

TRICOAST

INSURANCE SERVICES

Congressman Randy Weber
510 Cannon House Office Building
Washington, DC 20515

12/22/2014

Congressman Weber,

There is a critical issue that really needs to be addressed very soon regarding FEMA's rules that forbid ground level bathrooms under elevated coastal beach homes in Galveston County. The current FEMA flood guidelines for enclosures beneath elevated homes built in coastal areas seem to have two main overriding themes:

#1---No "habitable living area" is allowed, since permanent habitation at ground level is discouraged; and

#2---In order to minimize any obstruction to water flow beneath an elevated structure in a storm surge, then anything built below the Base Flood Elevation (BFE) is generally to be small and is to be built using breakaway walls. (The "BFE" is actually the 100 year flood expectation level.)

I feel that these two requirements are very reasonable for FEMA to require of us in order to minimize possible loss of life or property in future floods or storm surge. However, where I feel that FEMA is being unreasonable in their guidelines is that they do not allow residents to even have a half-bath built below the BFE. FEMA already allows homeowners to build a larger enclosed area below BFE if it is to be used for "parking or storage only" and also if it is built with breakaway walls. So what additional harm is done by simply having a small toilet and sink within a small enclosure built with breakaway walls? FEMA tells me that this may create an obstruction to water-flow, but this is not the case at all. The walls would still breakaway in a storm surge and a small toilet would create very little obstruction to water-flow. And as far as this enclosure being considered a "habitable living area", well I don't know about your experiences, but I really don't know any people who really care to live in a half-bath anyway! Not being allowed to build a half-bathroom at ground level then requires all of us (and even the elderly and the disabled) to be forced to climb a long set of stairs time and time again just to find a bathroom. It seems to make no sense to us that FEMA would not allow this one small exception to the rules. The only factor that I can even think would possibly be an objection here is pollution risk. But when you really think about it, what is the difference between a flushed toilet that is elevated 15-20 feet above the ground versus a flushed-toilet at ground level? Either way, the waste was already dumped into a sewer line or a septic tank.

Coastal residents desperately need this simple exception to their guidelines and we ask that you help us in getting this change implemented as soon as reasonably possible. It is a badly needed exception to their guidelines. Thanks for your attention to this very important matter and feel free to contact me at any time with questions.

Sincerely,



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