

ANNEX 4:

Disaster Housing Community Site Operations

Introduction

Providing for disaster victims becomes more challenging the longer individuals are displaced from their primary residence. For most disasters and emergencies, temporary sheltering is the only form of housing assistance needed. Once the danger has passed, individuals are generally able to return to their homes within hours or after a few days. For more serious disasters where homes or communities have been destroyed, damaged, or contaminated to such an extent that they are uninhabitable for an extended period of time, additional housing options are required. Interim housing is the phase of housing assistance that covers the gap between immediate sheltering and the return of disaster victims to permanent housing. The goal of the interim housing phase is to provide safe and secure temporary housing that allows a family to live together, with a reasonable amount of privacy, meets the physical accessibility needs of the household, and includes essential utilities, and access to areas for food preparation and bath facilities. Interim housing is designed to provide a solution for a period of generally up to 18 months.

In the aftermath of the historic events of 2004 and 2005, agencies and entities encountered situations that required change in their traditional emergency and disaster management roles. FEMA recognized that a new post-disaster housing paradigm must be developed to address hazards of all sizes, scopes, and scales. Currently, the use of direct housing options, assistance provided to disaster victims in the form of physical resources and not monetarily, are used only in situations in which temporary housing options are not sufficient to meet the needs of the affected population. When financial assistance options, monetary assistance provided to individuals and households to rent alternative housing accommodations, existing rental units, manufactured housing, recreational vehicles, or other readily fabricated dwellings, are infeasible based on established criteria and guidance provided by FEMA, factory built housing units (e.g., modular homes, manufactured homes, etc.) can be used. When the conclusion is made that factory built housing units are required, decisions such as unit and site types should be determined. Community sites, *are an option of last resort*, spaces that can accommodate two or more temporary housing units (THUs), may be used as the site type of last resort for placing THUs when private and commercial sites are not available.

To improve housing assistance, the Post-Katrina Emergency Management Act (PKEMRA), Section 683(b)(6), required a plan for the operation of community sites including access to public services, site management, security, and site density in the development of a collaborative Strategy. This Annex establishes a framework for Federal, State, territory, tribal, and local governments to plan for every step of the community site operations process, including determining the need for community sites and identifying potential sites, as well as constructing, populating, maintaining, depopulating, and deactivating these sites. These components can be most critical when community sites are placed outside the affected area, or in a different part of the affected community. In such a situation, additional infrastructure and other services are often

requested. A set of standard operating procedures for the community site operations process will better enable governments to meet temporary housing needs in the wake of a disaster.

As the disaster recovery community takes a more coordinated and holistic approach towards housing, this Annex looks to all stakeholders to collectively provide additional social services beyond simply a housing unit that is safe, sanitary, and functional. In addition to community site operations and plans, this Annex details the vital infrastructure, such as resident food, education, employment, medical care, and other essential services, that must be available in community sites. In developing community sites, the appropriate balance must be determined between providing adequate temporary housing to individuals in support of the overall recovery effort and the ability of pre-disaster communities to recover. Housing solutions that require applicants to provide some sort of financial contribution of their own should be used when possible, and provided amenities should not be incentives for individuals to remain in their temporary housing.

Disaster assistance should not be used to sustain individuals indefinitely and community sites are not a permanent housing option, guidelines are presented for depopulation and deactivation of community sites. This includes case management services available to assist disaster victims in identifying long-term housing solutions by connecting them with the resources they need. Finally, as strategic and considered pre-planning can mitigate issues prior to a disaster, crucial to the success of community site operations, lessons learned from previous operations and best practices are offered.

This Annex presents an array of methods to be used in the development, use, and deactivation or conversion of community sites, but is not an exhaustive list. Stakeholders should continually seek to innovate and improve disaster housing options for victims. To support innovation in disaster housing, the standards that housing and related services must minimally meet or exceed are described in this Annex.

Assessment of Need

The first step in the community site operations is to assess the needs of affected communities. Determining these needs will allow for the selection of the best housing solutions, including the potential use of community sites.

State-Led Housing Solutions Task Force

As discussed in the *Strategy*, when the impact of a disaster makes it necessary to provide temporary or permanent housing options, a State-Led Housing Solutions Task Force (SHSTF) should be convened at the Joint Field Office (JFO). The SHSTF will work closely with all sectors, as well as entities created specifically to provide disaster response, in order to develop recommendations that promote citizen-focused growth policies, help increase commerce into and from the affected region, assist with economic renewal, and help stabilize and reconstruct communities. The SHSTF will also facilitate the identification and coordination of housing ideas, innovations, strategies, solutions, and resources from all sectors and the affected population. Members of the SHSTF will identify available resources and coordinate the implementation of housing programs. The culmination of this effort will be a comprehensive housing plan for the

affected community and will identify all feasible housing assistance resources to sustain disaster victims from sheltering through permanent housing; including a determination as to if community sites are required. This plan will be implemented by the SHSTF and will maximize the availability and use of all identified, feasible, and existing housing options. The SHSTF plan will include a needs assessment and details on community site development if they will be utilized.

