



# FEMA

## DISASTER ASSISTANCE DIRECTORATE

DAP9453.3

### Guidance Memorandum

**I. TITLE: Abbreviated Decision Process for the Placement of Mobile Homes and Other Readily Fabricated Dwellings**

**II. DATE:** October 17, 2008

**III. PURPOSE:**

Establish a standard, consistent decision-making process to govern the placement of mobile homes and other readily fabricated dwellings (when provided as a form of temporary housing) on private and commercial sites.

**IV. SCOPE AND AUDIENCE:**

This guidance applies to major disasters and emergencies declared on or after September 2, 2008. All FEMA personnel are directed to follow this guidance.

**V. AUTHORITY:**

Section 408 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended (42 U.S.C. § 5174); Executive Order 11988, Floodplain Management, May 24, 1977; Executive Order 11990, Protection of Wetlands, May 24, 1977.

**VI. DESCRIPTION:**

When placing a mobile home or other readily fabricated dwelling (e.g. park model) on a private or commercial site under the authority of the Stafford Act, FEMA is required to comply with the provisions of 44 C.F.R. Section 9.13, which mandates the following:

A. The temporary housing placement shall be evaluated to determine if it is in - or affects - a floodplain or wetland.

B. Under no circumstances will a mobile home or readily fabricated dwelling be placed on a private or commercial site in a floodway or coastal high hazard area (otherwise known as "V-Zone").



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C. No individual or family shall be temporarily housed in a floodplain or wetland unless the Regional Administrator determines that such a site provides the only practicable alternative.

D. No mobile home or readily fabricated dwelling may be placed on a private or commercial site in the floodplain unless placement is consistent with National Flood Insurance Program (NFIP) criteria, or any more restrictive Federal, State, or local floodplain management standard.

E. No individual or family shall be temporarily housed in a floodplain or wetland (except in pre-existing housing) unless the Regional Administrator has complied with all provisions required to minimize harm to and within floodplains and wetlands.

FEMA shall comply with all public notice requirements, taking into account the emergency nature of temporary housing.

#### VII. GUIDANCE:

The following guidance outlines the abbreviated process FEMA will follow to comply with and satisfy the preceding requirements. This process will employ standard procedures to ensure that due diligence and adequate documentation is maintained throughout the decision-making process, and will be implemented on a geographic basis, as appropriate. Accordingly, the following steps must be taken before placement of a mobile home or other readily fabricated dwelling:

##### Step 1: Determine if the proposed site is in or affects a floodplain or wetland.

#### A. Necessary Background Information:

1. FEMA will base the floodplain determination on the FEMA Flood Insurance Rate Map (FIRM), the Flood Boundary Floodway Map (FBFM), and the Flood Insurance Study (FIS) as set forth in 44 C.F.R. §9.7(c) and the Advisory Base Flood Elevation (ABFE) Map, as developed in accordance with Executive Order 11988. Areas designated as "Special Flood Hazard Areas" (SFHAs), or as being in Zone A, AO, AH, A1-30, AE, A99, AR, AR/A1-30, AR/AE, AR/AO, AR/AH, AR/A, VO, V1-30, VE, or V are considered as being within the base floodplain or 100-year floodplain.

2. If the cause of damage is a flood, flood mapping of private sites occurs as part of the normal registration process at FEMA's National Processing Service Centers. The FIRM panel



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number, community number, effective date, flood zone, and sanctioned community status are recorded in National Emergency Management Information System (NEMIS) under the Insurance tab.

3. Most private site mobile home or other readily fabricated dwelling requests are for sites adjacent to the damaged dwelling, and FEMA will use the floodplain determination for the damaged dwelling as the floodplain determination for the unit.

4. Site requests for commercial or alternate private sites will require separate flood mapping determinations which can be accomplished electronically or by on-site map-reading. Direct Housing Operations will make these alternate flood zone determinations as part of the site inspection process.

5. No mobile home or other readily fabricated dwelling may be placed on a private or commercial site in the floodplain unless placement is consistent with NFIP criteria or any more restrictive Federal, State, or local floodplain management standard.

#### **B. Possible Determinations and Their Consequences:**

1. If the determination as to whether the proposed site is in a floodplain or wetland is "No", further analysis is NOT required under Part 9, and the proposed action may be taken if otherwise authorized.

2. If the determination as to whether the proposed site is in a floodplain or wetland is "Yes", determine if the proposed site is in a floodway or coastal high hazard area.

i. If the determination as to whether the proposed site is in a floodway or coastal high hazard area is "Yes", the analysis is complete and FEMA is prohibited from placing any type of unit on the site.

ii. If the determination as to whether the proposed site is in a floodway or coastal high hazard area is "No", continue to Step 2.

#### **Step 2: Early Public Notice**

A. FEMA shall provide opportunity for public involvement in the decision-making process through the provision of public notice upon determining that the proposed action can be expected to affect or be affected by floodplains or wetlands. Whenever possible, notice shall



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precede major project site identification and analysis in order to preclude the foreclosure of options consistent with the Orders.

B. Individual Assistance will coordinate the issuance of Early Public Notice(s) with FEMA's Environmental and Historic Preservation Advisor, Chief Counsel, and External Affairs.

C. Continue to Step 3.

#### Step 3: Determine if the proposed site is the only practicable alternative.

##### A. Procedures Required to Reach a Step 3 Determination:

1. Document projected housing requirement versus the availability of adequate, alternate housing in the area; identify alternate sites and available housing outside the floodplain.

2. Document efforts to obtain information on alternate housing resources in the area or outside the floodplain and describe efforts to provide that information to applicants (e.g. DHR.Online).

