NFIP Temporary Permitting Possibilities

Temporary NFIP grace period based on Craven County, NC program			
Basic Terms: - One year[1] grace period to make minimal repairs[2] - Initial application for grace period must include an estimate from a licensed general contractor or design professional calculating the cost of the minimal repairs *and* elevating the structure - Two one-year extensions available upon evidence of good faith effort to elevate - If noncompliance, enforcement measures up-to and including revocation of certificate of occupancy			
Strengths	Weaknesses	Opportunities	Threats/Risks
• Permits for minimal repairs that bring homes back to habitability can be issued very soon. • Less likely to have "unpermitted repairs" under this scheme • Potentially heads off a significant public health challenge of people living in damaged homes or homes with unpermitted repairs	• Leaves non-elevated structures in the special flood hazard area • Theoretically property owners could perform hundreds of thousands of dollars of repairs that would officially be "temporary"[2] • Uncertain whether there's a mechanism to "cloud the deed" so that new owners of properties that get sold are aware that the property is encumbered in this way.	• Preserves housing stock • Gets signed agreement from property owners that property will eventually be elevated • Gives time for recovery agencies to mobilize and help people elevate	• Not endorsed by FEMA • Unknown impact on NFIP eligibility which, if lost, would prevent others from buying subsidized flood insurance and eligibility for other benefits[3] • Kicks the can down the road on tough enforcement actions.

1- From date of federal emergency declaration (September 28, 2024)
2- Staff will be informed as to what constitutes a minimal repair by the State of North Carolina's "Sheltering and Temporary Essential Power (STEP) in North Carolina" program, a FEMA-approved program established for certain eastern counties after Hurricane Florence.
3- See attached "Effects of Non-Participation in the National Flood Insurance Program" sheet

No grace period; enforce NFIP			
Strengths	Weaknesses	Opportunities	Threats/Risks
• Preserves NFIP eligibility, which keeps all Brevard property owners eligible for govt subsidized flood insurance[1] • Flood safety elements of NFIP will be implemented • Fewer in-use structures in the special flood hazard area	• Owners of substantially damaged property unable to get permits for minimal repairs needed to make structures habitable	• ALL construction will be deemed “substantial improvement” so we may see a number of properties elevated all at once.	• May displace people indefinitely[2] • May lead to people returning to damaged homes[2] • Contributes to housing shortage. • Unpermitted repairs will be performed. • May see an increase in vacant/abandoned properties

1- See attached “Effects of Non-Participation in the National Flood Insurance Program” sheet
2- Significant efforts underway by non-profit sector (with support from city and county) to find temporary housing openings and match displaced families with them.