Determination of Need for Temporary Housing Units

Determining the housing requirements of an affected community begins with a preliminary assessment of the housing needs. To assist in this process, the Joint Housing Solutions Group has developed a mission scoping tool to help determine the potential number of applicants who will require temporary housing. To arrive at its determination, the scoping tool compares data from the Census Bureau, Preliminary Damage Assessments (PDAs), shelters, and eligible applicants with available rental resources. A multi-agency Housing Portal collects information on available housing resources. Applicants are also contacted directly to further identify those in need of housing assistance as well as their potential accessibility needs. While the scoping tool is not intended to establish the need for a community site, it will help determine the total number of housing units needed. A thorough examination of available resources to include private sites, commercial pads as well as rental resources will still need to be considered before the decision to build a community site is finalized.

Mission Planning Team

A Mission Planning Team (MPT) can be deployed to assist the State-Led Housing Solutions Task Force, providing tactical support with the analysis of housing needs and/or mass care needs, scoping the technical requirements to meet the need, and facilitating pre-operations planning. JFOs request the deployment of an MPT through FEMA.

The MPT is initially composed of subject matter experts from FEMA, USACE, HUD, USDA, Veteran Affairs (VA), and other agency components as required. The findings and recommendations of the MPT include recommended housing options, and a pre-operations plan, which address the disaster-specific technical requirements. These requirements will be provided in sufficient detail to develop the technical components required to successfully run the appropriate housing mission.

The MPT will perform three critical tasks for the successful execution of the mission: specific housing/mass care mission planning, scoping of requirements, and researching State regulatory/environmental requirements with the appropriate functional leads. Details of the tasks include:

- Regulatory laws, zoning, and permit requirements (FEMA/HUD/State/tribal/local).
- Consideration of flood zoning restrictions (FEMA/State/tribal/local).
- Hauling restrictions and required permits (FEMA/DOT/State/tribal/local).
- Assist with locating and analyzing potential group and commercial sites (FEMA/USACE/EPA/State/tribal).
- Installation requirements such as anchoring, blocking, etc. (FEMA/USACE and State/tribal/locals).

- Environmental requirements such as air pollution, fuel storage, water use, solid and hazardous waste disposal, sewage disposal, etc. (FEMA/USACE/EPA).
- Electrical coordination such as for community site and haul & install (local/USACE).
- State, local and public service districts points of contact (DHOPS).
- Support identification and analysis of available rental resources, as required. (FEMA/HUD/USDA/VA/State/tribal/local).
- Support analysis of the housing needs identified in the pre-placement interview process as needed (FEMA/State/tribal/local).
- Support to any State-led JHTF, as required.

Additionally, the USACE may be tasked with the preliminary study, environmental assessment, and site design of a potential community site. Completing design plans during the MPT phase will ensure that vital steps are taken towards completion of a community site in a timely manner.

Utilizing the full capabilities of the MPT is of great value to all stakeholders. Not only will the MPT assist all parties in understanding the scope of their mission, but it will also provide a clear roadmap on how to best assist the victims of a given disaster.

Sequence of Delivery

Community sites, when used, are employed and operated as part of FEMA's standard process and order, or sequence of delivery, for the distribution and awarding of specific types of disaster assistance. 44 CFR 206.117(b)(1)(ii) lays out the authorities for when FEMA may provide the different types of temporary housing assistance and specifically in 206.117(b)(1)(ii)(E)(3) and (4), community sites.

Disaster assistance begins with the provision of financial assistance for rent, hotel or motel reimbursement, and home repairs or replacement, which, for most disasters, is sufficient to address the majority of temporary housing requirements. Direct housing is used only when all other housing options, including financial assistance for rent, transitional shelters, and relocation, have been exhausted or are unreasonable. Direct housing is limited only to situations in which traditional financial temporary housing options are not sufficient to meet the needs of the affected populations. When financial assistance options are infeasible based on established criteria and guidance provided by FEMA, the SHSTF can request the use of direct housing options. Direct housing options can include the use of factory built housing units (e.g., modular homes, manufactured homes, etc.). Whether units will be clustered and which types of units and sites will be used will need to be determined.

A direct housing mission may include placing units on private sites to enable homeowners to remain on their properties while they repair and/or rebuild their permanent residences. Units may also be placed in pre-existing commercial parks to accommodate renters, or owners without a feasible place for a unit. If housing needs are unable to be addressed with commercial and private sites, direct housing may be placed in community site configurations. Manufactured homes are generally used to satisfy temporary housing needs and are typically placed on commercial pads or in community sites developed expressly for these homes to be placed in a community-like setting. Commercial and private site options must be exhausted before a community site is considered.

Criteria for Community Site Selection

The durability, safety, and functionality of community sites can be improved by taking proactive planning measures prior to beginning construction. When the determination is made to develop community sites, appropriate site selection and development is important in the disaster recovery process, and community site plans must be developed with consideration for the climate, geography, and accessibility and cultural needs of the affected community. If appropriately selected, these sites can offer individuals and households the opportunity to return to their pre-disaster communities when permanent housing resources have been destroyed. Additionally, these sites offer the community the opportunity to address housing needs for its residents and reestablish its workforce, tax based, and population following the loss of permanent housing stock due to a disaster.

