



**FEMA**

December 19, 2024

William Ray  
Director  
North Carolina Emergency Management  
4236 Mail Service Center  
Raleigh, NC 27699-4236

Re: Guidance on Placement of Temporary Transportable Housing Units (TTHUs) in  
Floodplains Post Tropical Storm Helene

Dear Director Ray:

This letter outlines FEMA's approach and considerations for placing Temporary Transportable Housing Units (TTHUs) in floodplains in counties affected by Tropical Storm Helene.

FEMA is committed to avoid adverse and unsafe impacts associated with the use of floodplains and follows the requirements of Executive Order (EO) 11988 as well as 44 CFR § 9.13. Where local floodplain management standards prohibit TTHU placement in floodplains, FEMA will not place TTHUs in floodplains. Absent a local prohibition, FEMA will place TTHUs in floodplains only when no practicable alternatives exist. Prior to placement within the floodplain, FEMA will engage with local jurisdictions' leadership to obtain local approval.

Currently, in North Carolina, the available housing resources outside of floodplains, including commercial parks and rental units, are generally sufficient to meet the needs of most applicants. Available housing resources exceed the number of eligible applicants across affected counties.

Because of the risks associated with placing TTHUs in floodplains, such as flash flooding and limited evacuation routes, placement in these areas will only be considered in cases where exigent circumstances are present and no other reasonable housing options are available.

In those cases where no viable alternative is identified and a TTHU needs be placed within a floodplain, there will be a site assessment where engineering restrictions, flood depths, and local restrictions will be considered. Minimization efforts will be put into place ensuring that sites comply with all federal, state, and local floodplain management requirements and that the units are safely secured and elevated to meet regulatory standards.

Placements will follow the decision-making process outline in 44 CFR § 9.13 and all decisions will be documented to show considerations of safety, feasibility, and lack of reasonable alternatives. However, it is recommended that housing solutions outside of floodplains be prioritized to ensure the safety of the applicants.

FEMA is committed to providing safe and timely housing solutions to applicants while adhering to regulatory requirements and minimizing floodplain impacts. Most housing needs can be met with resources outside floodplains. Placements in floodplains be considered in exceptional cases, with careful evaluation on a case-by-case basis and adherence to all necessary Federal, State, and local floodplain management standards.

FEMA will engage with local jurisdictions' leadership to obtain written approval prior to placing units in the floodplain. Each jurisdiction should confirm whether any TTHUs will be authorized in the floodplain area on a case-by-case determination based on the approach outlined above.

Sincerely,

Brett Howard  
Federal Coordinating Officer  
Disaster Recovery Manager  
FEMA-4827-DR-NC