium was \$500.00. I don't live close to any waterway that I could be flooded. I live on the side of a hill. Only once in the last 27 years that we were almost flooded from the water coming off of the hill, but it didn't reach our house. So I am expected to pay the same premium that other people who are flooded all the time and live in a flood zone? I don't see where this is fair. Thank you, Cindy Ruby Sent from my iPhone

Cindy Ruby

18.

My name is April Bollwage-Cloer. My family and I reside in the [REDACTED] neighborhood of Lower Makefield Township in Bucks County, just one mile from where Governor Shapiro signed Act 22 into law. We are not in the floodplain, but our home has flooded three times in the last twelve years.

On July 15, 2023, more than thirty homes in our immediate area suffered flood damage as the result of an intense rainstorm. Additionally, our home and the home of our immediate neighbor experienced considerable property damage due a compromised stormwater drainpipe located between our residences. This drainpipe flows into the Delaware Canal

The topography of our development, coupled with the drain drawing stormwater in search of an outlet, leaves our neighborhood vulnerable to flooding - flooding that is growing exponentially more frequent and more dangerous. This uncontrolled surge of stormwater bound for the canal has inundated our neighborhood for decades. Most recently:

During each of these rain events, floodwaters compromised our properties and the canal embankment leaving our homes, yards, and most importantly, our families, a little less safe each time.

All of our homeowner's insurance (including sinkhole coverage) claims were denied and flood insurance is cost-prohibitive because we do not qualify for assistance. We have incurred well over \$100,000 in losses/expenses in the last two years alone and continue to work through the emotional stress this puts on our family (and those of our neighbors) during even moderate rain events.

I am particularly interested in the Taskforce's role in recommending programs that incentivize local governments to support flood mitigation efforts, as well as subsidies for flood insurance premiums.

Thank you in advance for your consideration of our neighborhood and others like it. We appreciate your efforts more than you can imagine. If there is any additional context I may provide, please do not hesitate to contact me.

19.

Before this law, can we vote? It's not fair to raise or change this policy, people can't effort even existing insurance policies, they can't sell their houses anymore.

It was just recently make people to pay for storm water now this and what's next?

Lisa Parkinson (Broker, LMM Realty)

20.

I own 4 residential properties (each a duplex or double block) in the levy protected areas of Kingston Borough, Luzerne County, PA. I would recommend that since the flood insurance rates have increased almost to being unaffordable, that a fixed dollar amount of insurance be offered as an option to the existing program. Therefore, if a property owner can't afford the normal insurance program for whatever reason, they would at least have an option that would provide some financial assistance to help with the repair costs. Increments starting at \$25,000.00 and increasing by \$5,000.00 up to whatever the appropriate amount, might be a fairer way of offering the insurance and it might get more property owners to buy into the program which would help to keep the insurance rates more affordable. In the event of a flood, if a property owner had some insurance proceeds available to them, it would give them the incentive to invest their own money back into the property to finish the repair work.

Thank you for the opportunity to present an opinion.

Robert Besecker

21.

I wish to make comments to the task force regarding:

██████████ Yardley, PA 19067

You are pricing us out of retaining insurance. We have never filed a claim or been involved in any flooding ever at this address. We have made no changes. We have had flood insurance for 18 years and the price has more than doubled over that time. Below are the yearly charges. At first it was a stable price or it had reasonable increases. But in the last few years it has gone up more significantly every year, far outpacing our income increases or inflation. This is just wrong and making it basically impossible for us to continue. In addition you will be giving up "easy money" if you had just kept it withing reasonable increases. You should not take out your increased losses on those of us who have never filed a claim.

2005-2007 \$352

2008-2009 \$388

2010 \$395

2011 \$405

2012 \$417

2013-2014 \$460

2015 \$477

2016-2018 \$499

2019 \$534

2020 \$572

2021 \$633

2022 \$759

2023 \$880

Please reconsider your policy as we will be priced out of insurance. I welcome your comments.

