

**Testimony of the  
American Property Casualty Insurance Association (APCIA)**

**The New York Senate  
Standing Committees on Investigations  
and Government Operations; Insurance;  
and Housing, Construction and Community Development**

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# **Joint Public Hearing on the Cost and Availability of Insurance for Residential Property**

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**November 18, 2025**

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## **OVERVIEW**

Thank you for the opportunity to provide testimony on homeowners insurance affordability and availability in New York. The American Property Casualty Insurance Association (APCIA) is the leading national trade association representing home, auto, and business insurers of all sizes and structures, including 581 property casualty insurers doing business in New York. Our mission is to promote and protect the viability of competitive private insurance markets for the benefit of consumers and insurers.

APCIA applauds the Senators for raising concerns about housing affordability, which has become a significant challenge in New York and nationwide. APCIA has been working with a coalition of builders, mortgage lenders, realtors, and regulators on solutions to reduce the costs of housing, including the cost of homeowners insurance in the long-term.

Homeowners insurance rates in New York are below the national average, although they are higher in New York City and coastal New York. Homeowners insurance is typically only roughly 6.5 percent of overall homeownership costs including mortgage payments, maintenance, taxes, and utilities. But property insurance losses and corresponding rates have increased significantly over the last five years nationwide and in New York.

Property insurance losses are escalating for three reasons:

- 1) *Macroeconomic pressures* — The top property insurance cost drivers are economic growth, 40-year record inflation, and inflation in building materials and labor that have been significantly higher than the consumer price index. Increases in insured disaster losses roughly parallel the increased costs of replacing buildings in the United States. Home values in New York State have surged by 94 percent over the past decade. More expensive homes cost more to insure. While inflation is now slowing, tariffs and restrictive immigration policy are continuing to pressure building costs.
- 2) *Climate change* — Weather severity is increasing. From 1980 to 2003, New York did not experience more than three billion-dollar weather events in a year. In 2024, New York had ten natural disasters that each caused over a billion dollars in inflation-adjusted losses. The Federal Emergency Management Agency's National Risk Index ranks New York among the highest disaster-risk states due to its dense population, high property values, and vulnerability to multiple perils.
- 3) *Legal system abuse and regulatory costs* — New York City has the highest residential construction costs in the nation in part because it has the second highest litigation costs per capita in the nation, resulting from strict liability costs under the Scaffold Law and extremely high rates of fraud. Regulatory costs are also extremely high in New York, with the New York Department of Financial Services (DFS) reviewing every single insurer request for a rate or filing change, currently taking an average of 233 days per filing to ensure they are not excessive, inadequate, or unfairly discriminatory. According to the National Association of Insurance Commissioners (NAIC), insurers in New York had only a 0.2 percent annual underwriting profit over the last decade—in other words barely breaking even on underwriting. Insurers'

According to the National Association of Insurance Commissioners (NAIC), insurers in New York had only a 0.2 percent annual underwriting profit over the last decade—in other words barely breaking even on underwriting. Insurers' overall return on net worth in New York over the last decade was 6.7 percent, which is slightly worse than the 6.8 percent national average.<sup>1</sup> Homeowners insurance return on net worth in New York is right between and almost the same as New Jersey and Connecticut, respectively, which have similar coastal hurricane and flooding exposure. In good years, the rate of return on homeowners insurance is higher than many other lines of business, because insurers need to collect enough premiums to be able to pay for infrequent but severe catastrophes. New York is second only to Miami in being vulnerable to a hurricane exceeding \$100 billion in losses, which APCIA estimates would wipe out 69 years of homeowners insurance return on net worth.<sup>2</sup>



The current death spiral in the California homeowners insurance market is a cautionary warning. The antiquated and dysfunctional prior approval regulatory system in California resulted in suppressed homeowners insurance rates. Following the estimated \$40 billion wildfire losses in Southern California this January, homeowners insurance surplus became further depleted and most insurers have been unable to offer sustainable coverage in high-risk areas, leaving many if not most new homeowners only able to obtain coverage from the bare bones government FAIR Plan or the non-admitted market.

There have been unfounded claims suggesting that insurers are offsetting losses incurred in California by increasing premiums in other states, including New York. Insurance actuarial **principles** require rates to be based on the expected value of future costs. Future costs would not include unrelated losses in a different state. Moreover, New York law prohibits rates that are excessive, inadequate, or unfairly discriminatory. The New York Department of Financial Services (NYDFS) extensively reviews homeowners rate filings, taking an average of 233 days to ensure that every filing is actuarially reasonable and not excessive.

While the NYDFS extensively reviews insurance rates to ensure they meet actuarial standards, APCIA has been convening and sponsoring a series of roundtables with other housing stakeholders to discuss long-term affordability solutions. Climate change and inflation are not going to reverse overnight, meaning that homeownership costs will continue to increase, albeit hopefully more slowly. Housing stakeholders need to work together to empower consumers, realtors, builders, and others to make educated determinations about how to make structures more safe and more affordable long-term. Insurers invest in the Institute for Business and Home Safety (IBHS) that develops science-based building resilience standards. The current best practices for wind resiliency were found in recent studies to reduce hurricane losses by roughly 70 percent, while saving lives, reducing insurance costs, and improving resale values.<sup>3</sup> Long-term housing affordability will require incorporation of more environmentally friendly mitigation and resiliency in residential buildings.

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1 NAIC, Report on Profitability by Line by State in 2023, April 2025: <https://content.naic.org/article/naic-releases-2023-profitability-report>.

2 KCC White Paper: The \$100 Billion Hurricane – How and where it Can Happen, August 2025.

3 Alabama Department of Insurance, Performance of IBHS FORTIFIED Home Construction in Hurricane Sally, May 2025.

## NEW YORK INSURANCE MARKET CONDITIONS

### NEW YORK'S COMPETITIVE LANDSCAPE AND FINANCIAL HEALTH

New York's property casualty insurance market is highly competitive, with over 930 insurers offering coverage in 2024.<sup>4,5</sup> According to the NAIC's most recent insurance profitability report, the New York property casualty insurance industry has experienced a net underwriting loss in New York in 6 of the last 10 years.<sup>6</sup> Homeowners insurance in New York has been more stable. A majority of New York residents currently pay moderate to below-average homeowners insurance premiums compared to other high-risk states and the national average.<sup>7</sup> According to a recent article by Axios using Bankrate data, the average New York premium is \$1,900 compared to the national average of \$2,470.<sup>8</sup> According to S&P Global<sup>9</sup> the average homeowners rate increases in New York over the last five year have been roughly half the countrywide average.<sup>10</sup> Homeowners rate increases in New York have slowed considerably in 2025, with year-to-date increases for the largest insurers for residential coverage averaging between 3-6 percent.

Nationally, ratings agency AM Best has had a "negative" outlook on homeowners insurance for the last three years, although the commercial property insurance segment is maintaining a "stable" outlook. Rate increases for homeowners primary insurance and property reinsurance rates have been slowing nationally as well, as insurers are closing the gap between rates and losses.

### NEW YORK-SPECIFIC COST DRIVERS

The rising cost of property insurance reflects a convergence of macroeconomic, climate, and regulatory pressures that are affecting insurers nationwide. While these challenges are national in scope, they are also clearly present in New York, where their impact is shaped by the state's unique risk profile, housing market, and regulatory environment.

#### Increasing Weather Severity

Climate change is amplifying the frequency and severity of extreme weather events. Aon reports that 2024 was the ninth consecutive year with global disaster losses exceeding \$300 billion, with the U.S. accounting for the majority of insured losses. Modeling firms estimate that hurricane losses could rise 50 percent under a 2° Celsius climate warming scenario, with New York's insured losses increasing by 64 percent.<sup>11</sup>

New York is experiencing meaningful increases in the number and severity of natural disasters. According to NOAA's Billion-Dollar Disaster database, New York experienced 31 billion-dollar disasters in just the last five years (2020–2024), compared to an annual average of about 0.7 events in the 1980s.<sup>12</sup> This sharp increase

4 APCIA via S&P Global Market Intelligence, individual companies writing more than \$500 in New York property casualty premiums.

5 The property casualty insurance market's competitiveness is underscored by its Herfindahl-Hirschman Index (HHI, a commonly accepted measure of market concentration) of 152, a remarkably low figure. For context, the U.S. Department of Justice considers markets with an HHI below 1,000 to be unconcentrated, while an HHI between 1,000 and 1,800 is moderately concentrated, and above 1,800 is highly concentrated. Source: APCIA via S&P Global Market Intelligence, 2024 individual company HHI.

