

LET'S TALK (PRIVATE) TRASH

A workshop on Private Property Debris Removal in the evolving FEMA environment

MODERATED BY JEFF GOLDBERG | WALTON COUNTY EM

PANEL CO-PRESENTED BY



THE EVOLVING PPDR ENVIRONMENT

\$2T+

Cumulative U.S. disaster costs since 1980

28

Billion-dollar disasters in 2023 (NOAA)

RISING

Frequency of catastrophic events

TIGHTER

FEMA documentation standards

SLOWER

Approvals and closeouts

TIGHT

Disaster Relief Fund (DRF) capacity

MORE DISASTERS. STRICTER REVIEW. HIGHER STAKES.

YOUR PANEL

MODERATOR

Jeff Goldberg

Walton County EM | FEPA

County perspective. Sets scenarios and runs audience beats.

ASHBRITT

Senior Vice President

Matt Gierden

Contractor

Debris-mission execution and FEMA coordination.

DRC EMERGENCY SERVICES

Regional Manager

Evan Fancher

Contractor

PPDR operations and federal activation lessons.

CROWDERGULF

Florida Regional Manager

Joe Hayes

Contractor

Florida debris-recovery operations and eligibility.

SYNERGY DISASTER RECOVERY

Principal

Joe Gross

Consultant

Debris-program oversight and FEMA documentation.

WHAT WE'LL COVER

1 **What PPDR Is — and Isn't**
Statutory basis, FEMA framework, and how PPDR differs from ROW debris removal.

2 **Eligibility & ROE**
Public-interest determinations, Right of Entry, indemnification, duplication of benefits.

3 **Evolving FEMA Environment**
Recent PAPPG changes, cost-share shifts, and policies that catch jurisdictions off guard.

4 **Helene at Scale**
PPDR at scale: 5,000+ private properties surveyed and unprecedented debris types.

5 **Best Practices & Pitfalls**
What gets jurisdictions reimbursed — and what gets work deobligated by FEMA.

6 **Panel Q&A**
Open dialogue with the panel on your most pressing PPDR questions.

WHAT IS PPDR?

FEMA-funded debris removal from privately-owned residential, commercial, and multi-family parcels — when the debris poses an immediate threat to life, health, safety, or the public interest.

AUTHORITY

Stafford Act §403 & §407

- ▶ §403 — Essential Assistance (Cat. B)
- ▶ §407 — Debris Removal (Cat. A)
- ▶ FEMA PAPPG v5 — current policy

TRIGGER

Immediate Threat Standard

- ▶ Threat to life, health, or safety
- ▶ Threat to improved property
- ▶ Threat to economic recovery

AUTHORIZATION

FEMA Approval Required

- ▶ State approval is not sufficient
- ▶ Public-interest determination
- ▶ Legal authority + ROE required

Source: Stafford Act §403, §407 | FEMA PAPPG v5.0

FIVE QUESTIONS WE'LL WORK THROUGH

1

Pre-event stakeholder roles

Why PPDR succeeds or fails before the storm. What gets locked in during blue-sky.

2

Debris management sites

Eligibility, siting, and final disposal. Audience gut-check: who has a pre-identified DMS?

3

Proving threats after the fact

What documentation actually holds up. What teams routinely miss in the first 72 hours.

4

The hard cases

Mobile home parks. City equipment on private property. Other eligibility gray zones.

5

Where PPDR is heading

Looming Public Assistance policy shifts. What they mean for the next mission.

Plus a scenario round, audience Q&A, and one Monday-morning takeaway from each panelist.

PANEL DISCUSSION



**Why does PPDR succeed or fail —
before the storm ever hits?**

Pre-established stakeholder roles. What gets locked in during blue-sky?

PPDR vs. ROW DEBRIS REMOVAL

ROW DEBRIS REMOVAL

- ▶ Default debris program after most declared disasters
- ▶ Eligible: public roads, rights-of-way, parks, easements
- ▶ Authority already exists — no ROE needed
- ▶ Standard reimbursement: Category A debris removal

PPDR

- ▶ EXCEPTION program — not automatic
- ▶ Eligible: debris on private residential / commercial parcels
- ▶ Requires legal authority, ROE, and indemnification
- ▶ Must clear public-interest determination

Bottom line: PPDR adds three workstreams ROW does not — legal authority, homeowner ROE, and insurance reconciliation.