3. In determining whether there are practicable alternatives for adequate housing, consider the following factors:

i. Speedy provision of temporary housing (i.e., how quickly can a mobile home or other readily fabricated dwelling be provided and made ready for occupancy?).

ii. Potential flood risk to the temporary housing occupant(s) (i.e., how severe is the threat of flooding during the projected period of occupation?).

iii. Cost effectiveness (i.e., are the life-cycle costs of the alternative more or less expensive than a mobile home or other readily fabricated dwelling?).

iv. Social and neighborhood patterns (i.e., which solution presents the least disruption to the community?).

v. Timely availability of other housing resources (i.e., is the speed with which an alternative can be provided comparable to the timeliness with which a mobile home or other readily fabricated dwelling can be provided?).

vi. Potential harm to the floodplain or wetland (i.e., which alternatives have the least impact on the floodplain or wetland?).



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#### B. Possible Determinations and Their Consequences:

1. If the determination as to whether the proposed site(s) is the only practicable alternative is "No", do not proceed further with this proposed site (per 44 C.F.R. §9.9(a)(2) & (d)(1)).
2. If the determination as to whether the proposed site(s) is the only practicable alternative is "Yes", continue to step 4.

**Step 4: Determine if required provisions can be taken to minimize harm to and within floodplains and wetlands .**

**A. Necessary Background Information:** The federal government is self-insured and assumes all risks associated with federal placement of temporary housing units. When the housing units are placed, the unit will be anchored and placed on blocks to prevent movement; sewer and water connections will be sealed unless the unit is moved from its anchored location; propane tanks will be anchored to the unit; and exposed sewer lines will be strapped to prevent movement.

#### B. Actions Required to Comply With Step 4:

1. Document how the considerations below were analyzed and evaluated, and the steps taken to address them.
2. Units will be elevated to the highest level practicable, and be anchored. Actual elevation levels will be based on manufacturers' specifications and guidance in the Mitigation Job Aid.
3. Placement of units will be made in accordance with NFIP criteria or any more restrictive Federal, State, or local floodplain management standard that may be applicable.
4. Describe how the information and advisories described below will be provided (to include through Public Affairs and Community relations channels) to applicants.

#### Health and Safety Information/Advisories

- i. Advise individual/household that they will be in a flood-prone area.



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- ii. Advise individual/household that ingress/egress to the site may be affected by flooding.
- iii. Obtain information on occupant's special needs (e.g. elderly, individuals with disabilities).
- iv. Advise individual/household to prepare a disaster kit and have a disaster plan.

#### Evacuation Information/Advisories

- i. Direct occupant to leave unit in place if advised to evacuate.
- ii. Provide information on applicants (including those with special needs) residing in mobile homes or other readily fabricated dwellings to local emergency management officials responsible for planning evacuations, and ascertain if "reverse 911" service is available.
- iii. Advise individuals and households to heed the evacuation warning of local emergency managers.
- iv. Advise individuals and households that temporary housing units are not designed to be used as a shelter during an incident.
- v. Provide each applicant a pamphlet on what to do in an evacuation.
- vi. Obtain written acknowledgement from each applicant that they understand they will be living in a floodplain; the risks associated with living there, and their agreement to evacuate if so advised.

#### Right-of-Entry Information/Advisories

- i. Advise each applicant that FEMA may be required to remove the unit during an emergency or major incident.
- ii. Advise each applicant not to erect any structures or fencing that would impede access to the property or unit.
- iii. Advise applicants that, in an emergency, FEMA may not have time to provide advance notification that the unit is being moved.



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#### Personal Property Information/Advisories

- i. Advise each occupant to purchase flood insurance with contents coverage.
- ii. Advise each occupant to elevate personal items -only if time permits - before evacuation.

#### **C. Possible Determinations and Consequences:**

1. If the determination is "Yes" as to whether required provisions can be taken to minimize harm to and within floodplains and wetlands, continue to Step 5.
2. If the determination is "No" as to whether required provisions can be taken to minimize harm to and within floodplains and wetlands, do not proceed further with this proposed site.

#### Step 5: Re-evaluate Alternatives

- A. Re-evaluate decisions made in Steps 3 and 4, and verify that those decisions remain correct. Identify and document any changes in the status of previously rejected non-floodplain alternatives.
- B. Continue to Step 6.

#### Step 6: Final Public Notice

- A. For the purposes of this abbreviated process, this requirement is considered met by the successful completion of Step 2, Early Public Notice.
- B. Continue to Step 7.

#### Step 7: Disposal Procedures

- A. If there is a decision to dispose of units, other than to return them to FEMA's storage location, FEMA will comply with all prevailing statutory and regulatory requirements.
- B. FEMA will not sell or otherwise dispose of units for use in a floodplain or wetland without the recipient agreeing to fully comply with the 8-step process in Part 9.6.



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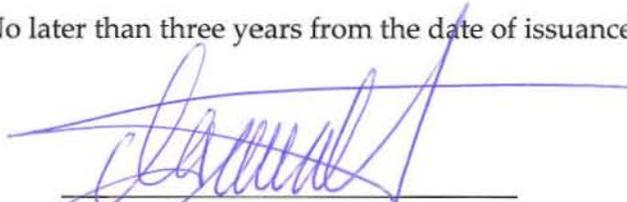
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VIII. **RESPONSIBLE OFFICE:** Disaster Assistance Directorate (Individual Assistance Division).

IX. **REVIEW DATE:** No later than three years from the date of issuance.



for  
Carlos J. Castillo  
Assistant Administrator  
Disaster Assistance Directorate