



FEMA

June 10, 2020

The Honorable Pat Hallisey
Mayor of League City
300 West Walker
League City, TX 77573

RE: National Flood Insurance Program

Dear Mayor Hallisey:

In a Community Assistance Contact (CAC) letter dated February 3, 2020 we requested copies of League City's floodplain development repair permits and other documents related to substantial damage determinations for 61 addresses which were damaged during Hurricane Harvey. Based on submittals from League City, we have not been able to verify National Flood Insurance Program (NFIP) compliance for the entire set of properties. With this letter, we are closing the CAC with a notation of "Community Assistance Visit (CAV) needed."

Based on our CAC findings, we feel that more formal assistance through a CAV is warranted. A main goal for the CAV is to help League City address its NFIP programmatic deficiencies and be well prepared for NFIP compliance matters during the 2020 hurricane season. Particularly, we encourage robust administrative capabilities pertaining to the NFIP's substantial damage requirement. Understanding that large flood events cause a significantly increased workload for local permit departments, we hasten to mention that the Federal Emergency Management Agency (FEMA) may be able to help with some of the increased expenses. Please find enclosed, a copy of the DRAFT FEMA Recovery Policy for Building Code and Floodplain Management Administration and Enforcement.

The NFIP paid 545 claims with a 2017 date-of-loss in League City which appeared to have been substantial damage. Historically, NFIP claims data reports 828 apparent substantial damage claims in your community, yet only 29 claims for Increased Cost of Compliance (ICC) have been paid. We fear that policyholders have not been able to access the full value of their NFIP policies, namely ICC claim payments, due to a lack of substantial damage determinations. It is our hope that the CAV will assist League City in identifying mitigation funding opportunities, present and future, to help your citizens break the cycle of repeat flooding.

Brian Bartley, FEMA Floodplain Management & Insurance (FMI) Specialist, will in a few weeks' time contact your Floodplain Administrator, Sonia Phillips, to schedule the initial CAV discussion. I thank you and your staff for your attention to NFIP matters. FEMA truly believes that NFIP participation and compliance lead to reduced future flood damages and overall community resilience. If you have any questions regarding this information and/or the enclosed

The Honorable Pat Hallisey

June 10, 2020

Page 2 of 2

policy paper, please feel free to contact Mr. Bartley at (940) 383-7207, or via email at brian.bartley@fema.dhs.gov.

Sincerely,

Lisa Jennings
for

Charles Cook
FMI Branch Chief

Enclosure: DRAFT FEMA Recovery Policy for Building Code and Floodplain Management
Administration and Enforcement

cc: Yi Chan, Texas NFIP State Coordinator
Sonia Phillips, League City Floodplain Administrator



Building Code and Floodplain Management Administration and Enforcement

DRAFT FEMA Recovery Policy [POLICY NUMBER]

BACKGROUND

Sections 402 and 406 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended by Section 1206 of the Disaster Recovery Reform Act of 2018 (DRRA), authorizes FEMA to provide assistance to state and local governments for building code and floodplain management ordinance administration and enforcement, including assessments for substantial damage compliance.

PURPOSE

This policy defines the framework and requirements for consistent and appropriate implementation through the Public Assistance (PA) Program of the DRRA 1206 amendments. The intent of this policy is to provide communities with the resources needed to effectively administer and enforce state and locally adopted building codes and floodplain management ordinances for a period of no longer than 180 days after the date of the major disaster declaration.

PRINCIPLES

1. Increase the overall speed of recovery by providing assistance to conduct building inspections, review disaster-related development in the floodplain, review applications for permits, and issue permits to adequately administer and enforce adopted building codes and floodplain ordinances.
2. Enhance compliance with state and local building codes and floodplain management ordinances by providing state, tribal, territorial, and local governments additional resources to carry-out required activities after a disaster.

REQUIREMENTS

A. APPLICABILITY

Outcome: To establish the applicability and retroactive implementation of this policy.

1. This policy applies to Major Disaster Declarations for PA declared on or after August 1, 2017.



2. For major disasters declared on or after the publication date of this policy, eligible costs will be reimbursed under the provisions of this policy.
3. For major disasters declared after August 1, 2017 and before the publication of this policy, eligible costs will be reimbursed under the provisions of this policy, provided the Applicant identifies and submits all supporting documentation within 90 days from the Recovery Scoping Meeting or 90 days from the date of publication, whichever is later. An example submission can be found in Appendix A of this policy.
4. FEMA will not fund activities under this policy in a community that is suspended from or has been sanctioned for not participating in the National Flood Insurance Program.
5. Work under this policy is not eligible for participation in the PA Alternative Procedures Pilot Program for Permanent Work or for alternate projects.