Susan Moore

22.

This is just an email on what happened to my client when buying a house.

The house was in Moosic and we were 2 weeks from closing. The budget was very tight and my clients could not afford anything more. Seller did not have flood insurance, all of a sudden in the 11th hour the mortgage company said they needed 4000.00 more! Unbelievable as they were already barely affording the house. That almost cost them the house and they had to move because (if I remember correctly) their apartment was being sold. They had nowhere to go it was not a good situation. It added another 333.33 dollars to their mortgage payment.

Thankfully it did work out, but they are stuck with a yearly 4000.00 cost for flood insurance because the maps were re-drawn.

Sarah Arndt – Realtor

23.

What can one do for flood insurance when they live in an apartment? What about flood insurance for someone who visits a beach area that floods?

Linda Gold

24.

Hello Flood Insurance Premium Assistance Task Force,

I am glad that you are looking into this issue.

Last summer, many of our neighbors suffered from the July 15th flood. There were a number of deaths and hundreds of thousands of dollars of property damage.

The level of flood mitigation in our community is poor. Development has proceeded with less oversight and fewer flood management actions than are required. These issues have been known to the township, county, and state for a long time. Little is done and this must change.

When the July 15th flood happened, there was a parade of photo opportunities for local, state and national elected officials. Even the President got an opportunity to state his empathy as he was in the Philadelphia that week.

However, there has been inadequate action by all of the various levels of government. So, your task force is welcome. However, please do more than the Task Force's stated purpose: "to explore ways to lower flood insurance premiums and incentivize communities to invest in flood prevention measures." Action with performance is the only appropriate outcome. And action at the speed of need, not the pace of task forcing.

Please make some decisions, invest in mitigation, spread the word that large expanses of manicured grass and excessive development cause floods. And, when disaster strikes, as it inevitably will, bring real resources and as fast as the disaster happened. Don't bring the media for photos. Instead, bring people, resources, and funding to solve problems in real time. Empathy is nice, but empathy without action is insulting and hurtful.

On the other hand, our community came together and took immediate action. Local churches, clubs, fraternal organizations, local family foundations, friends, and neighbors came together quickly to raise money for flood victims. We even called local, state, and federal elected and administrative officials, letting them know what we were doing and asking them to spread the word. The response was far less than impressive from most government officials (thankfully, there were a few exceptions, where local, very local, elected officials helped spread the word on their social media tools and helped us raise the

needed resources.) So, please put into your Task Force the need to coordinate response with local churches, clubs, and communities who are happy to help raise money and volunteer to help.

To my knowledge, in our area there were zero government monies allocated to individual families. The churches, local not-for-profit organizations, and community members that I worked with collaborated quickly and effectively and raised and delivered over \$144,000 to local families to help with their losses and recoveries.

I have learned a great deal about the power of community support during both Covid 19 and the July 15th flood. During the early days of Covid, our churches and community raised and delivered approximately \$100,000 to people who fell through the cracks of government administration (while others were committing outrageous frauds receiving government largess which the government will now spend millions of dollars prosecuting). Our community's support kept families fed and prescriptions filled.

So, in a few short years, in a small town environment, almost a quarter million dollars of local support, plus many hours of volunteer work, made a real difference in the lives of our neighbors and the strength and resilience of our community.

Please create action, speed, allocation of appropriate government resources, appropriate review and oversight of development, education of the public on disaster mitigation and rapid response, and a link to community spirit and engagement.

I would be honored to have an opportunity to share our experience and key learnings with a member of your team. Please feel free to email me to set up time for that.

All the best,

John Celentano

25.

I'm writing to you from the flood-prone town of Millvale, right outside Pittsburgh, PA. My only comment is that I strongly believe that flood insurance should have the option to be paid like all other insurance - with monthly payments!

