Public Comment

From: [redacted]
Sent: Friday, August 28, 2026 9:29 PM
To: PublicComment
Subject: Second Home Owner Eligibility for Coverage

To whom it may concern,

I am a second Home owner in Galveston County, TX. I think cancellation of coverage or ineligibility to qualify for Wind coverage as a second homeowner is discrimination. We are now in an economy where I cannot even sell my home in Crystal Beach due to the down real estate market. Now you want to put yet another financial hardship on me because this is not my primary home. A homeowner is a homeowner. I pay my taxes (at a higher rate) and have paid TWIA premiums for 4 years with no claim ever being filed. This simply is unfair to allow possible future damages to my home to ruin me financially. I would like a refund for past premiums if this is the case. I think you may find yourself in a class action suit if this is passed.

Disappointed,

[redacted]

Public Comment

From: [redacted]
Sent: Friday, August 28, 2026 6:42 PM
To: PublicComment
Cc: [redacted]
Subject: Please Preserve Coverage for TWIA Homes

To the TWIA Legislative and External Affairs Committee:

I am writing to oppose the proposal to limit TWIA residential coverage to owner-occupied homesteads.

I own a second home in Galveston County. Like many coastal homeowners, I carry three separate types of insurance: homeowners, flood, and TWIA. TWIA is not duplicate or optional coverage for us—it provides the wind and hail protection that our regular homeowners policy does not.

I understand TWIA's responsibility to manage its catastrophic exposure. However, eliminating eligibility for second homes does not eliminate that risk; it simply shifts it to individual property owners who may have no viable private-market alternative.

Before recommending that more than 53,000 Texas properties—including over 18,000 in Galveston County—lose access to the state's insurer of last resort, TWIA and the Legislature should be able to demonstrate that adequate and reasonably affordable replacement wind coverage is actually available.

This is especially concerning when TWIA's own materials show that its existing private-market depopulation program has had no participating insurers for the past three years. If the private market is not willing to assume these policies voluntarily, where are these homeowners expected to obtain comparable wind coverage?

I also urge the Committee to consider the broader consequences for coastal communities. The inability to obtain wind insurance could affect mortgages, property values, rentals, tourism, local businesses, contractors, and the coastal property-tax base. Second homes are an important part of Galveston's economy.

Finally, please clarify whether the proposed "owner-occupied homestead" requirement would exclude all non-homestead residential properties, including long-term and short-term rental properties, or only properties classified by TWIA as secondary/vacation homes.

I respectfully ask the Committee **not to recommend eliminating TWIA eligibility for second homes unless and until a viable, comparable insurance market exists for these properties.**

Thank you for considering the impact this proposal would have on Galveston County property owners and the coastal economy.

[redacted]
Galveston County property owners

Public Comment

From: [redacted]
Sent: Friday, August 28, 2026 6:27 PM
To: PublicComment
Subject: Insurance on second homes

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I am not an owner but instead a winter Texan. I rent a house for three months from a wonderful couple who owns the house as a second home. If this policy would go into effect, they could not afford to keep this house, which would force us to spend my winter vacation back in Florida. We came to your beautiful island because it was more affordable and people friendly.

Please reconsider this policy. It will have long reaching negative effects.

Sincerely,

[redacted]

Public Comment

From: Ryan Brannan <ryan@brannanllc.com>
Sent: Friday, August 28, 2026 4:09 PM
To: PublicComment
Cc: sharon.oconnor@oconnorgroup.co
Subject: public comment sign-up - September 1 Legislative and External Affairs Committee meeting

Good morning,

I'd like to sign up Sharon O'Connor to give oral public comment at the Legislative and External Affairs Committee meeting on Tuesday, September 1. She is President of the Coastal Windstorm Insurance Coalition and will be participating by Zoom - she is registered for the webinar under sharon.oconnor@oconnorgroup.co.

Her remarks will be directed to the Biennial Report to the 90th Legislature, specifically Topic 5 on secondary home coverage and Topic 4 on the depopulation program.

If there is a separate process or form for getting on the public comment list, or anything else you need from us, please let me know and I'll take care of it today. Sharon is copied here.