6 <https://content.naic.org/sites/default/files/publication-pbl-pb-profitability-line-state.pdf> (page 469/475).

7 NAIC, Dwelling Fire, Homeowners, Owner-Occupied, and Homeowners Tenant and Condominium/Cooperative Unit Owner's Insurance Report, May 2025.

8 <https://www.axios.com/2025/08/26/home-insurance-premiums-cost-map>.

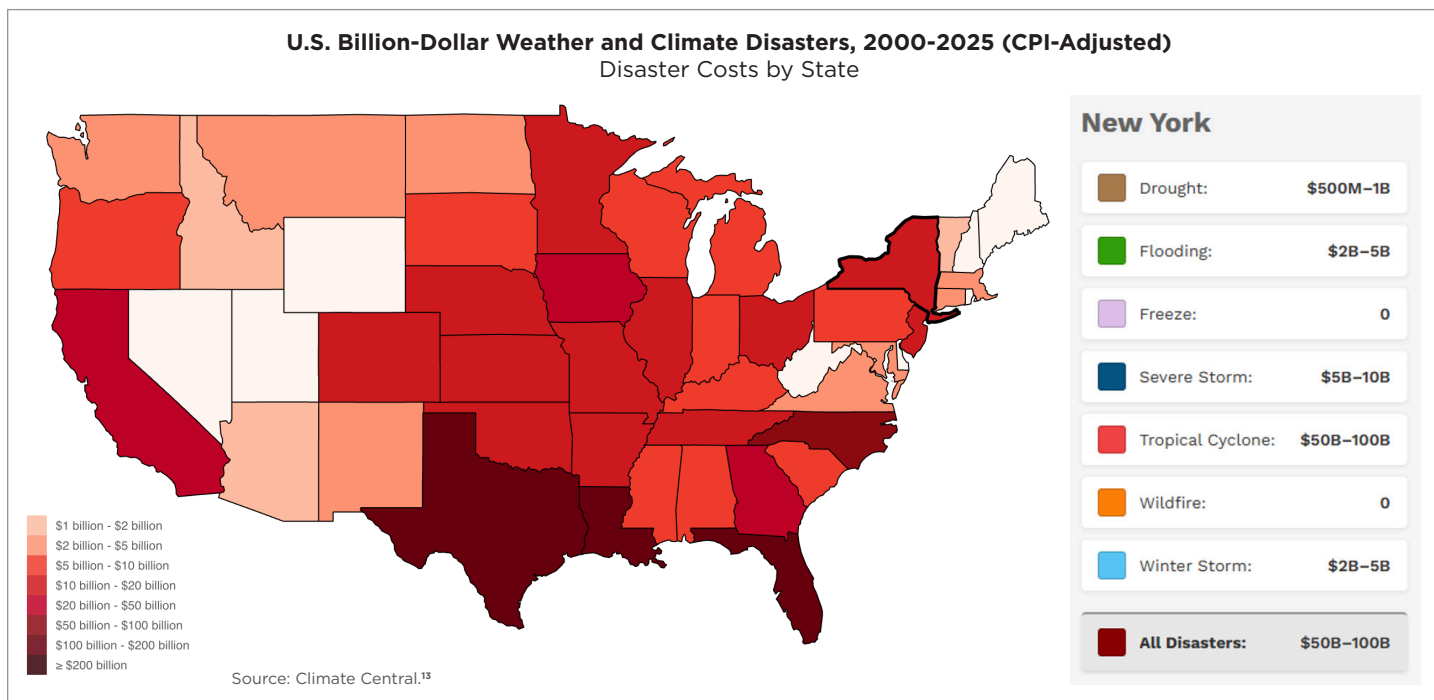
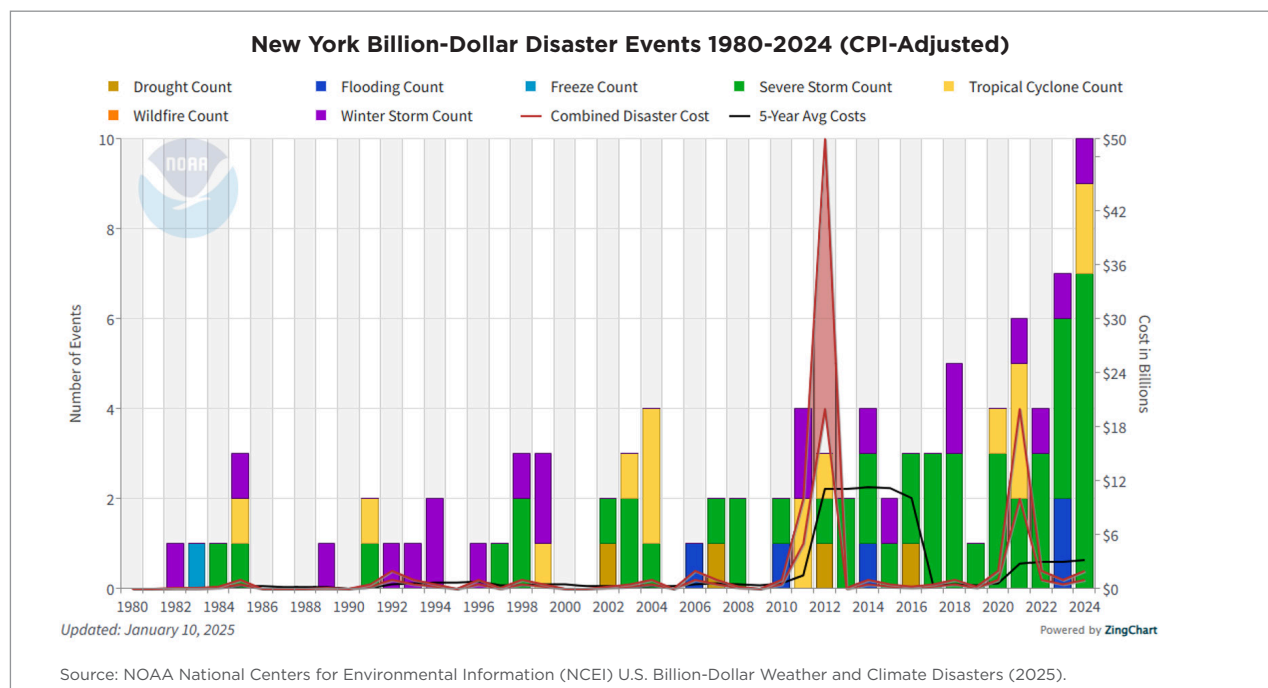
9 <https://www.spglobal.com/market-intelligence/en/news-insights/articles/2025/1/us-homeowners-rates-rise-by-double-digits-for-2nd-straight-year-in-2024-87061085>.

10 S&P approved rate filings from 2019 – 2024: Countrywide, the effective rate change from over this period was +44.9%, including +24.4 from 2023-2024. For New York, the effective rate change was roughly half the national values; +23.1% from 2019-2024, including +12.1 between 2023-2024. See: <https://www.spglobal.com/market-intelligence/en/news-insights/articles/2025/1/us-homeowners-rates-rise-by-double-digits-for-2nd-straight-year-in-2024-87061085>.

11 <https://www.swissre.com/institute/research/topics-and-risk-dialogues/climate-and-natural-catastrophe-risk/changing-climates-heat-is-still-on.html>.

12 <https://www.ncei.noaa.gov/access/billions/state-summary/NY>.

reflects both greater frequency and severity of extreme weather, including tropical cyclones, severe storms, and winter events. In fact, the most recent five-year average for New York is 6.2 major events per year, nearly triple the long-term average of 2.1, with losses outpacing those in surrounding northeastern states (see map of U.S. billion-dollar disasters below). These trends underscore a growing risk environment driven by climate change and expanding development in vulnerable areas, making resilience and adequate insurance coverage more critical than ever.



