

PLANNING CONSIDERATIONS FOR DISASTER HOUSING **(Obtained from FEMA Housing Contact of Sally's)**

Placement of Housing Units in Flood Plain:

- Code of Federal Regulation 44 (CFR44) – Part 9 – Flood plain Management: Contains an 8 step process for placing structures in the Flood plain. In the past FEMA has not followed this 8 step process – questionable as to how closely they will follow it in the future. FEMA is currently awaiting guidance on future policy in this area (Aug 07).
- Up until the recent interim policy issuance FEMA has allowed travel trailers (units less than 400 sq ft) to be placed in Flood Zone A for 180 days (6 months). If the units were needed in those locations longer than the 6 months some type of waiver from the County would be required. [No units can be placed in floodways or V Zones]
- New Interim Policy from FEMA states that FEMA will not place travel trailers or mobile homes in Flood Zone A. Mobile Homes have always been excluded from such placement (exceptions have been made to this in the past in extreme need circumstances). It is expected that FEMA will have to rescind or change the interim policy on Travel Trailers due to the extreme need in major/catastrophic events. Recommend that the County continue to plan for the use of travel trailers in Flood Zone A.
- Counties will have to enforce their own flood zone policies

Issues Related to Physical Placement and Permitting/Inspection:

- As housing operations commence FEMA will work with the locals to find out what the locals are going to require/will allow:
 - Will we allow Park Models, Mobile Homes, Travel Trailers
 - What local Zoning, Permitting and Inspection requirements will be
 - What will permit prices will be
 - What anchoring system(s) do we require beyond the State Standard for Mobile Homes

The locals can require whatever they desire but something to keep in mind is excessive and extremely restrictive requirements delay getting housing assistance to citizens. FEMA will deem all applicants who do not fall within the locals 'allowable' items to be "Infeasible."

- A major issue to plan for is the condemnation of properties – destroyed mobile homes specifically. Having a developed process for this means the units can be removed and replaced with FEMA units in an expedited manner.

In the past FEMA has handled this by using the USACE contractors to get signed "hold harmless" waivers from the owners. The units are then removed under the auspices of "site preparation"

since FEMA and their contractors cannot do ‘debris removal.’ The USACE website has a hold harmless release form.

The locals need to develop a process to condemn units, giving owners a time frame to remove the units (3 to 5 days). If an owner does not remove the unit in that time frame the local government removes the unit and charges the owner for removal. (Still need to clarify how this will work if the locals don’t have the resources for unit removal – presumption is that if we condemn and can get the ‘hold harmless’ waivers signed the Federal contractors can do the rest.) Issues related to properties not free of liens needs to be addressed.

- Another item to determine in local plans is power tie-ins for travel trailers. Will we allow homeowners to plug travel trailer units into homes where the power is still on but the house is damaged and not habitable until repaired? The power company will energize homes where infrastructure allows so there could be many damaged homes that have power. In many cases it might be roof damage that caused interior damage so the house is not habitable but putting a tarp on the roof will stop further damages.
- Another item to develop in the local plans is what permit charges will be. FEMA will pay the charges (their contractors will pay, FEMA reimburses). It was suggested we develop the charges for specific units; what will the charge be for Mobile Homes, for Travel Trailers, and for Park Models (and if the Portable on Demand Storage housing units become feasible these need to have permit charges designated).
- The Building Department needs to plan for a “Federal Housing Contractor Desk” where the Federal contractors can deal with personnel dedicated to the disaster housing issues and receive expedited service. Anything that can be done to speed processing means citizens get into housing units faster.

Additional planning for expedited permitting and inspections, as they apply to homeowners, should be addressed separately from disaster housing contractors. It is presumed by Emergency Management that the process for handling other types of contractors will also be addressed in emergency Building Dept plans.

- One good reason to require some type of permitting for the placement of travel trailers is that it will provide a record of those properties where houses were damaged so home repair inspections can be enforced. If some type of tracking is not established the locals will not know where FEMA places travel trailers because the Feds do not release the records of individuals. It is presumed by Emergency Mgmt that this type of tracking for mobile homes will be accomplished through current emergency permitting requirements.
- FEMA placement of travel trailers involves anchoring at the front and back with 18 to 24 inch anchors. Four anchors are used – 2 on the hitch/tongue and one on each side of the rear bumper. FEMA requires this of their contractors. Locals can require a different length anchor strap.

The only deviation from this on FEMA operations has been when a park owner or resident owned park refuses to allow any anchoring due to existing under ground utilities and possible damages to those utilities. In this case the applicant being housed in the unit signs a waiver to occupy the unit.

- Arcadia, FL has a lot of recent experience in the many disaster housing issues. From what FEMA staff conveyed the only inspections required for travel trailers was sewer inspections. It is highly recommended that building officials in Arcadia be contacted for lessons learned.
- Sewer Connections and FEMA contractors: The contractors will try to find the sewer clean out and tie to it, when unit is removed they will plug the tie in. If there is no clean out to connect to they will install one or direct connect to a septic system. In some cases they have direct connected to sewer lines.