Thanks,

- Ryan

Ryan Brannan
The Brannan Firm
ryan@brannanllc.com

Public Comment

From: [redacted]
Sent: Friday, August 28, 2026 2:31 PM
To: PublicComment
Subject: Upcoming Agenda - Elimination of TWIA Coverage for Second Homes

To Whom It May Concern:

I am a concerned resident of the great State of Texas, and we have been fortunate enough to have purchased a small beach house for our family to use for a long time. This was our dream and we saved for many years to be able to do this. We deserve the same right as any homeowner to have wind insurance. How fair is it to eliminate this from us, when we worked just as hard as anyone to be able to provide this for our family and future generations? Why should we be treated differently from those who have only one home?? In addition, this will highly affect the market for future sales and purchases. The market is already tough. Who will want to buy a home that cannot be insured?? This will also be a HUGE impact to all businesses along the Texas Coast to keep in operation, if no one will purchase new homes, many sell and/or rents go up to afford to stay. The impact will trickle down and ALL will be impacted.

We are aware that the Coastal Windstorm Insurance Coalition is also opposed to this change. Please do not allow this to pass!

Thank you,

[redacted]

Public Comment

From: [redacted]
Sent: Friday, August 28, 2026 1:32 PM
To: PublicComment
Subject: Elimination of wind insurance for secondary homes

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Dear committee, please do not eliminate our ability to get wind insurance for our secondary home. It has been hard to hang on to our place and the higher insurance goes the more we might need to contemplate letting the second place go.
Thank you for considering homeowners like me in mind. [redacted]
Sent from my iPhone

Public Comment

From: [redacted]
Sent: Friday, August 28, 2026 12:42 PM
To: PublicComment
Subject: Proposed elimination of coverage for 2nd homes

Hello - I am writing to voice my opposition to the proposed elimination of coverage for 2nd homes. As a Texas resident and tax-payer, please consider this position in your finalized proposal to reduce cost.

[redacted]

Public Comment

From: Wendy Moore <mayormoore@cityofportaransas.org>
Sent: Friday, August 28, 2026 11:50 AM
To: PublicComment
Cc: David Parsons
Subject: Opposition to restricting secondary home coverage

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[You don't often get email from mayormoore@cityofportaransas.org. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Dear Members of TWIA,

I was recently made aware that the TWIA Board was considering restricting secondary home coverage for windstorm coverage in Texas. As Mayor of Port Aransas I wish to formerly oppose this idea and would ask that the Texas Legislature, which starts in January, be allowed to handle this matter. Our beautiful coastal beach town has more than 5000 rooftops and approximately 80% are considered second homes to families throughout the State of Texas. Currently there are no other options for windstorm coverage on the Texas coast in our market and denying them coverage would be an economic travesty to our fiscal budget. If people don't have access to windstorm coverage they will not choose to have homes in our area and without the tax base that comes from all the these homes we will not be able to operate as a city. Please don't take any action on this matter and if it is a concern then urge you to let the state legislature get involved and make the best and most informed decision.

Best regards,

Wendy Moore
Mayor
City of Port Aransas

Public Comment

From: [redacted]
Sent: Friday, August 28, 2026 11:29 AM
To: PublicComment
Subject: Fwd: TWIA

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You don't often get email from [redacted] Learn why this is important

Dear TWIA Board of Directors and Legislative and External Affairs Committee,

I strongly oppose the proposal to eliminate TWIA coverage for second homes.

Property owners along the Texas coast already face extremely high insurance costs and significant hurricane-related risks. Removing access to TWIA would unfairly penalize one group of property owners and could seriously impact property values, investment, development, and the economies of our coastal communities.

Financial stability should not be achieved by simply excluding thousands of properties from access to essential windstorm coverage. There are more responsible solutions, including adjusted premiums, deductibles, and risk-based requirements.

I strongly urge the Board to reject this proposal and protect fair access to windstorm insurance for Texas coastal properties.