B. POLICY IMPLEMENTATION

Outcome: To identify key implementation guidelines for this policy.

1. Generally, costs associated with this policy will be obligated via a Category G: *Parks, Recreation, and Other* project worksheet.
2. The exception to B.1 is assistance provided directly by FEMA under its Substantial Damage Data Collection Contracts as described in Section E below.
3. Costs will be funded at the permanent work cost-share applicable to the disaster.

C. DESCRIPTION OF ELIGIBLE AND INELIGIBLE WORK

Outcome: To identify eligible and ineligible activities.

1. Eligible work: All building code and floodplain management ordinance administration and enforcement activities must relate to the repair, replacement, or retrofit of disaster-damaged public, private, and residential structures. Eligible activities under this policy include, but are not limited to:
 - a) Building Code Administration:
 - i. Review and process applications for building permits; certificates of occupancy; certificates of compliance; and the associated plans, specifications, and construction documents for compliance with federal, state, and municipal building, housing, and life-safety codes and standards applicable to disaster-related repair, replacement, or retrofit.
 - ii. Process requests for building code variances.
 - iii. Collect fees.



- 1 iv. Hire, train, supervise, certify, and license staff, as required to conduct eligible
- 2 activities.
- 3 v. Contract for services.
- 4 vi. Provide training and outreach to the public on building code and building permit
- 5 requirements applicable to the repair, replacement, or retrofit of disaster-
- 6 damaged buildings.
- 7 vii. Establish plan review and inspection processes, procedures, and instructions for
- 8 permit holders.
- 9 viii. Collect data and conduct assessments to verify disaster-damaged areas.
- 10 ix. Monitor impacted areas for unpermitted construction activities.
- 11 x. Coordinate building code administration and enforcement with floodplain
- 12 management ordinance administration and enforcement, as appropriate.
- 13
- 14 b) Code Enforcement:
- 15 i. Inspect structures under construction for compliance with approved plans,
- 16 specifications, and all requirements of applicable codes, laws, and ordinances.
- 17 ii. Identify and carry out corrective action in cases where construction, design, and
- 18 occupancy does not comply with codes and ordinances.
- 19 iii. Conduct and process condemnation determinations.
- 20 iv. Review elevation certificates.
- 21 v. Investigate complaints and assist in preparation of materials for abating violations
- 22 of building codes and related ordinances.
- 23
- 24 c) Floodplain Management Ordinance Administration and Enforcement:
- 25 i. Determine whether proposed disaster-related development activities are in areas
- 26 regulated by the community's floodplain management ordinance or building code.
- 27 ii. Hire, train, supervise, certify and license staff, as required to conduct eligible
- 28 activities.
- 29 iii. Contract for services.
- 30 iv. Provide training and outreach to the public on floodplain permit requirements
- 31 applicable to the repair, replacement, or retrofit of disaster-damaged buildings.
- 32 v. Review development proposals to ensure compliance with the requirements of
- 33 applicable floodplain management ordinances.
- 34 vi. Process permits for disaster-related development in the floodplain associated
- 35 with the declared disaster.
- 36 vii. Inspect all disaster-related development in in areas regulated by the community's
- 37 floodplain management ordinance or building code to ensure compliance.
- 38 viii. Process requests for floodplain management ordinance variances.
- 39 ix. Process, maintain, and track temporary occupancy permits and inspect
- 40 temporary occupancy buildings.
- 41 x. Provide information on flood hazards, floodplain map data, advisory flood data
- 42 and compliance to residents and property owners.



- 1 xi. Conduct inspections to ensure the removal of temporary fill and related materials
- 2 used in flood fighting.
- 3 xii. Coordinate floodplain management ordinance administration and enforcement
- 4 with building code administration and enforcement, as appropriate.
- 5 xiii. Monitor impacted areas for unpermitted construction activities.
- 6 xiv. Take corrective action necessary to ensure compliance with Federal, State, and
- 7 Local floodplain regulations
- 8 xv. Enforce or administer new standards for development according to community
- 9 floodplain management regulations.

