

Agenda

- Welcome and Introductions
- Concept Introduction
- Disaster Preparedness
- Substantial Damage Assessments
- 05 SD Exercise
- Substantial Improvement

Presenters

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Substantial Improvement/Damage

- Improvements & repairs can be permitted for existing structures in the floodplain.
- Minor improvements and repairs can simply be permitted.
- If the repair or improvement is valued at more than half the value of the structure it is considered **substantial** and is equated with new construction and must comply with your ordinance.

Title 455, Neb. Admin. Code, Chapt. 1 §002.21:

"Substantial damage" shall mean damage of any origin sustained by an obstruction whereby the cost of restoring the obstruction to its before-damaged condition would equal or exceed 50* percent of the market value of the obstruction before the damage occurred."

Post Disaster Duties

- Repairs to structures in the floodplain must be permitted
- If the structure is damaged more than 50%* of its value, it needs to be brought into compliance with your floodplain ordinance
- Therefore, a Substantial
 Damage Assessment
 (SDA) must be performed before repairs can be permitted

44CFR60.3 (a)

...the community shall:

(1) Require permits for all proposed construction or other <u>development</u> in the community...

44CFR59.1

Development means any manmade change to improved or unimproved real estate, including but not limited to buildings or other structures...



Known Hazards

- Floodplains are inherently hazardous places.
- Flooding is the most frequently reported hazard in Nebraska.
- In a 30 Year mortgage, a home has a 26% chance of experiencing a flood.
- Climate models show that NE is getting wetter, and
- Storm events will:
 - Increase in frequency
 - Increase in scale / intensity
 - Decrease in predictability

New Resource

Online at NeDNR's "Digital Desk Reference"

https://dnr.nebraska.gov/floodplain/digital-desk-reference

Substantial Damage Assessment Handbook

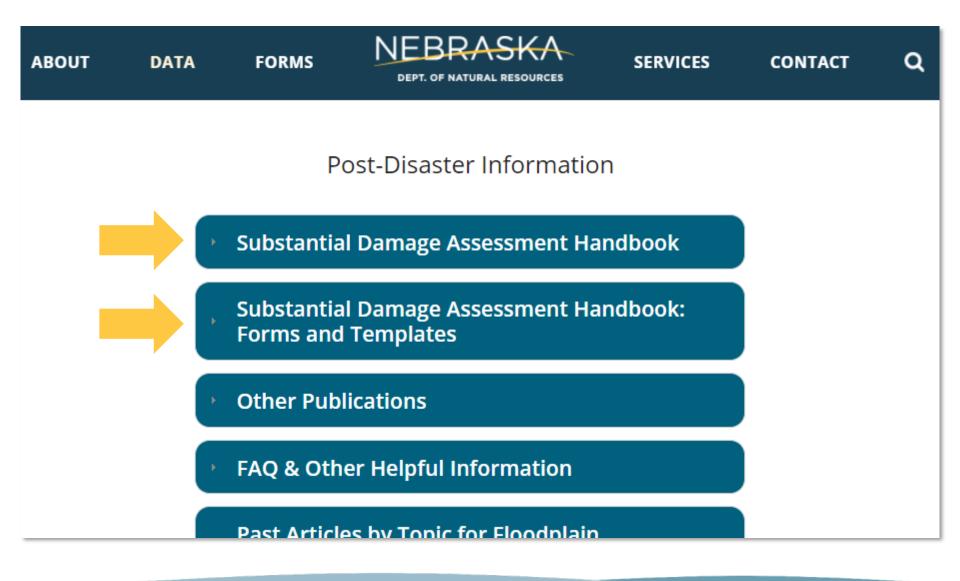
A Guide for Local Floodplain Administrators

State of Nebraska Department of Natural Resources

March 1, 2021



https://dnr.nebraska.gov/floodplain/digital-desk-reference



Substantial Damage Assessment

We will start with things that you can do anytime: "Sunny Day" actions

Being prudent and preparing prior to a disaster is wise.

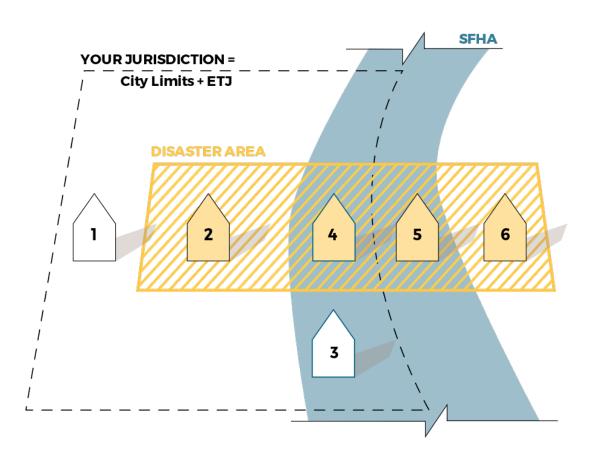
Your position as Floodplain Administrator is focused only on those properties within the floodplain, yet your duty as a community official may extend to all those affected by disaster. Today's guidance pertains to floodplains.

Sunny Day Actions

Pre-Disaster Planning

- Knowing your regulatory jurisdiction
- Knowing which structures are at risk
- Building a database
- Making a plan

Know Your Jurisdiction



- 1. In jurisdiction, not impacted
- 2. In jurisdiction, impacted, not in SFHA
- In jurisdiction, not impacted, in SFHA
- In jurisdiction, impacted, in SFHA
- Not in jurisdiction, impacted, in SFHA
- Not in jurisdiction, impacted, not in SFHA

Not under Floodplain Administrator purview; Handbook does not apply.

Handbook applies; use guidance in "Pre-Disaster" section.

This Handbook Applies. See the "SD Assessment and Permit Requirement Decision Tree."

Not under Floodplain Administrator purview; Handbook does not apply.

