



Agency of Commerce &
Community Development (ACCD)
Department of Housing and
Community Development (DHCD)
**Vermont 2025 HUD -Community
Development Block Grant
Disaster Recovery
(CDBG-DR) Action Plan**

Published 7.14.2025



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Change Log Version (Date)	Summary of Changes Made
Version 1 (Original version Submitted June, 6, 2025)	
Version 2 (updates made in response to HUD review prior to approval) (Submitted July x, 2025)	Changes made in response to HUD comments prior to Plan approval:
	Page 105 – Urgent Need section updated to reflect requirements of universal notice
	Pages 102, 104, 106, 117 – mitigation set- aside amount & use clarified
	Page 106 – Clarification of Environmental Review requirements of State
	Pages 114-120 – Clarification of distribution method for applicants & direct implementation
	Page 120-121 – additional information added regarding VT's CDBG-DR Website, public notice, hearing process, and consultation with necessary parties
	Page 132 – Clarification of substantial amendment process to include necessary language from Universal Notice

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1. Executive Summary

The State of Vermont is required to publish an Action Plan for Disaster Recovery that describes the proposed use of \$67,845,000 of U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant Disaster Recovery (CDBG-DR) funding associated with the Disaster Relief Supplemental Appropriations Act, 2025, Public Law 118-158 approved on December 21, 2024.¹ This funding supports recovery and mitigation efforts related to FEMA-4720-DR-VT, a major disaster declared by the President on July 14, 2023. The HUD guidance for the funding was published January 16, 2025, with an applicability date of January 21, 2025 in the Federal Register Notice as Docket Number FR-6512-N-01.²

The Act provides for disaster relief for unmet needs, long-term recovery and restoration of housing, economic revitalization, infrastructure, and mitigation in the most impacted and distressed (MID) areas resulting from severe storms, flooding, landslides, and mudslides of DR-4720 that occurred in the State during the weather and flooding events from July 9 through July 21, 2023.

To frame the review of the Action Plan, readers should be aware of the overall structure of the CDBG-DR Program. CDBG-DR exists only when Congress appropriates funding for such programs as Presidentially declared disasters under Title IV of the Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C.5121 *et seq.*). CDBG-DR is implemented through Federal Register Notices and, where appropriate, regulations for the annual CDBG program which can be found at 24 CFR 570 for the State Program.

The State has developed this Action Plan in accordance with the updated Universal Notice, released March 21, 2025, following Memorandums 2025-02 and 2025-03 on March 19, 2025, and April 5, 2025. The updated Universal Notice made changes to the guidance and requirements, taking into account recently signed Executive Orders.

Since the foundation of the CDBG-DR program is based on the regulations of the CDBG Program, which is administered by the Vermont Agency of Commerce and Community Development, Department of Housing and Community Development (collectively “ACCD” herein), the CDBG-DR funding will also be administered by ACCD.

¹ Source: (Public Law 118-158, 2024)

² Source: (FR-6512-N-01, 2025)

1.1 Overview

The U.S. Department of Housing and Urban Development (HUD) allocated \$67,845,000 in Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to the State of Vermont in response to the Presidentially declared disaster DR-4720 - Severe Storms, Flooding, Landslides, and Mudslides, through the Allocation Announcement Notice published in the Federal Register at 90 FR 4759, Docket No. FR-6512-N-01 published January 16, 2025, with an applicability date of January 21, 2025. This allocation was made available through the Disaster Relief Supplemental Appropriations Act, 2025, Public Law 118-158 approved on December 21, 2024. CDBG-DR funding is designed to address needs that remain after all other assistance has been exhausted. To meet disaster recovery needs, the appropriations act(s) making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and facilitate a quicker recovery.

This plan details how funds will be used to address the remaining need and mitigation efforts in the HUD- and Grantee-identified Most Impacted and Distressed (MID) areas. The process for identifying a MID area involves evaluating the amount of damage to housing, infrastructure, and other assets to determine where the most concentrated impacts of the disaster occurred. Both HUD and the State of Vermont measure damages to determine the MID area, though identify separately a MID area due to distinct priorities for fund usage. The HUD and State priorities are complementary as both are seeking to identify communities heavily impacted by the disaster, with a minimum of 80% of the CDBG-DR allocation to be used in the HUD-identified MID area while up to 20% of the allocation will be used in the Grantee-identified MID area.

Additionally, the State is allocated a specific amount for mitigation set-aside activities. These funds do not need to have a tie-back to the disaster unlike the CDBG-DR allocation, but must be used to address mitigation activities through stand-alone activities or to supplement program activities. The CDBG-DR funds received by the State of Vermont must be spent within six years from the date which the grant agreement is signed with HUD.

Table 1: CDBG-DR Disaster Summary

Disaster Summary	
Qualifying Disaster	4720
HUD-identified MID Area	Lamoille County ³ and Washington County
Grantee-Identified MID Area	Caledonia County, Orleans County, Rutland County, Windham County, and Windsor County

Table 2: CDBG-DR Allocation Overview

CDBG-DR Allocation Overview	
CDBG-DR Allocation	\$58,996,000
CDBG-DR Mitigation Set Aside	\$8,849,000
Total Allocation	\$67,845,000

1.2 Disaster Specific Overview

Between July 7, 2023 and July 21, 2023 the State of Vermont was directly impacted by severe storms, flooding, landslides, and mudslides. The weather system caused flash flooding in communities along the Winooski River, Lamoille River, West River, and Connecticut River and forced closures of the major transportation corridors Interstate 89, U.S. Route 2, U.S. Route 3, and V.T. Route 100 due to flood inundation. The immediate impacts of flood waters and soil erosion disproportionately affected low-income communities, with early FEMA data showing severe damage sustained by affordable housing structures.⁴ Per FEMA's PA Grants Portal Project Data, there has been a total of \$379,411,754 reported damages to infrastructure across the HUD and Grantee-Identified MID areas as of April 11th, 2025.

The impacts of this weather system resulted in significant housing, infrastructure, and economic damage across the State of Vermont, and washouts of roads and railroad beds leaving many residents stranded in their homes.⁵ Extensive impact was seen specifically in the following counties: Caledonia, Chittenden, Lamoille, Orange, Orleans,

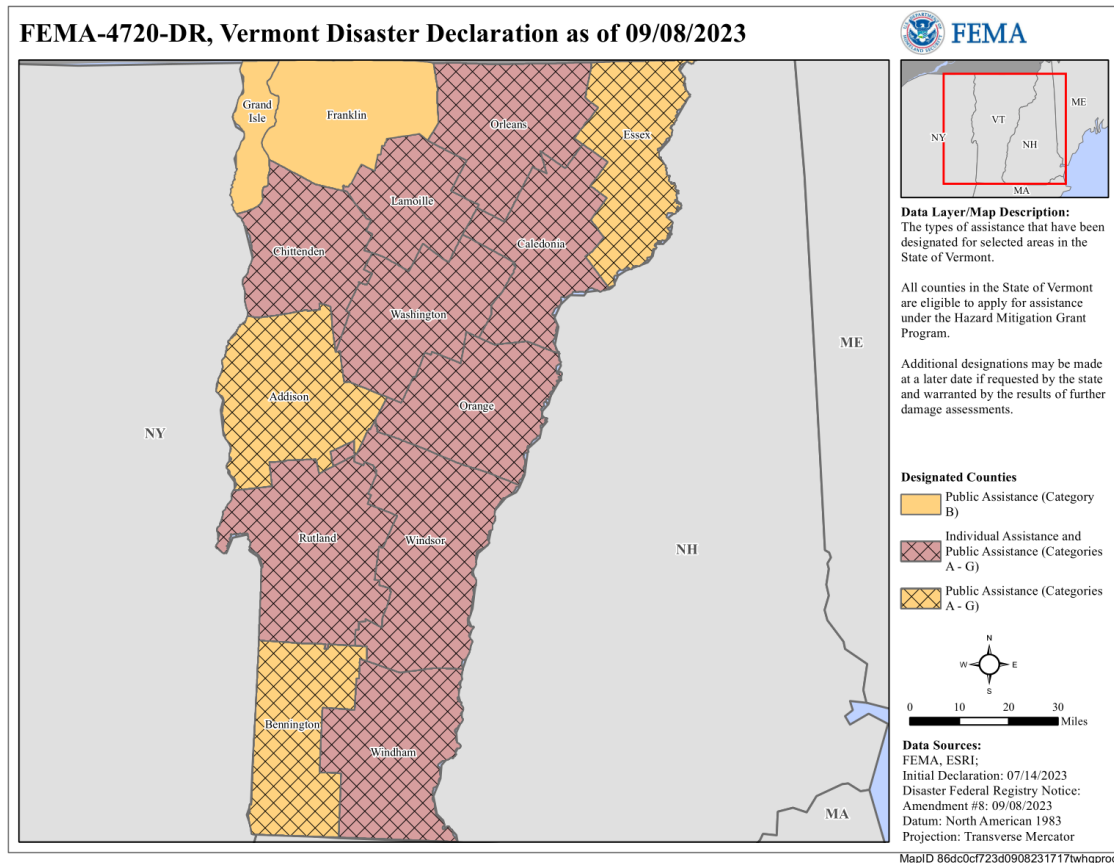
³ Expanded from ZIP code 05656 to the whole of Lamoille County

⁴ Source: (Duffort, 2023)

⁵ Source: (National Oceanic and Atmospheric Administration, 2023)

Rutland, Washington, Windham, and Windsor, which were designated as both Public Assistance (Category A-G) and Individual Assistance (Category A-G) counties by FEMA, as shown in Figure 1 below.

