



U.S. Department of Homeland Security
FEMA Region 6
800 N. Loop 288
Denton, TX 76209

FEMA

January 22, 2021

The Honorable Andrew S. Friedberg
Mayor, City of Bellaire
7008 S Rice Avenue
Bellaire, TX 77401

RE: National Flood Insurance Program

Dear Mayor Friedberg:

This letter initiates a Community Assistance Visit (CAV) within the National Flood Insurance Program (NFIP). An initial, virtual CAV meeting was held with ChaVonne Sampson on Wednesday, January 13, 2021. Recognizing that the COVID-19 national health emergency takes precedence, we offer flexibility in establishing a feasible schedule for the CAV components. FEMA conducts these visits to ensure that a NFIP participating community is adequately administering and enforcing the local floodplain management program. The CAV is a comprehensive study of a community's program. CAVs evaluate local compliance to the NFIP regulations and verify compliance to continue eligibility and participation in the NFIP's Community Rating System (CRS). CAVs also serve as FEMA's mechanism for identification of a community's floodplain management technical assistance needs and the offering such assistance.

As mentioned in my June 10, 2020 letter to close a Community Assistance Contact (CAC), one of the main goals for this CAV is to help the City of Bellaire be well prepared for NFIP compliance matters during upcoming hurricane seasons. Particularly, we encourage robust administrative capabilities pertaining to Bellaire's substantial damage requirements within your locally adopted flood damage prevention ordinance (FDPO) during the recovery phase of the Hurricane Harvey disaster. In a CAC letter dated January 16, 2020, we requested copies of Bellaire's floodplain development repair permits and other documents related to substantial damage determinations for 86 addresses. We had expected that a simple clerical operation to gather and forward the documents would have sufficed, and the CAC would have closed in a matter of weeks; unfortunately, we did not find comprehensive enforcement of substantial damage requirements.

In consultations related to NFIP compliance during disaster recovery, we expect to find that NFIP compliant communities have an operating procedure that achieves and show evidence that:

- There is an inventory or method to identify structures that are below the base flood elevation, and therefore are subject to substantial damage regulations.
- Repair permits are required and substantial damage determinations (including details of the cost of repair, the market value and the source of those items) are incorporated therein.
- Structures that had less than 50 percent damage can be rebuilt as-is.
- Substantially damaged structures are treated as new construction with an elevation requirement.
- Substantial damage status of properties have been communicated to owners.
- An established record-keeping process exists for update of the NFIP compliance status of determinations, including owners' appeals of substantial damage determinations.

To initiate this CAV, we request completion of the enclosed NFIP-participation Self-Assessment; and completion of the enclosed NFIP Community Floodplain Management Regulations Enrollment Review Checklist, for verification that the City of Bellaire's FDPO meets the minimum criteria of the NFIP.

We would like to remind your community that the basic requirement for participation in the CRS is a community's full compliance with the NFIP. The City of Bellaire joined the NFIP's CRS in 1993 and many NFIP policies in your community have been receiving a 15 percent premium discounts since 2014. Section 211 of the CRS Coordinator's Manual states, "The community must be in full compliance with the minimum requirements of the NFIP. If a community is determined at any time to not be in full compliance, it will revert to a CRS Class 10." FEMA will be reviewing Bellaire's CRS rating as a component of this CAV.

FEMA recognizes that mitigating substantially damaged buildings can be challenging and might require significant, varying resources. These resources may include grants, loans, technical assistance, flood control projects and in-kind services among others. Additionally, making these determinations focuses community needs for mitigation grant funding opportunities, including FEMA's Hazard Mitigation Assistance programs like the Hazard Mitigation Grant Program, and can help the State of Texas to identify priorities for this funding.

The benefits to the City of Bellaire through participation in the NFIP historically include 3,223 claims filed since 1978, resulting in payments of \$257 million dollars to policyholders. Currently, there are 5,171 policies in force providing \$1.6 billion dollars of flood insurance coverage.

FEMA Region 6 and the Texas NFIP State Coordinator are committed to assisting the City of Bellaire. As mentioned, we offer flexibility in the timeline expectations in this compliance review if complicated by other priorities necessitated by the current national health crisis. We stand ready to assist with any pressing questions or floodplain management concerns.

The Honorable Andrew S. Friedberg
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I thank you and your staff for your attention to NFIP matters. If you have any questions regarding this letter, please feel free to contact Lauren Fulton at (940) 898-5474, or via email at Lauren.Fulton@fema.dhs.gov.