- 10 d) Substantial Damage Determinations: For existing buildings located in areas
- 11 regulated by the community's floodplain management ordinance or building code,
- 12 eligible work may include work to:
- 13 i. Conduct initial field surveys to determine extent of damage and establish
- 14 damage trends to identify areas to focus building-specific assessment efforts.
- 15 ii. Prepare cost information on repairs and pre-disaster market value estimates for
- 16 substantial damage estimates.
- 17 iii. Hire, train, supervise, certify and license staff, as required to conduct eligible
- 18 activities Collect field data for damage assessments.
- 19 iv. Enter administrative data into the Substantial Damage Estimator.
- 20 v. Track cumulative substantial damage and repetitive loss for communities, if
- 21 required.
- 22 vi. Conduct damage inventory of structures.
- 23 vii. Inform property owners of damage determination and provide compliance
- 24 requirements.
- 25 viii. Perform inspections to ensure compliance with repair and substantial damage
- 26 construction requirements.
- 27 ix. Determine whether proposed improvements are "substantial improvements" and
- 28 trigger requirements for compliance, including a building permit.
- 29 x. Review, adjudicate, and resolve substantial damage determination appeals.
- 30
- 31

2. Ineligible Work:

- 32 a) Activities associated with non-disaster damaged buildings or non-disaster-related
- 33 development.
- 34 b) Activities to update a community's laws, rules, procedures, or requirements.
- 35 Examples include:
- 36 i. Adopting new or updating current building codes or floodplain management
- 37 ordinances,
- 38 ii. Adopting or updating zoning laws and requirements, or
- 39 iii. Developing new land use plans or requirements.



D. ELIGIBLE COSTS

Outcome: To establish costs eligible for reimbursement under Section 1206 of the DRRA.

1. Work described in Section C will be eligible for reimbursement for a period no longer than 180 days after the date of the major disaster declaration.¹
2. This policy does not change the eligibility criteria for PA permanent work projects. Activities to administer and enforce building code and floodplain ordinances authorized by this policy are eligible regardless of whether the building code or floodplain ordinance in question meets PA's regulatory eligibility criteria for permanent work.

Example scenario: After a disaster is declared, a community decides to update its building code to require a four-foot freeboard for all buildings in the special flood hazard area. Work associated with administering and enforcing the four-foot freeboard for disaster-damaged buildings in the community is eligible under this policy. However, PA would not fund the physical repairs to an eligible elementary school to meet the new four-foot freeboard requirement since the code was adopted after the date of the disaster declaration and therefore ineligible according to PA regulation and policy.

3. Reimbursement for work under this policy will be subject to Emergency Work Labor Eligibility as described in the Public Assistance Program and Policy Guide (PAPPG). Straight-time for budgeted employees is not eligible.
4. Other costs associated with extra hires or contracted support may be eligible for reimbursement. This includes costs for travel, accommodations, and per diem, as appropriate.
5. The purchase of additional supplies and equipment necessary to effectively execute activities described in this policy are subject to requirements established in the PAPPG and 2 CFR part 200.
6. Costs associated with reimbursement for mutual aid or Emergency Management Assistance Compact (EMAC) will be reimbursed according to provisions established in the PAPPG.
7. Costs associated with legal proceedings related to code and floodplain management ordinance enforcement are eligible for reimbursement.
8. To be eligible for reimbursement under this policy all costs incurred must adhere to PA's requirements under the PAPPG, including evaluation of cost reasonableness.

¹ Other sources of FEMA funding may be available to applicants that can demonstrate a need for services that extend beyond the eligibility of this policy. For example, FEMA's Hazard Mitigation Grant Program may be available to fund extraordinary post-disaster code enforcement costs not covered by this policy and activities to promote disaster-resistant codes.



9. Revenue collected by the applicant (including fees and fines) for the performance of eligible work funded under this policy is considered program income. The project worksheet will be reduced accordingly during closeout. FEMA will deduct income from total project costs as specified in 2 CFR Section 200.80 and 200.307. If the applicant waives fees or fines following the disaster, FEMA will still reduce the eligible costs by the amount that the fees or fines would have been.

E. Direct Assistance

Outcome: To describe the process for assistance under FEMA's Substantial Damage Data Collection Contract.

