

AGENDA STATEMENT

City of Bellaire

MEETING: City Council - Aug 15 2022

PREPARED BY: Andrew S. Friedberg

DEPARTMENT: City Council

ITEM TITLE:

Discussion and possible action to provide direction to staff concerning correspondence received from Verisk (on behalf of FEMA Region 6) regarding the City's Community Rating System classification modification - Submitted by Andrew S. Friedberg, Mayor.

RECOMMENDATION:

Mayor Friedberg recommends the City Council discuss and provide policy direction to staff concerning the options suggested by Tetra Tech in response to correspondence received from Verisk (on behalf of FEMA Region 6) regarding the City's Community Rating System classification modification.

BACKGROUND/SUMMARY:

As reported in the Interim City Manager's August 5, 2022, Weekly Memo:

CRS Update

Attached is correspondence from Verisk (representing FEMA Region 6) to the Bellaire CRS Team regarding their opinion about the path forward for an improved CRS rating for Bellaire. As you will read, Verisk appears to wish to punt the matter to a later date even through the Bellaire Team has submitted the required materials and made required changes. Below the first email is a second from our consultant, Tetra Tech, that expresses frustration with this process and provides options for consideration. Staff and Tetra Tech will continue the discussions with Verisk and FEMA Region 6 as we do not feel that what is proposed by Verisk are satisfactory and we are hopeful we do not have to settle for the options provided by Tetra Tech.

PREVIOUS COUNCIL ACTION:

N/A

CITY ATTORNEY REVIEW:

☐ Yes ☒ No

From: Harper, Sherry <SHarper@verisk.com>

Sent: Tuesday, August 2, 2022 12:46 PM

To: Groves, Christina <CHRISTINA.GROVES@tetrattech.com>; Hinson, Danny <Danny.Hinson@tetrattech.com>; Csomers <Csomers@bellairetx.gov>

Cc: Stephanie.weeks <Stephanie.weeks@verisk.com>; Smith, Jonathan L.

<Jonathan.Smith@verisk.com>; Gowans, Amanda R. <Amanda.Gowans@verisk.com>; Cofoid, Scott

<SCofoid@verisk.com>; Gilbert Gironjr <gilbert.giron@fema.dhs.gov>; Cook, Charles

<Charles.Cook4@fema.dhs.gov>; Lesser, Bill <Bill.Lesser@fema.dhs.gov>

Subject: CRS- Bellaire TX classification modification request

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Good Morning Christian, Christina-

Thank you for your interest in seeking a CRS Classification Modification. After initial review of preliminary information from Cristina Groves, consultant to the community, I concur a 1 class modification may be feasible, pending further review and verification of a formal, full submittal. ISO staff has reviewed your community's file, and find the following:

- October 1, 2021 – Community was retrograded to a CRS Class 10, due to community staff failure to implement the CRS program.
- January, 2022 - Community demonstrated compliance to FEMA Region 6, following a FEMA CAV revealing multiple compliance issues. The FEMA Region agreed to waive the 1 year time frame for readmittance to the CRS program in light of the community's proactive approach to addressing the compliance findings.
- April 1, 2022- Community was reenrolled in the CRS Program as a CRS Class 9, under the condition the community continue to maintain their CRS program.

The next step for the community would typically be to recertify the CRS program during the October time frame.

After consultation with FEMA Region 6, Gil Giron, it has been determined that ISO may not process a CRS Classification for your community at this time, as the community has not been re-enrolled in the CRS program for a sufficient period of time to demonstrate the CRS program is being fully implemented. ISO will receive and review the CRS recertification materials received in response to the regularly scheduled recertification period, and report our findings to the FEMA Region. Please expect the recertification package to be sent to your community on or around mid September, with a due date back to ISO of October 15, 2022.

Pending satisfactory completion of the CRS recertification, ISO will then review and process the CRS Classification Modification request.

Please coordinate with your ISO/CRS specialist Stephanie Weeks (copied on this transmission) directly for modification guidance, after completion of the CRS recertification. Also note – during initial conversation, the community consultant implied the community may actually be able to document a 2 class change. This is great news, and indicative of a progressive program. Should the community decide to pursue a 2 class change, this does trigger a full CRS cycle visit, where all CRS activities are evaluated, as compared to a more simple 1 class change where only the modified activities are reviewed. Should

the community decide to pursue a 2 class change after successful recertification, please inform Stephanie Weeks so she may schedule a cycle visit to fully evaluate the CRS program.

Best Regards,
Sherry Harper, AICP, CFM
Director of Natural Hazards
+1.850 902 5075
verisk.com | [LinkedIn](#) | [Twitter](#) | [YouTube](#)



From: Groves, Christina <CHRISTINA.GROVES@tetrattech.com>
Sent: Tuesday, August 2, 2022 3:19 PM
To: Christian Somers <CSomers@bellairetx.gov>
Cc: Hinson, Danny <Danny.Hinson@tetrattech.com>; Flaner, Rob <Rob.Flaner@tetrattech.com>
Subject: [EXTERNAL] FW: CRS- Bellaire TX classification modification request

Hi, Christian.

Based on the email below, we have the following feedback laid out into two options from our perspective:

Option 1 - We do not agree with the approach of holding Bellaire back from modifying the classification to be effective on April 1, 2023. We are not aware of where she is can point to a rule that would require the city to complete a recertification prior to being eligible for the modification. There is an option for Bellaire to go to Gil Giron at Region 6 to provide the city's side of this and perhaps request where the standard is in the CRS Coordinator's Manual with the goal of his response overturning her decision. Though this is an option, we do not feel the end result will be to get the city's modification through the process because the time it would take to get a response on this will likely be longer than the window to submit the modification for processing as it was originally outlined.

Option 2 – We recommend the city play the long game and complete the recertification package from ISO in October followed by a multi-class modification submittal for the next possible effective date allowed by ISO per the email today. This would have the city aiming for the discount change on October 1, 2023 with more than a one class improvement. The period of performance on the contract with us (Tetra Tech) is through December 31, 2022 which gives time for us to package up this multi-class improvement that would include eligible technical reviews.

I know the communications with ISO have been frustrating to say the least and this response today is very disappointing. We were hopeful for a more positive outcome but feel that ultimately the goals of the community can still be accomplished on an extended timeline.

If you would like to have a virtual meeting to discuss this further, please let me know.

Christina Groves, CFM | Senior Community Resilience Planner
Mobile +1 (270) 820-7817 | christina.groves@tetrattech.com

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