However, identifying appropriate construction sites for temporary housing in the disaster area may be difficult due to feasibility, environmental, and availability issues. Sufficient time and resources must be allotted for meeting various regulatory and administrative requirements, including environmental and historic preservation considerations, Davis-Bacon minimum wage provisions, licensing/building codes, and accessibility specifications. Climate and seasonal requirements will also affect housing requirements; if community sites will be provided beyond the current season, planning efforts should consider the full seasonal cycle to ensure such housing is adequate for a full four-season climate.

Land Leasing

A key component of the community site operation process is the leasing of the land on which a community site will be developed. All options for leases should be evaluated, but standard guidelines and procedures can help ensure that the chosen community site is both cost effective and can be used towards permanent community housing goals. 44 CFR 206.117(b)(1)(ii)(E) outlines the specific order in which different sites and properties can be considered for community sites.

To begin, properties owned by Federal, State, and local governments should be considered as the first option in an effort to reduce costs. State and local governments are responsible for identifying vacant land that they own that may be suitable for a community site. Once a suitable site has been chosen and acquired, a memorandum of understanding between FEMA and the Government entity that owns the site is prepared, generally detailing the State or local government agrees to let FEMA use the land chosen for a community site for the duration of the housing program.

If publicly owned land is unavailable or infeasible, the State and local government are responsible for identifying potentially viable sites for FEMA to lease. The U.S. General Services Administration (GSA) can be used to acquire a lease from private landowners. Leasing options that can be used to provide permanent housing for individuals and/or may be converted into permanent ownership for future development, such as a permanent mobile home park or residential subdivision, are preferred. This will facilitate housing solutions that incorporate hazard mitigation principles at the earliest possible stage. If FEMA agrees to put in infrastructure that will

remain and can be used after the community site is deactivated, terms can often be negotiated which compensate the Government for any permanent repairs or upgrades.

Environmental and Historic Preservation Reviews

After determining the need and identifying a requirement to utilize community sites, FEMA engages in environmental and historic preservation reviews to make informed decisions regarding site selection and construction. The purpose of the environmental and historic preservation reviews is to assess the impacts of potential new sites on the natural environment, and on historic properties. In general, sites whose presence will have significant impact on the environment should not be chosen. The reviews occur during site selection to determine site feasibility, and identify considerations for site design and construction. The environmental and historic preservation review may impose conditions that must be followed during construction, operation, or depopulation. FEMA will identify who (e.g., FEMA, contractor, site proponent, or landowner) is responsible for meeting these conditions, and the FEMA Regional Environmental Officer (REO) is the primary point of contact for coordinating the environmental and historic preservation review and addressing questions and concerns. The environmental and historic preservation review must be completed before land can be leased for a community site and construction may begin.

The National Historic Preservation Act (NHPA) provides considerations for community site selection. The initial step in identifying and assessing NHPA considerations for community sites involves the impact of community sites to historic properties such as archeologically sensitive areas, buildings, districts, structures, or objects listed on or eligible to be listed on the National Register of Historic Places. It is also necessary to consult with the State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO) if any action will affect historic properties.

To mitigate potential damage to the environment, a specific level of National Environmental Policy Act (NEPA) analysis is required based on several factors surrounding the environment in which community sites may be placed. To identify the level of NEPA analysis required, the Categorical Exclusions (CATEX) for emergency and commercial community sites are first documented. CATEX are actions which have no significant effect on the human environment and are, therefore, categorically excluded from the preparation of environmental impact statements and environmental assessments except where extraordinary circumstances as defined in 44 CFR 10.8(d)(3). The identification of the level of NEPA analysis needed also includes the Environmental Assessment (EA) for commercial community sites, and the EA for previously undeveloped community sites (green sites) must also be considered as well as the Environmental Impact Statement (EIS) for sites that have significant impacts to the human environment. The following are issues of concern for the EA and EIS:

- **Floodplains.** Full floodplain review must be conducted for all community sites as under FEMA's regulations, the agency cannot place units on sites located in the coastal high hazard area or floodways (44 CFR 9.13). Sites located in a floodplain should also be avoided, as, if chosen, FEMA must elevate units located in the floodplain to the fullest extent possible (44 CFR 9.13).

- **Wetlands and Storm Water.** Selecting sites in wetlands should be avoided. Site designs should be modified, if necessary, to avoid impacts to and from wetlands. Site designs and operations should be coordinated with the appropriate State and/or local authorities on the need for storm water and/or erosion control management techniques and/or permits.
- **Environmental Justice.** Sites that, if selected, would have disproportionately high and adverse environmental and health impacts to minority and low-income communities should not be selected. Additionally, once any site is selected, public notice and comment opportunities should be made available.
- **Hazardous Materials/ Wastes.** Site conditions should be identified and assessed regarding presence of hazardous materials and wastes (e.g., spills, chemicals, wastes, underground storage tanks, Superfund sites, reportable chemicals, etc.). Sites with unmitigated/un-remediated hazardous materials/ wastes issues must not be selected.
- **Endangered and Threatened Species.** Site conditions should be identified and assessed regarding the presence of endangered or threatened species or a protected habitat. The Fish and Wildlife Service (FWS) or National Marine Fisheries Service (NMFS) should be consulted if action will likely adversely affect endangered or threatened species or adversely modify the critical habitat. Sites that have endangered or threatened species present or are within protected habitat should not be selected for use.
- **Coastal uses.** Coastal zone consistency determination should be used if needed. Sites in Coastal Barrier System Units (CBRS) should not be selected.
- **Noise.** Unacceptable noise sources and sensitive receptors should be identified and assessed. Sites adjacent to unacceptable noise sources that cannot be mitigated (e.g. Airports, quarries, etc.) should be avoided.
- **Land Use and Zoning.** Sites should be identified and assessed for existing land uses and possible change in land use as a result of the new housing site. Sites that would require converting prime and unique farmland into residential or urban land should be avoided. Additionally, sites must be compatible with existing zoning designations.
- **Transportation.** Existing transportation patterns and system, as well as any potential need to modify these to accommodate the community site, should be considered.
- **Natural Hazards.** Sites in areas with potential natural hazards should be avoided. These hazards include seismically sensitive areas, areas prone to falling rocks or avalanches, etc.