It's so strange to me that flood insurance has to be paid in one lump sum each year, unlike every other type of insurance.

It's just too huge a payment. It hurts me every year. It wasn't until I became a homeowner that I understood why people would go without flood insurance; they can't afford to pay it all in one huge lump sum.

I think things would immediately be more affordable and reasonable for people if this was changed.

Emily Voelker

26.

I have lived at [REDACTED] Monroe Township since 1988. We live near Bowman's Creek and have carried flood insurance since we bought the property Initially the insurance was \$100.

Every year it increases and this year it's \$963. When we flooded in 2011 most of the damage was to the outside of our house we had huge craters in our yard and flood insurance did not cover the repairs In 1973 a protective barrier was in place that protected our property. It was destroyed in 2011 and despite our pleas it was not replaced. I would love not to purchase flood insurance as it's far too expensive and increases every year but unfortunately I am committed Feel free to contact me if you would like to discuss further

Mary Clare Thomas

27.
rethought Flood (see included printout)

28.
PAFPM survey results (see included printout)

29.
I'm 71, a widow, and live on [REDACTED] in Kingston Pa since 1984. We carried flood insurance every year. The house was flooded in 1972. All has been fine since then with the construction of the dikes. There may have been one or two times since then that we were told to evacuate just to be on the safe side but nothing happened. Thank goodness. Here is my problem. Every year my flood insurance is due in early December. Here is my main problem. I am on a fixed pension. For the last 2 years or so it's been going up, and I've read in the paper that it will go up for a few more years. This past year it was up to \$753. I called to see if I could drop the insurance down from 150,000 to 100,000 but i would only save \$57.

AND, it is always due right before Christmas and must be paid in full!!! If they can split it up to a least 2 payments a year like our taxes or even better monthly, that would be a great help. The last few years I was thinking of dropping it, but with weather so severe and unpredictable the last few years all over the world, I was afraid to. Any help you can give would be greatly appreciated by all, I'm sure. Thank you!

Julie Fisher

30.
PA Association of Realtors (see included printout)

31.
Based on our work, one way to reduce premiums is to limit the construction of new improvements in flood prone areas and designated flood plains.

While we recognize that property owners have a right to utilize their property, we also recognize that municipalities may grant zoning variances to permit construction in flood plains.

By allowing for construction of residential or commercial improvements in flood plains, we increase the opportunity for potential damage and hence insurance payouts which help to drive premiums higher.

Striking a balance between the rights of property owners and the natural environment will be a challenge but is one example of how premiums might be reduced.

Bucks County Planning Permission

32.

As Policy Director for PID, I applaud you for taking on this responsibility, not only because the outcome will hopefully benefit Flood Insurance consumers, but because this effort needs a guiding hand such as yours.

For the record, I'm Vince Phillips. I retired in 2021 after 31 years at the State Capitol lobbying on behalf of insurance agents. What I learned about Flood Insurance from producers and the NFIP itself, I used for teaching several Flood Insurance CE courses. I did so long before PID wanted to mandate it. You might review the NFIP no-cost continuing education for Flood Insurance agents shown at the bottom of this email.: And of course, Dave Buono is an excellent resource.

I know that the Task Force members will not take the time to take this NFIP class but hopefully, PID or whomever else staffs this Task Force will take advantage of this instructional material to better know the subject about which they are dealing. Some observations:

-- It's not really insurance. Rather, it is a Federal program created and "edited" (as a kind way of saying that Congress micromanages the details) by the legislative/political process. Like the USDA Risk Management Agency with Crop Insurance, it uses the private sector insurers to place this coverage. It is called the Write Your Own program. NOTE: The PID Annual Statistical Report lists companies through which NFIP Flood Insurance might be obtained. The 2019 Report says that 44 companies were participating at that time. When State Farm withdrew a few years back, it was a setback to placement of Flood Insurance. Link to companies:

https://www.legis.state.pa.us/WU01/LI/TR/Reports/2019_0026R.pdf

-- As a result, the National Flood Insurance Program (NFIP) can't act like a standard carrier because Congress sets the rules. An example is the repeated claims paid for properties that have suffered flood damage and received NFIP payments previously. It was only by long-delayed congressional action that NFIP could really begin to look seriously at any sort of removal of those repetitive claim properties.