Figure 1: FEMA-DR-4720 Vermont Disaster Declaration as of 9/8/23⁶



Source: [Designated Areas | FEMA.gov](https://www.fema.gov/designated-areas)

Due to the severity of the event, the American Red Cross provided emergency relief and assistance in addition to the State of Vermont's response. The organization offered more than 600 overnight stays for nearly 200 residents across four emergency shelters in the towns of Barre, Johnson, Rutland, and White River. They also distributed over 16,670 meals and snacks along with 18,701 relief items – including comfort kits and cleaning supplies.⁷ These essential services were provided to 1,525 households and were vital for those who had lost their homes or access to basic necessities due to flooding.

⁶ Source: (FEMA, 2025)

⁷ Source: (American Red Cross, 2023)



Emergency workers wading through flood waters in a residential community during DR-4720

1.2.1 Weather System Timeline

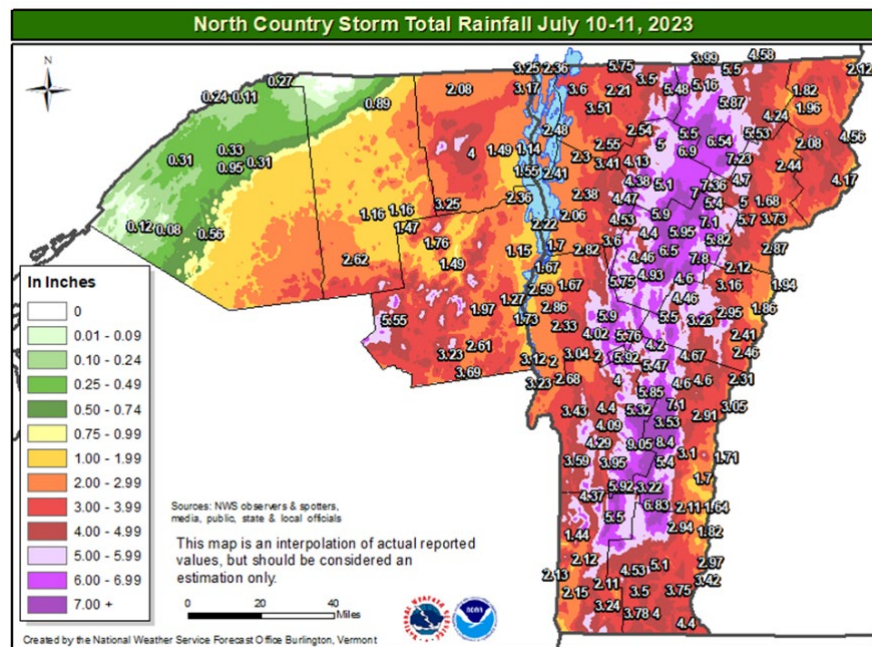
Overview of Weather Events: July 7, 2023 – July 11, 2023

On July 7, torrential rainfall caused a mudslide resulting in catastrophic road damage in Rutland County. Between July 9 and July 11, flash flooding and river flooding occurred throughout the State as heavy rainfall continued. Across the State of Vermont, three to nine inches of rain fell within 48 hours, as shown in Figure 2.

Figure 2: North Country Storm Total Rainfall July 10-11, 2023

The prolonged rainfall led to a river water height level record, not seen since the 1920s, for the Winooski River at 21 feet.⁸

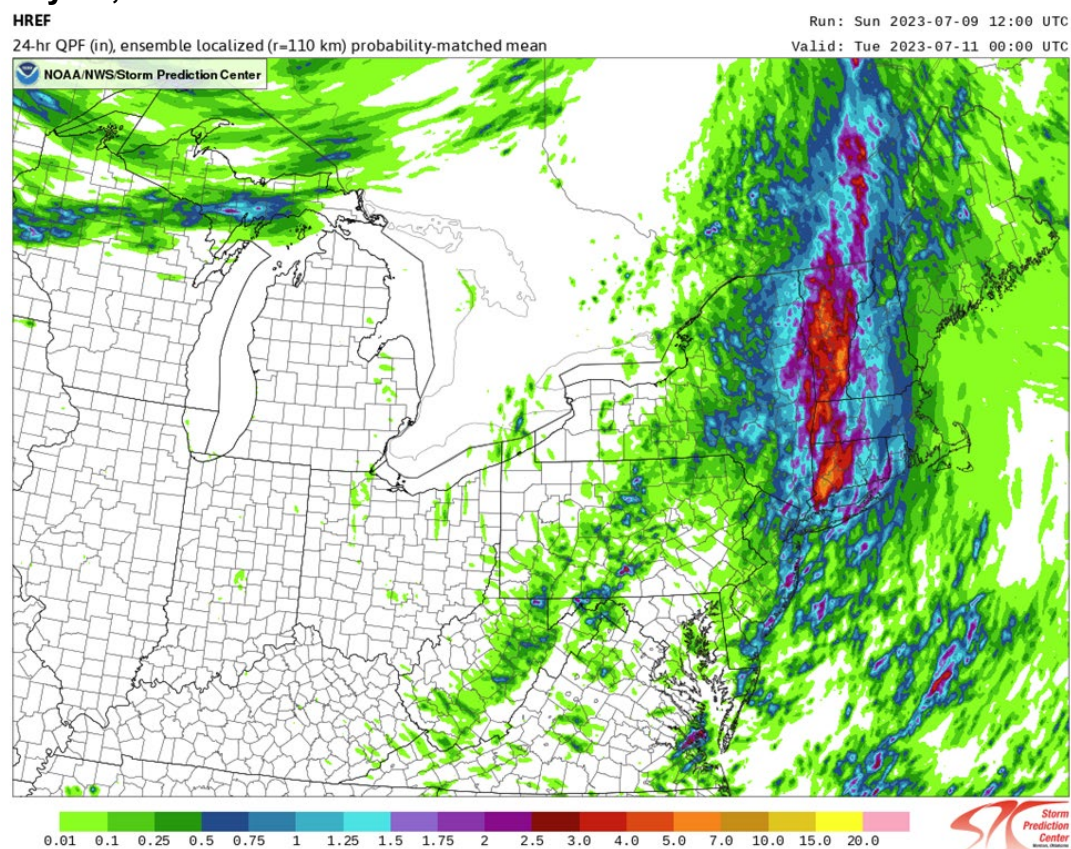
Communities along the major rivers of the Winooski; Lamoille; West; and Connecticut, such as



⁸ Source: (Alexander)

the towns of Montpelier; Johnson; Middlesex; and Andover, were among the hardest hit in the State. Over nine inches of rainfall was recorded in Washington and Windsor counties with Rutland and Orange counties receiving eight inches of rainfall; Orleans and Lamoille counties receiving over seven inches of rain; Bennington county recorded over six inches of rain; Addison, Caledonia, Franklin, and Windham counties received over five inches of rain; Chittenden and Essex counties reported over four inches; and Grand Isle county recorded over three inches of rainfall during this 24-hour period.⁹ Figure 3 below shows the total amount of rain forecasted to fall during the aforementioned 24-hour period beginning July 9, but actual recorded amounts in each county completely exceeded the forecasted amounts.

Figure 3: 24 Hour Quantitative Precipitation Forecasts for the State of Vermont on July 9th, 2023



July 10, 2023

When the waters were cresting on southern Vermont's rivers during the evening of July 10, 2023, and on the northern rivers such as the Winooski and Lamoille during the day on July 11, 2023, major transportation corridors including Interstate 89, U.S. Route 2, U.S. Route 4, and V.T. Route 100 were closed due to inundation, rendering many

⁹ Source: (National Oceanic and Atmospheric Administration, 2023)

communities inaccessible. Over 100 state-managed roads were closed or experienced delays. Many roads were washed out preventing emergency vehicles from getting through to individuals in need of medical assistance. At least two lives were lost as a result of the flash flooding with rising rivers and landslides.¹⁰ Shelters were opened, including the Barre Auditorium, being managed by the American Red Cross.¹¹

July 11, 2023

By the morning of July 11, 2023, there had been more than 214 active rescues performed by the twelve Urban Search and Rescue Teams working around the state, including two Federal Swift Water teams and eight out-of-state teams accessed through Emergency Management Assistance Compact (EMAC). Southern rivers were beginning to subside but rivers in the north were still rising. Damage at the Ludlow Fire Station rendered their emergency vehicles inoperable. Long-term care facilities were evacuated in Cambridge, Enosburg, and Montpelier.