Unless it is also engaged in construction efforts, FEMA typically does not perform environmental and historic preservation reviews for any other type of temporary housing, including hotel or motel reimbursement, home repairs assistance, transitional shelters, or the placement of units on private or commercial sites when such action has minimal ground disturbance.

Site Selection Considerations

- **Zoning and Local Compliance.** Local and tribal governments hold the primary responsibility of selecting and approving sites, as well as streamlining the permitting and zoning processes for site development. During the community site design phase, it is critical that all relevant building codes, Federal, State, and local environmental regulations and other relevant requirements are considered. This includes those for storm water, water discharge, air quality, waste disposal, and buildings. These requirements can vary greatly from region to region, and close coordination with State and local governments, as well as other responsible Federal agencies is essential to ensure adherence to applicable laws, codes, and regulations. Sufficient coordination, research and pre-planning can go a long way towards verifying compliance prior to site construction. Once ownership of land slated for use is established, zoning must be considered to ensure proper land use.
- **Host Community Considerations.** If possible, community sites should be located within, or in close proximity to, the affected community to allow victims to return to their communities, promote community recovery, and to avoid adverse impacts on the tax base of the community. It is critical to ensure the intersection of community site development with other community plans and goals. The presence of significant public opposition can adversely affect the success of a site. See NDHS Annex 2 for best practices for interaction between host communities and relocated disaster victims, including those in community sites.
- **Utility Infrastructure.** One of the most critical factors to consider during the community site selection process is the availability and accessibility of essential utility infrastructure. Electrical, water and septic systems must be located and evaluated to determine if they are capable of supporting a fully operational community site for the duration of the interim housing period. If it was determined for any reason that any or all of these systems are incapable of sustaining operations, plans must be made to either upgrade or replace the affected elements. The most efficient locations to consider for site placement are sites that previously supported a mobile home site or other form of temporary housing. Paved areas with above ground utilities, such as military bases, business parks, or airports should also be considered. If a site is being constructed in an area that has not previously been used to support housing, significant infrastructure upgrades and construction may be necessary, and site factors may necessitate the construction of facilities such as sewage lift stations, electrical substations, and utility corridors.
- **Essential Services.** Proximity to essential services, such as fire, police, medical, and education services, is a prime concern when selecting potential community site locations. Accessibility requirements must also be considered, such as access to transportation and bus lines, senior shuttles for shopping, and other needs.
- **Environmental Hazards and Considerations.** In addition to the criteria for environmental preservation outlines in the previous section, environmental hazards, other factors that may contribute to inadequate living conditions, should be considered. This includes distance away from wet areas as well as mosquito, snake, and rodent infested areas. FEMA should ensure that soil tests are conducted and the results analyzed prior to construction. This can help ensure that proper excavation, backfill/refill, and compaction measures are taken throughout the site to prevent sub-base failure. Topography should be considered to comply with Uniform Federal Accessibility Standards (UFAS) requirements and open flat areas generally make for the most effective and usable community sites.

Timeframes

The environmental and historic preservation review is conducted after a site has been identified by FEMA as a potential candidate for group housing. Sites requiring an environmental assessment, environmental impact statement, or sites that will be located in floodplains may trigger the need for public review. Once completed FEMA will make a decision on whether to proceed with the site. Once approval has been granted, a Notice to Proceed is issued, and the community site construction process begins.

States, tribal, and local government can expedite the environmental and historic preservation review process by engaging in pre-identification, pre-evaluation, and pre-selection of sites for group housing. These entities can use the criteria for community site selection information to screen sites that would not be suitable or would require significant time for consultation. Although responsibility for compliance under various laws like NEPA; NHPA; the Endangered Species Act; 44 CFR 9; Floodplain Management and Wetlands Protection (EO 11988); the Environmental Justice and Coastal Zone Management Act, among others, falls strictly with the Federal agency engaging in the action, State, tribes and local government entities can facilitate the review process by considering taking into account impacts to the natural environment and to historic properties and providing FEMA through the FEMA REO, with any information that was collected during the pre-identification of sites.

Community Site Development

Once the community site has been selected, other key components must be carefully considered, planned, and designed to ensure the success of a site. Prior to beginning work on a community site, it is critical that all parties have discussed, and agree on proposed design specifications and construction processes. FEMA, USACE, the SHSTF, and contractors should all be on the same page regarding methods and design direction. Concurrence between all parties involved in the process of community site design and construction should be reached before construction is initiated. Clear communication of objectives is also critical to the establishment of attainable mission goals.

