

Congress of the United States
Washington, DC 20515

October 23, 2015

The Honorable Craig Fugate
Administrator
Federal Emergency Management Agency
500 C Street S.W.
Washington, D.C. 20472

Dear Administrator Fugate:

We are writing to express our significant concerns with the methodology FEMA is using to modify Flood Insurance Rate Maps (FIRMs) for New Jersey. As several appellants have already demonstrated, fundamental methodological errors—including, but not limited to, inadequacies in validation and deficient tidal effects—have resulted in erroneous estimates of the 1% Flood Risk elevation by several feet. This difference has enormous implications for tens of thousands of New Jersey homeowners and small businesses.

As you know, FIRMs are an important tool developed to quantify flood risk all around the country. They are used, not only to determine flood insurance premiums, but also to guide building codes and mitigation activities. Subsequently, these determinations have significant real world consequences for families and business owners. Being placed in a greater risk zone results in higher and sometimes unaffordable insurance premiums, reduction in property values, and costly retrofitting. With the consequences of FIRMs being so broad and far-reaching, it is critically important that these maps be objective and accurate.

To date, dozens of New Jersey municipalities have appealed their preliminary FIRMs as currently drafted. Analysis from Jersey City, for example, shows that FEMA has overestimated properties in the Special Flood Hazard Area (SFHA) by as much as 34 percent, unnecessarily putting approximately 28,000 Jersey City residents in the SFHA at a potential cost of millions of dollars. Similarly, the City of Elizabeth predicts that the inaccurate expansions of SFHAs will begin “driving residents from their homes,” especially in older communities, while the City of Newark expects a devastating effect centered on its vital Ironbound community, potentially depleting this important tax base. Additionally, we understand that the City of New York has appealed their preliminary FIRM based on what they believe to be fundamental flaws in FEMA’s methodology. As FEMA evaluates the appeal, we ask that you consider the impact that potentially flawed methodology would have on the preliminary FIRMs for communities throughout all of New Jersey.

We have received letters from multiple boroughs, organizations and individual homeowners who cannot afford the dramatic increases in insurance premiums associated with the FIRMs—increases that appear to go well beyond the risk. In some cases, individuals will simply no

longer be able to afford their homes or businesses—while at the same time, they may be unable to sell them with such high premiums.

With the memory of the devastation caused by Superstorm Sandy fresh in our minds, we along with our fellow New Jerseyans are more than cognizant of the need for accurate flood maps to identify risk and steer rebuilding in a more resilient manner. We understand and take flooding very seriously. However, including more homes and neighborhoods into SFHAs than necessary adversely affects families and, more broadly, calls into question the credibility of the FIRMs.

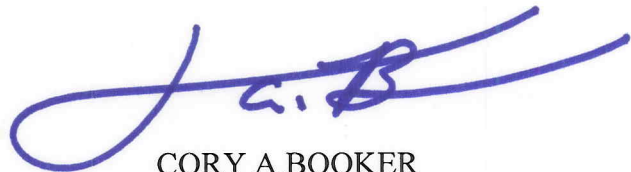
In order to justify full compliance with the NFIP, FIRMs and flood insurance rates must reflect the most accurate predictions that technology affords.

The evidence laid out in a number of appeals suggests that several core flaws may have exaggerated the flood risk across New Jersey, resulting in insurance premiums that are neither sustainable nor reflective of the most accurate science. We strongly urge you to ensure all communities have the technical assistance and resources to exercise their right to appeal, and act with all expedience to resolve these discrepancies so New Jerseyans have access to reliable, objective, and accurate flood risk information.

Sincerely,



ROBERT MENENDEZ
United States Senator



CORY A BOOKER
United States Senator



FRANK PALLONE
Member of Congress



ALBIO SIRES
Member of Congress



DONALD PAYNE JR.
Member of Congress



TOM MACARTHUR
Member of Congress



RODNEY FRELINGHUYSEN

Member of Congress



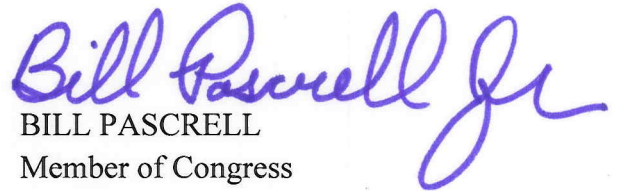
BONNIE WATSON COLEMAN

Member of Congress



FRANK LOBIONDO

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BILL PASCRELL

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LEONARD LANCE

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CHRIS SMITH

Member of Congress



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