Know Your Hazard Zones

Can you answer?

- Where is your jurisdiction's SFHA located?
- What structures exist in the SFHA?

Resources available:



- FIRM, FHBM
- NeDNR Interactive Map
- FEMA Flood Map
 Service Center (https://msc.fema.gov/portal/home)

Looking for a Flood Map? •

Enter an address, a place, or longitude/latitude coordinates:

Enter an address, a place, or longitude/latitude cc

Search

Looking for more than just a current flood map?

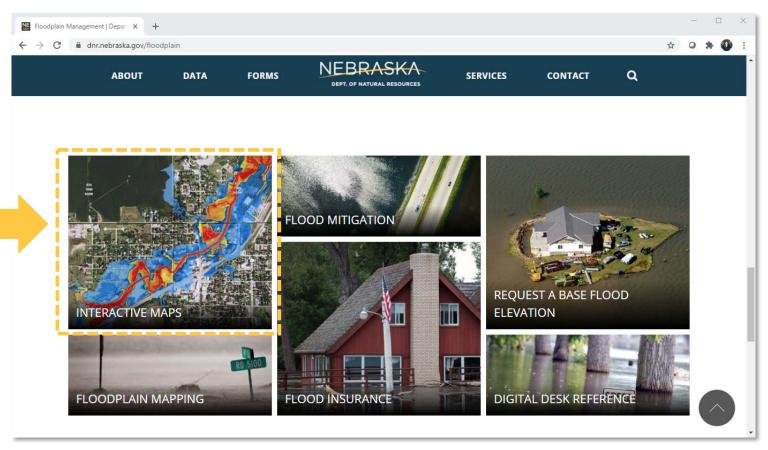
Visit <u>Search All Products</u> to access the full range of flood risk products for your community.





NeDNR Interactive Map

dnr.Nebraska.gov/floodplain

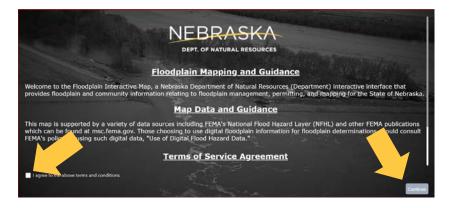




Floodplain Interactive Map

Agree and continue:

 Then give the map a minute to download.



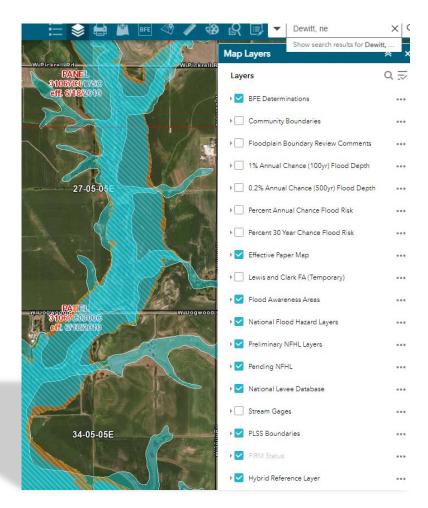
Zoom in to your jurisdiction:

- The roller on your mouse,
- The zoom button on the top left,
- By searching the address or section (S-T-R) in the search box in the upper right



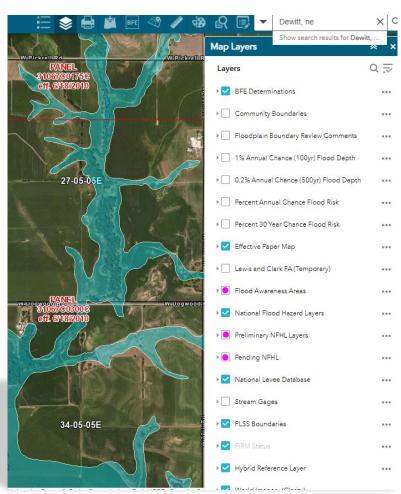
Too Many Layers?

 Layers can easily be turned off or on by checking or unchecking the box in the Layers Menu

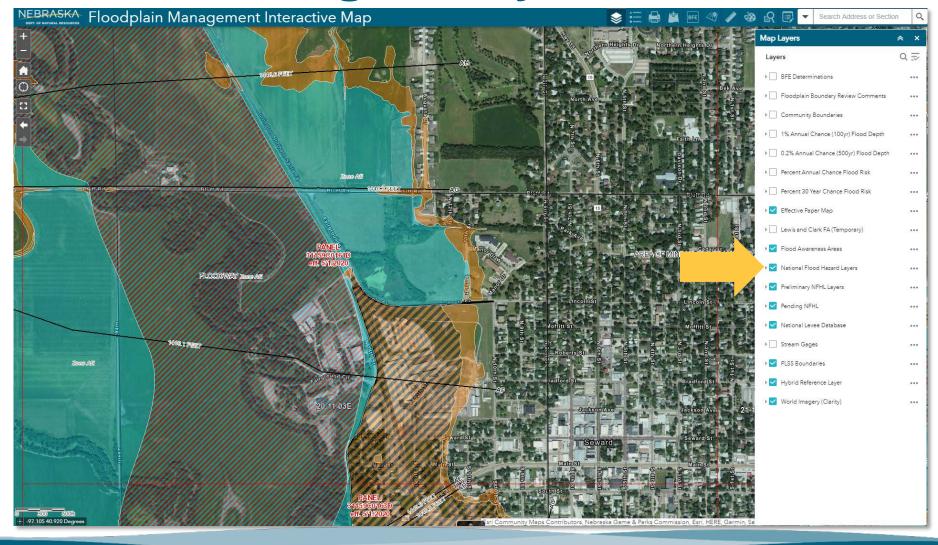


Regulatory Floodplain Only?