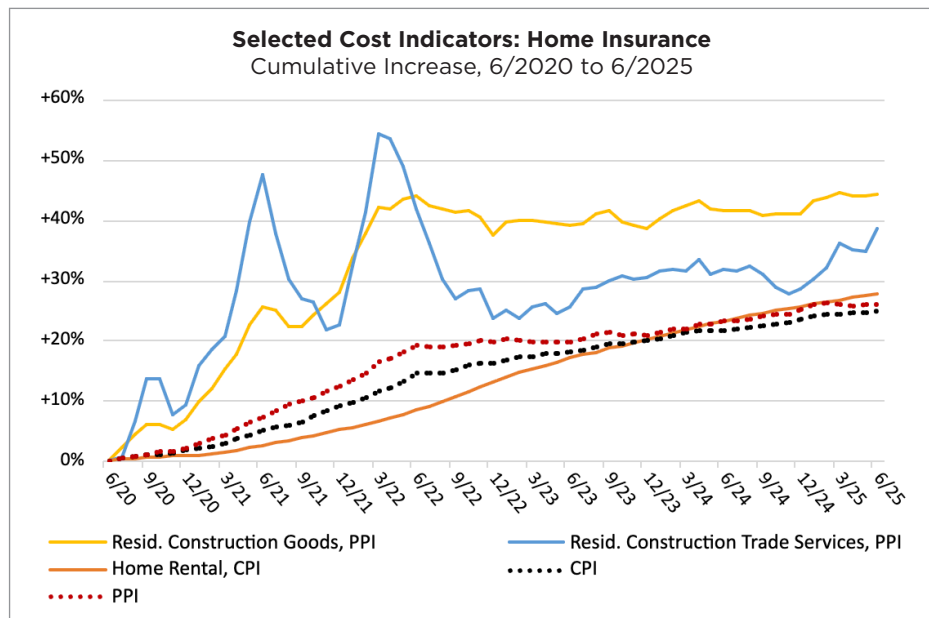
13 Climate Central at <https://www.climatecentral.org/climate-services/billion-dollar-disasters/mapping?metric=cost&years=2000-2025> (data as of November 12, 2025).

## Demographic Trends

In addition to the rising costs related to natural disasters, another driver of increased insurance costs is rapid population growth and migration into areas that have either traditionally been or are becoming catastrophe prone. In New York, demographic shifts and lifestyle preferences have fueled development in coastal and high-risk areas. At the same time, homes being built today are not only more numerous but also larger and more expensive, reflecting both consumer demand and inflationary pressures on land, labor, and materials. These trends mean that when disasters strike, the cost to repair or rebuild is significantly higher than in previous decades. As a result, the combination of increased exposure, rising property values, and more complex construction amplifies the impact of insurance costs on consumers and underscores the importance of aligning rates with actual risk.

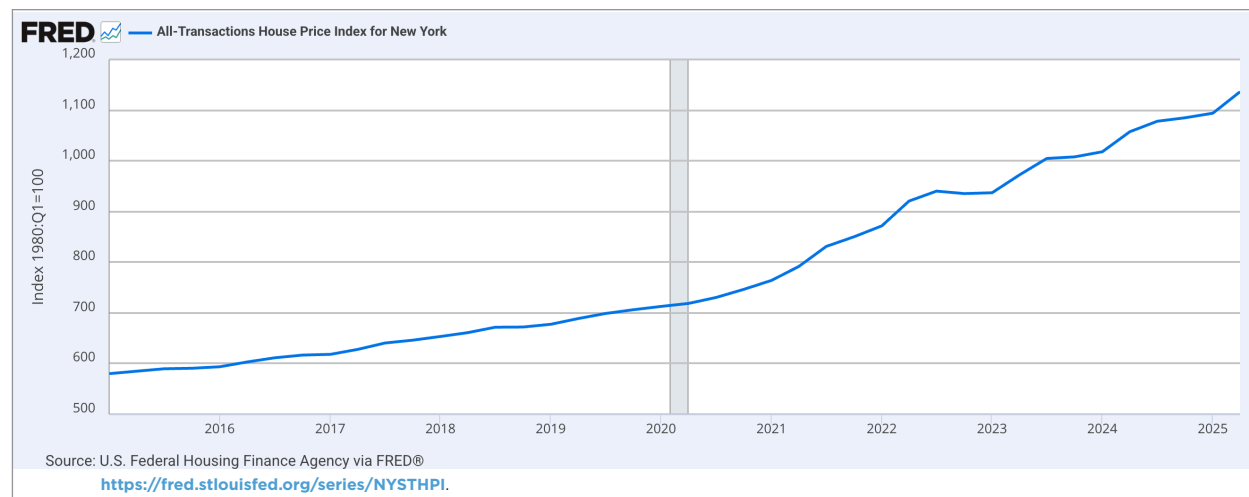
## Inflation in Construction Materials and Labor (Building Costs)

Economic inflation has significantly increased the cost of rebuilding and repairing homes. According to the U.S. Bureau of Labor Statistics, nationally, construction materials costs rose 44 percent and related labor costs rose 39 percent over the five years ending June 2025, far in excess of the CPI (see graph below). Building replacement values have surged by 44 percent since 2019, while home values have increased by 50 percent, far outpacing the growth in insurance rates.



According to the U.S. Federal Housing Finance Agency's House Price Index, home values in New York State have surged by 94 percent over the past decade (see graphic below). Some NYC neighborhoods saw price growth of 100 percent to 288 percent over the last decade, driven by gentrification, climate resiliency investments, and demand for larger homes in coastal areas.<sup>14</sup> While this increase is not directly tied to property insurance rates, it underscores a critical reality: more expensive housing stock means higher costs to rebuild or repair after natural disasters. As construction materials and labor expenses rise alongside property values, insurers must account for these factors to ensure adequate coverage and financial protection for homeowners.

<sup>14</sup> <https://www.propertyshark.com/Real-Estate-Reports/2025/06/03/double-in-a-decade-nyc-neighborhood-price-growth/>.

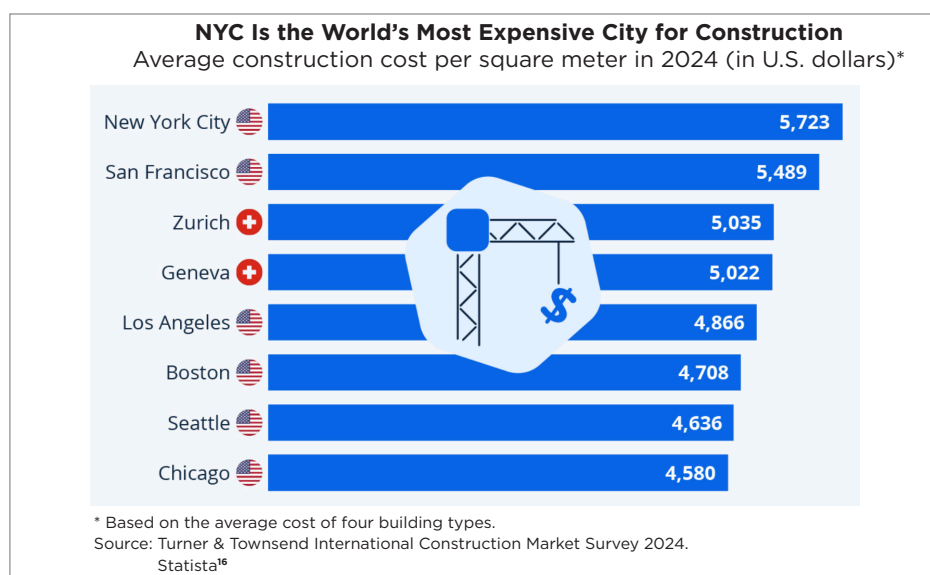


In NYC, residential construction costs are among the highest in the nation, driven by a combination of elevated labor rates, material costs, regulatory complexity, and logistical challenges unique to the urban environment. The annual increase in residential reconstruction costs for New York is shown in the table below. As of early 2025, the cost to build a standard single-family home in NYC ranges from \$400 to \$800 per square foot, with luxury construction exceeding \$1,200 per square foot. These figures reflect not only the price of materials and skilled labor but also the added costs of transporting and staging materials in dense urban neighborhoods.<sup>15</sup>

**Table 1. Residential Reconstruction Cost Increases, 2018-2025**

|                         | Nov 2018 -<br>Nov 2019 | Nov 2019 -<br>Nov 2020 | Nov 2020 -<br>Nov 2021 | Nov 2021 -<br>Nov 2022 | Nov 2022 -<br>Nov 2023 | Nov 2023 -<br>Nov 2024 | Nov 2024 -<br>Nov 2025 |
|-------------------------|------------------------|------------------------|------------------------|------------------------|------------------------|------------------------|------------------------|
| <b>New York Average</b> | 2.5%                   | 8.8%                   | 9.1%                   | 8.5%                   | 4.3%                   | 5.2%                   | 3.4%                   |
| <b>New York City</b>    | 1.1%                   | 8.8%                   | 15.5%                  | 7.5%                   | 5.0%                   | 6.9%                   | 5.3%                   |
| <b>Long Island</b>      | 2.5%                   | 6.6%                   | 9.0%                   | 6.7%                   | 2.1%                   | 7.4%                   | 2.5%                   |

Source: Verisk



<sup>15</sup> <https://nycestimatingservices.us/how-much-does-it-cost-to-build-a-house-in-nyc/>.