IS YOUR JURISDICTION ELIGIBLE?

1

Immediate threat to life, health, or safety?

Structural hazards, hazmat, fire/disease vectors, blocked emergency access.

2

Legal authority to enter the property?

Established by local ordinance, state declaration, or court order — not by FEMA.

3

Public interest, not just the owner's benefit?

Community recovery and economic restoration — not private property enhancement.

4

Right of Entry + indemnification signed?

Signed ROE with FEMA-required elements — every parcel, every time. No exceptions.

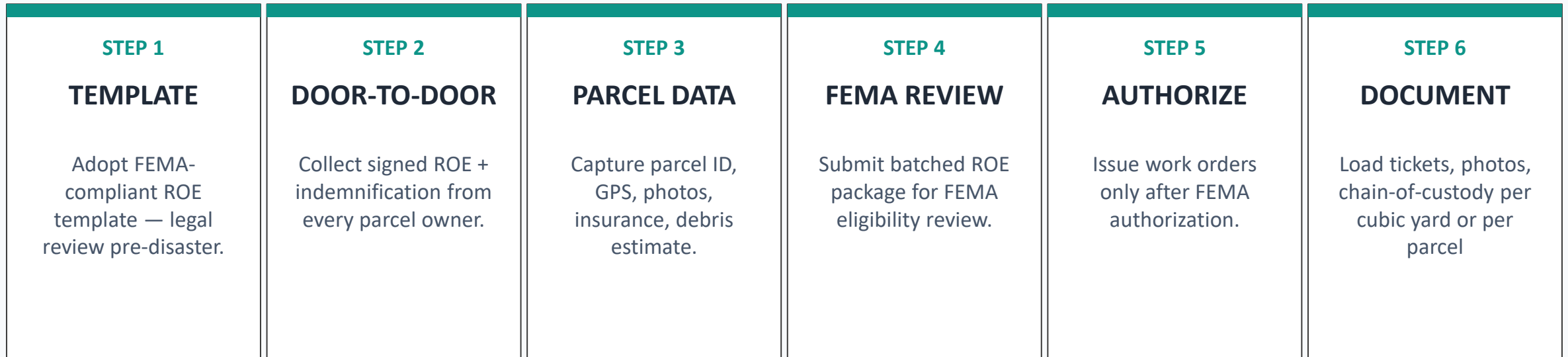
5

Duplication of benefits with insurance addressed?

Capture insurance coverage and offset reimbursement accordingly.

Any "No" = stop. Refer to FEMA before proceeding. Work performed without all five = high deobligation risk.

THE ROE PROCESS



FRICION POINT — WHAT WE SEE IN THE FIELD

ROE collection routinely runs 2–6 weeks longer than jurisdictions plan for. Causes: absentee owners, language barriers, distrust, and unclear template versions.

THE EVOLVING FEMA ENVIRONMENT

PAPPG v5.0 Amended (2025)

TIGHTENED STANDARD

Pre-approval requirement eliminated. Applicants must notify FEMA and document the five eligibility tests in writing.

Disaster Relief Fund Pressure

FUNDING PRIORITIZATION

When DRF is constrained, PPDR is among the first to face delayed obligations. Strong early documentation jumps the queue.

Insurance Duplication Scrutiny

CLOSEOUT DEOBLIGATIONS RISING

FEMA is increasingly deobligating PPDR at closeout when insurance reconciliation is weak. Capture coverage at ROE signing.

Cost-Share Variability

DON'T ASSUME 75/25

May be elevated (90%+) in catastrophic events or reduced for PPDR specifically. Read the obligation letter before pricing.