- To see only the regulatory FIRM and get rid of the confusing overlays, turn off these layers:
 - Flood Awareness
 Areas
 - Preliminary NFHL Layers
 - Pending NFHL

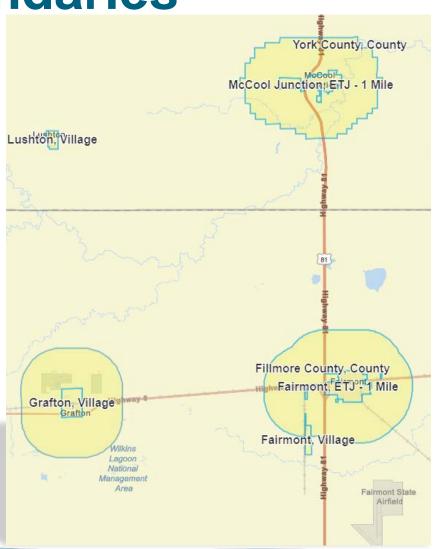


NFHL is Regulatory



Community Boundaries

- Some communities have a 1-mile Extra-Territorial Jurisdiction, and some do not.
- Some ETJs are orthogonal, others are radial.



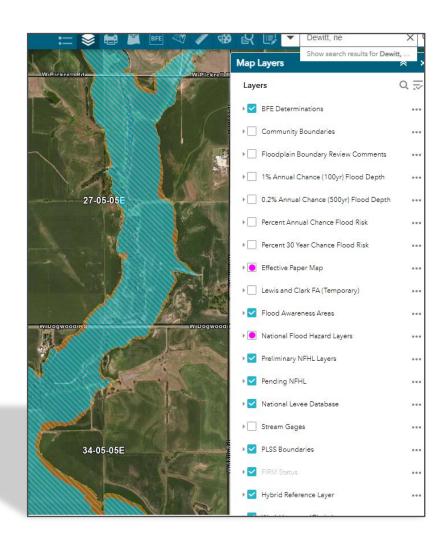
Find the Jurisdiction

- Sometimes an ETJ can extend beyond the county line.
- The house pictured in the floodplain is out in the country in Hall County... but is in the <u>jurisdiction</u> of Prosser in Adams County.

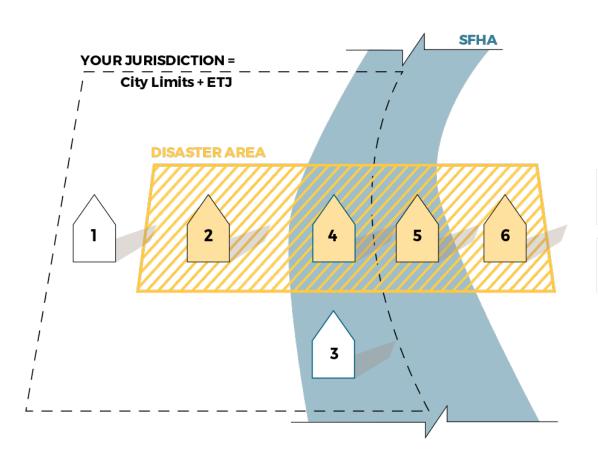


New Maps?

- To see the new maps or Best Available Data turn off either or both of these layers:
 - Effective Paper Map
 - National Flood Hazard Layer



Identify the Structures



- 1. In jurisdiction, not impacted
- 2. In jurisdiction, impacted, not in SFHA
- 3. In jurisdiction, not impacted, in SFHA
- 4. In jurisdiction, impacted, in SFHA
- Not in jurisdiction, impacted, in SFHA
- Not in jurisdiction, impacted, not in SFHA

Not under Floodplain Administrator purview; Handbook does not apply.

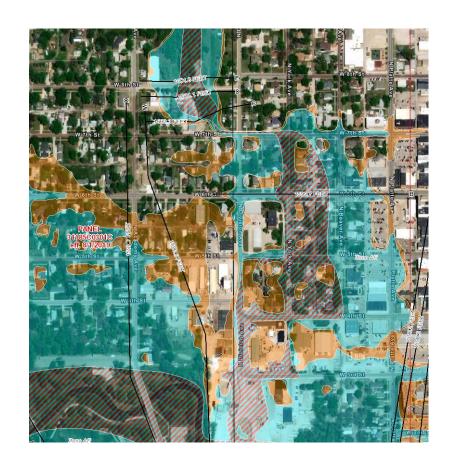
Handbook applies; use guidance in "Pre-Disaster" section.

This Handbook Applies. See the "SD Assessment and Permit Requirement Decision Tree."

Not under Floodplain Administrator purview; Handbook does not apply.

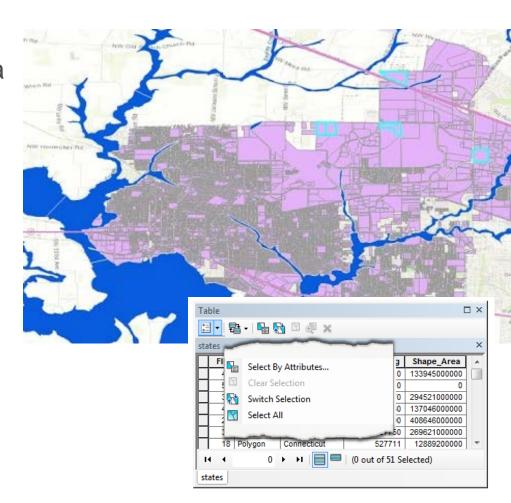
Identifying Floodplain Structures

- Before a disaster, take time to identify existing structures in the floodplain
- Create a Property Record Inventory or database of structures in the floodplain
- Use the SDE 3.0 to create the database to ensure



GIS & Property Records

- If your county utilizes GIS consultant, they can provide a list of properties
- Simply fill out a work ticket
- Request properties in the 1% annual floodplain
- Provide a shapefile of your jurisdiction
- You may need to sort through to find which properties have no structures in the floodplain



Assessor Info: Owner

Much information can be gathered from the County Assessor's page:

- Owner's first and last name
- Owner's telephone number
- Community name (helpful if your jurisdiction is a county)
- Zip code
- Official structure address
- Owner's mailing address (if different from structure address)
- County name (for municipalities with jurisdiction covering multiple counties)
- Lot and parcel number

Assessor Info: Structure

The Assessor page also has a lot of information on the structure and its value.