<sup>16</sup> [https://www.statista.com/chart/25409/average-construction-cost-per-square-meter/?srsltid=AfmBOosB61sKZ\\_ztcj5kVGVR8gPnehuzfB-dPkPL\\_K-acYRka\\_Og1wA6](https://www.statista.com/chart/25409/average-construction-cost-per-square-meter/?srsltid=AfmBOosB61sKZ_ztcj5kVGVR8gPnehuzfB-dPkPL_K-acYRka_Og1wA6).



### Legal System Abuse and Social Inflation

Litigation costs are a major driver of insurance expense. Swiss Re's Social Inflation Index shows that liability claims in the U.S. have increased by 57 percent over the past decade, with social inflation<sup>17</sup> contributing 7 percentage points to claims growth in 2023 alone.<sup>18</sup> This trend is fueled by mega-verdicts, third-party litigation funding, and expanded tort liability. To keep up with rising costs from social inflation—bigger and more expensive lawsuits—insurers have had to set aside an extra \$40 billion in reserves over the past decade to ensure they can pay future claims.<sup>19</sup>



The general liability lines have experienced 10-year average combined ratios exceeding 114 percent due to litigation and adverse legal environments.<sup>20</sup> When the combined ratio exceeds 100 percent, insurers paid out more money to cover losses and expenses than they were able to collect in premiums. Legal system abuse and potential reforms are discussed in more detail below.

### Government Regulatory Interference

Regulatory actions—such as coverage mandates, rate suppression, and delayed rate approvals—can exacerbate affordability and availability issues. These policies interfere with insurers' ability to price risk accurately and maintain solvency. When rate approvals are delayed or constrained, insurers may be unable to respond to rising loss costs driven by inflation, climate-related events, and increased litigation expenses. This can lead to reduced participation in the market or more conservative underwriting practices, particularly for properties with higher risk profiles. New York's regulatory environment is covered in more depth below.

### Uninsurance and Underinsurance

While most homeowners with mortgages are required to carry insurance, gaps in coverage remain a concern. Some policies may not fully reflect current rebuilding costs, given inflation in construction materials and labor. Standard homeowners policies also exclude flood damage, yet many residents mistakenly believe they are covered. These misconceptions leave families financially vulnerable. The problem extends to renters, where insurance take up remains low, despite its affordability and importance in protecting personal property.

## NEW YORK'S NATURAL CATASTROPHE EXPOSURE

New York faces significant exposure to natural hazards, including hurricanes, coastal flooding, severe winter storms, and inland flooding. FEMA's National Risk Index (NRI), ranks New York among the highest-risk states due to its dense population, high property values, and vulnerability to multiple perils (for more information, refer to the APPENDIX). Expected Annual Loss (EAL)<sup>21</sup> for the state is driven primarily by coastal flooding, hurricanes, strong winds, and winter weather, reflecting the state's mix of urban coastal areas and inland regions.

17 Swiss Re defines social inflation as the "increased severity of insurance claims beyond that which can be explained by economic drivers". <https://www.swissre.com/institute/research/sigma-research/sigma-2024-04-social-inflation.html>.

18 <https://www.swissre.com/press-release/Litigation-costs-drive-US-liability-claims-by-57-over-past-decade-reveals-Swiss-Re-Institute/0b538159-9648-47da-a152-4550a7640d35>.

19 <https://www.insurancejournal.com/news/international/2025/09/26/840755.htm>.

20 <https://www.insurancejournal.com/blogs/iat/2025/03/21/813836.htm>.

21 The NRI calculates Expected Annual Loss (EAL) by combining hazard frequency, exposure, and vulnerability.



Catastrophic events have already caused multi-billion-dollar impacts. Hurricane Sandy (2012) alone resulted in an estimated \$19 billion in damages statewide, disrupting infrastructure, housing, and economic activity. Severe winter storms and flash floods have further escalated costs. A recent report from the New York State Comptroller shows that billion-dollar weather disasters have occurred with increasing frequency since 1980, and federal disaster aid to New York has averaged \$958.6 million annually since 1998, underscoring the scale and persistence of these risks.<sup>22</sup>

Compared to neighboring states like Connecticut, Massachusetts, and New Jersey, New York's risk profile is amplified by its large coastal exposure and concentration of high-value assets in New York City and Long Island. While all Northeast states face winter storm and flood risks, New York's combination of urban density and critical infrastructure means even moderate hurricanes or floods can cause tens of billions of dollars in losses. FEMA's NRI data and state hazard mitigation plans consistently rank New York among the highest-risk states in the region

The New York State Comptroller's report, *Ten Years After Sandy—Barriers to Resilience* (October 2022)<sup>23</sup> underscores this vulnerability and warns that the likelihood of devastating coastal flooding has only increased. Key findings include:

- 79% of citywide land designated for transportation and utility infrastructure lies within the current 100-year floodplain.
- 67% of open space and recreation areas are also in the floodplain.
- 46% of the city's industrial and manufacturing zones are similarly exposed.

These exposures have implications not only for homeowners insurance but for all property-related coverages.

### Hurricane Exposure

According to catastrophe modeling firms, cities like New York are among the highest-risk areas for potential insured losses from major hurricanes.<sup>24</sup> Industry analyses warn that a major hurricane striking the New York metropolitan area could generate insured losses exceeding \$100 billion and total economic losses well over \$200 billion, given current exposure levels and inflation-adjusted rebuilding costs.<sup>25, 26</sup> These figures place New York in the same category as other high-risk coastal states like Florida and Texas for “peak loss” scenarios, even though such events are less frequent in the Northeast. To put this into perspective, a hurricane causing \$100 billion in insured losses would equal more than a dozen years' worth of homeowners premiums collected in New York alone.



The devastation caused by Hurricane Sandy in 2012 illustrates the scale of potential impacts. By mid-2013, approximately \$7.8 billion in federal aid had been authorized for lower New York, and private insurers paid roughly \$9.6 billion in claims.<sup>27</sup> In New Jersey, federal aid totaled \$5.5 billion, with insurers settling an estimated \$6.3 billion in claims. These figures reflect the cost of a single event. For context, total homeowners insurance premium volume in New York and New Jersey combined was less than \$11 billion in 2023, according to the NAIC.

22 <https://www.stateregstoday.com/business/natural-disaster/economic-impact-of-natural-disasters-in-new-york>.

23 <https://comptroller.nyc.gov/reports/ten-years-after-sandy/#:~:text=Superstorm%20Sandy%20made%20landfall%20in%20New%20York,stations%20Difficulty%20traveling%20and%20delivering%20vital%20goods>.

24 KCC White Paper: The \$100 Billion Hurricane – How and where it Can Happen, August 2025.

25 <https://www.swissre.com/risk-knowledge/natcat-2025.html>.

26 [https://www.verisk.com/company/newsroom/insurance-industry-faces-average-annual-natural-catastrophe-losses-of-\\$133b-a-new-high-according-to-verisk-report/](https://www.verisk.com/company/newsroom/insurance-industry-faces-average-annual-natural-catastrophe-losses-of-$133b-a-new-high-according-to-verisk-report/).

27 U.S. Department of Commerce: Economic Impact of Hurricane Sandy – Potential Economic Activity Lost and Gained in New Jersey and New York; September 2013.

Recent research from 2025 further emphasizes the growing risk in the Northeast. Hurricane-exposed areas along the eastern seaboard, including New York and Boston, are projected to see the steepest relative increases in insured losses, with New York facing an estimated 64 percent increase.<sup>28</sup> More than 2 million homes in New York are at moderate or greater risk of hurricane wind damage, with a total reconstruction cost exceeding \$1.2 trillion.<sup>29</sup>

### Flooding

Flash flooding has become an increasingly pressing concern in New York, especially in densely populated areas like New York City. Recent events, including the October 2025 storm that killed two residents and flooded major infrastructure, underscore the growing severity and frequency of flash floods.<sup>30</sup> Despite the risk, flood insurance coverage remains alarmingly low. Standard homeowners policies do not cover flood damage, and it's estimated that only 3 percent of residential properties in New York carry flood insurance.<sup>31</sup>



This gap leaves millions of residents financially vulnerable. And although around 171,000 policies are in force through the National Flood Insurance Program (NFIP), NFIP coverage is often limited.<sup>32</sup>

Since 2015, New York City has actively opposed FEMA's efforts to expand coastal floodplain maps to include additional neighborhoods, due to the requirement that homeowners in those areas purchase flood insurance. While this resistance is rooted in concerns about affordability and property values, it has also contributed to a broader misunderstanding among residents. When these areas flood, standard homeowners policies do not cover the damage, leading to frustration and the inaccurate perception that insurers are failing to honor their commitments. This highlights the urgent need for improved public education on flood risk and insurance coverage, as well as coordinated efforts to close the protection gap.

