




OFFICE OF THE COUNTY ADMINISTRATOR

M E M O R A N D U M

TO: Board of County Commissioners
 FROM:  Mark S. Woodard, County Administrator
 SUBJECT: Floodplain Ordinance Changes – Manufactured Home Parks
 DATE: October 2, 2018

As a follow up to questions regarding proposed changes to the floodplain ordinance, specifically related to manufactured homes that are within high risk flood zones, the information in Table 1 below is intended to provide more clarity on the elevation changes proposed:

Table 1: Summary of existing and proposed conditions

| Reason for replacement* | Elevation Requirement | |
|---|--------------------------|-----------|
| | Current | Proposed |
| Flooding | BFE** + 1ft | BFE + 1ft |
| Other | 3ft above existing grade | BFE + 1ft |
| *substantial improvement (>50% of value) treated as replacement. | | |
| **BFE - Base Flood Elevation; elevation at which 100-yr flood will occur. | | |

This proposed change would only apply to manufactured homes in the unincorporated area of the County at the time of replacement. The rate of replacement of these homes is currently at less than 1% annually.

The primary reason for this change is that we continue to see replaced manufactured homes in high risk flood zones repeatedly impacted by flooding because they are not being raised above the flood levels. Subsequent renters or property owners continue to experience the same loss on the manufactured home which severely impacts their quality of life. This proposed ordinance change will reduce the risks and costs of flooding for the renter or property owner in the long term.

Currently there are approximately 16,475 manufactured homes in unincorporated area of the County. Of the total, 14,643 or 89% are unaffected by the proposed change as that are either not in a high risk flood zone or are in a high risk flood zone where the BFE is less than 3 feet above the existing ground elevation. This change will impact 1,811 or 11% manufactured homes **when and if** they are replaced. Table 2 on the following page provides a summary of these impacts. Under the current ordinance, if any of these 1,811 manufactured homes were replaced due to

documented damage from flooding they would be required to elevate to the BFE + 1ft. Our proposed change would provide them with this same level of protection (BFE + 1ft) before they flood rather than after since the protection level currently only applies when the manufactured home is replaced **after it floods**. This change would require the protection level to be in place when the manufactured home is replaced regardless of cause or reason for replacement.

Table 2: Number of manufactured homes and elevation requirement

| Jurisdiction | *MHs (total) | MHs in SFHA** | MHs NOT in SFHA | Elevation above existing ground (ft) | | | | | | | | |
|--|--------------|---------------|---------------------|--------------------------------------|--------|--------|--------|--------|--------|--------|---------|----------|
| | | | | less than 3 | 3 to 4 | 4 to 5 | 5 to 6 | 6 to 7 | 7 to 8 | 8 to 9 | 9 to 10 | 10 to 11 |
| Unincorporated | 16,454 | 3,652 | 12,802 | 1,841 | 410 | 429 | 258 | 192 | 161 | 152 | 180 | 29 |
| | % | 22.2% | 77.8% | 11.2% | 2.5% | 2.6% | 1.6% | 1.2% | 1.0% | 0.9% | 1.1% | 0.2% |
| MHs NOT Impacted | | | 14,643 (89%) | | | | | | | | | |
| MHs Potentially Impacted | | | 1,811 (11%) | | | | | | | | | |
| *MH - Manufactured Home | | | | | | | | | | | | |
| **SFHA - Special Flood Hazard Area (flood zone); 100-yr floodplain | | | | | | | | | | | | |

A majority of the Pinellas municipalities generally follow the same requirements we currently have in place, including the requirement that a manufactured home that is replaced due to flooding be elevated to the BFE + 1ft (or the freeboard requirement for that community).

The proposed change to the County’s floodplain ordinance will result in the same level of flood protection and resiliency as other homes (i.e. non-manufactured) within the County. While we recognize that there are financial impacts in elevating manufactured homes higher than what is currently required, the benefits (not being damaged by flooding) of elevating to the BFE + 1ft when the home is replaced generally outweighs the elevation costs in the long term. Additionally, similar to other homes in the County, manufactured homes have the ability to purchase flood insurance and are also eligible for grants, including the FEMA Flood Mitigation Assistance (FMA) grant, for mitigation reconstruction (replacement). These grants provide manufactured home owners a proactive approach to raising their homes above the BFE and reducing their risk of flooding.