Unit Types

The Housing Assessment Tool (HAT) is a tool designed to collect information on housing products and help FEMA determine whether proposed options are suitable for disaster housing needs. The assessment tool contains 175 questions about the major aspects of the housing products proposed by potential providers and used to determine appropriate unit types to use based on local characteristics, including climate, topography, proximity to floodplain, and other factors as follows:

- **Range of Use.** This assesses how adaptable a unit would be under various environmental, geographic, and cultural or conditions required by local government. For example, in coastal areas characteristic of high wind zones, units need to meet wind zone standards and specialized units may be needed for colder climates.

- **Livability**: The livability discusses how well the units can accommodate or help provide for a household's daily living essentials as well as their physical and emotional needs.
- **Timeliness**. The timeliness, or how fast units could be made ready for occupancy, is a crucial factor in providing rapid response in the wake of a disaster.
- **Cost**. A unit's cost-effectiveness is assessed both in absolute terms and in terms of its value relative to other housing options.

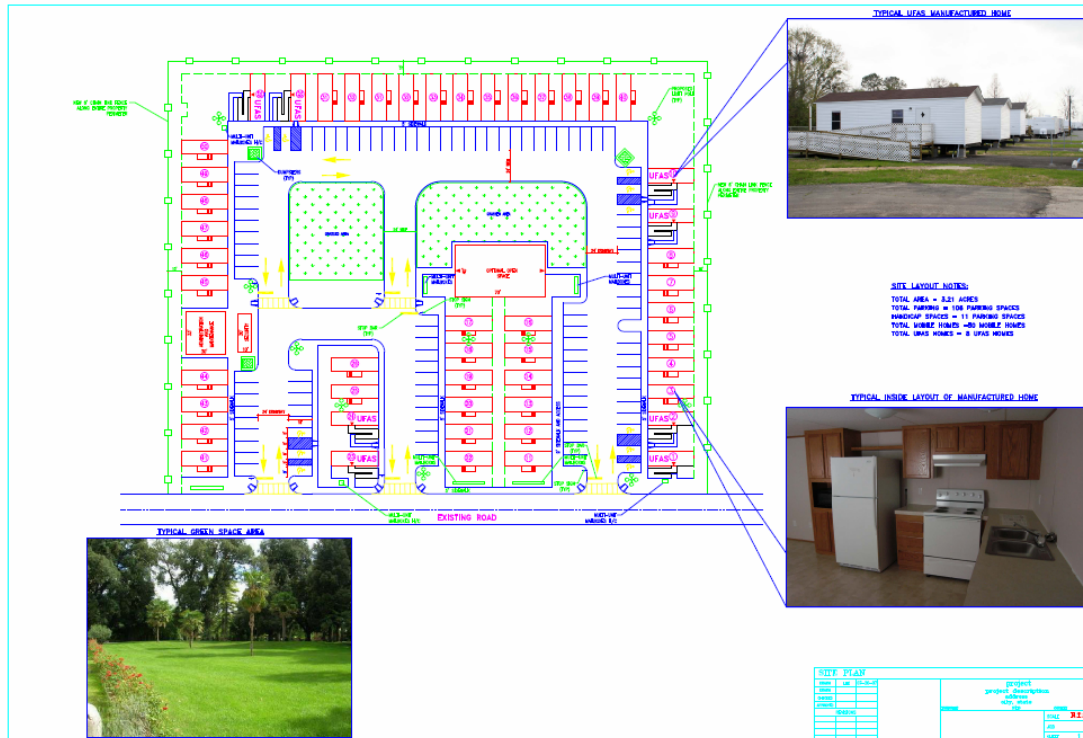
Additionally, most units must comply with the HUD regulations, and UFAS compliant units must be available.

Infrastructure Design

Site design must adhere to local building and zoning codes and requirements. Local codes, such as set backs from boundary lines and other units, depth of buried water, and regulations for sewer and electrical lines, cannot be circumvented. Electrical service requirements and codes are of primary concern, as are adequate water supply and sewage facilities. Where no sewer or septic system exists, a portable wastewater treatment facility may be provided.

Gravel sidewalks and driveways should either be built above grade and contained by framing material, or built below grade to be even with the ground to prevent spreading of gravel. Torrential, sustained rainfall can cause compacted material used for driveways and sidewalks to loosen, spread and scatter. This deterioration can cause the surfaces to sink into the soil below, as well as lead to the clogging of drainage culverts.

Group-Site Design Accommodation for 50 Units



This is the design of a typical 50-units community site. It is projected that a typical unit should comfortably accommodate, on average, 2 - 3 individuals. The density of the site, defined as the number of individuals can be housed in the site at one time against the size of the site, is an important consideration during the community site design phase as the site density impacts site access as well as the size of each resident's individual lot.

Wrap-Around Services

It is essential that access to educational institutions, places of employment, and essential social services is considered during the process of planning and designing a community site. However, in many cases, positioning a community site in close proximity to these facilities is not always possible. The term 'wrap-around services' includes the delivery of infrastructure and additional social services to affected residents living on temporary housing sites that go beyond a physical need for housing.