- Date of construction
- Type and number of units on the property
- Habitable area (in square feet) per structure
- Structure use (a required field on the SDE 3.0 program)
- Number of stories
- Construction type (e.g., wood frame, masonry)
- Foundation type
- Exterior material type (e.g., vinyl siding, brick veneer)
- Attached or detached garage
- A picture of the structure or structures
- Adjusted tax assessed value of the structure

Creating a Post-Disaster Plan

- Meeting locations
- Staff members & responsibilities
- Emergency or critical routes
- Known stockpiles of emergency materials: fuel supplies, sandbags, generators, food banks.
- List of contacts: council members, neighboring jurisdictions, state agencies, mutual aid agreements (police, fire...)
- Plan for notifying the public and local officials
- List of info and where to find: permit files, tax records.
- Substantial damage assessment resources: SDA handbook, FEMA guides, and fieldwork tools.

Checklists

You don't have to "think of everything" yourself!

	Checklist 1 - Pre/Post Disaster Planning							
	Need	Complete	Item	Notes:				
Items 1-12 may all be completed prior to a disaster occurring. Do not attempt items 13 - 19 without first completing items 1 - 12.								
1.			Brief all elected officials as soon as possible after the event regarding the NFIP requirements for Substantial Damage determinations. Source: FEMA P-758, Substantial Improvement/Substantial Damage Desk Reference, Chapter 7 (May 2010)					
2.			Select an SDE Manager. Source: FEMA P-784, SDE User Manual and Workbook, Section 7.1 (August 2017)					
3.			Review NFIP requirements for Substantial Damage and Substantial Improvement. Sources: NFIP Regulations; FEMA P-758, Substantial Improvement/Substantial Damage Desk Reference (May 2010); FEMA 213, Answers to Questions About Substantially Damaged Buildings (May 1991)					
4.			Review SDE tool and User Manual to understand the SDE data requirements. Sources: FEMA P-784, SDE User Manual and Workbook, Sections 3 and 4 (August 2017); FEMA SDE Best Practices (August 2017); FEMA Substantial Damage Estimator Tool Frequently Asked Questions					
5.			Identify Flood Insurance Rate Maps (FIRMs) or other floodplain maps to review the boundaries of the SFHA. Data may include FIRMs, FBFMs, FIS reports, community maps showing previously flooded areas, and flood studies by State or other Federal agencies. Source: FEMA P-784, SDE User Manual and Workbook, Section 8.1 (August 2017); Community NFIP coordinator					
6.			Identify type, location, and community contacts for tax or GIS data for structures within the SDE inventory area that are potentially Substantially Damaged. Any or all of the following data will be useful: owner name, building address, type of house, non-residential building use, year of construction, square footage, number of stories, adjusted building values, number of years since last tax adjustment, and dates of additions or renovations. Source: FEMA P-784, SDE User Manual and Workbook, Section 8.1 (August 2017)					
7.			Identify community street, address, or tax maps for delineating the boundaries of the SFHA. This will help delineate the maximum limits of the SDE inventory area while also showing addresses or lot locations. Source: FEMA P-784, SDE User Manual and Workbook, Section 7 (August 2017)					
8.			Transfer SFHA boundaries from floodplain map to a base map that includes streets, addresses, or a tax map. Using the effective FIRM for the community, transfer the SFHA boundaries to a base map with named streets and either addresses or lot boundary lines. This will delineate the maximum limits of the SDE inventory to narrow the focus of the inspections while avoiding areas outside the SFHA. Source: FEMA P-784, SDE User Manual and Workbook, Sections 8.1 and 9.3 (August					

Checklists

You don't have to "think of everything" yourself!

	Need	Have	Item	Notes:
1.			Flood maps such as FIRMs, FIRMetts, clips of NeDNR Interactive Flood Maps, or other floodplain or flood risk maps.	
2.			Assessor's map or other address map with flood boundaries.	
3.			Route or area map showing proposed areas and sequence for data collection.	
4.			Tax data: structure owner name, structure address, mailing address, number of stories, and dimensions or habitable area.	
5.			Copies of blank SDE Damage Inspection Worksheets.	
6.			Copies of blank photo log sheets (if needed).	
7.			Photo ID badges for inspectors.	
8.			Letter of Introduction with community point of contact (name and telephone number).	
9.			Clip boards, pens/pencils, steno pad or notebook, highlighter.	
10.			100 ft tape measure (to obtain or verify structure dimensions).	
11.			Address board and dry erase markers.	
12.			Hard hat, gloves, safety glasses and vest, steel-toe and steel-shank shoes, safety vest, and flashlight.	
13.			Cell phones or walkie-talkies.	
14.			Digital camera, primary and alternate memory cards, and extra batteries.	
15.			Verification that police, fire, and emergency management agencies have been advised of SDE inspections.	
16.			Laptop computers or tablets with SDE tool installed and power cords with plug adaptors for use and re-charging in field vehicles.	
17.			Rain or cold-weather gear.	