1. For substantial damage data collection work described in section C.1.d(i-vi) of this policy, FEMA's Substantial Damage Data Collection Contract may be available to support communities in cases where the State and local government lack the capability to perform or contract for eligible substantial damage data collection-related efforts due to the extreme catastrophic nature of an event or a demonstrated lack of resources.
2. Local governments that seek assistance through FEMA's Substantial Damage Data Collection Contract must submit a request in writing to the State, which will review and, if warranted, submit the request to the Regional Administrator which shall include:
 - a) A statement as to the reasons the State and local government cannot perform or contract for performance of the requested work;
 - b) Agreement that the State will: hold and save the United States free from damages due to the requested work, and shall indemnify the Federal Government against any claims arising from such work; and
 - c) Agreement that the State will provide reimbursement to FEMA for the non-Federal share of the cost of such work in accordance with the provisions of this policy and the FEMA-State Agreement;
3. If the Regional Administrator approves the request, the work must be completed within 180 days of the date of the disaster declaration.
4. Once the Substantial Damage Data Collection Contract is approved and activated for a local government, FEMA will only provide assistance described in section C.1.d to that local government through the Contract. Work under C.1.d performed prior to the date of activation of the Contract will be eligible subject to the terms of this policy.



F. OTHER DOCUMENTATION REQUIREMENTS

Outcome: To establish documentation requirements for this policy.

1. To receive funding, applicants must submit the following to FEMA, as applicable:
 - a) All supporting documentation necessary to demonstrate the work completed.
 - b) All documentation associated with work that was completed through an EMAC resource request or intrastate/interlocal mutual aid request.
 - c) If work was performed by contract labor, the applicant will submit to FEMA all documentation demonstrating federal procurement rules in 2 CFR Part 200 were followed.
2. FEMA may require that the applicant provide documentation demonstrating that the eligible activities are in support of the community's legally adopted building code or floodplain management ordinance. This may include floodplain management ordinance administration and enforcement documentation; disaster-related development inspections; and substantial damage inspections, determinations, letters, and appeals.

RESPONSIBLE OFFICE

Office of Response and Recovery
Recovery Directorate
Public Assistance Division

Keith Turi
Assistant Administrator
Recovery Directorate

Date



ADDITIONAL INFORMATION

REVIEW CYCLE

This policy will be reviewed, reissued, revised, or rescinded within four years of the issue date, and will be incorporated into the PAPPG update that follows the publication of this policy.

AUTHORITIES

Section 324, 402 and 406 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5165b, 5170a and 5172, as amended.

Sections 324, 402 and 406 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5165b, 5170a and 5172, as amended. The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

DEFINITIONS

Substantial Damage (SD)² – Damage of any origin sustained by a structure whereby the cost of restoring the structure to its before damaged condition would equal or exceed fifty percent of the market value of the structure before the damage occurred.

Substantial Improvement (SI)³ – Any reconstruction, rehabilitation, addition or other improvement of a structure, the cost of which equals or exceeds fifty percent of the market value of the structure before the “start of construction” of the improvement. This term includes structures that have incurred “substantial damage,” regardless of the actual repair work performed.

QUESTIONS

Direct questions to FEMA-Recovery-PA-Policy@fema.dhs.gov

² 44 CFR Part 59.1

³ *Ibid.*



Appendix A: Opt-in Notification for Building Code and Floodplain Management Administration and Enforcement

In accordance with the Federal Emergency Management Agency (FEMA) Recovery Policy [INSERT FP and Title] (Policy), Applicants that meet the criteria below may elect to opt-in to the Policy.

Applicants wishing to participate must make their election no later than either:

- [INSERT DATE] (90 days from date of Policy publication), or
- 90 days after the date of the Recovery Scoping Meeting (RSM) for Applicants that have not yet participated in their RSM

This notification does not apply to Applicants in declarations on or after the date of Policy publication.

Applicant must identify the disaster number and declaration date.

We, _____ (name of Applicant) _____, elect to seek reimbursement for activities eligible under Recovery Policy [INSERT TITLE AND FP NUMBER] for _____ (Disaster number and date) _____.

Signature of Subrecipient's Authorized Representative and Title (Printed) Date

Subrecipient Name PA ID Number

Signature of Recipient's Authorized Representative and Title (Printed) Date

Recipient Name Name of State or Tribe

September 17, 2020

The Honorable Pat Hallisey
Mayor of League City
300 West Walker Street
League City, TX 77573

Re: Community Assistance Visit for the City of League City

Dear Mayor Hallisey,

The City of League City currently participates in the National Flood Insurance Program (NFIP). As a participant in the NFIP, it is the responsibility of the community to enforce floodplain management standards as mandated by the adopted FEMA Flood Damage Prevention Ordinance. The Texas Water Development Board (TWDB) conducts Community Assistance Visits (CAVs) to maintain contact with communities in their efforts to carry out NFIP Regulations and to evaluate local floodplain management ordinances and enforcement practices to determine their effectiveness.