-- Until recently, NFIP could not legally enter the reinsurance market for a stop-loss arrangement. Much of the complexity has to do with Congress rather than insurance underwriting. For example, two or three reforms ago, Congress debated how to have NFIP could insure an indoor swimming pool such as that found in a hotel.

-- The Federal program is truly complex because Congress forced complexity into it.

-- When (if) NFIP tries to do what standard carriers do, for example, update the maps to show changes in risk, it is met with huge consumer and legislator pushback. At least, there is now a feature allowing for a process of appeal where the Flood Insurance re-mapping can be challenged and the consumer's legal fees could be refunded.

-- Congress runs the show with NFIP. States don't. That means that the Flood Insurance Premium Assistance Task Force has little flexibility in changing Federal rules and even NFIP premium discounts (<https://search.usa.gov/search?utf8=%E2%9C%93&affiliate=nfip&query=premium+discounts&commit=>) If PA wanted to change a confusing definition such as 'what is a flood?', it can't.

Here is the rub. The Task Force has no members who sell Flood Insurance per the way the PA law was written. That means that the Task Force is starting its work at a disadvantage because knowing about this difficult product and its marketing is critical when it presents its recommendations or tries to improve this Federal program created and renewed with changes that the Task Force may not even hear about. Also, the Flood Manual sees periodic updates such as:

Number	Title	Date Issued
W-23016	Updated Functionality for FEMA Elevation Certificate and Floodproofing Certificate	11/6/2023

This email is to notify you that a new bulletin(s) has been posted to the NFIP Web site. You are listed as a WYO Company POC and/or have opted to be on the NFIP Clearinghouse email distribution list.

NFIP SO

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Mclean, VA 22102

Possibly, the Task Force could create an ad hoc advisory group consisting of people from the Insurance Industry who have Flood Insurance knowledge and bounce ideas off of them. Given my background, if you created such an informal group, I'd like to be counted as a resource or be in a position to recommend insurance producers with that expertise..

So, what can the PID actually regulate? It:

- Can ensure the solvency of the Write Your Own standard carriers.
- Cannot change NFIP underwriting standards
- Cannot approve NFIP Flood Insurance rates and forms
- Can try to establish a private sector alternative to NFIP that more than only the rich can afford.

PID has already had some success here with putting separate Flood Insurance on the export list. As you know, the export list allows retail insurance producer access to the Surplus & Excess Lines market with having the two declinations applying to other E&S products. This PID Flood Insurance focus began as far back as the Rendell Administration.

NOTE: A sizeable number of retail producers may run afoul of PID E&S rules because PID materials including the press release announcing PID's work in this area January 5. do not clearly state that a retail producer must obtain private sector Flood Insurance coverage through a surplus lines licensee. I fear the misleading language may put some producers into non-compliance.

I could not find on the PID website, a list of E&S carriers offering Flood Insurance altho I believe that Lloyd's of London may have had a large part of that PA market. However, according to the Rough Notes' 2024 The Insurance Marketplace (a national market directory of E&S and specialty lines), only these were listed on page 68: Amwins (CAT coverage by Poulton Associates; GenCAT Group); Johnson & Johnson, Inc. (Lee & Mason Financial Services); One80 Intermediaries; Quaker Special Risk; REInsure Pro. That list seems sparse. Perhaps other carriers offer private sector Flood Insurance as part of a combined product.

I have some ideas about how the Task Force might reach its statutory goal or at least lay out some policy options that the General Assembly and PID can consider. If your schedule permits, I'd love to have a conversation.