Returning disaster victims to their pre-disaster communities is preferred, however, when community sites are placed outside or in a different part of the affected community, additional infrastructure and other services are often requested. These services can include access to public transportation (including paratransit services), emergency services, and healthcare facilities. The availability of accessible food and shopping services, laundry facilities, childcare, and common areas such as playgrounds and pet areas can also be considered.

The availability and proximity of infrastructure and services are prime consideration factors in the evaluation of a site for utilization as a community site; therefore requested enhancements are site and population specific. For example, an urban population dependant on public transportation may have difficulty in accessing services in a more rural community where public transportation does not exist. The needs of elderly populations, individuals with disabilities, and families requiring childcare should also be considered.

Through the evaluation of lessons learned, study of our best practices, and by partnering with other service providers (Federal, State, local, voluntary, and private sector), wrap-around services were identified as a key concern requiring further evaluation and discussion to ensure the consistent and appropriate delivery of community site housing assistance. Many of the wrap around services requested of FEMA by local authorities, advocacy groups, and voluntary organizations, are traditionally provided by State, local, or private entities in the communities from which the affected population was living before the disaster. As a result of the disaster, applicants who require a direct housing solution will have to temporarily relocate out of the range of the pre-existing service. The Stafford Act currently provides no specific authorities to FEMA for these temporary augmentations; however, all of these factors should be taken into consideration during the community site design process.

Uniform Federal Accessibility Standards (UFAS)

The Uniform Federal Accessibility Standards (UFAS) present uniform standards for the design, construction and alteration of buildings so that individuals with disabilities will have ready access to and be able to use these structures. In coordination, temporary housing must address the needs of those with functional disabilities and medical conditions that affect the configuration of their housing environment and must comply with UFAS. A 42 point inspection process, which has been reviewed and approved by the Access Board, is used to assess and determine UFAS compliance. Fifteen percent of the unit pads and parking spaces must be compliant with UFAS in the contractor's design unless otherwise specified. Other UFAS-related concerns can include access to dumpsters and mailboxes, as well as parking for wheelchair-equipped vans. Full UFAS specifications are available: <http://www.access-board.gov/ufas/ufas-html/ufas.htm>, and when developing a community site design and placing individuals with disabilities, the Special Needs Coordinator for the disaster, or the FEMA Disability Coordinator in the Office of Equal Rights should be consulted.

Safety and Security Measures

As an option of last resort, the design of a community site can affect the safety and security of all residents. Planners must consider the relative safety of the area selected for development of the site, including the level of crime in the surrounding community. If additional site security is necessary, provisions for solutions such as fencing and the hiring of additional security personnel should be considered. Local law enforcement should be consulted prior to building a community site and coordinated with during operation.

Planners must also ensure that the number and location of fire hydrants are appropriate for the size and design of the site, and conform to the National Fire Code. Coordination with local emergency responders to develop roads that will satisfy the requirements for emergency vehicle access in case of an emergency should also be addressed. In addition to emergency planning,

road and access route design should also take into consideration the volume of traffic in the area which may increase significantly once a community site is fully populated. This can have an impact on the safety of both vehicular and pedestrian traffic.

Emergency storm shelters may be needed when a community site is constructed in an area with a high probability of severe weather activity. If shelters are required, the construction and positioning of these shelters will need to be considered during the overall community site design process.

Additionally, security during the lifespan of the community site must be offered. This includes the preliminary determination of the level of security needed. Security will depend on several factors including the size of the park and location. Larger parks (up to 200 units) will require a higher level of security than smaller parks. In larger parks, vehicle access passes and a controlled access point along with roving patrols within the park will deter unwanted visitors. A system also needs to be in place to allow access for health and social service workers as well as other wrap around services personnel. The park rules and regulations must clearly define visitor hours for non-residents.

Identification must be made as to who among Federal, State, territory, tribal, and local agencies will provide security, including establishing the level of access to community sites for non-residents. In tribal areas, the tribe reserves the option to employ their own security force.

Construction

After the site design plans have been finalized, the lease has been agreed upon, and permits are in place, a 'Notice to Proceed' is issued, and the community site construction can commence at the direction of FEMA. Federal expense is limited to 75 percent of the cost of construction and development, including installation of utilities. In accordance with Section 408(a)(4) of the Stafford Act, the State or local government shall pay any cost which is not paid for from the Federal share, including long-term site maintenance such as snow removal, street repairs, and other services of a governmental nature.

The designated contractor will begin the process by securing permits and coordinating efforts with the local utility providers. The contractor should allow for sufficient time to organize and deploy construction resources. It is expected that the contractor will complete construction of the site according to the approved design, operations plan and project schedule. The surveying, clearing, debris disposal, fill and grading, and infrastructure installation should conform to agreed-upon specifications and applicable regulations. The construction of roadways, culverts, and driveways should be closely monitored to ensure that they are constructed according to plan.

It is expected that the contractor will schedule work to meet the required deadlines. Working in shifts to cover 24 hours per day is not mandatory, but permissible. The contractor may be expected to work seven days per week, including weekends and holidays, based on operational and disaster needs. It is anticipated that, barring any contingencies such as local opposition and rain delays, the site should be ready for the first unit to be installed within approximately 30 days after the 'Notice to Proceed' is issued, and, if the community site is scaled to accommodate greater than 100 housing sites, a reasonable timeframe would be for the first 100 units to be installed within 45 days.