July 14, 2023

Despite a brief respite, severe storms returned on July 14 resulting in flooding of the Middlebury River which led to road closures between 3 Mile Bridge Road and the State Highway Garage.¹² The Middlebury River flood also caused a landslide in the Town of Ripton, in Addison County which destroyed one house and led to the evacuation of nearly a dozen other homes.¹³ On July 14, 2023, the President signed a Major Disaster Declaration, FEMA-4720-DR-VT, due to severe storms and flooding with an incident period of July 7 through July 21, 2023.¹⁴ Six counties were designated for FEMA's Individual Assistance (IA) program which provides financial assistance to individuals and households impacted by the event: Chittenden, Lamoille, Rutland, Washington, Windham, and Windsor. On July 21, 2023, two additional counties were designated for IA: Caledonia and Orange. On July 26, 2023, one additional county was designated for IA: Orleans, for a total of nine counties.

Weather Event's End: July 16 – July 21, 2023

The weather system continued impacting the State on July 16 as additional rainfall occurred in Northeast Vermont, causing road closures due to washouts and inundation. On July 19, another round of rainfall caused Otter Creek to flood again in Rutland and Addison Counties, and Lake Memphremagog's shores and tributaries flooded in Orleans County. On July 20, soil saturation from the previous rainfall in Washington

¹⁰ Source: (Cassidy, 2023)

¹¹ Source: (American Red Cross, 2023)

¹² Source: (Flowers, 2023)

¹³ Source: (Heintz, Cotton, Crowley, & D'Auria, 2023)

¹⁴ Source: (Federal Emergency Management Agency, 2025)

County caused a landslide in the town of Plainfield. The weather system's final day was July 21 wherein five inches of rain fell within eight hours in the Town of Hartland in Windsor County. The rainfall caused major damage to two roads and minor damage to six roads. Over 141 of the 251 municipalities of Vermont were impacted by this period of flash-flooding events. The direct impacts from the weather system continued through the following weeks as landslides caused by saturated soil were documented across the State until August 8, 2023.

1.2.2 Initial Response Efforts

An Emergency Declaration was signed by the President on July 11, 2023, which authorized emergency protective measures to begin, followed by the signing of a Major Disaster Declaration on July 14, 2023.

1.2.2.1 Disaster Recovery Center Operations

In the immediate aftermath of the event, emergency resources from FEMA were deployed to meet the needs of the nine IA-declared counties, including setting up Disaster Recovery Centers, which are temporary facilities and mobile offices established after a disaster to provide support to the impacted areas. The efforts through these operations resulted in:

- 61 FEMA staff members were deployed to serve the disaster at its peak.
- 793 registrations for FEMA assistance were taken
- 918 documents submitted to support FEMA applications, including proof of identity, proof of occupancy and information about the disaster-related loss
- 3,966 survivors visited 14 Disaster Recovery Centers



A FEMA Disaster Survivor Assistance team conducting door-knock outreach following DR-4720

In order to further expand the reach of these efforts beyond those who were able to visit a center, Disaster Survivor Assistance teams walked endless miles to knock on over twenty thousand (20,000) doors in their outreach, ensuring that assistance reached those who needed it.

1.2.2.2 Individuals and Households Program (IHP)

FEMA's IHP provides financial and direct services to eligible individuals and households affected by a disaster. This assistance is used to supplement underinsured or uninsured individuals to meet basic needs. The initial declaration date for assistance began on July 14, 2023, and the deadline to register for assistance has since passed. In that time, applications were taken for Housing Assistance (HA) for direct housing needs and Other Needs Assistance (ONA) to cover other disaster-caused expenses and serious needs. The impact of that assistance is shown in Table 3.

Table 3: FEMA IHP Financial Assistance

IHP Program	Applicants Approved	Totals Approved
Housing Assistance (HA)	3,174	\$24,442,060.90
Other Needs Assistance (ONA)	1,623	\$1,759,004.29
IHP Total Approved	3,616	\$26,201,065.19

Table 4: FEMA HA Max Grants Awarded

HA Max Grant	Total Max Grants	Total HA Max Grant Awarded
HA Max Grant Award	85	\$3,654,501.94

Under Section 408 of the Stafford Act, the maximum amount of IHP financial assistance provided to an individual or household with respect to any single emergency or major disaster is \$43,600 for housing assistance and \$43,600 for other needs assistance.¹⁵ If a household need is greater than that, assistance would need to be provided through other means.

¹⁵ Source: (Federal Emergency Management Agency, 2024)

1.2.2.3 Joint Field Office Outreach (JFO)

The Joint Field Office is a management office with the ability to provide services remotely. Staff from JFO worked diligently to assist survivors, address the barriers to their eligibility and to maximize their available FEMA assistance. FEMA had already established a JFO in Vermont due to prior disaster declarations and its activities were rapidly ramped up in response to DR-4720.

The IHP team conducted outreach to survivor populations who had previously been denied FEMA assistance to assist them with obtaining required documentation, enabling more households to receive assistance. The results of this outreach permitted an additional \$10,325,357 to reach survivors for their recovery beyond the initial applications. A summary of the assistance provided is broken out by county and type of assistance in Table 5.

Table 5: FEMA IHP Assistance After JFO Outreach as of 1/15/24

County	IHP Total Assistance	IHP Assistance After JFO Outreach	HA Assistance After JFO Outreach	ONA Assistance After JFO Outreach
Caledonia	\$1,132,784.28	\$517,819.29	\$493,462.58	\$24,356.71
Chittenden	\$813,508.27	\$440,814.72	\$431,671.06	\$9,143.66
Lamoille	\$2,814,011.64	\$1,011,792.46	\$929,258.57	\$82,533.89
Orange	\$1,939,957.20	\$756,692.51	\$721,684.32	\$35,008.19
Orleans	\$1,395,114.76	\$582,381.12	\$575,896.65	\$6,484.47
Rutland	\$1,680,679.94	\$700,974.44	\$660,073.96	\$40,900.48
Washington	\$9,716,967.77	\$3,635,008.53	\$3,304,266.78	\$330,741.75
Windham	\$1,710,359.94	\$490,283.54	\$478,244.95	\$12,038.59

County	IHP Total Assistance	IHP Assistance After JFO Outreach	HA Assistance After JFO Outreach	ONA Assistance After JFO Outreach
Windsor	\$4,267,060.97	\$2,189,570.80	\$2,140,639.78	\$48,931.02
Total	\$25,470,444.77	\$10,325,337.41	\$9,735,198.65	\$590,138.76

Source: DR-4720-VT Transition Plan Final

1.2.2.4 Small Business Administration (SBA)

The SBA offers low interest loans to qualified disaster survivors for physical damage loans, mitigation assistance, and economic injury disaster loans (EIDL) and are available to eligible businesses, homeowners, renters, and private nonprofit organizations. As of close of business on 5/12/2025 assistance provided to Vermont residents and businesses through SBA loans totaled over \$20 million as shown in Table 6.

Table 6: SBA VT18016 & VT18017 Loan Activity

Applications	Home Loans	Business	EIDL	Total
Initial Application Count	828	277	96	1201
Offer Count	490	82	12	584
Disbursement Count	295	56	11	362
Total \$ Disbursed	\$9,502,000	\$9,687,398	\$1,753,400	\$20,942,798