The CAV for League City will take place on Thursday, October 1, 2020, from 1:30 to 3:00 pm. The CAV will include a floodplain tour of the areas delineated on the current Flood Insurance Rate Map (FIRM), and a review of League City's floodplain permits and elevation certificates. We will request a meeting with you at the end of the CAV to discuss the findings, address any questions, and provide technical assistance. In order to adequately assess your program, we request the following be available at the time of the CAV:

1. Copy of your local flood damage prevention ordinance (provided before the date of the meeting),
2. Addresses of all permit records for development in the floodplain from October 2015 until present (provided before the date of the meeting),
3. Elevation Certificates of structures built in the floodplain from October 2015 until present,
4. Records of approved variances,
5. List of addresses for any substantially damaged/improved structures, and
6. Appropriate staff to explain the community's floodplain management program and processes.

Our Mission

Leading the state's efforts in ensuring a secure water future for Texas and its citizens

Board Members

Peter M. Lake, Chairman | Kathleen Jackson, Board Member | Brooke T. Paup, Board Member
Jeff Walker, Executive Administrator

Pat Hallisey, Mayor of League City

September 17, 2020

Page 2

Should you have questions, please contact me at (281) 838-2160 or at sephra.thomas@twdb.texas.gov. I look forward to visiting with you soon.

Sincerely,

Sephra Thomas

Sephra Thomas

Flood Outreach Specialist

Texas Water Development Board

cc: Brian Bartley, Hazard Mitigation Emergency Management Specialist, FEMA Region VI
Sonia Phillips, Floodplain Administrator for League City

March 26, 2021

The Honorable Pat Hallisey
Mayor of League City
300 West Walker Street
League City, TX 77573

Re: Community Assistance Visit for the City of League City

Dear Mayor Hallisey,

Since October 1, 2020, the Texas Water Development Board (TWDB) has been conducting a Community Assistance Visit with League City. The purpose of the Community Assistance Visit is to evaluate the local floodplain management ordinance and enforcement practices to determine their effectiveness in accordance with the Federal Emergency Management Agency's National Flood Insurance Program regulations. The Community Assistance Visit included a driving tour of the City's regulatory floodplain, a review of supporting documentation, and multiple phone calls with Sonia Phillips, the Floodplain Administrator for League City and myself, Sephra Thomas with the TWDB.

During the Community Assistance Visit, it was noted that for League City to be compliant with the National Flood Insurance Program regulations, the actions outlined in the enclosed documents are needed. Listed below are additional items regarding the city's floodplain management ordinance and enforcement practices that should be addressed. Please respond to these issues within **60 days** (May 26, 2021) of this letter.

1. As discussed in the initial Community Assistance Visit meeting on October 1, 2020, League City currently does not have a plan for post-disaster damage assessments. Details of these plans have been discussed and a draft plan has been submitted with the community. A successful substantial damage plan includes the following components.
 - The substantial damage plan may include a list of contacts within the community that the floodplain administrator will use to complete damage assessments. These contacts should include name, position, and contact information.
 - The substantial damage plan may include who is on the damage assessment team for the community, allowing for a proactive response from the community in the wake of disaster.

Our Mission

Leading the state's efforts in ensuring a secure water future for Texas and its citizens

Board Members

Peter M. Lake, Chairman | Kathleen Jackson, Board Member | Brooke T. Paup, Board Member

Jeff Walker, Executive Administrator

- The substantial damage plan may include an inventory of homes for which the team will focus their efforts. This inventory should include homes that were previously substantially damaged but not assessed/brought into compliance, homes below the higher standards, and pre-FIRM homes below the minimum base flood elevation.
 - The substantial damage plan may include detailed instructions on how to assess a damaged house. Although the current plan has information on what is substantial damage, it does not connect the definition and general knowledge to the specificities of League City.
2. A number of sites from the floodplain tour were seen to have been substantially damaged. This was either by visual confirmation of work being done to elevate the home, or by data from FEMA where damage assessments were completed and communicated with the community. For these addresses, please provide proof of compliance. If these structures were not originally permitted, then retrofitted permits will be required to ensure the current structure and its work is at compliance with the adopted regulation in the Flood Damage Prevention Ordinance. A list of these homes is enclosed in an attached document. These structures should also be included in the substantial damage inventory of homes for focused post-disaster assessments. In addition, letters should be provided to homeowners to notify them of their structure being found substantially damaged.
 3. A couple permits were missing the Final Elevation Certificates. As a Community Rating System (CRS) community, and per the Flood Damage Prevention Ordinance, elevation certificates are required for structures in special flood hazard areas (SFHA). It is necessary to require documentation that proves compliance with the current elevation standards in the community's ordinance.