During this process, State and local officials, as well as other internal and external customers, should be kept abreast of progress. In addition to managing expectations, these entities can provide invaluable assistance in meeting project goals. Additionally, all involved parties should develop contingency plans to manage and mitigate any obstacles that may arise.

After the actual construction of the site has been completed, unit installation activities can commence. FEMA should work with the construction contractor, as well as with State and local authorities, to ensure that the appropriate permits and waivers are in place. FEMA will closely monitor the installation process to verify that all units are blocked, leveled, and positioned according to requirements. Once it has been confirmed that the unit is ready for occupancy, FEMA can complete the process of assigning the *applicant* to their temporary home.

Quality and costs can be controlled effectively if direct coordination between the contractor and utility/commodity companies is permitted. It is much easier to manage project timelines and milestones when this sort of direct communication exists. In future disasters, it may be beneficial to consider exploring alternative contracting vehicles and approaches for community site related requirements. For example, existing public assistance contractors and programs may be considered to assist with the replacement and repair of utility structures.

Placement of Individuals and Households

The State, tribal, territory, and local government will determine the priorities for placement of individuals and households. Through the State-led JHTF, the decisions will be made as to which populations have precedence to ensure that everyone is housed to best suit their individual needs. Items the task force may consider when determining housing priorities are:

- **Medical Needs.** Any person who may not remain in optimum health in a shelter or other emergency facility. Such persons may include those dependent upon oxygen or dialysis equipment. However, disaster victims with medical needs should not be provided with housing until the services they need to assist them are available. One consideration for housing locations is proximity to facilities that will assist in meeting their medical needs.
- **Accessibility Requirements.** As outlined in the 'UFAS' section above, a UFAS compliance check-list is used to determine accessibility, and strategic consideration is given to the number of UFAS-compliant units that will be required as well as which residents will be placed specifically into UFAS-compliant units.
- **Court Restrictions.** Although FEMA may not discriminate in housing applicants, court orders take precedence. Applicants with court orders excluding them from living in proximity to specified groups or individuals may not be suitable for housing in a community site. Special housing arrangements will need to be provided and State and local partners should be engaged to help facilitate the placement of these applicants.

Other disaster-dependant considerations may be made for first responders, any person who has a need to remain in the community to help in the response and recovery for the event. Such persons may include police, firefighters, medical staff, and other emergency personnel.

The Pre-Placement Interview (PPI) is a FEMA tool used to determine the type and scope of housing needs for a disaster. Each applicant who indicates they have a housing need is called and asked a set of questions, through which it is determined what type of resource will best fit their housing needs. During the PPI, the household size, household composition, and any special accommodations that may be required are identified. Applicants may require, for example, a UFAS-compliant unit, a ramp, or special bathing facilities.

During the PPI, it is decided if the applicant is to be provided with a temporary housing unit. If the applicant is provided with a unit, it will either be a private site, where the applicant has private property on which to place a unit (dependent upon a site inspection for feasibility), a commercial site where FEMA has identified and contracted for pads within an existing commercial site, or a community site where, due to lack of private sites and existing commercial sites, FEMA has contracted to develop a site on land either donated or leased.

If the applicant is not provided with a temporary housing unit during the PPI, they will either remain in their damaged dwelling, be provided information on rental resources if available, or confirm that they have located or will locate their own housing resources. In this case, the PPI determined that the applicant was not eligible for the direct housing assistance, or the applicant selected another housing option to meet their needs.

Park Management

The two distinct areas of management required for community sites are the physical maintenance to ensure the site is properly kept throughout the duration of its use and the management related to ensuring appropriate casework is provided for the population residing within the park. Physical maintenance is performed to ensure the site is properly kept throughout the duration of its use. Site maintenance includes but is not limited to the upkeep of the infrastructure including utilities, roads, snow removal, maintenance of common areas, waste (e.g., solid, hazardous, sewage) management and removal, signage, and the eventual deactivation of the site. This may also include mowing of grass and rodent and pest control. Additionally, unit maintenance includes routine maintenance and repairs to individual units, replacement or deactivation of units as required; or alterations to individual units to meet accessibility needs. It also includes keeping area surrounding individual units free from debris, unusable vehicles, pet litter, and maintained in a neat and orderly manner for the health and safety of all park residences.

Another aspect of the park management relationship with the population involves ensuring the appropriate casework of park residents. Casework includes determining an occupant's continued eligibility for residing in the park and ensures residents comply with the terms of their revocable licenses and park rules. Case management includes assisting residents in identifying long-term housing solutions that are sustainable without disaster related assistance and potential on-site management to assist the residents.

FEMA has the authority to terminate assistance for an individual or household for a number of eligible reasons either for cause or due to change in eligibility status. For example, if an applicant fails to meet FEMA's requirements for housing eligibility repeatedly violates park rules or is a

threat to the safety and security of other park residents, FEMA may take actions to terminate the occupancy agreement.

The importance of effective communication, coordination and cooperation between emergency management agencies and the local utility providers cannot be overstated. It is imperative that levels of responsibility are agreed upon as far in advance as possible. An example of this sort of coordination could include determining which entity would respond in the event of an emergency situation such as a power outage or a water main break. If a municipal water system fails, deciding on lines of responsibility in advance can minimize service interruption to the individuals residing in the park.