Checklist 2 - Field Preparations

Post-Disaster: Substantial Damage Assessments

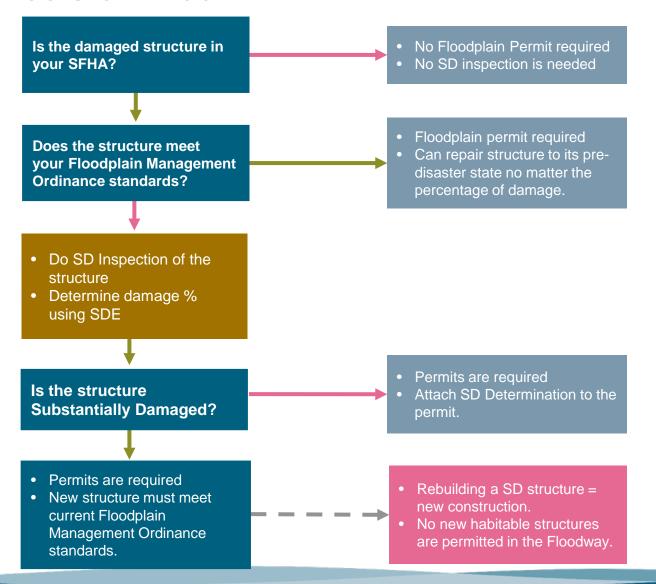


Post Disaster Duties

- Repairs to structures in the floodplain constitute development and are subject to permit
- If the structure is damaged more than 50% of it's value, it needs to be brought into compliance with your floodplain ordinance
- A Substantial Damage
 Assessment (SDA) must be performed before repairs can be permitted



SDA Decision Tree



"Post-Disaster": The SDA Process

- Step 1: Office review and Prerequisite preparations
- Step 2: Curbside Review
- Step 3: Substantial Damage Inspections, comprising of:
 - ✓ Developing the Substantial Damage Inspection schedule
 - ✓ Notifying authorities of inspection plans
 - ✓ Providing training for inspectors via pilot inspections
 - ✓ Conducting substantial damage inspections
- Step 4: Processing field data
- **Step 5**: Review and issue Substantial Damage Determinations
- Step 6: Floodplain Development Permits

"Post-Disaster": The SDA Process

Step 1: Office review and Prerequisite preparations

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NOTE: You may be reimbursed for time and expenses by FEMA Public Assistance if in a Federally Declared Disaster Area. So keep good records!

Step 4: Processing field data

Step 5: Review and issue Substantial Damage Determinations

Step 6: Floodplain Development Permits

1. Office Review & Prerequisites

Identify structures exempt from SDA:

- Areas of SFHA not impacted by the disaster.
- Damaged structures located outside of the SFHA.
- Structures in compliance with current floodplain ordinance.

1. Office Review & Prerequisites

Immediate Outreach is Key:

Community officials should be prepared to answer questions throughout the post-disaster recovery phase

Public needs to understand the recovery process.

- Connect with the Public Information Officer for social media platform
- Press releases to radio, newspaper, etc.

1. Office Review & Prerequisites

The Public:

Property owners, contractors, etc **need to know**:

- Structures need inspection before repair work starts.
- What activities require a permit.
- Substantial Damage requirement and compliance.
- Availability of Increased Cost of Compliance (ICC) coverage with NFIP flood insurance policies for SFHA structures.
- Caution about unlicensed contractors & fraudulent entities that may take advantage of disaster victims.
- Opportunity to implement mitigations not required by ordinance.
- Consider sharing this info on an annual basis

"Somebody Already Inspected My House"

A disaster event may trigger <u>multiple</u> forms of damagescoping assessment:

- Rapid Needs Assessment
- Preliminary Damage Assessment
- Damage Assessment*
- Public Assistance Damage Assessment
- Substantial Damage Assessment*

2. The Curbside Review

- Drive through damaged areas of SFHA
 - Determine limits of disaster area
 - Draw disaster boundary on map
 - Number of structures
 - Structure types
 - Estimated levels of damage
 - ID health & safety issues

2. The Curbside Review

- Continued:
 - Note access issues
 - Depth of flooding above the first floor
 - Duration of flooding
 - Take photos to help prioritize field work back at the office

3. Substantial Damage Inspections

SD Inspections should *collect accurate data as quickly as possible* to complete an SD determination:

- A. Develop Substantial Damage Inspection schedule
- B. Notify Authorities of Inspection Plans
- C. Pilot Inspections
- D. Conduct Substantial Damage Inspections

3A. Develop a Substantial Damage Inspection Schedule:

Consider the following when determining which areas to **prioritize** for inspection:

- Areas with little to no apparent damage, allowing permits for minor repairs to be issued quickly
- Areas where debris and contents have been removed from the structures, allowing for faster inspections
- Areas with critical facilities that may be a community priority
- Areas with a high density of development and many structures
- Areas with temporary (debris) or permanent (gates) access issues

3B. Notify Authorities of Inspection Plans

Prior to SD Inspections:

- Issue a public announcements or press release
- Check in with the local fire, police, & EM on the purpose and timing of SD inspections
- Inspectors should carry personal ID and letters of introduction from local officials

3C. Pilot Inspections

Arrange for up to three pilot inspections for both residential and non-residential structures with various levels of damage.