Source: SBA Disaster Loan Data as of 05/12/2025

1.3 Most Impacted and Distressed Areas

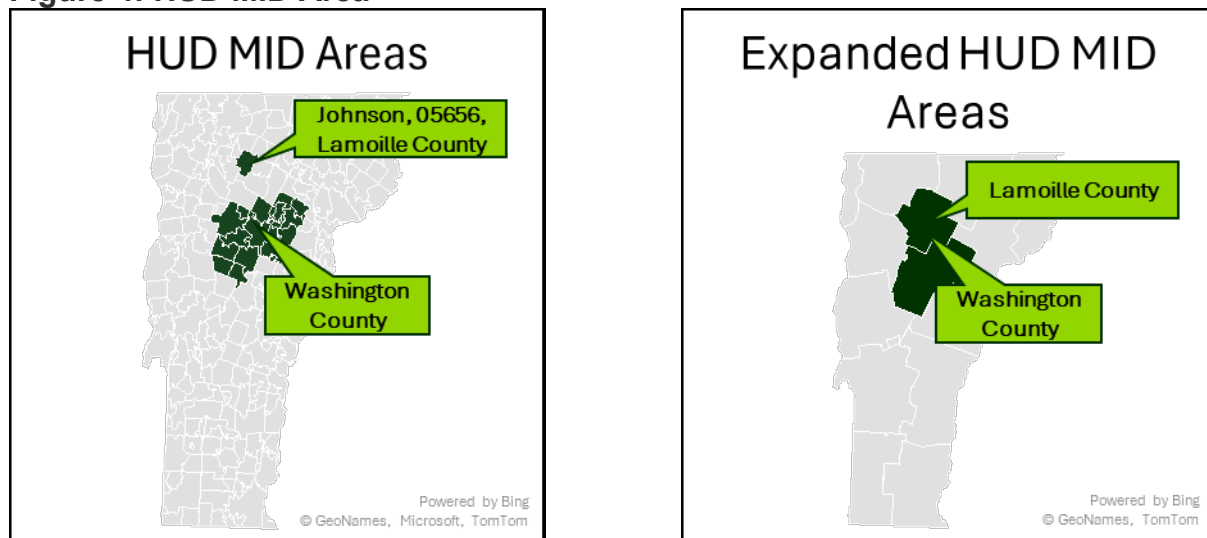
A Most Impact and Distressed (MID) area is a region identified by either HUD or the State as having experienced severe impacts from a federally declared disaster, such as DR-4720. These areas show significant unmet recovery needs across housing, infrastructure, and economic revitalization. Designation as an identified MID area qualifies a municipality for CDBG-DR funds to ensure communities with the greatest need and highest risk for prolonged recovery challenges are provided with program funds to support long-term recovery. The HUD- and Grantee-identified MID areas within this section suffered severe damages from the floods and landslides of DR-4720. Many major roads within the identified MID areas, such as Interstate 89 and VT Route 100, sustained significant damage to bridges, culverts and large swaths of pavement leading to closures. Many homes within the MID areas were severely damaged or completely destroyed, like the four mobile home parks in Washington and Lamoille Counties. Households faced basement flooding, being trapped indoors by landslides, destruction of property, and more. Hundreds of people were displaced by the event and ended up in transitional housing or emergency shelters. These damages are further explored, documented, and calculated throughout this Action Plan.

As found in the Unmet Needs Assessment (UNA), all identified MID areas have a similar percentage of the LMI population when compared to the State as a whole. The UNA finds that the MID areas are made up of 41.9% LMI persons of working age while Vermont as a whole is made up of 41.5% LMI. However, when individual MID area counties are examined, it is revealed that a higher percentage of several identified MID area counties have a higher concentration of LMI persons compared to the overall percentage of LMI persons in the State of Vermont. The UNA also finds that about a third of households within the identified MID areas are cost-burdened, meaning the people living in a household spend more than 30% of their income on housing costs. These cost-burdened individuals were already facing financial strains that were then exacerbated by flood damage to their homes which added the need for repairs and in some cases completely destroyed their homes leaving them displaced and homeless. In addition to housing impacts, the fallout of DR-4720 includes damaged roads, bridges, and dams within the identified MID areas leading to increased repair costs that exceed the municipality's ability to pay.

ACCD will award funding to projects to ensure that the required minimum of 80% of funds are spent in the HUD-identified MID area and no more than 20% of funds are spent in the Grantee-identified MID.

1.3.1 HUD-identified MID Areas

Figure 4: HUD MID Area



The Universal Notice requires grantees to spend a minimum of 80% of CDBG-DR funds to address the unmet needs or mitigation activities in the HUD-Identified MID areas. In the Allocation Announcement Notice (AAN), HUD identified its MID areas for the State of Vermont as all of Washington County and the zip code 05656 (Town of Johnson) in Lamoille County. Pursuant to the updated CDBG-DR Universal Notice, and confirmation on the allowability from HUD, the State of Vermont has elected to expand the HUD MID areas to include the whole of Lamoille County, not just zip code 05656, Town of Johnson. Figure 4 shows the HUD-identified MID areas and the expanded HUD MID areas.

The State is expanding the HUD MID area of zip code 05656 to include the entirety of Lamoille County based on recent historical data from the National Oceanic and Atmospheric Administration (NOAA) showing that the County has been repeatedly impacted by significant flooding along the Lamoille River and is likely to continue experiencing weather events that cause flooding.¹⁶ Three of the largest floods, as recorded by the NOAA, in Lamoille County occurred during weather events in 2023 and 2024. Per this Action Plan's Unmet Needs and Mitigation Needs Assessments, the State of Vermont finds the damages from flooding and erosion that impacted housing, infrastructure, and the economy of the regions around the originally identified MID areas to be significant enough to warrant this expansion, as the damages compounded existing housing, cost-burden, and built environment issues detailed later in this document. In Washington and Lamoille County, four mobile home parks saw homes

¹⁶ Source: (National Oceanic and Atmospheric Administration, 2025)

destroyed in floods and landslides.¹⁷ By August 1, 2023, 61 mobile homes had been deemed uninhabitable due to damage sustained from DR-4720. These homes sustained water damage to their overall structures and personal property inside, with some being completely destroyed by landslides.¹⁸ Across both counties, many houses experienced basement flooding, as well as residents being trapped in their homes due to landslides and road flooding. The UNA finds that through FEMA's Individual and Households Program registration data, HUD identified 193 homes in Lamoille County and 516 homes in Washington County as having major to severe damage.

Many businesses were forced to close due to damage inflicted on physical property as well as roads in the surrounding area, resulting in both infrastructural and economic loss. To prepare for future severe weather events and respond to the unmet needs from DR-4720, the State of Vermont will need to utilize CDBG-DR funds across Lamoille County for activities such as floodplain restoration projects, flood mitigation projects, and ensuring adequate funding is available for other potential housing development, infrastructure, and mitigation projects in the County.

1.3.2 Grantee-identified MID Areas

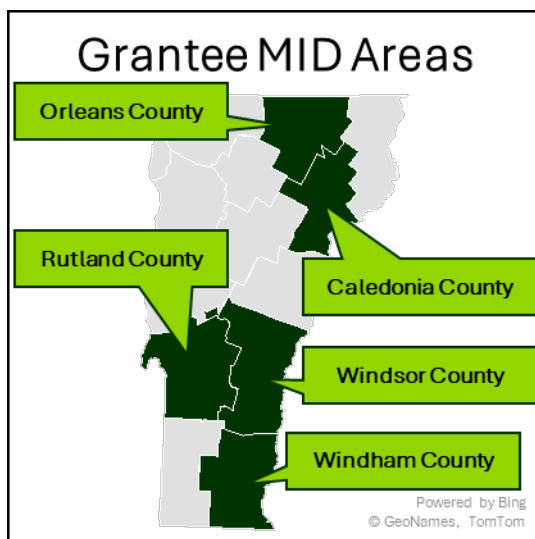


Figure 5: Grantee-identified MID Area

The Universal Notice authorizes grantees to spend no more than 20% of CDBG-DR funds to address the unmet needs or mitigation activities in Grantee-identified - MID areas. The State of Vermont has designated five counties as Grantee-identified MID areas, based on damage reports and regional State data collected post-disaster. The Grantee-identified MID areas include: Rutland County, Caledonia County, Orleans County, Windham County, and Windsor County, all of which were included in the Major

Disaster Declaration, FEMA-4720-DR-VT signed by the President on July 14, 2023, with Caledonia County added on July 21, and Orleans County added on July 27. These counties were selected due to the significant damage sustained within and surrounding the following towns within their counties: **Caledonia County:** Town of Hardwick (zip code 05843); Town of Lyndon (zip code 05849); **Orleans County:** Town of Barton (zip

¹⁷ Source: (Cutler, 2023)

¹⁸ Source: (Berlin, 2024)

code 05822); Town of Glover (zip code 05839); Town of Coventry (zip code 05825).

Windham County: Town of Londonderry (zip code 05148). **Windsor County:** Town of Weston (zip code 05161); Town of Ludlow (zip code 05149). Though these towns are listed, the entire counties in which they reside are considered part of the MID area, making funds available for all municipalities within those counties. Figure 5 shows the Grantee-identified MID area.

Per this Action Plan's Unmet Needs and Mitigation Needs Assessments, the State of Vermont identifies these areas as the MID areas because of the disproportionate amount of damage accrued from DR-4720 when compared with the entirety of Vermont. The data presented later in this document highlights the aging housing stock, the low availability of affordable housing, and the higher likelihood of people living within these Grantee-identified MID areas to be cost-burdened. Additionally, the Grantee-identified MID areas are made up of communities predominantly situated along the State's major rivers and floodplains. These low-lying areas are highly susceptible to flood damage due to their location and experienced rapid water level rises that led to flash flooding impacting their homes and local infrastructure like roads, bridges, and dams. The inundation flooding brought about widespread property loss and displacement for those within the region. These factors show that the impacts of DR-4720 further intensified existing hardships faced by the population and built environment across these areas, warranting classification as Grantee-identified MID areas.

