



FEMA

October 24, 2017

Information Regarding Mobile Housing Units or RV's on Individual Sites in Special Flood Hazard Areas

The purpose of this letter is to ensure that the placement of Mobile Housing Units (MHU) or Recreational Vehicles (RVs) in the Special Flood Hazard Area (SFHA) is done in a manner that minimizes risk to life and property while providing temporary accommodation for displaced homeowners and meet all local regulations.

Your community has been identified as a potential recipient of some of these units. If these are provided, would your community allow units such as RVs or MHUs in your special flood hazard area? The placement of these units would be temporary and not to exceed 18 months from the date of the declared disaster Hurricane Harvey DR-4332. If the applicant, who receives an MHU, places that unit on their private property, they will have the opportunity to purchase it at the end of the 18-month period. However, if it is placed in a SFHA they cannot purchase it unless they move it to a location out of the SFHA, coastal high hazard area, Coastal Barrier Resource Act (COBRA) or otherwise protected area.

WE ASK THAT EACH FLOOD PLAIN ADMININSTRATOR PLEASE RESPOND TO THE FOLLOWING QUESTIONS BY EMAILING THE ANSWERS TO: FEMA-4332temphousing@FEMA.dhs.gov

- Would your community allow placement in the SFHA, despite any standing local laws or ordinances that may currently prevent such placement?
- Would your community allow placement of any MHUs or RVs below base flood elevation (BFE)?
- Would your community require certain permits per unit and, if so, what are those permits and is there an expedited process to get those obtained?
- Would your community allow blanket permitting for qualified recipients of MHUs or RVs identified by FEMA or TX GLO?
- Would your community allow occupancy of MHUs and/or RVs without an elevation certificate (EC)?

Procedure

Units will be elevated to the highest level practicable, and subsequently due to the temporary nature of the housing units may be placed below base flood elevation (BFE) Code of Federal Regulations allowed by DAP9453.3. FEMA will not consider the placement of these units in the SFHA a National Flood Insurance Program (NFIP) violation, nor will this have an impact on Community Rating System (CRS) ratings.

When you reply; please indicate your approval of this procedure and your preference to either a single permit or blanket permit, by sending your response to: FEMA-4332temphousing@FEMA.dhs.gov

Jet M. Hays
Deputy Director for Federal Programs
Community Development and Revitalization
Texas General Land Office

Charlie Cook
Floodplain Management and
Insurance branch Chief
Federal Emergency Management Agency

Attachment: Fact Sheet



Question: How should a community utilize published flood hazard information for the placement of temporary housing units in special flood hazard areas?

Answer: A community should refer to the FEMA Flood Insurance Rate Maps, Flood Hazard Boundary Map, Flood Boundary and Floodway Maps, and Flood Insurance Study to ensure that temporary housing units are elevated to the highest level practicable and be anchored. The community must remember that the purpose of any elevation of a housing unit is to ensure the protection of life and property against the next event. If new preliminary maps have been issued, they should be used as "best available data" by FEMA for 44 CFR 9 review and in accordance with the Guidance Memorandum DAP 9453.3, dated October 17, 2008 "*Abbreviated Decision Process for the Placement of Mobile Homes and Other readily Fabricated Dwellings.*"

Question: Can a community issue a permit for placement of a temporary housing unit that results in elevation lower than the effective Base Flood Elevation (BFE)?

Answer: Yes. A community may issue a permit for temporary housing unit where the "highest level practicable" has been determined to be below the effective BFE. The unit must also be anchored. Documentation of the review process should be maintained in the communities permit files.

Question: Is a community's participation in NFIP jeopardized by issuing a permit based on the Guidance Memorandum?

Answer: No. A community's participation in the NFIP will not be jeopardized.

Question: Does a community need to amend its ordinance to issue a permit based on the Guidance Memorandum?

Answer: FEMA will not require the community to amend its floodplain management ordinance.

Question: Will a community need to grant a variance in order to meet the permit requirements of the local ordinance?

Answer: No. A community will not need to grant a variance in order to issue a permit for temporary housing units that are placed on property for the purpose of assisting homeowners with the reconstruction of the permanent dwelling and in accordance with the Guidance Memorandum.

Question: If a community participates in the Community Rating System (CRS) program, will issuing a permit based on the Guidance Memorandum have any CRS implications?

Answer: No. Issuing a permit based on the Guidance Memorandum will not affect the community's CRS rating. In addition, the ability of a community to join the CRS will not be affected.