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AN EQUAL OPPORTUNITY EMPLOYER



October 28, 2008

R. David Paulison
Administrator
Federal Emergency Management Agency (FEMA)
500 C Street SW
Washington, DC 20472

Dear Administrator Paulison:

As the Governor's Authorized Representative, I request that you commit to creative solutions to ensure adequate, alternative housing for residents who live in flood zones in parishes that lack rental resources. The situation is dire as residents in need must turn to friends and relatives in order to remain within close proximity to their jobs, schools and homes. In fact, some residents have resorted to living in tents (see attached pictures). This is not an acceptable alternative. I ask that you use your authority to immediately mobilize park models for these families. In addition, since these models traditionally require elevation, I request that you direct your staff to use already-adopted Advisory Base Flood Elevation (ABFE) requirements in lieu of newly-released Digital Flood Insurance Rate Map (DFIRM) guidelines.

On September 1, 2008, and September 12, 2008, respectively, Louisiana was severely impacted by Hurricanes Gustav and Ike. Singularly, each was a major disaster; combined, these storms amount to a catastrophic event for the state. At the time of these two hurricanes, Louisiana was in the midst of recovery from the largest disasters in U.S. history – hurricanes Katrina and Rita.

My staff has coordinated with your staff to educate parish leaders impacted by the 2008 storms about the new prospects for temporary housing solutions outlined in FEMA's 2008 Disaster Housing Strategy guidance. We have encouraged parishes to utilize rental resources, including the Disaster Housing Assistance Program (DHAP) resources, where rental resources are readily available as an option.

In many parishes, especially the hardest hit in our coastal regions, solutions that utilize available rental resources (such as DHAP), are not an option. As you know, hurricanes Katrina and Rita destroyed more than 250,000 homes and more than 80,000 rental units. The state and its localities are still working to rebuild these areas. Additionally, the areas most impacted by the 2008 storms are mostly rural and had few rental resources to begin with. For example, according to FEMA's own data, as of October 27, 2008, Cameron Parish had only one rental resource. Many of these coastal residents are employees of the state's vital seafood and oil and gas industries, which have a vital impact nationwide. FEMA's own definition of Adequate, Alternate Housing confirms this proximity to be a priority in housing solutions: "Housing that accommodates the needs of the occupants; is within the normal commuting patterns of the area or is within reasonable commuting distance of work, school, or agricultural activities that provide over 25 percent of the household income; and is within the financial ability of the occupant." (44 CFR 206.111)

In the absence of immediate, realistic alternatives for residents, park models are an essential and viable solution for communities like Cameron Parish. Under FEMA's regulations authorizing housing assistance to individuals, "travel trailers" are expressly included as a viable housing alternative where rental resources are not available. (26 C.F.R. 206.101 (g)) Communities similar to Cameron Parish do not have available rental resources to meet the housing needs of the citizens displaced by the storms. This is why Cameron Parish and other communities in similar situations are requesting that "recreational vehicles" be placed by FEMA on homeowners private lots.

While it is understood that according to the Interim Direction signed by you, effective March 10, 2008, the use of travel trailers are temporarily prohibited. However, expressly exempted from that prohibition are "Park Model" travel trailers. Under 44 CFR 60.3(e)(9) Park Models can meet the criteria of a Recreational Vehicle, and these portable units can be placed on the home sites within communities such as Cameron without the need for extensive elevation methods. (44 CFR 59.1 definition – built on a single chassis, 400 square feet or less, permanently towable by a light duty truck, and not a permanent dwelling).

In addition to pursuing the immediate availability of park models, I also ask you to direct your staff to use the already-adopted ABFE requirements in lieu of the newly-released DFIRM guidelines, the current method used to determine appropriate zones. Communities such as Cameron Parish have only recently received the letter of determination for its DFIRMs, of which FEMA has not yet formally published. Communities such as Cameron Parish are preparing to appeal them, as it is within their right. In the meantime, communities such as Cameron Parish have already adopted the ABFEs as their new building elevation standard. It is unreasonable to expect a parish to build to a new code that has not yet been analyzed or adopted. I request that the ABFEs be the standard adopted under this request. (See attached letter dated October 28 to James Stark)

The solutions outlined are essential to enable residents to stay within a reasonable commuting distance of work, school, or agricultural activities and would also allow them to live within their means.

I am grateful for your support and request your prompt response.

Sincerely,



Paul W. Rainwater
Executive Director

Attachments

cc: Mark Riley, SCO, DR-1786/1792, GOHSEP
Admiral Harvey Johnson, FEMA Deputy Director & COO
General Douglas O'Dell, Federal Coordinator for Gulf Coast Rebuilding
James W. Stark, Director, Assistant Administrator for Gulf Coast Recovery
The Honorable Mary Landrieu, U.S. Senate
The Honorable David Vitter, U.S. Senate
The Honorable Jim McCrery, U.S. House of Representatives
The Honorable William Jefferson, U.S. House of Representatives
The Honorable Rodney Alexander, U.S. House of Representatives
The Honorable Charles Boustany, U.S. House of Representatives
The Honorable Charlie Melancon, U.S. House of Representatives
The Honorable Steve Scalise, U.S. House of Representatives
The Honorable Don Cazayoux, U.S. House of Representatives