All Grantee-identified MID areas shall be able to apply for assistance consistent with specific program requirements as outlined in this Action Plan, keeping in mind that the State must use at least 80% of its CDBG-DR funds (including mitigation set-aside funds) in the HUD-identified MID areas.

2. Unmet Needs Assessment Summary

2.1 Overview

HUD requires that grantees document the impacts and unmet needs that remain after initial recovery efforts through an Unmet Needs Assessment (UNA). The UNA supports program and funding decisions for the use of CDBG-DR funding. The UNA is divided into three cost categories: Housing, Infrastructure, and Economic Revitalization. Within each of these three categories, the UNA provides an analysis and summary of disaster damage, initial efforts to recover from said damage, and the remaining unmet cost of further recovery. More specifically, the Unmet Housing Needs Assessment discusses the preexisting vulnerabilities of Vermont's housing stock and the various ways in which the 2023 floods exacerbated them by destroying homes and displacing families. The Unmet Infrastructure Needs Assessment primarily discusses the devastating effect of damage to critical public facilities including power, wastewater, and transportation systems as well as the staggering cost of repairing them. Finally, the Unmet Economic Revitalization Needs Assessment estimates the damage sustained by Vermont's numerous businesses with real estate, equipment, and merchandise losses which are as hard to calculate as they are to remedy.

Through these various sections of the Unmet Needs Assessment, the data analysis has indicated that Infrastructure is the largest unmet need at \$213M, or over half of all unmet need, followed by Housing at \$107M, and Economic Revitalization at \$30M.

Table 7: Met and Unmet Needs Overview by Category

Category	Impact	Assistance	Unmet Need	Percent of Unmet Need
Housing	\$218,775,961	\$111,421,500	\$107,354,461	30.6%
Infrastructure	\$668,645,523	\$455,953,218	\$212,692,305	60.6%
Economic Revitalization	\$45,307,616	\$14,314,596	\$30,993,020	8.8%
Total	\$932,729,100	\$581,689,314	\$351,039,786	100.0%

Summary of Unmet Needs and Allocation Distribution

While the total dollar amount of impact to infrastructure exceeds the housing dollar impact, ACCD is prioritizing addressing unmet housing needs due to their more immediate and severe impact on individuals and households. The aftermath of DR-4720 has left many without stable shelter, and the detrimental effects on housing access are likely to continue long after funds for compensating and repairing physical property damage are disbursed. Due to Vermont's chronic housing shortage coupled with rising rents and property values, the amount of disaster assistance received by a household to replace lost housing can become insufficient if unmet needs are not dealt with quickly and efficiently. FEMA HMGP-funded buyouts, while important for long-term flood mitigation, require participants to find acceptable and safe replacement housing in a scarce housing environment. These households looking for affordable units often face lengthy waitlists, if they can find available units at all. Thus, it is imperative that the State allocate a formidable portion of its CDBG-DR funds to meet unmet housing needs.

By providing a substantial allocation of funds for unmet housing needs, ACCD is ensuring that other investments in both infrastructure and economic revitalization will have more beneficiaries living in the benefited area. The beneficiaries will be Vermont residents in newly stable housing created using these CDBG-DR funds. These residents will be able to make use of the infrastructure improvements made with funds from the CDBG-DR allocation and other funding sources. Prioritizing addressing housing unmet needs also protects future infrastructure investments by reducing the risk of damage to homes connected to critical systems like water and sewer lines. These types of systems will be addressed through infrastructure in direct support of housing projects. Additionally, relocating housing away from floodplains and future infrastructure investments helps keep households safer from future impacts and reduces the likelihood of repeated losses. Businesses depend on local customers, and local spending drops when basic needs like shelter are not met. Consequently, restoring housing stability is critical not only for individual household recovery, but also for revitalizing the MID area's economy and community. Though it is evident that restoring infrastructure and revitalizing the economy are essential, neither can fully succeed without addressing housing needs first.

2.2 Background and Process

HUD defines “unmet needs” as those resources necessary to recover from a disaster that are not likely to be addressed by other sources of funds. In order to gather a comprehensive understanding of these needs, various forms of available assistance must be reviewed and analyzed, such as FEMA funds and compensation from private insurance. By looking at the most current data available, the total cost of pre-assistance

damage is quantified, totaled, and compared against the amount of assistance received. Then, by calculating the difference between the amount of aid required and the aid disbursed, an estimate of unmet need can be determined. Each of the categories identified in the Universal Notice (Housing, Infrastructure and Economic Revitalization) are individually assessed to determine an unmet need estimate across the HUD- and Grantee-identified MID area.

2.2.1 Data Sources and Limitations

This section outlines the data sources analyzed for the UNA, along with the key limitations that may affect the interpretation of the results. The sources cited were used to calculate a dollar value for the unmet need estimate for each category (housing, infrastructure, and economy). There are also additional sources throughout the UNA that provide context and comparison but may not have an associated dollar value for impact. Table 8 below provides an overview of data sources used to quantify the UNA.

Table 8: Data Sources Used in Unmet Needs Assessment

Data	Sources
Housing Data	<ul style="list-style-type: none"> • Vermont Agency of Commerce and Community Development Housing Needs Assessment • Vermont Housing Finance Agency Community Data Profiles • Vermont Coalition to End Homelessness Point-in-Time Count • FEMA Individuals and Households Program (IHP) • HUD UN AAN Methods for Estimating Serious Unmet Needs for Housing • FEMA National Flood Insurance Program (Residential Buildings) • Vermont Department of Financial Regulation 2023 Flood Insurance Data Call (Residential Property Insurance) • Vermont Emergency Management Pre-Application Form for Hazard Mitigation (Housing Projects) • SBA Disaster Home Loans • Vermont BEGAP (Landlord – Residential Applicants)

Data	Sources
Infrastructure Data	<ul style="list-style-type: none"> • FEMA Public Assistance and additional estimated damages not yet captured in FEMA Grants Portal • Vermont Emergency Management Pre-Application Form for Hazard Mitigation (Infrastructure Projects)
Economic Revitalization Data	<ul style="list-style-type: none"> • Vermont Business Emergency Gap Assistance Program • SBA Disaster Business Loans • SBA Economic Injury Disaster Loans

To accurately assess the findings of the UNA and their applicability, it is essential to understand the constraints of the data and its analysis. The State has analyzed a variety of impacts from a wide array of available information sources to calculate unmet need. However, there are several limitations to the analysis:

- For Residential Property Insurance, data was not available for assessed damage. The analysis assumes that all applicants who were denied claims sustained a similar level of damage to their homes as those whose claims were approved, but that their insurance policy did not cover repair of that damage. Additionally, Private Flood Insurance was analyzed but was not included in the UNA, as the data call did not differentiate between residential and commercial policies.
- Small Business Administration Disaster Loan data is not yet publicly available for FY23. Vermont does not yet have a data sharing agreement with SBA, so per-applicant data (including verified loss estimates) were not available for the analysis. Instead, the unmet needs assessment applies the HUD multiplier for flooding to FEMA IA inspection data.
- The Housing and Infrastructure project costs reported by the Vermont Emergency Management Pre-Application Form for Hazard Mitigation have not all undergone review. Project costs may not consider additional costs like closing, legal fees, or demolition. Additionally, the reported costs do not account for the potential duplication of benefits, although they are assumed to be minimal.
- Due to complexities with the process of applying for FEMA Public Assistance funding, several projects have reported estimate costs that may not match current information in Grants Portal. The impact calculations for these projects are estimated and subject to change.
- The Vermont Business Emergency Gap Assistance Program (BEGAP) provides a grant for 30% of net uncovered damages, up to \$50,000. The calculation for

unmet need assumes that all applicants received 30% of net uncovered damage; the calculation does not account for applicants that suffered damage so large that \$50,000 did not represent 30% of their net uncovered need.

2.2.2 Demographic Considerations

This section identifies key demographic factors that may influence data interpretation and the relevance of findings across different population groups. The Unmet Needs Assessment has given particular focus to low-to-moderate income (LMI) households, per the HUD Universal Notice requirement that 70% of funds be used for activities that benefit LMI persons.¹⁹ As defined by HUD, LMI households have household incomes at or below 80% of the Area Median Income (AMI). HUD has set this requirement as a major tenet of the CDBG-DR program to prioritize benefiting LMI persons.

Table 9: 2021 HUD Estimate of Vermont LMI Households

Location	LMI Households (<80% AMI)
MID Areas	53,259
Vermont	108,149

Source: [Households by income group | HousingData.org - Directory of affordable rental housing](#); U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS), 2021

Using this definition, LMI households make up just over 41% of all households in Vermont and the identified MID Areas. However, when separated into its composite counties, there are several parts of the identified MID areas where more than 41% of the population are considered LMI. The distribution of LMI households by county is shown below in Table 10.