Sincerely,

Charles Cook
FM&I Branch Chief

Enclosures: NFIP-participation Self-Assessment
NFIP Community Floodplain Management Regulations Enrollment Review
Checklist

cc: Yi Chan, Texas NFIP State Coordinator
ChaVonne Sampson, Floodplain Administrator, City of Bellaire



COMMUNITY
RATING
SYSTEM

VERIFICATION
REPORT

City of Bellaire, TX

Verified Class 10

NFIP Number: 480289

Cycle-Phone Verification

Date of Verification Visit: August 13, 2020

This Verification Report is provided to explain the recommendations of Insurance Services Office, Inc. (ISO) to DHS/FEMA concerning credits under the Community Rating System (CRS) for the above named community.

A total of 129 credit points are verified which results in a recommendation that the community retrograde from a CRS Class 8 to a CRS Class 10. The following is a summary of our findings with the total credit points for each activity noted in parenthesis:

Activity 310 – Elevation Certificates: The Development Services Department maintains elevation certificates for new and substantially improved buildings. Copies of elevation certificates are made available upon request. The community did not meet the 90% threshold of correctness; therefore, no points are assigned. (0 points)

Activity 340 – Hazard Disclosure: Credit is provided for state regulations requiring disclosure of flood hazards. (15 points)

Activity 350 – Flood Protection Information: Documents relating to floodplain management are available in the reference section of the Bellaire Public Library. (10 points)

Activity 430 – Higher Regulatory Standards: Credit is provided for a Building Code Effectiveness Grading Schedule (BCEGS) Classification of 4/4. (21 points)

Activity 440 – Flood Data Maintenance: Credit is provided for maintaining and using digitized maps in the day to day management of the floodplain. (83 points)

Attached is the Community Calculations Worksheet that lists the verified credit points for the Community Rating System.

CEO Name / Address:

Brant Gray
Interim City Manager
7008 South Rice Street
Bellaire, Texas 77401

CRS Coordinator Name / Address:

ChaVonne Sampson
Director of Development Services
7008 South Rice Street
Bellaire, Texas 77401
(713) 662-8243

Date Report Prepared: January 21, 2021

DRAFT

720 COMMUNITY CREDIT CALCULATIONS (Cycle-Phone Verification):

CALCULATION SECTION :

Verified Activity Calculations:	Credit
c310 0	0
c320 0	0
c330 0	0
c340 15	15
c350 10	10
c360 0	0
c370 0	0
c410 0 x CGA =	0
c420 0 x CGA =	0
c430 20 x CGA 1.07 =	21
c440 78 x CGA 1.07 =	83
c450 0 x CGA =	0
c510 0	0
c520 0	0
c530 0	0
c540 0	0
c610 0	0
c620 0	0
c630 0	0

Community Classification Calculation:

cT = total of above	cT = 129
Community Classification (from Table 110-1):	Class = 10

CEO Name/Address:

Brant Gray
 Interim City Manager
 7008 South Rice Street
 Bellaire, Texas 77401

CRS Coordinator Name/Address:

ChaVonne Sampson
 Director of Development Services
 7008 South Rice Street
 Bellaire, Texas 77401
 (713) 662-8243

Date Report Prepared: January 21, 2021



FEMA

June 14, 2021

Mr. Brant Gary
Interim City Manager
7008 South Rice Avenue
Bellaire, TX 77401-4495

Dear Mr. Gary:

The purpose of this letter is to provide the results of your community's 5-year cycle verification and accompanying field visit for the National Flood Insurance Program (NFIP) Community Rating System (CRS). The field verification report is enclosed for your records.

I regret to inform you the Department of Homeland Security, Federal Emergency Management Agency (FEMA), has determined your community has not met the Class 9 prerequisite of having a minimum of 500 credit points. This requirement is explained on page 210-8 of the *CRS Coordinator's Manual*. Accordingly, the City of Bellaire will retrograde to a CRS Class 10. The premium discount for flood insurance policyholders will be decreased from 15 percent to 0 percent, effective October 1, 2021. The deficiencies noted in the enclosed verification report were communicated to your community's CRS Coordinator by the Insurance Services Office, Inc.

I invite the City of Bellaire to reapply for participation in the CRS when it can resolve the above-mentioned deficiencies.

Flood insurance premium discounts often are the most widely recognized benefit of community participation in the CRS program. Although the premium discounts are important, we like to remind communities that all residents in CRS communities benefit from CRS participation as a result of the enhanced safety brought about by the floodplain management practices the CRS communities implement. This community-wide benefit of CRS participation may be useful to consider should your community choose CRS participation in the future.

If you have any questions or need additional information, please contact the FEMA Region VI Office, CRS Coordinator, David Hiegel, by telephone at (940) 898-5405.

Sincerely,

A handwritten signature in black ink that reads "William H. Lesser".

William H. Lesser, CRS Coordinator
Federal Insurance and Mitigation Administration

Enclosure

cc: ChaVonne Sampson, CRS Coordinator



COMMUNITY
RATING
SYSTEM

VERIFICATION
REPORT

City of Bellaire, TX

Verified Class 10

NFIP Number: 480289

Cycle-Phone Verification

Date of Verification Visit: August 13, 2020

This Verification Report is provided to explain the recommendations of Insurance Services Office, Inc. (ISO) to DHS/FEMA concerning credits under the Community Rating System (CRS) for the above named community.