New York also exhibits one of the largest dollar gaps between homes located in FEMA-designated Special Flood Hazard Areas (SFHAs) and homes that actually face severe or extreme flood risk under more comprehensive models. According to analysis by First Street Foundation, the gap in exposure is estimated at \$95.3 billion for New York, \$65.6 billion for Los Angeles, and \$54.9 billion for San Francisco.<sup>33</sup> This discrepancy highlights a critical issue: FEMA flood maps, while essential for regulatory and insurance purposes, often underrepresent the true extent of flood risk because they do not fully account for factors such as climate change, rainfall-driven flooding, and future sea-level rise. As a result, many properties outside SFHAs remain uninsured despite being highly vulnerable to flood risk.

The implications for New York are significant, particularly for coastal areas like New York City and Long Island. A major storm surge event—similar to or exceeding Hurricane Sandy—could cause tens of billions of dollars in uninsured losses, compounding economic disruption and recovery challenges.

28 Journal of Catastrophic Risk and Resilience: Insured U.S. Hurricane Loss Under a 2°C Warmer Climate; June 2025.

29 Cotality: Hurricane risk 2025: Outpriced and underwater; May 29, 2025.

30 <https://www.yahoo.com/news/articles/nearly-15-million-people-across-171733120.html>.

31 [https://citylimits.org/what-new-yorkers-should-know-about-flood-insurance-where-to-get-it/?utm\\_source=chatgpt.com](https://citylimits.org/what-new-yorkers-should-know-about-flood-insurance-where-to-get-it/?utm_source=chatgpt.com).

32 [https://www.fema.gov/sites/default/files/documents/fema\\_new-york-state-profile\\_04-2025.pdf?utm\\_source=chatgpt.com](https://www.fema.gov/sites/default/files/documents/fema_new-york-state-profile_04-2025.pdf?utm_source=chatgpt.com).

33 <https://help.firststreet.org/hc/en-us/articles/360048502394-Why-a-property-s-FEMA-zone-does-NOT-impact-its-Flood-Factor>.

## COMMERCIAL INSURANCE CONSIDERATIONS

Much of New York's commercial building stock is aging and not designed to withstand today's growing natural catastrophe exposure. Older electrical and mechanical systems, outdated roofing, and insufficient disaster protections increase vulnerability and drive higher loss costs. Insurers must price for this risk, which can lead to premium increases or coverage restrictions. Without investment in property hardening, loss frequency and severity will continue to escalate.



New York law prohibits insurance discrimination against affordable housing providers and Section 8 voucher recipients, as codified in the 2024 budget and enforced by DFS. Insurers do not base underwriting decisions on tenant income or voucher status; rather, pricing reflects objective risk factors such as building condition, location, and loss history. APCIA and its members remain committed to compliance with these requirements and to working with DFS to ensure fair access to coverage for all housing providers.

### Crime

Commercial property policies typically cover theft and vandalism, subject to deductibles and limits. However, elevated crime rates pose significant challenges for the commercial insurance market, particularly for multifamily properties. Rising incidents of property crime and theft in multifamily communities increase liability exposure and security costs, which insurers typically may factor into underwriting decisions. Research shows that as violent crime increases, property vacancies also increase, which further compounds risk for insurers.<sup>34</sup> These dynamics illustrate how crime trends can directly influence insurance for multifamily housing in New York and underscore the importance of mitigation and security improvements. Such measures help maintain coverage availability while managing risk.

### Legal System Abuse

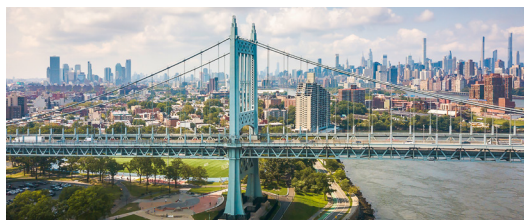
Legal system abuse is creating significant challenges for commercial insurers serving multifamily property owners. Escalating litigation trends—such as nuclear verdicts, aggressive plaintiff tactics, and third-party litigation funding—are driving up claim severity well beyond economic inflation. Industry analyses estimate these factors have added hundreds of billions in liability costs nationwide over the past decade. For multifamily properties, this often translates into higher premiums for general liability and umbrella coverage, stricter underwriting standards, and reduced availability of high-limit policies. Large jury awards and prolonged legal battles can erode reserves and destabilize pricing models, forcing carriers to balance risk appetite with the need to remain solvent in an environment of social inflation and unpredictable litigation outcomes. Additional discussion of legal system abuse and common sense solutions is provided later in this testimony.

According to Verisk, the most recent data for policies issued in 2022 shows insurers paid more than 94 cents of claims and expense costs for every dollar of premium collected for New York general liability coverage on apartments—excluding operational costs such as acquisition, underwriting, administration, or overhead. The five-year average (2018–2022) was even higher at 96 cents. In New York City, the ratio was more than 93 cents for 2022 policies, and averaged \$1.01 over the same five-year period. When factoring in operational costs, these figures represent an operating loss for insurers.

## NEW YORK'S REGULATORY ENVIRONMENT

APCIA supports reasonable and balanced efforts that promote both the availability and affordability of homeowners and multi-family property insurance. A healthy, competitive insurance market—supported by sound regulation—is the best mechanism to deliver value and protection to consumers.

<sup>34</sup> New York Life Real Estate Investors, *Crime Doesn't Appreciate Commercial Real Estate*, CRE Finance World, 2020.



The New York insurance market is among the most rigorously regulated and competitive in the nation. The Department of Financial Services (DFS) enforces a robust regulatory framework to ensure rates and forms are not excessive, inadequate, or unfairly discriminatory, and that insurers remain financially sound. Among its many consumer protection provisions, New York law imposes strict limitations

on nonrenewals of homeowners insurance policies. Once a policy has been in effect for 60 days, insurers are generally prohibited from canceling or non-renewing it for a three-year period, except under specific circumstances such as nonpayment of premium, fraud, or significant changes in property condition.<sup>35</sup>

While these protections are designed to ensure coverage stability for consumers, they can also create market friction. Insurers facing rising loss costs or deteriorating risk profiles may be unable to adjust their portfolios promptly, leading to reduced appetite for new business or withdrawal from certain geographic areas. This dynamic can contribute to coverage availability challenges, particularly in high-risk zones like coastal New York and flood-prone urban areas.

### Rate Approval Delays

DFS is widely recognized as a tough and thorough regulator, ensuring actuarial soundness and consumer fairness. However, persistent staffing shortages in recent years have contributed to longer approval timelines for insurance rate filings. In fact, New York stands out for its lengthy insurance rate approval process.

According to Perr + Knight, the median number of days from filing submission to approval or disposition for homeowners rate filings was 233 days for the 12-month period ending June, 30, 2025—the second longest in the nation.<sup>36</sup> In practice, many insurers report that approvals often take much longer, sometimes extending into years, due to the complexity of the review process and the need to withdraw and refile submissions.

These extended timelines create significant friction in the market, limiting insurers' ability to respond swiftly to rising costs and evolving risk conditions. Prolonged uncertainty can affect pricing stability, market competitiveness, and ultimately, consumer access to coverage.

To address this challenge, APCIA supports legislation which would allow DFS to hire outside consultants to assist with filing reviews (S5321/A4259). This would ensure that DFS is able to promptly review filings while it continues to work to fill vacant positions. Supporting this legislation reflects our commitment to a well-functioning regulatory system and underscores a practical step the legislature can take to strengthen DFS operations and improve market responsiveness.

### Cross-Subsidization

As highlighted in our August 25, 2025 letter to several Senate Committees<sup>37</sup> investigating residential insurance, property and casualty insurers underwriting residential property insurance policies do not cross-subsidize between states. Ratemaking regulation and actuarial professional standards generally mandate that the price of risk reflect costs associated with the risk transfer, so rates in a particular state are based on the claims experience and projections for that specific state.