Please refer to the enclosed document for a list of these permits. Additionally, please provide a plan of how the community plans to move forward and require and retain the final elevation information for development in the floodplain.

4. A number of elevation certificates during the permit review process did not reflect compliance with the higher standards set forth by the community's Flood Damage Prevention Ordinance. As per the Ordinance, residential and non-residential structures in special flood hazard areas should be elevated to 18 inches above the base flood elevation (BFE) or highest adjacent grade (HAG), whichever is greater. However, a number of structures do not use the greater of either the BFE or HAG. These homes should be put on the substantial damage inventory for focused post-disaster assessments if they currently are non-compliant. Changes can be made to the Flood Damage Prevention Ordinance if the community finds these higher

standards inappropriate for the safety of their community, but this may impact their rating for CRS.

5. There were a few homes with AC units not elevated on a slab. In addition, a few permits from the review process did not verify elevated utilities built in out-door kitchens. The community's Flood Damage Prevention Ordinance requires the Community's Floodplain Administrator to verify that all utilities are elevated to or above the base flood elevation. Moreover, if a flood event damages the utilities, this can trigger an insurance claim larger than \$1,000. If a second such claim is triggered, the home automatically becomes a "repetitive loss" structure and the homeowner can face an increased insurance premium. The enclosed addresses need to confirm proper elevation of utilities.
6. From the floodplain tour, a number of homes were seen to have work containers or storage containers sitting outside of the home. These containers should be properly anchored to reduce any damages in case of a storm. In addition, a number of homes also had recreational vehicles (RVs) that were not road ready. Road ready RVs need to have inflated tires, a jacking system attached to the site only by quick disconnect utilities, no permanent attachments, meet the elevation and anchoring requirements for manufactured homes, and be on site for fewer than 180 consecutive days. The enclosed list of addresses needs to have pictures or notices, confirming compliance requirements were discussed with homeowners.
7. There were a number of projects occurring in the community within the regulated flood hazard areas. Please provide permits for these addresses. The addresses can be found in the enclosed attachment.
8. A number of homes appeared to have enclosures, either from the floodplain tour or the permit review process. Documentation or pictures of venting are required to ensure compliance for all homes not pre-FIRM. If pictures cannot be obtained, please send homeowners a letter of potential violation.
9. A number of homes in League City appeared to be split-level homes, where the front door is elevated above the natural grade, but the garage and home seem to be built on grade from the exterior. Please submit elevation certificates for these homes, to ensure that there are no enclosures partially or fully below the base flood elevation without venting. The addresses can be found on the enclosed attachment.
10. Staff also would like to make the following recommendations regarding record keeping and filing. No action is needed at this time; however, we want to let you know what we observed to improve the city's floodplain management program going forward.

Pat Hallisey, Mayor of League City

March 26, 2021

Page 4

- Filling out all documents completely and obtaining signatures by the appropriate individual
- Properly reference the correct FEMA map panel and appropriate flood zone and regulatory elevation for the project on every permit.
- Include pictures of vents and no-rise certifications with the permit documents.
- Encourage applicants to start a new application instead of scratching out and rewriting corrections to permit applications.

I want to thank the floodplain management team at the City of League City for their dedication to improving their program and to maintaining higher standards for the safety of their community. Their responsiveness has made this effort much easier and I am honored to work with them. Should you have questions, please contact me at (281) 838-2160 or at sephra.thomas@twdb.texas.gov. I look forward to visiting with you soon.

Sincerely,

Sephra Thomas

Sephra Thomas
Flood Outreach Specialist
Texas Water Development Board

cc: Brian Bartley, Hazard Mitigation Emergency Management Specialist, FEMA Region VI
Yi Chan, NFIP State Coordinator, Texas Water Development Board
Sonia Phillips, Floodplain Administrator, League City