Table 10: 2021 HUD Estimate of Vermont LMI Households by County

County	Households with Income < 80% AMI	Total Population	% of Households with Income < 80% AMI
Caledonia	5,915	12,490	47.4%
Lamoille	4,084	10,754	38.0%

¹⁹ Source: (U.S. Department of Housing and Urban Development, 2025)

County	Households with Income < 80% AMI	Total Population	% of Households with Income < 80% AMI
Orleans	5,140	11,235	45.8%
Rutland	10,825	24,745	43.8%
Washington	9,435	24,890	37.9%
Windham	8,410	18,980	44.3%
Windsor	9,450	23,955	39.5%
MID Areas	53,259	127,049	41.9%
Vermont	108,149	260,342	41.5%

Source: [Households by income group | HousingData.org - Directory of affordable rental housing](#); U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS), 2021

According to Table 10 above, a majority of identified-MID area counties have a larger proportion of LMI households than the state-wide proportion. LMI individuals and families often struggle with limited access to financial resources and insurance coverage further hindering their ability to rebuild and relocate following disaster events. Financial constraints may also mean that these households lack savings or alternative housing options which may lead to prolonged displacement. As a result of the limited access to financial resources, individuals in the identified-MID areas were both more vulnerable to a disaster like DR-4720 and less capable of recovery.

2.3 Housing

Vermont has long suffered from an acute housing crisis. Following the events of DR-4720²⁰, the State of Vermont conducted a Housing Needs Assessment for 2025 – 2029, which was published in June 2024. To perform the following Unmet Housing Need Assessment, this Housing Need Assessment for 2025-2029 was used in combination with a review of the impacts of the July 2023 flood events on emergency shelters, interim and permanent housing, public housing units, affordability, and damages to residential homes and rental units.

²⁰ Source: (State of Vermont's Agency of Commerce and Community Development, 2024)



A Vermont Task Force 1 responder assisting in the emergency response effort.

Of course, this damage was addressed with a prodigious amount of aid—from both federal and local sources. At the federal level, the Federal Emergency Management Agency (FEMA) and Small Business Administration (SBA) provided disaster recovery funding through a number of programs. Locally, private insurance policies and state programs like the State of Vermont Business Emergency Gap Assistance Program (BEGAP) supplanted or supplemented federal recovery assistance where available. However, despite the laudable amount of aid and assistance provided, the circumstances of Vermont and especially of the identified MID areas were such that there remained a sizable amount of unmet need following the 2023 flooding disasters.

The Housing Unmet Needs Assessment found that much of Vermont's housing stock is located within floodplains which were heavily impacted by the flooding from DR-4720. The damage from DR-4720 exacerbated issues already faced by the identified MID areas, such as an aging housing stock and a high population of cost-burdened groups who are less able to afford rent, repairs, and rehabilitation. The flooding displaced hundreds of individuals from their homes stressing the capacity of emergency shelters and transitional housing programs. Partially damaged homes which, if left in disrepair, may cause further disruptions to the lives of those living in them or, worse, further deteriorate to an uninhabitable condition. Whether they were renters or owners, living in single family homes or apartment buildings, DR-4720 disproportionately impacted people and housing within the identified MID areas when compared to the rest of Vermont. Table 11 below provides the summarized financial findings of the Housing Unmet Needs Assessment.

Table 11: Summary of Housing Unmet Needs

Funding Source	Total Damage	Assistance Provided	Unmet Need
FEMA Individual Assistance	\$19,860,418	\$18,528,847	\$1,331,571
HUD Multiplier for Homes and Mobile Homes	\$70,326,693	\$0	\$70,326,693
FEMA National Flood Insurance Program	\$17,193,163	\$16,160,446	\$1,032,717
Residential Property Insurance	\$18,787,930	\$0	\$18,787,930
Hazard Mitigation Pre-Application Interest for Housing Projects	\$88,945,189	\$75,583,436	\$13,361,753
BEGAP Award for Residential Housing	\$3,662,568	\$1,148,771	\$2,513,797
Housing Total	\$218,775,961	\$111,421,500	\$107,354,461

2.3.1 Housing Profile

2.3.1.1 Housing Stock

Vermont's housing stock continues to be strained by economic and environmental challenges, such as a low vacancy rate and high likelihood of flooding from severe weather. The identified MID areas contain 176,563 homes, which is 52.4% of all homes

in the State.²¹ Most homes in the identified MID areas are owner-occupied, while 19.1% are renter-occupied and 6.0% are vacant. This is a notable difference from the rest of Vermont, where the home ownership rate is slightly higher and there are less renter-occupied and vacant homes. According to data available from HousingData.org, a database maintained by the Vermont Housing Finance Agency (VHFA), the State's overall housing vacancy rate is just 5%, highlighting a shortage of affordable rental options and the growing pressure on the housing market. Table 12 below breaks down the housing stock within the MID area and Vermont as a whole against the homes' occupation status.

Table 12: Housing Stock by Occupation Status

Location	Total Homes	Owner households	Renter households	Seasonal homes	Vacant homes
MID Areas	176,563	97,832	33,715	34,464	10,552
MID Areas (%)	100.0%	55.4%	19.1%	19.5%	6.0%
Vermont	337,072	196,162	73,304	50,742	16,864
Vermont (%)	100.0%	58.2%	21.7%	15.1%	5.0%

Source: [Housing stock | HousingData.org - Directory of affordable rental housing](#); U.S. Census Bureau: American Community Survey 5-year estimates (Table B25003, B25004)

2.3.1.2 Residential Building Profile

The distribution of housing types in the identified MID areas indicates a larger proportion of smaller-scale housing options, which limits the availability of more affordable multi-family rental units. This lower population density per residential building likely prolonged the displacement of many households, as repairing low-density housing restores housing to fewer individuals per repair compared to repairing larger multi-family rental units. Within the identified MID areas, single-family homes make up the majority of owner and renter-occupied housing units, accounting for 72.5% of the housing stock.²² The next largest share of the housing stock is 2–4-unit buildings, which make up 12.3% of the housing stock. Compared to the rest of Vermont, the identified MID areas have a

²¹ Source: (Vermont Housing Finance Agency)

²² Source: (Vermont Housing Finance Agency)

slightly higher percentage of single-family homes, 2–4-unit buildings, and manufactured homes. In contrast, there are fewer 5-19 unit and 20+ unit buildings than in other parts of the State. Table 13 below shows a comparison between renter- and owner-occupied home types in the MID Area.

Table 13: Occupied Housing Units by Residential Building Type

Location	Total Occupied Housing Units	Single-family	2–4-unit buildings	5–19-unit buildings	20+ unit buildings	Manufactured home
MID Areas	131,510	95,334	16,133	7,699	3,717	8,627
MID Areas (%)	100.0%	72.5%	12.3%	5.9%	2.8%	6.6%
Vermont	269,376	190,536	32,160	16,977	13,528	16,175
Vermont (%)	100.0%	70.7%	11.9%	6.3%	5.0%	6.0%

Source: [Residential building type | HousingData.org - Directory of affordable rental housing](https://www.housingdata.org/directory-of-affordable-rental-housing/); U.S. Census Bureau: American Community Survey 5-year estimates (Table B25032)

To further delineate the challenges that can be faced depending on the make-up of one's housing unit, Table 14 below shows the percentage breakdown of Owner and Renter-Occupied Housing Units in the identified MID areas. When severe weather events occur, such as the flooding from DR-4720, many single-family and manufactured homes are likely to need major structural repairs as the occupants of these households generally have less access to flood protection resources than an organization or owner running an apartment complex would. Renters living in apartment buildings are likely to need different types of support, such as repairs to their building systems or even relocation assistance. Within the identified MID areas, the majority of owner-occupied housing units are single-family homes at about 89% of the owner-occupied housing stock. Manufactured and mobile homes are the second most common owner-occupied home, making up about 7% of the owner-occupied housing stock. Renters are more likely to live in small apartment buildings, as the most common rental unit is an apartment building with 2-4 units at 39%. The second most common rental unit is single-family homes at about 25% of rental stock, and the third is medium-sized

apartment buildings with 5-19 units at about 21% of the rental stock. With single-family homes being the most frequent unit of housing in the identified MID areas, and the type most likely to face significant structural damage from floods, a large number of housing structures in the identified MID areas require substantial repairs.