Some have suggested that insurers offset losses in one state by raising rates in another, or may exploit less regulated markets to boost profits. This is a misconception. Insurers cannot arbitrarily raise rates to “make up” for losses elsewhere—such filings would be rejected by regulators.

Furthermore, if excess profits were possible in any state, new entrants would quickly increase competition and drive rates down. This system ensures that premiums reflect local risk factors, not cross-subsidization.

Thus, in the same way there is no evidence that insurers are shifting resources out of profitable markets in New York to unprofitable markets elsewhere, there is likewise no evidence that insurers ever shifted resources from profitable lines of business in other states into unprofitable lines in New York—such as personal and commercial auto insurance in recent years. New York policyholders can be confident that their premiums are determined by the actual risk and claims experience in New York—not by losses or profits in other states.

<sup>35</sup> [https://www.dfs.ny.gov/consumers/help\\_for\\_homeowners/insurance/cancellations\\_and\\_nonrenewals](https://www.dfs.ny.gov/consumers/help_for_homeowners/insurance/cancellations_and_nonrenewals).

<sup>36</sup> Perr + Knight, State Filings Pulse, 2025 Q2 Edition, September 29, 2025.

<sup>37</sup> New York State Senate Standing Committee on Investigations and Government Operations; Standing Committee on Housing, Construction, and Community Development; and Standing Committee on Insurance (collectively the “Committees”).

## SOLUTIONS

To stabilize New York's insurance market and protect consumers, a multi-pronged approach is needed—one that combines risk mitigation, public policy incentives, and regulatory flexibility. By reducing risk at the source and enabling insurers to tailor coverage, the state can preserve consumer access to affordable, adequate insurance while strengthening resilience against future catastrophes.

### Property Mitigation and Home Hardening

One of the most effective ways to reduce losses—and therefore insurance costs—is through property hardening. Studies show every \$1 spent on mitigation saves up to \$13 in recovery costs,<sup>38</sup> making this a high-return investment for states and homeowners alike. Actions such as installing impact-resistant roofing, upgrading windows and doors, elevating structures in flood-prone areas, and improving drainage systems can significantly lower risk.

Florida's My Safe Florida Home Program demonstrates the power of state-backed mitigation incentives:

- Provides free wind mitigation inspections and matching grants up to \$10,000 for improvements like impact windows, hurricane shutters, and roof reinforcements.
- Since its relaunch in 2022, the program has received \$576 million in legislative funding, inspected 178,000+ homes, and helped thousands of homeowners harden properties against hurricanes.

Alabama's Strengthen Alabama Homes Program offers another proven model:

- Grants up to \$10,000 for homeowners to meet IBHS FORTIFIED Roof standards.
- Over 8,700 homes have been fortified through state grants; more than 53,000 homes statewide now meet FORTIFIED standards.
- A University of Alabama study found that if all homes impacted by Hurricane Sally had met FORTIFIED standards, insurers would have saved \$112 million in payouts and policyholders \$35 million in deductibles. Loss frequency dropped by up to 74 percent, and claim severity decreased by 15–40 percent.<sup>39</sup>

New York could adopt and enforce stronger safety codes and above-code building standards, and require risk disclosures for real estate transactions in high-risk regions. Additionally, New York could create models similar to Florida and Alabama, or offer a variety of incentives for increasing individual and community level resilience:

- **Grants** — States or local communities can establish resilience grant programs to help property owners. Programs could include a cost-share match from the property owner or through a public-private partnership.
- **Low interest loans** — States or local communities can establish a revolving fund that helps provide loan interest loans for resilience projects. Alternatively, financial institutions may provide options to incorporate funding for mitigation into mortgage costs, to spread over 20-30 years, or through a home equity line of credit (HELOC).
- **Waive/reduce fees** — Communities can provide a rebate, waive, or reduce building permit fees or the cost of designation program inspections, for properties that achieve a qualified resilience designation, such as IBHS FORTIFIED.
- **Tax credits** — Similar to energy efficiency tax credits, states or local communities can provide a variety of resilience tax credits, such as income tax credits for costs to retrofit homes or businesses, sales tax credits for materials purchased to retrofit, or property tax credits for properties that achieve and/or maintain a resilience designation.

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38 [www.nibs.org/wp-content/uploads/2025/04/ms\\_v4\\_overview.pdf](http://www.nibs.org/wp-content/uploads/2025/04/ms_v4_overview.pdf).

39 <https://www.insurancejournal.com/news/southeast/2025/05/28/825141.htm>.



- *Insurance Incentives* — States can encourage insurers to provide premium credits for resilience actions.
- *Return on Investment* — States and local communities can promote potential return on investment (ROI) benefits from resilience, such as, for example, increased property resale values, improving insurability, and avoided loss costs, such as insurance deductibles or other loss related expenses that may occur following a disaster.
- *Protect the Irreplaceable* — States and local communities should also promote resilience benefits that cannot be quantified, or replaced (in some cases), following a loss, such as heirlooms, lives, and peace of mind.

### Government and Policy Incentives

Policymakers play a critical role in shaping a resilient housing market. Beyond funding mitigation programs, state and local governments can streamline permitting for resilience retrofits, mandate stronger building codes, and create public-private partnerships to expand access to risk-reduction resources. These measures reduce reliance on insurers to absorb catastrophic losses and help maintain affordability by lowering the underlying risk. Other states have shown success:

- Florida and Alabama recognize the importance of a holistic approach to financial incentives, including actuarially appropriate insurance discounts, which together are all aligned and reinforcing the same desired action.
- FEMA's Hazard Mitigation Assistance grants and similar programs can supplement state efforts, leveraging federal dollars for local resilience projects.

### Importance of Rate and Form Flexibility

Regulatory flexibility is essential for insurers to offer products that meet diverse consumer needs and budgets. Tools such as tiered deductibles, adjustable policy limits, and optional endorsements for specific risks allow customization and cost control. Similarly, permitting exclusions for high-risk features gives consumers choice without forcing insurers to withdraw from markets entirely. Flexibility in rate filings and policy forms ensures that insurers can respond quickly to changing risk conditions and maintain solvency while still providing coverage options.

### Legal System Abuse Reforms

New York's courts have become a playground for fraudsters and opportunistic trial lawyers, while New York residents pay the high costs. New York City's dramatic rise to the top of this year's **2024-2025 Judicial Hellholes® report and rankings**, is the result of a civil justice system in crisis. As a result, New York's litigation costs are 67 percent higher than the national average, driven by excessive lawsuits, inflated settlements and verdicts, and a legal environment that encourages fraud.<sup>40</sup>

With the second-highest tort costs in the nation, New Yorkers pay over \$7,000 per household - well above the national average of \$5,215.<sup>41</sup> For claims involving bodily injury, claims costs in New York are 4.5 times higher than in neighboring Connecticut and Massachusetts, and 6.6 times larger than the rest of the nation.<sup>42</sup>

The state also loses more than 418,000 jobs annually due to excessive tort costs, and New York businesses spent a massive \$88.6 billion due to frivolous lawsuits.<sup>43</sup> Data shows that if lawmakers enacted specific reforms targeting lawsuit abuse, the state could boost its economy by \$45.6 billion.<sup>44</sup>

40 Partnership for NYC, Excessive Litigation is Driving NY's Affordability Costs, Sept. 2025 at <https://pfnyc.org/research/excessive-litigation-is-driving-new-yorks-affordability-crisis>.

41 The Perryman Group, US Tort Costs Report, April 2025.

42 Partnership for NYC, Excessive Litigation is Driving NY's Affordability Costs, Sept. 2025.

43 *Id.*

44 <https://cala.com/wp-content/uploads/2024/01/Perryman-Impact-of-Tort-Reform-10-27-2023.pdf>

Several key legal system abuse policy issues are especially responsible for driving up costs, including New York's unique Labor Law 240, or "Scaffold Law," which imposes strict liability on employers, contractors and premises owners for gravity related injuries, even if the injured party is largely at fault. Scaffold Law-related costs are estimated to consume \$785 million in public funds each year.

According to the Empire State Chapter of the Associated Builders and Contractors, insurance costs on construction projects have risen from 4 percent in 2010 to over 12 percent by 2023-2024.<sup>45</sup> Even schools are affected, with the New York State School Boards Association reporting that Scaffold Law-related insurance and liability expenses cost upstate New York schools approximately \$200 million annually.<sup>46</sup>



Further inflating insurance and liability costs are widespread fraudulent insurance claims and staged accidents, many of which emanate from the Scaffold Law. The growing number of staged construction and slip and fall accidents, some involving indigent and homeless people who underwent inflated or unnecessary medical care, has also been well documented. These insurance claims schemes, the focus of multiple recently filed anti-racketeering lawsuits, involve a referral web of unscrupulous plaintiff attorneys, third-party litigation funders and medical providers who build up claims damages and then share in the inflated recoveries, often to the detriment of the injured party.