Source: FEMA PAPPG v5.0 | Stafford Act §403, §407 | Field observations, 2024–2026 declarations

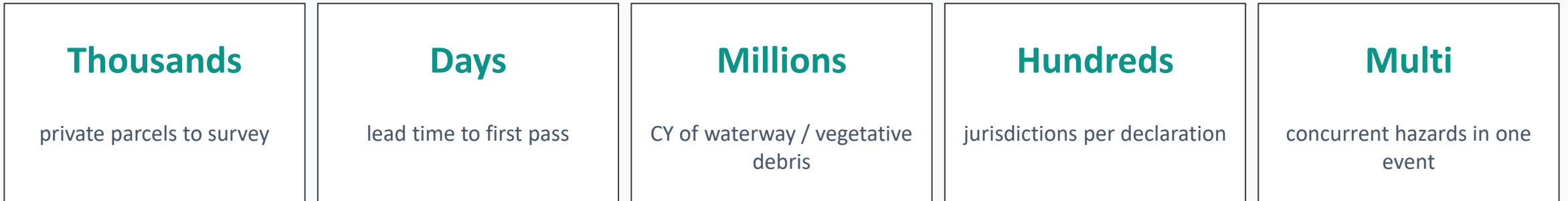
PANEL DISCUSSION



**The hard cases —
where do you draw the line?**

Mobile home parks. City equipment on private property. Where has FEMA drawn the line?

WHEN PPDR GOES BIG



THE COMPLICATIONS

Steep or restricted access. Damaged infrastructure (bridges, roads). Comingled debris streams that resist PAPPG categories. Soil, mud, and sediment. Mobile-home parks and other gray-zone parcels.

THE RESPONSE

Door-to-door ROE collection at scale. Specialty equipment for restricted parcels. Alternate haul routing. Real-time data flow between contractor, monitor, FEMA, and applicant.

DISASTER OPS | VISUAL RECORD



Selected debris-recovery operations from recent federally-declared events.

DEBRIS SCENARIOS THAT COMPLICATE PAPPG APPLICATION

Trees + Stumps

Vegetation mixed with landslide sediment doesn't fit standard unit-price categories.

Soil & Mud

Landslide and flood deposits on yards and driveways. Requires Cat. A justification.

Titled Assets

Vehicles, boats, trailers — on land and in water. Title research and owner notification add weeks to the timeline.

Hazardous Cargo

Displaced rail cars and tanks. Coordination with rail, EPA, and HAZMAT response.

Backyard Access

Inaccessible to standard grapples. ATVs, mini-excavators, and rigging needed.

Comingled Piles

Vegetative + C&D + household + hazardous all together. Drives cost and risk.

RECOMMENDATION FOR JURISDICTIONS

Build flexibility into your PPDR contract on day one. Pure unit-price contracts fail on unusual debris. Include lump-sum modification provisions, alternate access methods, and a path for environmental compliance.

QUICK QUIZ

A homeowner refuses to sign the ROE, but dangerous debris on their property threatens neighbors.
What's the correct PPDR response?

A Proceed — public safety threat overrides the ROE requirement.

B Skip that parcel — without ROE, the work is FEMA-ineligible regardless of threat.

C Document the threat retroactively — FEMA will accept it after the fact.

D Refer to code enforcement and your legal authority — PPDR isn't the only tool.

QUIZ — ANSWER

A homeowner refuses to sign the ROE, but dangerous debris on their property threatens neighbors.

A Proceed — public safety threat overrides ROE.

B Skip that parcel — FEMA-ineligible without ROE.

C Document retroactively — FEMA will accept it.

D Refer to code enforcement / legal authority.

ANSWER: B and D. PPDR work without ROE is FEMA-ineligible — period. But the safety threat is real, and code enforcement, condemnation, or police powers may be the right tool when ROE is refused.

PPDR BEST PRACTICES

PRE-POSITION

Pre-Disaster Contracts & Templates

Compete debris and monitoring contracts under 2 CFR 200. Pre-qualify technical tree crews — arborists, climbers, rigging — before the event. Identify your complexity factors (terrain, canopy, utilities, access) and assume reduced production from Day 1.

DOCUMENT

Capture Insurance at ROE

Collect insurance coverage data at ROE signing — not at closeout. Build the deobligation defense package while the work is happening.

MONITOR

Independent Monitoring Day One

Debris monitor must be unrelated to the hauler. Electronic load tickets from Day 1. Load ticket = chain of custody = reimbursement.