A total of 129 credit points are verified which results in a recommendation that the community retrograde from a CRS Class 7 to a CRS Class 10. The following is a summary of our findings with the total credit points for each activity noted in parenthesis:

Activity 310 – Elevation Certificates: The Development Services Department maintains elevation certificates for new and substantially improved buildings. Copies of elevation certificates are made available upon request. The community did not meet the 90% threshold of correctness; therefore, no points are assigned. (0 points)

Activity 340 – Hazard Disclosure: Credit is provided for state regulations requiring disclosure of flood hazards. (15 points)

Activity 350 – Flood Protection Information: Documents relating to floodplain management are available in the reference section of the Bellaire Public Library. (10 points)

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Activity 440 – Flood Data Maintenance: Credit is provided for maintaining and using digitized maps in the day to day management of the floodplain. (83 points)

Attached is the Community Calculations Worksheet that lists the verified credit points for the Community Rating System.

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Interim City Manager
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Bellaire, Texas 77401

CRS Coordinator Name / Address:

ChaVonne Sampson
Director of Development Services
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c330 0	0
c340 15	15
c350 10	10
c360 0	0
c370 0	0
c410 0 x CGA _____ =	0
c420 0 x CGA _____ =	0
c430 20 x CGA 1.07 _____ =	21
c440 78 x CGA 1.07 _____ =	83
c450 0 x CGA _____ =	0
c510 0	0
c520 0	0
c530 0	0
c540 0	0
c610 0	0
c620 0	0
c630 0	0

Community Classification Calculation:

cT = total of above	cT = <u>129</u>
Community Classification (from Table 110-1):	Class = <u>10</u>

CEO Name/Address:

Brant Gray
 Interim City Manager
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 Bellaire, Texas 77401

CRS Coordinator Name/Address:

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800 N. Loop 288
Denton, TX 76209

FEMA

July 12, 2021

The Honorable Andrew S. Friedberg
Mayor, City of Bellaire
7008 S Rice Avenue
Bellaire, TX 77401

Re: National Flood Insurance Program

Dear Mayor Friedberg:

The purpose of this letter is to advise you of progress since my letter dated January 22, 2021 which opened a Community Assistance Visit (CAV) within the National Flood Insurance Program (NFIP). The initial virtual meeting occurred on January 13, 2021 and was attended by ChaVonne Sampson, Floodplain Administrator, City of Bellaire and Lauren Fulton and Angela Harrison, Federal Emergency Management Agency, Floodplain Management and Insurance Specialists. Recognizing that the COVID-19 national health emergency takes precedence, we have and continue to offer flexibility in establishing a feasible schedule for the CAV components. A CAV is a comprehensive study of a community's program used to ensure that a NFIP participating community is adequately administering and enforcing the local floodplain management program and to ensure continued eligibility for participation in the NFIP and the Community Rating System (CRS). CAVs also serve as FEMA's mechanism for identification of a community's floodplain management technical assistance needs and the offering of such assistance.

To date there have been 4 virtual meetings, conducted on January 13, 2021, February 2, 2021, March 8, 2021, and May 27, 2021. FEMA staff met with ChaVonne Sampson, Floodplain Administrator. The main topics of discussion were:

- A Floodplain Management Self-Assessment
- Implementation of an Information Sharing Access Agreement (ISAA)
- Review of the city's Flood Damage Prevention Ordinance (FDPO)
- Review of documents received to verify compliance of the 84 sites in which 30 sites have been verified as compliant.

The outcome of the meeting and status of the CAV is for Ms. Sampson to submit the remaining documentation needed to verify compliance for the remaining 54 sites. The documentation needed to verify compliance is substantial damage assessments and determinations, substantial damage notification letters, permits and final elevation certificates. Once all the documentations

The Honorable Andrew S. Friedberg
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have been received and reviewed a follow up discussion meeting will be held with Ms. Sampson to discuss the outcome of the review.

The FEMA Region 6 FMI team and the Texas NFIP State Coordinator are appreciative of the floodplain management efforts of your community and are committed to helping the City of Bellaire be well prepared for future flooding events and thus help residents break the cycle of repeat flooding. If you have any questions regarding this information or would like any further assistance, please let me know by writing to the letterhead address or by contacting Lauren Fulton at (817) 987-8185 or by email lauren.fulton@fema.dhs.gov or Angela Harrison at (512) 865-9015 or by email angela.m.harrison@fema.dhs.gov.

Sincerely,



Charles Cook
FMI Branch Chief

cc: Yi Chan, Texas NFIP State Coordinator
ChaVonne Sampson, FPA, City of Bellaire