- The purpose of the pilot inspections is to familiarize inspectors with the SDE data requirements, inspection procedures, and use of the SDE tool.
- Demonstrate the consistent field procedure for performing SDE
- Demonstrate the SDE tool to the inspectors
- These structures can be the first entries in the SDE inventory

3D. Conducting Substantial Damage Inspections

- Perform SDA with respect
- Have consistent procedure in all structures
- Maintain consistent, unbiased judgement
- Use the worksheets and guides in the Handbook to ensure consistency of inspection within your community

3D. Worksheets and Guides

Helpful Resources Include:

- Worksheet Templates
- Exterior Inspection
 Guide
- Interior Inspection Guide
- Percent Damage
 Estimation Tables

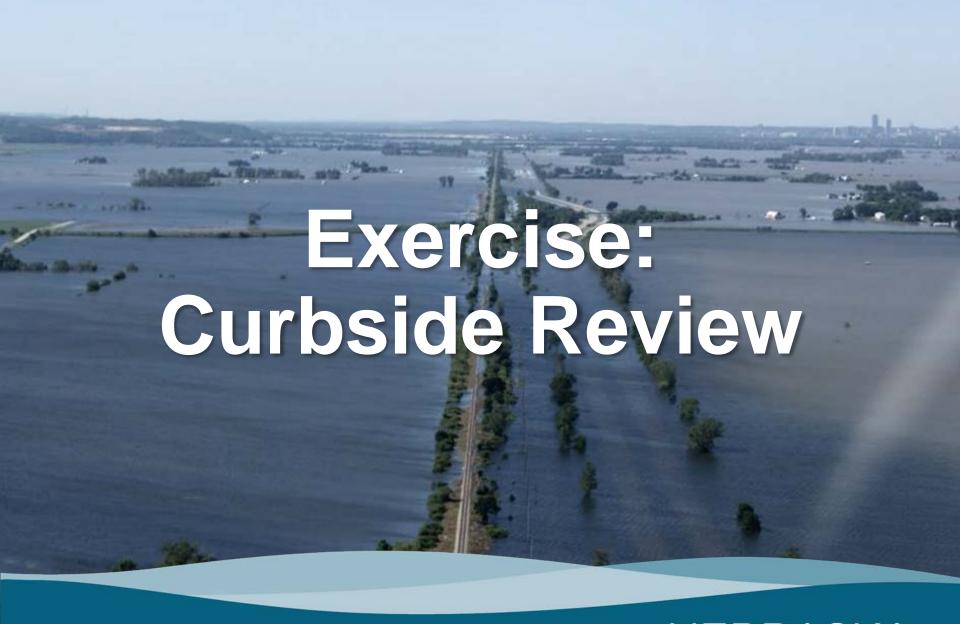
Substantial Damage Assessment Handbook: Forms and Templates

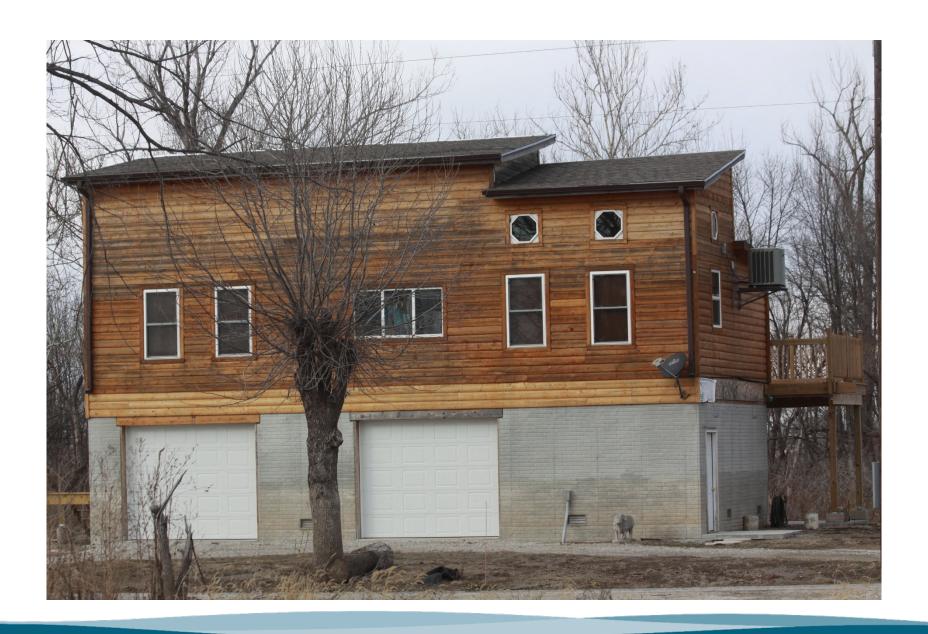
- Checklist 1 Pre/Post Disaster Planning
- SDA Notice to Post on Structures
- Release
- NFIP and SD/SI Informational Handout
- ☐ Included and Excluded Costs for Damage Repair Estimates
- Right of Entry Certification and Release
- Exterior Inspection Guide
- Interior Inspection Guide
- Percent Damage Estimation Tables
- SDA Damage Inspection Worksheet Residential
- 3 SDA Damage Inspection Worksheet Non Residential
- 3 SDA and Permit Requirement Decision Tree
- SD Determination Letter Flood-Related Damage
- SD Determination Letter Not Flood-Related
- Non-SD Determination Letter

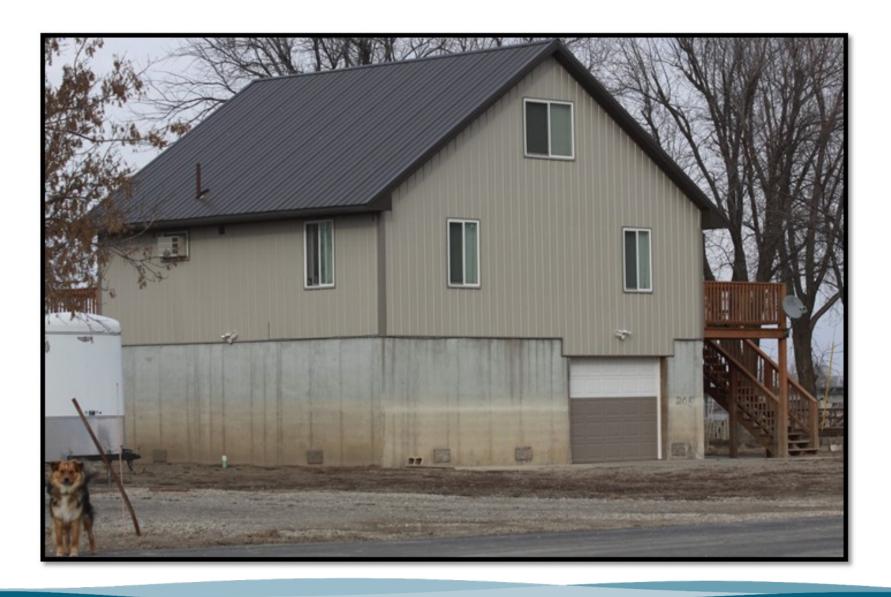
https://dnr.nebraska.gov/floodplain/digital-desk-reference

