Public Comment

From: Marie Robb <marie@marierobb.com>
Sent: Monday, November 9, 2026 10:32 AM
To: PublicComment
Cc: Marie; Marie
Subject: CWIC Comments November 10, 2026, Board Meeting

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Dear Chairman and Members of the TWIA Board of Directors:

On behalf of the Coastal Windstorm Insurance Coalition, I am submitting these comments regarding the November 10, 2026, Board meeting and several significant issues affecting Texas coastal property owners.

Our coalition recognizes TWIA's essential role in providing windstorm coverage where adequate private-market alternatives are unavailable. We also recognize the importance of maintaining its financial stability. However, that stability must not come at the expense of affordability, transparency, or fair treatment of coastal policyholders.

1. Financial Accountability and Hurricane Beryl Financing

The proposed approximately $44 million financing arrangement to address outstanding Hurricane Beryl claims raises important questions about TWIA's catastrophe funding structure.

With estimated Hurricane Beryl losses of approximately $535 million, a projected year-end 2026 catastrophe reserve balance of $59 million, and a projected 2027 balance of approximately $350 million, coastal property owners deserve a clear explanation of TWIA's financial position.

We respectfully request that the Board publicly address:

- The interest rate, total borrowing costs, repayment terms, and funding sources associated with the proposed financing.
- Why additional borrowing is necessary more than two years after Hurricane Beryl.
- Whether the financing could result in additional costs to policyholders.
- The assumptions underlying projected catastrophe reserves and whether TWIA's existing funding structure adequately prepares it for future storms.

Financial transparency is essential to maintaining the confidence of the coastal property owners who depend on TWIA.

2. Legislative Recommendations and Mandatory Private-Market Transfers

We are particularly concerned about the legislative recommendations adopted October 8, including the possibility of requiring TWIA policyholders to accept qualifying private-market insurance offers.

A comparable premium does not necessarily provide comparable protection.

Differences in deductibles, exclusions, replacement-cost provisions, coverage limitations, insurer financial stability, and claims-handling practices can expose policyholders to substantially greater financial risk.

We believe policyholders should retain the ability to evaluate and voluntarily accept or reject private-market offers without automatically losing eligibility for TWIA coverage.

The recent efficiency audit documenting limited private-insurer participation in TWIA's existing depopulation programs reinforces the need for caution before considering mandatory transfers.

Any legislative proposal affecting eligibility should be supported by clear evidence that affordable, reliable, and substantially equivalent private-market coverage is genuinely available.

3. Protection of Second Homes and Non-Homestead Properties

Our coalition remains concerned about proposals that could restrict TWIA eligibility based on whether a property is a primary residence, second home, vacation property, or rental property.

Non-homestead property owners contribute significantly to coastal communities through property taxes, insurance premiums, employment, tourism, and local economic activity.

We oppose eligibility restrictions based solely on homestead status.

Insurance availability should be evaluated using legitimate underwriting and risk considerations, not simply how frequently an owner occupies a property.

4. Protection of Older and Historic Coastal Homes

We also wish to bring attention to the Texas Department of Insurance's proposed amendments to 28 TAC §21.1006 concerning the distinction between a property's age and its physical condition.

We recognize that this rulemaking is under TDI's authority rather than a decision before the TWIA Board. Nevertheless, its practical implications deserve attention.

Texas homeowners should not be denied insurance coverage solely because of the age of their homes or individual building components.

We are concerned that poorly defined physical-condition standards could become a substitute for prohibited age-based underwriting decisions.

We encourage clear, objective underwriting standards, documented reasons for condition-based denials, and meaningful opportunities for property owners to demonstrate that deficiencies have been corrected.

We also request confirmation that the proposed reorganization of TWIA's building-code authority does not expand that authority or create additional requirements for existing structures beyond those authorized by law.

This issue is particularly important for Galveston Island and other coastal communities with substantial inventories of older and historic homes.

5. Long-Term Affordability and Policyholder Protections

TWIA's financial stability and the availability of affordable coastal insurance must remain central considerations in every financial and legislative recommendation.

We encourage the Board to prioritize:

- Transparent financial reporting and responsible management of catastrophe reserves.
- Careful oversight of operating expenses and reinsurance costs.
- Meaningful consumer protections in any proposed private-market transfer program.
- Fair treatment of primary residences, second homes, rental properties, and older coastal structures.
- Full consideration of the cumulative financial burden already facing coastal property owners.

Conclusion

Texas coastal property owners are not asking for special treatment. They are asking for fair treatment, affordable and dependable insurance coverage, transparency, and accountability.

TWIA was established to address a critical insurance need along the Texas coast. Any changes to its financing, eligibility requirements, or legislative recommendations must preserve that fundamental purpose.

We respectfully request that these comments be included in the official record of the November 10, 2026, Board meeting and that the Board carefully consider the consequences of its decisions for all Texas coastal property owners.

Sincerely,

Marie Robb
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Coastal Windstorm Insurance Coalition
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