Respectfully,

[redacted]

[redacted]

Public Comment

From: County Judge Connie Scott <Connie.Scott@nuecescountytx.gov>
Sent: Friday, August 28, 2026 11:10 AM
To: PublicComment
Subject: Against Legislative Recommendation #5 relating to secondary home coverage.

Importance: High

Against Legislative Recommendation #5 relating to secondary home coverage.

Public Comment

From: [redacted]
Sent: Friday, August 28, 2026 7:49 AM
To: PublicComment

CAUTION: This email originated from outside of the organization. Do not reply with sensitive information or click links or open attachments unless you recognize the sender and know the content is safe.

Secondary home coverage issues should not be acted upon. Legislature meets in January and that issue should be handled during legislative session.
Sent from my iPhone

Public Comment

From: Sharon O'Connor <sharon.oconnor@oconnorgroup.co>
Sent: Friday, August 28, 2026 8:36 AM
To: PublicComment
Subject: Coastal Windstorm Insurance Coalition Re: Public comment on the 2026 Biennial Report to the 90th Texas Legislature — Topic 5, Secondary Home Coverage, and Topic 4, Depopulation Program
Attachments: 2026-08-28 CWIC response to TWIA Topic 5.pdf

Coastal Windstorm Insurance Coalition

Representing Texas coastal windstorm policyholders

August 28, 2026

Members of the Legislative & External Affairs Committee
Texas Windstorm Insurance Association
4801 Southwest Parkway, Building One, Suite 200
Austin, Texas 78735

Submitted by electronic mail to PublicComment@TWIA.org
cc: David Durden, General Manager; Members of the Board of Directors

Re: Public comment on the 2026 Biennial Report to the 90th Texas Legislature — Topic 5, Secondary Home Coverage, and Topic 4, Depopulation Program

Members of the Committee:

The Coastal Windstorm Insurance Coalition submits this comment in opposition to Topic 5 of the draft Biennial Report, which would *"[m]odify Chapter 2210 regarding the property types eligible for TWIA coverage to require residential policies to be owner-occupied homesteads."* We respectfully ask the Committee not to advance this item to the Board.

We appreciate that the item originated as a good-faith effort to reduce the Association's probable maximum loss, and we share the Committee's interest in lowering the cost of catastrophe funding. Our objection is not to that goal. It is that this particular means would remove 53,620 Texas households from the residual market that the Legislature created to serve them, would fall on Galveston and Nueces Counties more heavily than on the rest of the coast combined, and is before the Committee without any analysis of those consequences.

1. The record before the Committee contains only one side of this question.

The September 1 materials present Topic 5 with policy counts, exposure figures, a revised probable maximum loss, and an estimated reinsurance saving. They contain no considerations for the Committee, no drawbacks, and no risk analysis of any kind. Every other substantive item in the packet is a refinement of how TWIA is funded or governed. This one would change who is allowed to buy a policy, and it is the item with the least analysis attached to it.

Section 2210.0025 requires the Association's report to state the reasons supporting each proposed change. A projected saving is a benefit, not a reason. The reason has to survive the cost, and the cost has not been estimated.

2. The proposal is written considerably broader than the data supporting it.

The Committee's data describes *secondary homes*. The proposal text requires policies to be *owner-occupied homesteads*. Those are not the same test, and the difference is not small.

A homestead-occupancy requirement would reach far beyond vacation property. It would reach a family renting out the house they grew up in while an estate is probated. It would reach a service member on orders who leases their home rather than sell it. It would reach long-term rental housing — the tenant-occupied single-family stock that much of the coastal workforce lives in. It would reach property held in a family trust or an LLC for ordinary estate-planning reasons, where the occupant and the record owner are not the same person. TWIA has not counted any of those populations, has not estimated their exposure, and has not told the Committee how large they are.

The Committee is being asked to vote on language whose reach exceeds the analysis in front of it. At a minimum, no recommendation should go to the Board in terms broader than the data the Association has actually developed.