ABOUT DATA **FORMS** SERVICES CONTACT Post-Disaster Information **Substantial Damage Assessment Handbook Substantial Damage Assessment Handbook: Forms and Templates** Other Publications **FAQ & Other Helpful Information** Past Articles by Tonic for Floodplain









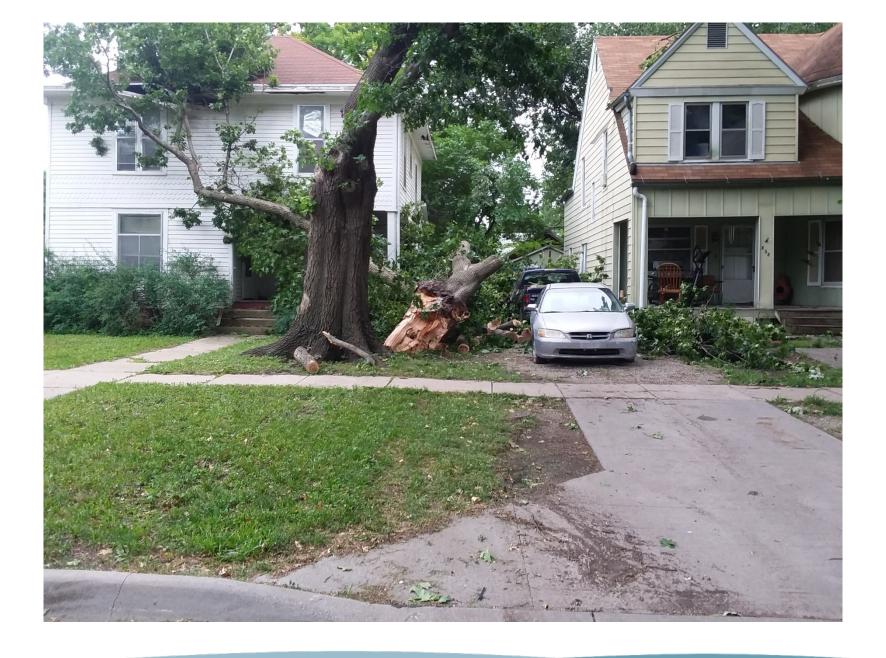












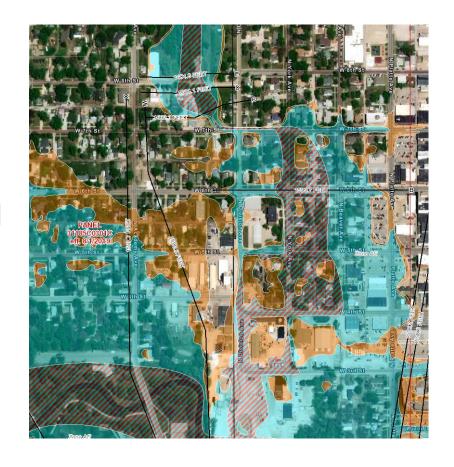






Creating a Database

- Before a disaster, take time to identify existing structures in the floodplain
- Create a Property Record Inventory or database of structures in the floodplain
- Use the SDE 3.0 to create the database to ensure



Estimated Percentage Damage Range

	0% - 25%	25% - 50%	50% - 75%	75% - 100%
FOUNDATION				
Continuous perimeter foundations, footings, and piers for internal beams and floor loads. Footing depth averages between 30 inches and 42 inches below ground level. Materials include unreinforced cast-in-place concrete, unreinforced masonry or concrete masonry units (CMUs), concrete slab on grade, or raised slab construction.	 Water level does not rise to the level of the bottom of the first floor of the structure. No scouring at the footings. Some undermining but no visible cracking at concrete slab. 	 Water level rises just above first floor level. Limited scouring at the footings. Soils are saturated. Undermining of the concrete slab, especially at corners - hairline cracks only. 	 Water level is 4-7 feet against the outside of the building. Limited scouring at the footings. Soils are saturated and unstable. Cracks noted on or along the foundation walls. Significant undermining of the concrete slab – significant cracking is visible. 	 Water level is 7 feet or higher against the outside of the building. Limited scouring at the footings. Foundation is notably cracked and/or displaced. Structure has been knocked off its foundation. Portions of the foundation are damaged or missing. Significant undermining of the concrete slab - major cracking and separation of the concrete slab.
SUPERSTRUCTURE				
For wood frame & masonry. The wall support systems that extend from the foundation wall to the roof structure. Superstructures include the exterior wall sheathing panels, shear panels, or braced wall panels. This section also includes structural members that support the roof (rafters and trusses), but does not include the roof sheathing.	 Water level does not rise to the level of the bottom of the first floor of the structure. No damage to the roof framing. 	 Water level rises just above first floor level. Damage to the exterior walls is limited. Damage to the roof framing is limited. 	 Water level is up to 3 feet high on the first floor level. Some damage to exterior walls. Significant damage to sections of the roof framing. 	 Water is over 3 feet high on the first floor level of the house. Significant damage to exterior walls. Significant damage to the main portion or multiple sections of the roof framing.

include the roof sheathing.

