

March 16, 2026

Hon. Tom Cole
Chairman
Appropriations Committee
U.S. House of Representatives

Hon. Rosa DeLauro
Ranking Member
Appropriations Committee
U.S. House of Representatives

Hon. Mark Amodei
Chairman
Subcommittee on Homeland Security
Appropriations
U.S. House of Representatives

Hon. Henry Cuellar
Ranking Member
Subcommittee on Homeland Security
Appropriations
U.S. House of Representatives

Dear Reps. Cole, DeLauro, Amodei and Cuellar:

Congress appropriated funding for the National Flood Insurance Program's (NFIP's) Flood Hazard Mapping Program to protect lives and property, and we respectfully urge you to ensure that money reaches the state, local, and tribal partners who do that work without further delay. The undersigned organizations appreciate your continued commitment to reducing flood risk and strengthening community resilience across the country. We write today to share concerns about the timely implementation of Federal Emergency Management Agency's (FEMA) Flood Hazard Mapping Program and to request your assistance in addressing administrative barriers so appropriated funds can reach the communities and stakeholders they intend to serve. Flooding remains our nation's number one natural hazard, and accurate, current flood maps are essential to protecting lives, property, and our broader economy.

Strong Bipartisan Support for the Program

Congress appropriated over \$400 million for the flood mapping program in fiscal year 2025, including both direct appropriations and transfers from the National Flood Insurance Fund. The President's own FY2025 budget identified flood hazard mapping as a core FEMA mission area, describing the program as one that "drives national actions to reduce flood risk by addressing flood hazard data update needs, supporting local government hazard mitigation planning, and providing the flood risk data needed to manage the NFIP's financial exposure." We are grateful for this shared commitment across both branches of government.

It is in that spirit that we raise the following concern: as of the date of this letter, very little of the FY2025 flood map funding has reached implementing partners. Additionally, no Notice of Funding Opportunity (NOFO) was issued for the Cooperating Technical Partners (CTP) program in FY2025, leaving state and regional partners without awards, guidance, or a clear timeline. We understand that administrative processes and other challenges within Department of Homeland Security (DHS) and FEMA have contributed to these delays, and we hope that, with your support, these issues can be addressed promptly.

Public Safety and Life-Safety Implications

Current, accurate flood maps are a critical tool for officials at every level of government and the private sector. When map updates are delayed, emergency managers and first responders may be planning and practicing based on information that no longer reflects actual flood risk conditions. Several examples illustrate the real-world stakes. In the Saluda Watershed in South Carolina, communities are still operating under outdated flood risk assessments despite the devastation caused by Hurricane Helene. In the Upper Green Watershed in Kentucky, the 2025 flood events exposed the same gap between mapped risk and actual conditions on the ground. In the Chunky-Okatibbee Watershed in Mississippi, which includes the metropolitan Meridian area, regulatory products are more than 15 years old on average and hydraulic modeling dates back to the early 1990s. We raise these examples not to alarm, but to underscore the importance of timely implementation and the very real consequences of delay for the communities this program is designed to protect.

There are also important insurance implications. When floodplain boundaries are not updated and communicated to property owners, some homeowners may not realize they need flood insurance coverage and thus don't directly insure risks to their property – a key mechanism for individuals to reduce risk to the general taxpayer. Ensuring that mapping keeps pace with changing flood conditions helps protect families from unexpected financial hardship and reduces federal, state, and private expenses in the aftermath of a flood event.

Permitting, Affordability, and Economic Considerations

Flood mapping delays also have effects on delaying local permitting and economic activity. Conditional Letters of Map Revision (CLOMRs), which may be a necessary requirement of local permits, are being slowed and even completely stopped. When those reviews stall, development projects are delayed, costing valuable time and money. For example, if a CLOMR is needed to certify a levee improvement, it may delay a certificate of occupancy for a new business, hospital, etc. Lenders also rely on current maps to make mortgage and insurance determinations, and outdated maps create uncertainty for buyers and sellers alike. Delayed updates to mapping of floodplains can mislead borrowers purchasing homes, either resulting in late notice of a flood insurance requirement for which they had not budgeted or causing them to pay premiums that would not have been required or that were at higher rates based on outdated flood hazard data. Homeowners rely on processing of Letters of Map Amendments (LOMAs) to remove the mandatory flood insurance requirement, impacting the affordability of the purchase, if their house was inadvertently shown in the special flood hazard area.

According to the National Flood Association (NFA), 27,343,355 flood hazard determinations were made by NFA's members in 2025 alone to support regulatory compliance for mortgage lenders, risk analysis and rating for insurers and for other organizations' hazard reviews, all of which were based on the federal Flood Insurance Rate Maps (FIRMs)¹. FIRM maintenance and updates supported by flood map funding are critical to ensuring that the data remains relevant and current.

¹ National Flood Association 2025 Member Survey, www.nfaflood.com.

The NFIP program and FEMA are supported by many contracts where national contractors perform statutory tasks and actions that support NFIP, communities and their businesses and families. Many of these contracts have task orders that are expiring at the end of March or in April. Without the execution of these extensions critical program functions will be interrupted. These include new and updated floodplain mapping, Conditional Letters of Map Change (CLOMRs), Letters of Map Amendment (LOMAs), Dam Safety, Building Science and other critical required work supporting the NFIP.

