



FEMA

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PLACEMENT OF TEMPORARY STRUCTURES IN THE SPECIAL FLOOD HAZARD AREAS (SFHA) IN RESPONSE TO THE GULF OIL SPILL

With the Gulf Oil Spill, permitting officials and local jurisdictions are faced with a unique situation. To allow recovery workers the quickest access to the Gulf to expedite the work, there have been requests made to local communities to place temporary structures and other development in a Special Flood Hazard Area (SFHA).

In order to effectively reduce the risk of future loss of lives and property during a flood event, it is important for communities to permit all development in the SFHA, including temporary structures. Temporary structures and other development are temporary in nature and, at no time, considered permanent.

Each community has its own ordinance and rules governing permits and variances. Some communities have authority to directly permit temporary development and other communities may have to go through the variance process. If and when a community chooses to allow temporary structures and development in the floodplain, it is recommended that those communities be aware of and understand the guidelines for such placements so that they may effectively manage floodplain areas. By following these recommended guidelines, participation in the National Flood Insurance Program (NFIP) and the Community Rating System (CRS) Program should not be jeopardized.

We urge you to consider the following items for temporary structures and development placed in the Special Flood Hazard Areas (SFHA):

- The community should determine the purpose, need and use of the temporary structures and/or development and then require the applicant to apply for a local floodplain development permit.
- In addition to the purpose, need, and use of the temporary structure and/or development, the community should obtain other detailed information about the proposed temporary development such as the type and dimensions of buildings or structures, the size and contents of liquid storage tanks or other storage containers, and whether the materials to be stored on the temporary site are hazardous materials which could create an added dimension to the flood disaster response and recovery efforts.
- Structures and other development to be placed, using this guidance, should be temporary in nature.
- The duration for the temporary structures and/or development on a site should be noted on the permit. In addition, the community should consider noting on the permit the date by which the temporary structures and/or development will be removed from the site.

- Permits for placement of temporary structures in the SFHA are not recommended for longer than 180 days. Should the permit applicant request an extension, the community should revalidate the need and follow a re-permitting process, noting the length of time and the date of the extension.
- Communities are recommended to conduct a thorough initial site inspection prior to placement of temporary structures and conduct ongoing inspections of structures and other development in the SFHA throughout the temporary placement period.
- No or limited V Zones placements.
- Develop an evacuation plan prior to placement, i.e. a plan for removal and where the structures will be moved outside the SFHA.
- The timeframe at which the structure will be removed (i.e., minimum of 72 hours before landfall of a hurricane or immediately upon the flood warning notification).
- Have the capability for quick disconnects, with no permanent utility or foundation attachments, and/or be road ready, dependent on the nature of the structure.
- Review proposed temporary structure and/or development to assure that all necessary permits have been received from those governmental agencies from which approval is required by Federal, State or local law, including Section 404 of the Clean Water Act and Section 10 and Section 7 of the Endangered Species Act.
- Require within flood-prone areas (1) new and replacement water supply systems to be designed to minimize or eliminate infiltration of flood waters into the system; (2) onsite waste disposal systems to be located to avoid impairment to them or contamination from them during flooding.
- Keep and maintain records.

Based on the flood hazards and flood characteristics at the site and other factors, the community is recommended to place conditions on the permit to minimize the potential for loss of life and to minimize flood damages to properties when one or more NFIP requirements cannot be met. Communities may identify other conditions on the permit for temporary structures and/or development to further minimize flood damages and the loss of life.

It should be noted that while a plan for removal of temporary structures and other development in the event of a hurricane or flood warning notification is generally good procedure from a preparedness standpoint, removal of these structures may not always be possible in a flash flood or hurricane situation where evacuation may be limited to persons only. Permit applicants should be made aware of this fact and plan accordingly.

Provided below are agency contacts for your use. Please feel free to contact these experts who stand ready to assist you.

State National Flood Insurance Program (NFIP) Coordinator:

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State Community Rating System (CRS) Coordinator:

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