					1			
COMMUNITY			STRUCTUR	RE		INS	PECTION	
NFIP Community I	D (CID):	Structure A	ddre	ss:	Insp	ector Name	2:
NFIP Community I	Name:					Tea	m #:	
Latitude: City		City:		Assessment Date:				
Longitude: Zip:			Date Damaged:					
			County:					
PHOTOS		·						
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STRUCTURE ATT			y Residence		Year Const	ructed:		Southeast
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Exterior: Foundation: Superstructure: Roof Coverings: Exterior Finish: HVAC System:	0 0 0 0 0 0 0 0 0 0 0 0 0	Single Famil One Story Continuous Piles Stud-Framec Common Bri Shingles Clay Tile Siding or Stu Brick Veneer None Low Good Fire	y Residence Wall + Slab	000000000000000000000000000000000000000	Year Const Town or Row Hou Two or More Stori Basement Slab-on-Grade ICF Masonry Standing Seam (N Slate Exterior Insulated Finishing System Heating or Cooling Budget Excellent Flood Wind Hours	ructed: se ses	O Manu O Crawl Piers None Struct Avera	factured House space and Posts (Common Brick or ural) ge and Wind

SD	A Damage Inspection \ - Residentia		
DEPRECIATION RATING			
	Very Poor Condition Requires Extensive Repairs Requires Some Repairs	Average Condition Above Average Condition Excellent Condition	Other:
ELEMENT PERCENTAGES			
Element	Percent Damaged	Element	Percent Damaged
Foundation:		Floor Finish:	
Superstructure:		Plumbing:	
Roof Covering:		Electrical:	
Exterior Finish:		Appliances:	
Doors & Windows:		Interior Finish:	
Cabinets & Countertops:		HVAC:	
# of # of Stories		# of # of Stories	# of Stories Use measurement of longer of 2 sides.
# of Stories		# of # of Stories S	# of tories







Substantial Improvement

Title 455, Nebraska Administrative Code, Chapter 1 §002.22:

"Substantial improvement" shall mean any reconstruction, rehabilitation, addition, or other improvement of an obstruction, the cost of which equals or exceeds 50 percent of the market value of the obstruction before "start of construction" of the improvement. This includes obstructions which have incurred "substantial damage," regardless of the actual repair work performed.

Substantial Improvement

- Improvements are often made at time of damage repair, or shortly after
- Damage value needs to be incorporated, even if property owner elects not to repair all
- Look out for 'phased improvement' or 'consecutive permits'

SI/SD: What Costs to Include?

Costs for Substantial Improvements and Repair of Substantial Damage

Included Costs

Items that must be included in the costs of improvement or costs to repair are those that are directly associated with the building. The following list of costs that must be included is not intended to be exhaustive, but characterizes the types of costs that must be included:

- Materials and labor, including the estimated value of donated or discounted materials and owner or volunteered labor
- Site preparation related to the improvement or repair (foundation excavation, filling in basements)
- Demolition and construction debris disposal
- Labor and other costs associated with demolishing, moving, or altering building components to accommodate improvements, additions, and making repairs
- Costs associated with complying with any other regulation or code requirement that is triggered by the work, including costs to comply with the requirements of the Americans with Disabilities Act (ADA)
- Costs associated with elevating a structure to an elevation that is lower than the BFE
- Construction management and supervision
- Contractor's overhead and profit
- Sales taxes on materials
- Structural elements and exterior finishes, including:
 - Foundations (e.g., spread or continuous foundation footings, perimeter walls, chainwalls, pilings, columns, posts, etc.)
 - Monolithic or other types of concrete slabs
 - Bearing walls, tie beams, trusses
 - Joists, beams, subflooring, framing, ceilings
 - Interior non-bearing walls
 - Exterior finishes (e.g., brick, stucco, siding, painting, and trim)

- Structural elements and exterior finishes (cont.):
 - Windows and exterior doors
 - Roofing, gutters, and downspouts
 - Hardware
 - Attached decks and porches
- Interior finish elements, including:
 - Floor finishes (e.g., hardwood, ceramic, vinyl, linoleum, stone, and wall-to-wall carpet over subflooring)
 - Bathroom tiling and fixtures
 - Wall finishes (e.g., drywall, paint, stucco, plaster, paneling, and marble)
 - Built-in cabinets (e.g., kitchen, utility, entertainment, storage, and bathroom)
 - Interior doors
 - Interior finish carpentry
 - Built-in bookcases and furniture
 - Hardware
 - Insulation
- Utility and service equipment, including:
 - HVAC equipment
 - Plumbing fixtures and piping
 - Electrical wiring, outlets, and switches
 - Light fixtures and ceiling fans
 - Security systems
 - Built-in appliances
 - Central vacuum systems
 - Water filtration, conditioning, and recirculation systems

Record Keeping

Necessary documents and permit records:

- Development permit + all attachments (site plans)
- SD determination + supporting docs
- Building inspection records
- Engineered openings design documents
- Evidence historic structures will maintain status
- Variance proceedings
- Elevation certificate (before occupancy certificate)



Additional Handbook Items:

- Field Data Processing Tips, p. 27-28
- Determination Letters, p. 29 & Appendix
- Determination Integrity Tips, p. 30
- Permitting Considerations, p. 31
- Infrastructure Repairs, p. 32
- Violations, p. 32
- Site Inspections, p. 33

SI/SD Resources



Substantial Improvement/ Substantial Damage Desk Reference

FEMA P-758 / May 2010





Answers to Questions About Substantially Improved/ Substantially Damaged Buildings

FEMA 213 / August 2018





SDE 3.0 Resources



Substantial Damage Estimator (SDE) User Manual and Field Workbook

Using the SDE Tool to Perform Substantial Damage Determinations

FEMA P-784 / Tool Version 3.0 / August 2017





Substantial Damage Estimator Best Practices

Approaches for Using FEMA's Substantial Damage Estimator Tool

Prepared for:



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August 2017



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