State and Local Capacity

We share the administration's goal of empowering states and localities to take an active role in flood risk management. The Cooperating Technical Partners (CTP) program is a primary vehicle for that partnership, enabling state and regional agencies to conduct mapping work close to the communities they serve. This program has been encouraging state and local leadership and ownership of their flooding risks since 1999 with positive results in those areas that have participated. We are concerned, however, that the absence of FY2025 CTP funding is beginning to erode that capacity. Some partner organizations, including in states like Illinois, Nebraska, Iowa, and Georgia have already lost professional staff and are evaluating more staffing reductions because of uncertainty around funding timelines.

Additionally, state managed activities supporting flood hazard mapping such as reviewing Letters of Map Revision have already had to be turned back over to the federal government, reducing the state involvement in the process and federalizing it. This is contrary to the administration's goals of moving more resilience functions to the states. Rebuilding technical expertise in flood modeling and risk assessment takes considerable time, and we hope to avoid a situation where funding eventually arrives but the capacity to execute has diminished.

Requests for Action to Protect Lives and Property

In the interest of helping our organizations and their members plan effectively, we respectfully ask for your assistance in the following actions:

- Request the FEMA Administrator to explain the reasoning behind the significant delays either through formal testimony at a hearing or by letter.
- Send a letter to the Director of Office of Management and Budget urging FY25 appropriations be obligated in a timely fashion.
- Direct FEMA Administrator to execute task orders to contractors immediately to ensure critical FEMA statutory tasks and actions that support the NFIP, communities, and their businesses and families continue uninterrupted.

We recognize that federal programs involve complex administrative processes, and we appreciate the many dedicated professionals within FEMA who are working to advance the flood mapping mission. Our goal in raising these concerns is constructive: we want to see this program succeed and benefit from the investments Congress has made fully realized. We believe that with focused attention and support, the implementation challenges facing the program can be quickly resolved.

Thank you for your leadership on this important issue. Our coalition stands ready to assist in any way that helps advance the nation's flood mapping capabilities and ensures safer, more resilient communities across the country. Please do not hesitate to reach out if we can provide additional information or technical perspective.

Sincerely,

American Property Casualty Insurance Association (APCIA)
American Society of Civil Engineers (ASCE)
Association of State Floodplain Managers (ASFPM)
Big I-Independent Insurance Agents & Brokers
Consumer Credit Industry Association (CCIA)
Management Association for Private Photogrammetric Surveyors (MAPPS)
National Association of Home Builders (NAHB)
National Association of Flood and Stormwater Management Agencies (NAFSMA)
National Flood Association (NFA)
The Council of Insurance Agents & Brokers (CIAB)
U.S. Chamber of Commerce

cc: DHS Secretary Kristi Noem
Acting FEMA Administrator Karen Evans
Hon. Sam Graves, Chair, House Transportation and Infrastructure Committee
Hon. Rick Larsen, Ranking Member, House Transportation and Infrastructure Committee
Hon. Scott Perry, Chairman, House Transportation and Infrastructure Subcommittee on
Economic Development, Public Buildings and Emergency Management
Hon. Greg Stanton, Ranking Member, House Transportation and Infrastructure
Subcommittee on Economic Development, Public Buildings and Emergency
Management
Hon. French Hill, Chairman, House Financial Services Committee
Hon. Maxine Waters, Ranking Member, House Financial Services Committee
Hon. Mike Flood, Chairman, House Financial Services Housing and Insurance
Subcommittee
Hon. Emanuel Cleaver II, Ranking Member, House Financial Services Housing and
Insurance Subcommittee

March 16, 2026

Hon. Susan Collins
Chair
Appropriations Committee
U.S. Senate

Hon. Patty Murray
Vice Chair
Appropriations Committee
U.S. Senate

Hon. Katie Britt
Chair
Homeland Security Appropriations
Subcommittee
U.S. Senate

Hon. Chris Murphy
Ranking Member
Homeland Security Appropriations
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American Society of Civil Engineers (ASCE)
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Big I-Independent Insurance Agents & Brokers
Consumer Credit Industry Association (CCIA)
Management Association for Private Photogrammetric Surveyors (MAPPS)
National Association of Home Builders (NAHB)
National Association of Flood and Stormwater Management Agencies (NAFSMA)
National Flood Association (NFA)
The Council of Insurance Agents & Brokers (CIAB)
U.S. Chamber of Commerce

cc: DHS Secretary Kristi Noem
Acting FEMA Administrator Karen Evans
Hon. Rand Paul, Chair, Senate Homeland Security and Governmental Affairs Committee
Hon. Gary Peters, Ranking Member, Senate Homeland Security and Governmental Affairs Committee
Hon. Tim Scott, Chairman, Senate Banking, Housing and Urban Affairs Committee
Hon. Elizabeth Warren, Ranking Member, Senate Banking, Housing and Urban Affairs Subcommittee
Hon. John Kennedy, Chairman, Senate Banking Committee Economic Policy Subcommittee
Hon. Raphael Warnock, Ranking Member, Senate Banking Committee Economic Policy Subcommittee