Table 14: Owner and Renter-Occupied Housing Units in MID Area

Occupation	Total Occupied Housing Units	Single-family	2–4-unit buildings	5–19-unit buildings	20+ unit buildings	Manufactured home
Owner-Occupied Housing Units	97,797	86,984	3,079	540	281	6,913
Owner-Occupied Housing Units (%)	100.0%	88.9%	3.1%	0.6%	0.3%	7.1%
Renter-Occupied Housing Units	33,713	8,350	13,054	7,159	3,436	1,714
Renter-Occupied Housing Units (%)	100.0%	24.8%	38.7%	21.2%	10.2%	5.1%

2.3.1.3 Aging Housing Stock

The 2025-2029 Housing Needs Assessment found that Vermont's housing stock had and continues to have physical vulnerabilities that increase the likelihood and severity of

damage. Vermont has an aging housing stock, among the oldest in the country, which exposes thousands of households to dangerous conditions. For instance, buildings built before 1978 are at risk of containing lead-based paints and buildings built before 1980 are at risk of containing asbestos. Many older homes still contain lead-based paint which poses serious health risks, especially for young children. Materials like asbestos can also be hazardous if disturbed by an event like a flood, which expose these substances to their occupants and often require expensive professional cleanup to ensure the home is habitable. Table 15 below shows the percentage of occupied housing units in the MID area and across the entirety of Vermont, to highlight the disparity between the MID area and Vermont as a whole in aging housing units susceptible to exacerbated damage between the MID area and the non-MID areas.

Table 15: Owner and Renter-Occupied Housing Units Built Before 1980

Location	Occupied Housing Units	Owner-Occupied Housing Units Built before 1980	Renter-Occupied Housing Units Built before 1980	% of Occupied Housing Units Built before 1980
MID Areas	131,547	56,712	23,914	61.3%
Vermont	269,466	106,235	45,921	56.5%

Source: [Year structure built | HousingData.org - Directory of affordable rental housing](#); U.S. Census Bureau: American Community Survey 5-year estimates (Table B25034, B25036)

According to U.S. Census data, over 61% of occupied housing units in the identified MID areas were built before 1980. Therefore, when comparing the age of housing across the entire State, people living in the identified MID areas are more likely to live in a dangerously aged home than the rest of Vermont. These homes may already require maintenance or lack modern flood protections, which makes them more susceptible to damage from severe weather events. Furthermore, since the identified MID areas have a higher population of LMI individuals and households, the owners and occupants of these aged homes are more likely to have limited financial resources to repair damage sustained from DR-4720. For these families, paying for the rehabilitation of their homes without assistance will leave them further cost burdened.

2.3.1.4 Households with Housing Problems

It is important to note that even beyond age, asbestos, or lead-paint, a home can have problems that seriously threaten the health of its occupants. On September 12, 2024,

HUD released an updated dataset for the Comprehensive Housing Affordability Strategy (CHAS). Using 5-year estimates from the Census Bureau’s American Community Survey in 2021, HUD catalogued the number of households in Vermont that had at least one of the following four problems:

- Home lacks complete kitchen facilities,
- Home lacks complete plumbing facilities,
- Household is overcrowded, defined as having more than one person per room of the unit, or,
- Household is cost burdened, defined as monthly housing costs, including utilities, exceeding 30% of monthly income.

Table 16 below shows the percentage of Households with Housing Problems across the MID area and Vermont as a whole.

Table 16: HUD CHAS – Households with Housing Problems

Location	Households with Housing Problems	Occupied Housing Units	Estimated % of Occupied Housing Units with Housing Problems ²³
MID Areas	39,235	131,547	29.8%
Vermont	81,223	269,466	30.1%

Source: [Housing-related problems | HousingData.org - Directory of affordable rental housing](#); U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS), 2021; [Community snapshot | HousingData.org - Directory of affordable rental housing](#); U.S. Census Bureau: American Community Survey 5-year estimates

Similar to the rest of Vermont, a significant number of households within the identified MID areas face housing problems. Just as in the case of aging housing, when there are existing problems with a home, flood damage exacerbates the issues and adds to the cost of repair and replacement. This suggests that these households experiencing housing problems in the identified MID areas likely carried a greater burden of the flood damage and cost as compared to households without pre-existing identified housing problems according to HUD CHAS. For LMI households, the flood damage from DR-

²³ Source: Households with Housing Problems is from 2021 U.S. Census Bureau, American Community Survey, 5-year estimates; Occupied Housing Units is from 2023 U.S. Census Bureau, American Community Survey, 5-year estimates

4720 likely compounded pre-existing issues like poor housing conditions and financial instability. These households are unlikely to have the resources to repair their homes or find safe, affordable alternative housing. With Vermont already facing a shortage of affordable housing, DR-4720 left many low-income residents with few options for stable shelter, extending the long-term impacts of the event.

2.3.1.5 Shortage of Affordable Housing and Housing Cost Burden

As detailed above, a number of Vermont households were identified by HUD to be cost burdened. HUD considers households to be cost burdened if monthly housing costs exceed 30% of their monthly income and severely cost burdened if that cost exceeds 50% of monthly income²⁴. Housing affordability has long been an issue for Vermont, as half of all Vermont renters and one quarter of all Vermont homeowners pay more than 30% of their income on housing costs. For these cost-burdened households, the financial strain of high housing costs leaves limited resources for other necessities, making it particularly challenging to weather emergent expenses—such as the cost of repairs for flood damage. Table 17 below shows the percentage of households that are cost-burdened across the MID area and the State of Vermont.

Table 17: Households with Housing Cost Burden

Category	% of Households Paying 30-49% income on Housing Expenses	% of Households Paying 50% income or more on Housing Expenses	% of Households that are Cost- Burdened
MID Areas	17.5%	13.4%	30.9%
Vermont	17.4%	13.9%	31.3%

Source: [Housing Cost Burden | HousingData.org - Directory of affordable rental housing](#); U.S. Census Bureau: American Community Survey 5-year estimates (Table B25070, B25091)

Similar to the rest of Vermont, about 30% of all households in the identified-MID areas impacted by DR-4720 pay at least 30% of their annual income towards housing costs. It is important to note that the average income in the identified-MID areas is lower than the average income for the whole of Vermont. This means that the average cost burdened household in the identified-MID areas may find it more difficult to afford flood

²⁴ Source: (Department of Housing and Urban Development, 2024)

recovery than a similarly burdened individual outside of the Identified-MID areas. To further compound the cost-burdened issue, for those that do not qualify for—or have not secured—public housing assistance, the overall cost of purchasing and renting housing continues to rise.

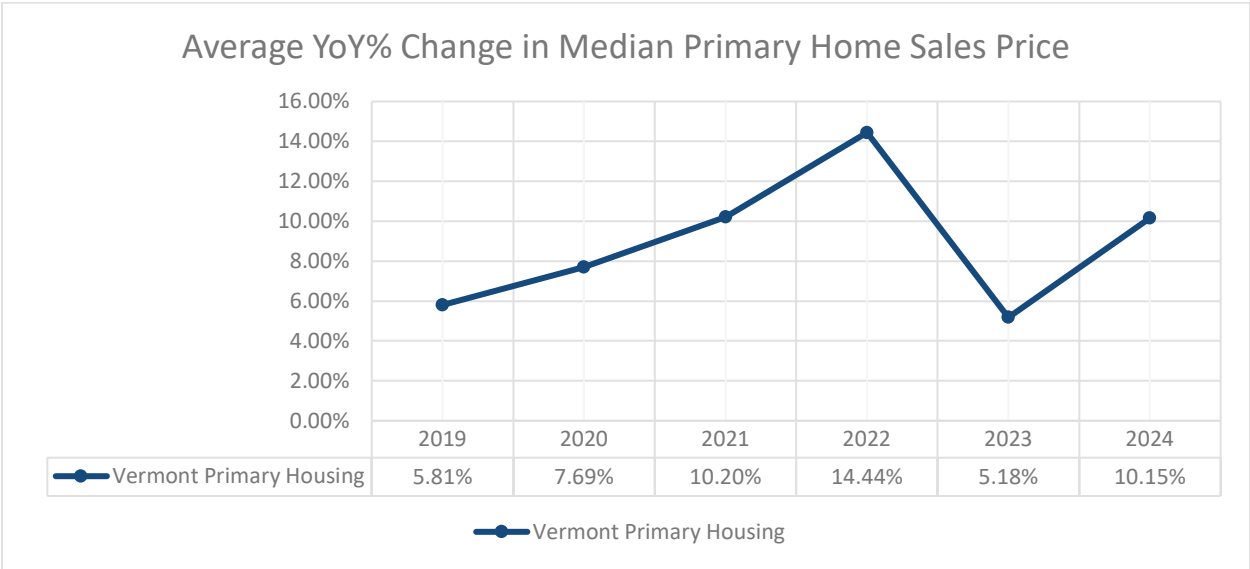
Data from the U.S. Census Bureau shows that between 2019 and 2023, the median purchase price of primary residences and median gross rent increased substantially in both the Identified-MID areas and across Vermont. Within the Identified-MID areas, the purchase price of a home increased by at least 56% while rent rose by at least 12%. As the price of housing grows, so too does the burden that housing costs pose to LMI individuals in and outside of the Identified-MID areas. The increase in rental and purchase prices in the Identified-MID areas has likely caused financial strain making it unlikely that residents could fully afford the costs accrued from DR-4720.