3. There is no private market to receive these policies, and the Committee's own agenda says so.

Topic 4 of the same packet reports that TWIA's Assumption Reinsurance Depopulation Program *"has been dormant since 2023 due to a lack of carrier interest,"* and the August 4 Board materials confirm that no carrier applied to participate in either of the last two rounds. The Association cannot simultaneously report to the Legislature that no insurer will voluntarily accept TWIA policies and that 53,620 of them can be released to a private market.

Under Section 2210.202, eligibility today turns on an insurable interest and a single declination — that is, on the absence of a private option. Removing coverage from policyholders who by definition have no private option does not reduce risk. It relocates it, uninsured, into the coastal economy, and ultimately onto the State when a storm makes landfall.

4. On the Association's own numbers, these policyholders are not a drag on the book.

The Committee's table shows the average building limit on a secondary-home policy is **$307,572**, against **$384,710** for a primary residence — roughly twenty percent less exposure per policy. The same materials state that these policies are priced no differently from primary-home policies, and that under Section 2210.208(f) they receive no Additional Living Expense coverage, which TWIA values at approximately five percent of premium.

Stated plainly: secondary-home policyholders pay the same rate for measurably less coverage on measurably smaller risks. Whatever else they are, they are not the reason TWIA's rates have been under pressure. Removing nineteen percent of the residential book removes nineteen percent of the premium contribution while the Association's fixed expenses do not fall proportionately. The materials model the effect on probable maximum loss. They do not model the effect on rate adequacy for the policyholders who would remain, and the Committee should not recommend this without that number.

5. The consequences do not stop at the policyholder.

Lenders require windstorm coverage in the catastrophe area. A property that cannot obtain wind coverage cannot carry a conforming mortgage, which means it can be sold only for cash. That is not a hypothetical inconvenience; it is a repricing of a substantial share of the coastal housing stock, and it flows directly into appraised values and onto the tax rolls that fund our counties, cities, school districts, hospital districts, and college districts.

TWIA reports that nearly sixty percent of the affected policies sit in Galveston and Nueces Counties — 18,178 in Galveston alone. This is not a proposal that spreads its costs evenly across the seacoast territory. Two counties would absorb most of it, and neither has been consulted.

6. The timing works against the Association.

Three weeks ago this Board voted unanimously to file for no rate increase for 2027, on an analysis finding TWIA's rates adequate for the first time in more than a decade — a result the Association attributes directly to the funding reforms enacted in 2025. That outcome was built by a coastal coalition that worked for years to get those reforms passed.

Recommending, in the same document that reports that success, that tens of thousands of coastal policyholders be put out of the Association will not read to the 90th Legislature as prudent exposure management. It will read as an invitation to reopen Chapter 2210 generally, and the coast will not be the only party with amendments. We would also note that the 2026 hurricane season is still underway, and nothing in this report should signal to 53,620 policyholders that their renewal is in question before the season closes.

Request

CWIC respectfully requests that the Committee decline to advance Topic 5. If the Committee wishes to pursue exposure reduction in the Biennial Report, Topic 2 — the feasibility and public funding of FORTIFIED construction and other mitigation — lowers the Association's actual risk rather than transferring it to households that have nowhere else to go, and CWIC supports it.

Should the Committee nonetheless wish to study the question, we ask that it be carried as a request for a study rather than as a substantive recommendation, and that any such study quantify the effects identified above — the population actually captured by an owner-occupancy test, the availability of private coverage for those risks, the rate impact on the remaining book, and the county-level effect on property values and taxable value.

For the same reasons, we urge caution on the twenty percent renewal-ineligibility rule contemplated in Topic 4. A policyholder who is priced out of TWIA by a private offer twenty percent above their current premium has not been served by the residual market; they have been removed from it.

CWIC has participated in TWIA proceedings continuously since 2018 and appreciates the Committee's willingness to take public comment before acting. We are glad to provide any of the underlying figures cited here, and to appear on September 1.

Respectfully submitted,

Signed by:
Sharon O'Connor

Sharon O'Connor
President, Coastal Windstorm Insurance Coalition
sharon.oconnor@oconnorgroup.co • (314) 276-0424

Galveston Windstorm Action Committee, d/b/a Coastal Windstorm Insurance Coalition