In order to combat what has been coined as New York's "fraudemic", legislation must be enacted that disincentivizes staged accidents and insurance fraud. For example, APCIA supports Senate Bill S.5231 which would make staging a construction site accident a class E felony.

New York also leads the nation in nuclear verdicts — verdicts which include exceptionally high jury awards. To that end, New York ranks second nationally per capita for high-dollar awards in personal injury trials. The median nuclear verdict in New York is a staggering \$20 million, with recent examples including a \$287 million product liability verdict and a \$72.5 million negligence award.<sup>47</sup>

Premises liability cases' share of total nuclear verdicts is markedly higher in New York than in the rest of the country (14%). This is partially due to the Scaffold Law, which is a significant contributor to the size and frequency of nuclear verdicts in New York.<sup>48</sup> Two notable trials of Scaffold Law claims resulted in a \$48 million verdict in 2022 and a \$53.5 million verdict in 2023.

The skewed abundance of nuclear verdicts in New York is driven by a variety of plaintiff-friendly factors, including a lack of damage caps. Unlike many other states, New York does not have a statutory limit on awards for noneconomic damages. According to many research studies, including a recent Rand report, introducing a reasonable cap on non-economic damage awards would lower costs and provide a more predictable underwriting environment.

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<sup>45</sup> <https://www.lawleyinsurance.com/risk-management/scaffold-law/>.

<sup>46</sup> *Id.*

<sup>47</sup> US Chamber of Commerce Study on Nuclear Verdicts, Nov. 2024.

<sup>48</sup> *Id.*



Additionally, New York has been identified as among the top four most attractive states for third party litigation financing (TPLF).<sup>49</sup> Studies demonstrate that unchecked TPLF fuels nuclear awards and settlements. Unlike a growing number of states, New York does not currently require regulation or disclosure of Third Party Litigation Financing, nor does the state require disclosure of Third Party Medical Financing, both of which run rampant in NY and contribute to increased claims damages build-up and insurance fraud.

Legislation to regulate TPLF passed both houses of the legislature this year (S1104-A/A804-C) but the bill lacks important provisions requiring disclosure of TPLF in litigation and without disclosure, the purported benefits of the legislation are undermined. Without disclosure of the existence of TPLF in litigation, it will be impossible to monitor compliance with the law. The penalties for violations of the law are very low (maximum \$5,000 fine and only for “knowing” violations), but even these fines will not be triggered if there is no disclosure of the existence of TPLF in a given case. APCIA is urging that provisions requiring disclosure in litigation be added to the bill via a chapter amendment.

Aggressive trial lawyer tactics such as “jury anchoring”, where personal injury lawyers are allowed to urge juries to return supersized non-economic damage amounts untethered to the actual evidence, are allowed to flourish in New York without limitation. According to the *New York Law Journal*, New York’s trend of upwardly spiraling verdicts for pain and suffering is “directly precipitated” by abuses of jury anchoring.

Overly broad consumer protection and disability laws are also causing New York businesses, including small businesses, to suffer economic consequences. Last year, 25 percent of all national food and beverage cases were filed in New York, while the state accounted for 33 percent of all federal lawsuits filed under the Americans with Disabilities Act.<sup>50</sup>

New York lawmakers must meaningfully address legal system abuse and the high costs it imposes on New York businesses, non-profits and consumers.

## CONCLUSION

The convergence of rising catastrophe losses, inflationary pressures, aging infrastructure, legal system abuse and regulatory constraints is straining the affordability and availability of coverage for homeowners and commercial property owners across New York. Without timely action, these pressures will ripple through the housing market, local economies, and community stability—impacting families, small businesses, and vulnerable populations most severely.

While New York benefits from a highly competitive insurance market and robust regulatory oversight, preserving access to coverage and ensuring long-term market stability requires shared responsibility and forward-looking solutions. Insurers are committed to working with policymakers, regulators, and communities to strengthen resilience, improve transparency, and support fair and sustainable insurance practices. This includes incentivizing mitigation, modernizing regulatory processes, and curbing legal system abuses to reduce risk and costs.

Equally important is empowering consumers through education and awareness, ensuring they understand mitigation options and available incentives. By addressing risk at its source and fostering collaboration across all stakeholders, New York can safeguard homes, businesses, and communities—protecting not only property owners but the state’s economic vitality for generations to come.

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49 Marathon Strategies, Corporate Nuclear Verdicts Report, 2025.

50 ATRA’s Judicial Hellholes Report, Dec. 2024.

## APPENDIX

### APPENDIX A: INSURANCE MYTHS AND FACTS

Recent media coverage of New York's property insurance challenges has elevated public awareness—but several articles also contain implied myths or misconceptions about how the insurance industry operates. A New York Times article titled “[Home Insurance Rates in America Are Wildly Distorted. Here's Why.](#)” (July 8, 2024) implied that insurers use profits from one state to offset losses in another through complex financial arrangements. Additional reporting, such as Newsweek's “[How Home Insurers Are Fueling Costs for Americans](#)” (September 15, 2025), has suggested that insurers are major investors in fossil fuels, contributing to climate change and exacerbating the very risks that drive up insurance costs.

Other national publications have contributed to these misconceptions. For example, the Bisnow article, “[Legislators Introduce Bills To Tackle Spiraling Property Insurance Costs](#)” (October 27, 2025) and the City & State NY opinion piece, “[Protect Housing Affordability: Confronting New York's Looming Insurance Crisis](#)” (October 3, 2025) raise concerns that reflect misunderstandings about insurance pricing, regulation, and underwriting practices.

To help clarify these issues, the following section addresses several common myths and presents the facts based on regulatory standards, industry data, and insurer practices.

**Q1: Does the property-casualty insurance industry invest heavily in fossil fuels that are driving climate change?**

**Myth:** Insurers are major investors in fossil fuel companies.

**Fact:** Property-casualty insurers have only a small single-digit percentage of their total assets invested in fossil fuel-related holdings, which include utilities and independent power producers. The vast majority of insurer portfolios are in highly secure assets like government and municipal bonds to ensure claims-paying ability.

**Q2: Do insurers use profits from one state to offset losses in another, charging higher rates where they can?**

**Myth:** Insurers shift costs across states and exploit less regulated markets to boost profits.

**Fact:** State insurance markets are heavily regulated and highly competitive. Rates must be approved by state regulators and cannot be excessive, inadequate, or unfairly discriminatory. Insurers cannot arbitrarily raise rates to “make up” for losses elsewhere—regulators would reject such filings. If excess profits were possible in a state, new entrants would quickly increase competition and drive rates down. This system ensures that premiums reflect local risk factors, not cross-subsidization.

**Q3: Are CEO salaries in the insurance industry excessively high?**

**Myth:** Insurance CEOs earn far more than peers in other industries.

**Fact:** CEO compensation in property-casualty insurance is generally lower than CEOs of comparable-sized companies in other sectors, despite the complexity of managing large investment portfolios that safeguard communities and ensure solvency. Research shows insurance CEOs have smaller salaries and option packages than non-insurance firms of similar size, even though they oversee billions in assets and critical risk management functions.

**Q4: Are insurers intentionally refusing to cover affordable housing due to tenant income or voucher status?**

**Myth:** Insurance companies discriminate against affordable housing providers and refuse coverage based on tenant income or use of housing vouchers.

**Fact:** New York law prohibits insurers from refusing coverage based on income or voucher status. While some insurers previously declined to quote policies for affordable housing, this was often due to objective underwriting concerns such as building condition, location, or loss history—not tenant demographics. The industry supports fair access to coverage and complies with all anti-discrimination regulations.

**Q5: Is the insurance industry profiting unfairly from rising premiums in distressed housing markets?**

**Myth:** Insurers are raising rates arbitrarily and profiting from the crisis in affordable housing.

**Fact:** Insurance rates must be approved by state regulators and cannot be excessive, inadequate, or unfairly discriminatory. Rising premiums reflect increased risk exposure, higher rebuilding costs, and more frequent catastrophic events. In fact, many insurers have exited high-risk markets due to sustained underwriting losses, not excess profits.