COMMUNICATE

Public Information Discipline

Single source of truth for residents. PPDR-specific FAQ. Trained PIO — rumors and social media will outpace you otherwise.

COMMON PITFALLS

1

Starting work before FEMA authorization

Verbal nods don't count. Wait for the written eligibility determination — or explicitly document the work as 'at-risk.'

2

Treating ROE collection as an afterthought

Door-to-door takes 2–6 weeks even at 24/7 pace. Pre-train canvassers and pre-stage materials.

3

Weak insurance data capture

Duplication-of-benefits is now a routine FEMA finding at closeout. Capture coverage at ROE signing.

4

Comingled monitoring and hauling firms

Affiliated relationships trigger conflict-of-interest deobligation. Use unrelated firms.

5

Underestimating non-standard debris

Unit-price-only contracts fail when sediment, vehicles, or restricted access enter the mission. Build flex pricing in.

6

Public communication breakdown

Without a single PPDR information channel, social media will drive resident anger faster than crews can mobilize.

QUICK QUIZ

Your PPDR contractor invoices for vegetative debris on 200 parcels. Half the load tickets are missing GPS coordinates. What happens at FEMA closeout?

A FEMA accepts — load ticket totals are sufficient.

B FEMA deobligates the GPS-missing portion as unverifiable.

C FEMA allows the applicant to backfill GPS from monitor logs.

D FEMA cuts the cost share by 25% as a documentation penalty.

QUIZ — ANSWER

Half the load tickets are missing GPS coordinates. What happens at FEMA closeout?

A FEMA accepts.

B FEMA deobligates the GPS-missing portion.

C FEMA allows backfill from monitor logs.

D FEMA cuts cost share 25%.

ANSWER: B. Every load ticket must have verifiable GPS and ROE. Without GPS, FEMA cannot verify the debris originated from an authorized parcel. Unverifiable = ineligible.

LESSONS LEARNED

PRE-DISASTER

- ▶ Adopt a PPDR-specific local ordinance for legal authority
- ▶ Pre-position FEMA-compliant ROE template with legal review
- ▶ Compete debris + monitoring contracts under 2 CFR 200

DURING THE EVENT

- ▶ Stand up dedicated PPDR command — separate from ROW
- ▶ Deploy specialized tree crews where complexity demands it
- ▶ Let safety set the pace — pressure to accelerate causes incidents
- ▶ Capture insurance coverage at ROE signing — every parcel
- ▶ Daily documentation review by applicant team

POST-EVENT

- ▶ Reconcile every load ticket to a parcel + signed ROE
- ▶ Build the deobligation defense package proactively
- ▶ Run insurance-duplication scrub before reimbursement

PPDR readiness is a policy, legal, operational, and communications decision — made before the storm.

PANEL DISCUSSION



**Where is PPDR heading —
and what does the next mission look like?**

Looming Public Assistance policy shifts. What they mean for your jurisdiction.

QUESTIONS

POLICY

What single PAPPG change would make PPDR more workable for your jurisdiction?

OPERATIONAL

What's the longest you've waited for FEMA's PPDR eligibility determination — and what did you do while waiting?

LEGAL

Has your county counsel ever blocked a PPDR mission over indemnification language? How did you resolve it?

CONTRACTING

What should jurisdictions be asking debris contractors before signing, that they typically don't?

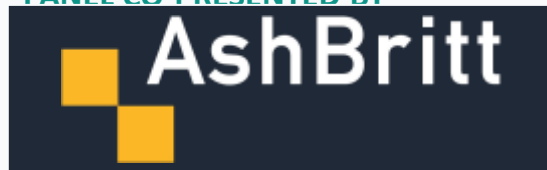
COMMUNITY

What's the hardest conversation you've had with a homeowner over a PPDR decision?

THANK YOU

Questions & Continued Discussion

PANEL CO-PRESENTED BY



Matt Gierden, AshBritt
mgierden@ashbritt.com



Evan Fancher, DRC
efancher@drcusa.com



Joe Hayes, CrowderGulf
jhayes@crowdergulf.com



Joe Gross, Synergy
jgross@synergy-dr.com