Depopulation, Conversion, and Deactivation Strategies

Depopulation of a community site is achieved through intensive case management of the applicants. Helping an applicant and their families find safe, suitable permanent housing is the ultimate goal of FEMA recertification and case management. A FEMA employee will visit with each applicant at least once every month to assist them with the development of their Permanent Housing Plan (PHP) as well as providing access to local, State, and Federal unmet needs providers. The PHP is a realistic plan that, within a reasonable timeframe, will put the disaster victim back into permanent housing that is similar to their pre-disaster housing situation. A reasonable timeframe includes sufficient time for securing funds, locating a permanent dwelling, and moving into the dwelling.

FEMA case workers will assist with finding and matching rental resources to applicants who were renting homes or apartments before the event. They will also track the progress of repairs of damaged or destroyed homes owned by the applicant. Once an applicant has met their housing plan, FEMA ensures that the applicant is furnished with all available resources for dealing unmet needs and additional casework resources.

Once a FEMA temporary housing unit has been vacated and is determined to no longer be needed, it is deactivated from the site. FEMA issues a work order to its Maintenance and Deactivation Contractor (MDC) to complete the work. The deactivation of a temporary housing unit consists of four steps. First, all utilities must be disconnected and capped or made safe. Second, all utility materials (sewer pipe, electrical wiring/conduit etc.) must be removed in accordance with the terms of the lease agreement. Third, the unit is removed from the site and returned to either National Logistics Staging Area (NLSA) or a Temporary Housing Storage Site (THSS). Both of these are operated by FEMA's Logistics Management Directorate (LMD). Finally, the site is returned to the land owner in a predetermined condition set forth in the lease agreement for the community site. Returning the site to the land owner may require site restoration activities including but not limited to rehabilitation of vegetation, natural drainage patterns, etc. Once the temporary housing unit is returned to the LMD, the determination is made on whether or not the unit can be refurbished and reused. If the unit cannot be reused it will be disposed of in accordance with LMD policy.

FEMA is authorized under Section 408 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act to dispose of temporary housing units through sales to occupants when the applicant lacks permanent housing. FEMA will generally sell units at an adjusted fair market

value, and adjustments to the sale price will be made in a fair and equitable manner. Using the same authorization, FEMA may also donate housing units to a qualified recipient organization for the sole purpose of providing temporary housing to victims of major disasters. In most cases, the qualified recipient is either a voluntary agency or an impacted State/tribal territory. Certain provisions are required; please see the attached Donation Agreement for additional guidance on implementing this program.

Lessons Learned and Best Practices

Examining the past experiences, successes, and failures of existing housing programs will aid in preparing for future disasters. Identifying the critical challenges that have undermined and prevented a more efficient and effective response in the past will allow disaster planners and others to be better prepared for future situations. Additionally, recognizing what past solutions and actions were particularly effective can be incorporated as best practices and included in future disaster housing plans. Lessons learned about community site housing in the aftermath of the 2005 hurricane season have served to strengthen Federal response and recovery capabilities, making them more expeditious, comprehensive, scalable, and flexible to better meet specific disaster sheltering and housing requirements.

- **Incentive programs for individuals help facilitate recovery.** Individuals and families must take initial responsibility for their recovery, and disaster assistance should essentially be used to provide a bridge to recovery. To accomplish this, a phased approach should be used to transition housing support from the government to the individual. One approach is to increase the “rent” the disaster victim pays gradually each month. Other incentive programs include the establishment of a partnership with local educational organizations to provide the training necessary for residents receiving housing assistance (particularly in community sites) that will help them move beyond reliance on Federal assistance. Such training could address basic educational deficiencies or may target specific skills necessary to qualify for a specific career area.

The recipients of housing assistance will not be able to move onto their own until they have the capability to assume such costs, and many HUD programs work to build that degree of self-sufficiency in individuals. Such supportive services should be integrated between Federal agencies and with the local community. Through Homeowner Voucher Assistance, assistance provided through a voucher can be applied to the costs of homeownership. Resident Opportunity and Self Sufficiency programs provide training and other supportive services to housing residents to increase their self sufficiency. Family Self Sufficiency programs assisted individuals in overcoming many impediments to their participation in training or employment such as transportation, childcare, remedial education or job skills.

- **Strategies of community site placement to ensure employment and the resources disaster victims need for living are available.** When determining potential community site placement, experiences from past disasters have highlighted the importance of considering the availability of employment opportunities, and other important resources that would aid disaster victims in returning to normalcy. Selecting sites near these important resources is a critical part of assisting disaster victims in taking ownership of their recovery process. Placing disaster victims in areas where employment opportunities and other resources are

unavailable facilitates a dependence on government, nongovernmental organizations (NGO), and private sector assistance, and prolongs and impeding the recovery of individuals and communities.

Ensuring these types of resources are available where community sites are developed is a challenging task. In addition to ensuring the availability of these resources, comes the critical component of connecting disaster victims to the resources. Annex 2 details methods to connect disaster victims to employment and the resources they need for living, including establishing a framework for public messaging and outreach.

References

Additional documents and sources were used to develop this Annex and can provide further information on the topics discussed herein.

- Stafford Act, 42 USC §5174 (Sec. 408)
- The Code of Federal Regulations, 44 CFR 206.110-117