**Q6: Is insurance the largest driver of rent increases in affordable housing?**

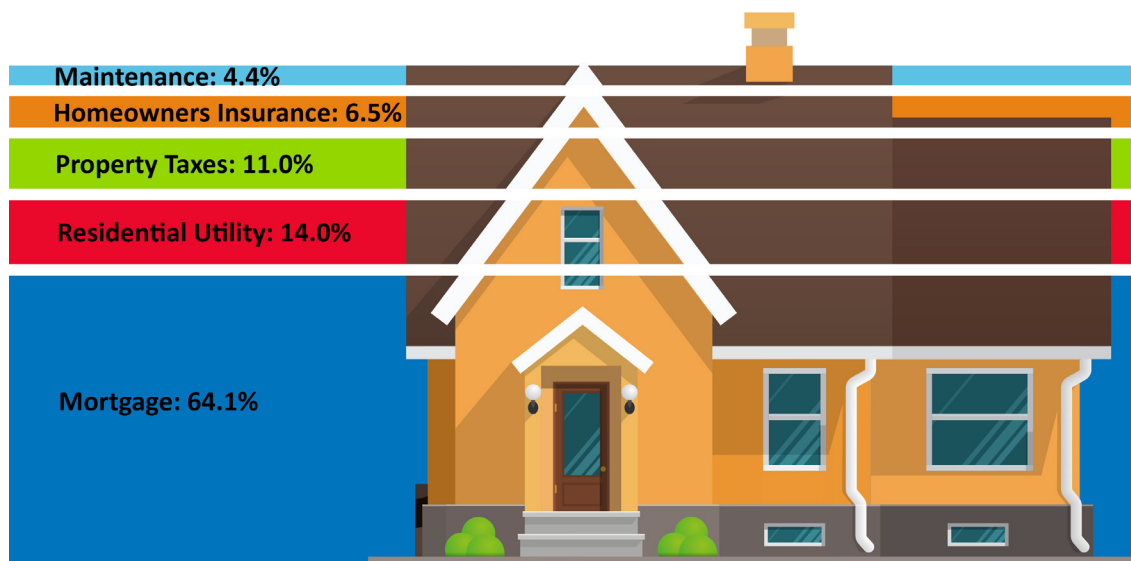
**Myth:** Insurance costs are the primary reason rents are rising in affordable housing developments.

**Fact:** While insurance premiums have increased significantly—especially in high-risk areas—they remain one of several operating cost drivers. Utilities, maintenance, taxes, and financing costs also contribute to rent increases. Insurance is a required and regulated expense, and its impact varies by location and property type.

## APPENDIX B: HOMEOWNERS INSURANCE — A SMALL SLICE OF THE COST OF HOMEOWNERSHIP

When looking at the total cost of owning a home, homeowners insurance represents a relatively modest portion of the overall expense of homeownership. As shown in the graphic below, insurance accounts for 6.5 percent of total costs—just slightly higher than ongoing maintenance (4.4%) but significantly lower than other recurring expenses such as mortgage payments (64.1%), residential utilities (14.0%), and property taxes at 11.0 percent. Like insurance, utilities and property taxes also typically rise over time, highlighting the importance of educating consumers about long-term expenses during the home buying process.

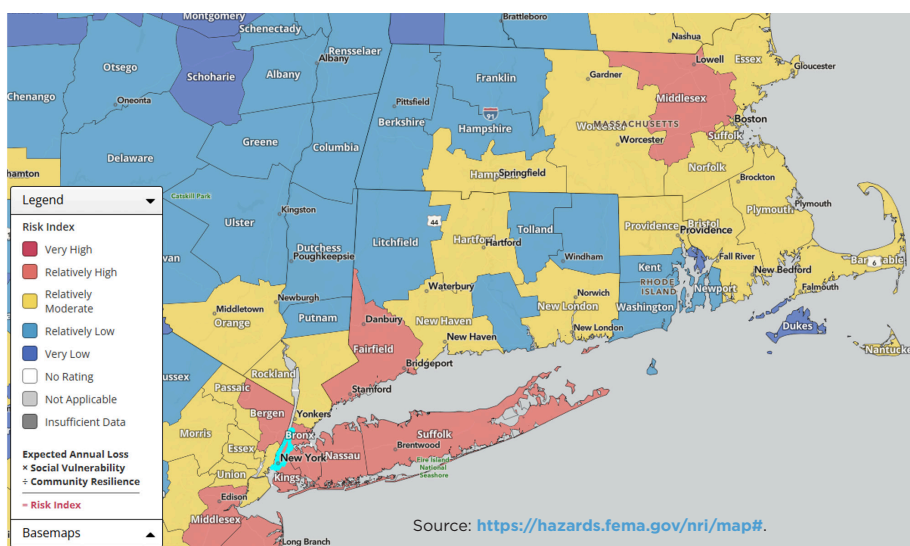
Compared to other expenses associated with owning a home, homeowners insurance represents a relatively small cost. Yet it provides essential protection for a home and belongings, and in fact, for most homeowners, insurance is one of the most cost-effective ways to safeguard their largest asset.



Source: APCIA research based on data from Experian, Statista, ATTOM, Statista, Insurify, Bureau of Labor Statistics.

## APPENDIX C: NATIONAL RISK INDEX ANALYSIS OF NEW YORK CITY AREA

Greater New York City (NYC) represents the highest concentration of both population and insured property value in the state. According to FEMA's National Risk Index, the region faces significantly elevated natural catastrophe risk—ranking within the top 2–4 percent of all U.S. counties. This level of exposure far exceeds the national average and is notably higher than most other parts of the Northeast, even those with similar coastal characteristics. These elevated risk levels contribute directly to the cost and volatility of property insurance in the region.



In NYC, the expected annual loss due to a variety of natural catastrophes is considered very high, driven by high property values and population exposure. NYC has high social vulnerability based on its population demographics. It has moderate community resilience with strong emergency response services, but aging building and dense development pose challenges.

The key risk factors for NYC include:

- **High-value infrastructure:** Dense concentration of commercial and residential buildings.
- **Coastal exposure:** Vulnerability to sea-level rise and storm surge.
- **Transit and utility networks:** Susceptible to flooding and power outages.
- **Population density:** Increases potential human impact and complicates evacuation.

Recent historical events that have resulted in significant economic damage include:

- **Hurricane Sandy (2012):** \$19 billion in damages across NYC (statewide \$32.8 billion).
- **Hurricane Ida (2021):** Record-breaking rainfall and flash flooding; over 6 inches of rain fell in a few hours; NYC issued its first-ever Flash Flood Emergency.
- **Winter Storms:** Notable events in 2003, 2006, 2010, 2016.

**National Risk Index Summary of NYC Area Counties**

| County                     | Risk Index Score | National Percentile | Population   | Key Risk Drivers                                                                                                                                    | Top Natural Hazards                                                                                |
|----------------------------|------------------|---------------------|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| <b>Bronx County, NY</b>    | 96.31 (High)     | Top 4%              | ~1.4 million | Dense urban population, high building value, coastal and riverine flood exposure, very low community resilience, and very high social vulnerability | Strong wind, coastal flooding, hurricane, riverine flooding, ice storm, heat wave                  |
| <b>Kings County, NY</b>    | 98.1 (High)      | Top 2%              | ~2.6 million | High population density, high building value, coastal exposure, very low community resilience, and very high social vulnerability                   | Strong wind, heat wave, coastal flooding, hurricane, riverine flooding, ice storm, winter weather  |
| <b>Nassau County, NY</b>   | 96.7 (High)      | Top 4%              | ~1.4 million | High population density, high building value, coastal exposure.                                                                                     | Winter weather, ice storm, strong wind, coastal flooding, hurricane, riverine flooding, lightning. |
| <b>New York County, NY</b> | 96.18 (High)     | Top 4%              | ~1.7 million | High population density, high building value, coastal exposure, and high social vulnerability                                                       | Strong wind, coastal flooding, hurricane, ice storm, heat wave                                     |
| <b>Queens County, NY</b>   | 97.39 (High)     | Top 3%              | ~2.4 million | High population density, coastal proximity, flat terrain, valuable infrastructure, low community resilience, and high social vulnerability          | Strong wind, heat wave, coastal flooding, hurricane, ice storm, winter weather                     |
| <b>Suffolk County, NY</b>  | 97.1 (High)      | Top 3%              | ~1.5 million | Large geographic area, high building value, coastal exposure                                                                                        | Ice storm, winter weather, strong wind, coastal flooding, hurricane, riverine flooding, lightning  |