Table 18: Change in Median Sale Price 2019-2024

Location	Average Median Sales Price 2019	Average Median Sales Price 2024	% Change in Median Sales Price 2019-2024
Caledonia	\$150,000	\$248,000	65.3%
Lamoille	\$227,000	\$375,000	65.2%
Orleans	\$150,000	\$252,000	68.0%
Rutland	\$156,500	\$262,750	67.9%
Washington	\$221,500	\$346,800	56.6%
Windham	\$190,000	\$315,000	65.8%
Windsor	\$200,000	\$313,250	56.6%
Vermont	\$227,500	\$358,000	57.4%

Source: [Primary & seasonal home sales | HousingData.org - Directory of affordable rental housing](#); Vermont Department of Taxes Property Transfer Tax (PTT) records, 2019 - 2024

Figure 6: Average Year over Year % Change in Median Housing Sales Price in Vermont



Source: [Primary & seasonal home sales | HousingData.org - Directory of affordable rental housing](#); Vermont Department of Taxes Property Transfer Tax (PTT) records, 2019 – 2024

As previously mentioned, half of all renters in Vermont are cost burdened, paying 30% or more of their income on housing costs. As the Median Gross Rent in the identified MID areas has increased over 12% since 2019, the cost burden placed on renters continues to grow. People who face significant increases in rent are less likely to be able to cover the costs associated with disaster damage and a larger portion of their income will go to housing expenses.

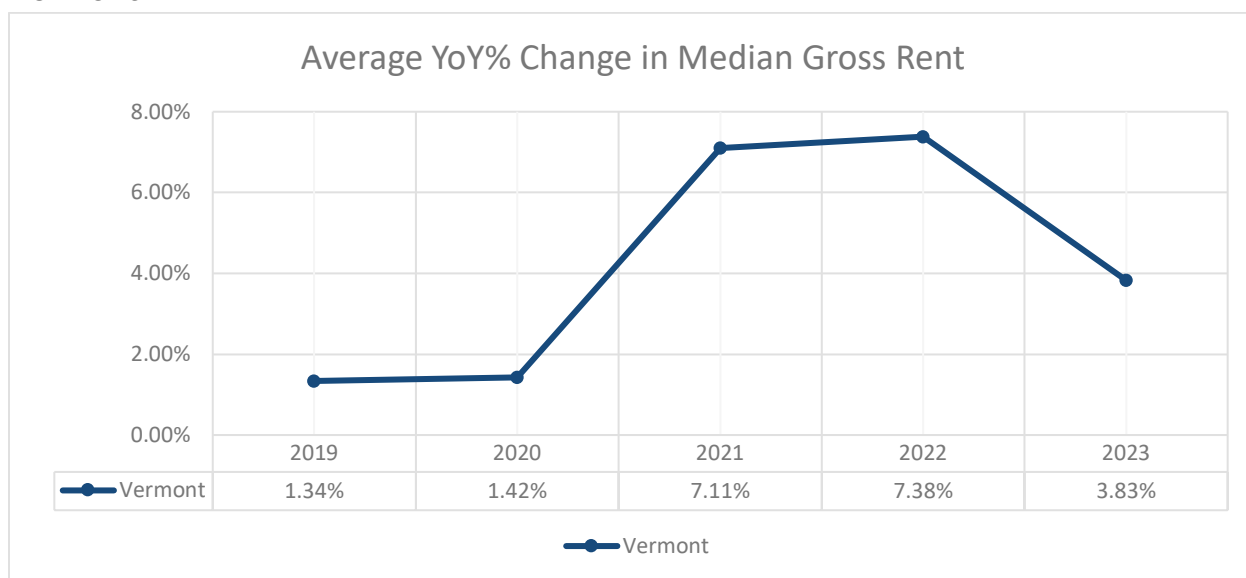
Table 19: Change in Median Gross Rent 2019 - 2023

County	Average Median Gross Rent 2019	Average Median Gross Rent 2023	% Change in Median Gross Rent 2019-2023
Caledonia	\$790	\$904	14.4%
Lamoille	\$956	\$1,123	17.5%
Orleans	\$796	\$897	12.7%
Rutland	\$826	\$965	16.8%
Washington	\$916	\$1,094	19.4%

County	Average Median Gross Rent 2019	Average Median Gross Rent 2023	% Change in Median Gross Rent 2019-2023
Windham	\$881	\$1,056	19.9%
Windsor	\$935	\$1,089	16.5%
Vermont	\$985	\$1,193	21.1%

Source: [Median rent | HousingData.org - Directory of affordable rental housing](https://www.housingdata.org/), U.S. Census Bureau: American Community Survey 5-year estimates (Table B25064)

Figure 7: Average Year over Year Percent Change in Median Gross Rent in Vermont



Source: [Median rent | HousingData.org - Directory of affordable rental housing](https://www.housingdata.org/), U.S. Census Bureau: American Community Survey 5-year estimates (Table B25064)

The effects of these rising costs are compounded by the slowing rate of housing construction and rising costs of developing new housing. According to the 2025-2029 Housing Needs Assessment, only 2,302 homes were built in 2022 out of the 5,000-7,000 homes needed annually to meet the State's needs. Since the pandemic, construction costs have increased 30% year over year. The average total costs of developing a single apartment within a multifamily building for low-income Vermonters was \$500,000 in 2023 and the median price for a newly constructed single-family home was \$616,500. Overall, the demand for housing in Vermont far outstrips supply and the cost of introducing new housing stock remains far outside the reach of the households that need it most.

2.3.1.6 Housing Profile Summary

After thorough review of the housing stock in Vermont, it is clear that even prior to DR-4720, there were existing housing issues within the identified MID areas that could be exacerbated by damages from a severe weather event. Following the series of storms and floods across Vermont in July 2023, FEMA reported that at least 4,000 homes were damaged. The floods displaced families throughout the State of Vermont, leading to a surge in the number of individuals and households in need of emergency and transitional shelter lasting through the end of 2023. When families were able to return to their homes, thousands found their homes in various states of damage, requiring expensive repairs and remediation. Those who had their homes destroyed struggled in an unforgiving housing market defined by high demand and a strained, outpaced supply of largely unaffordable housing. Even if families qualified for public housing assistance, affordable housing supplies were just as constricted as in the private market, if not more. Throughout Vermont, flood damage was amplified by the age of Vermont's housing stock.

Recovery was made more difficult by pre-existing housing cost burden, burgeoning rent, and home sales prices. Furthermore, around 20% of the state's manufactured home lots in 2023 were located in floodplains, which made them especially susceptible to flood damage. The 2025-2029 Housing Needs Assessment estimates the need for 24,000 to 36,000 year-round homes to be built by 2029 to meet the growing demand in order to normalize vacancy rates and replace housing stock lost in the State's floods. As Vermont's housing stock continues to age and the likelihood of floods increases year-to-year, it is imperative that the State address this unmet need by building new affordable homes, rehabilitating existing structures, and implementing flood risk mitigation strategies to ensure long-term availability and affordability across the State.

2.3.2 Emergency Shelters, Interim, and Permanent Housing

Hazard events can significantly impact those who are experiencing homelessness. Without permanent residences, unhoused individuals and households are at an elevated risk of property loss and physical injury during disaster events. It is crucial for communities to maintain and operate services that provide temporary and long-term housing for people experiencing homelessness not only to provide them with emergency shelter but also to provide a stable pathway to owning or renting a home.

The State of Vermont's Agency of Human Services (AHS) is the primary local agency providing assistance to the lowest income, most vulnerable Vermonters. AHS helps provide funding to emergency overnight and day shelters; to supportive services for

homeless families and individuals; and to the implementation of effective homeless prevention and rehousing initiatives. At the federal level, HUD funds and promotes the Continuum of Care (CoC) Program, which is designed to establish and facilitate community-wide efforts to quickly rehouse homeless individuals and families. CoC shelters are operated by a network of nonprofit organizations and provide valuable sheltering assistance across the State of Vermont.

During disasters such as DR-4720, the CoC network of shelters operates not just as a source of shelter for the unhoused population of Vermont but also serves as an emergency shelter for individuals and households displaced by the disaster. By tracking the change in the shelter populations across the identified MID areas before and after July 2023, it is possible to evaluate the level of displacement caused by DR-4720.

2.3.2.1 Point-in-time Counts for Unhoused, Transitional Housing, and Emergency Shelter Populations

The CoC network periodically performs Point-in-time (PIT) counts to measure the population of unhoused individuals and households throughout all shelters in addition to those unhoused individuals that have not been able to find shelter. PIT counts occur on a single night each year in January. It is important to note that since 2023, Vermont has experienced multiple other flooding events primarily around July 2024. As the 2024 PIT count was conducted in January 2024, it does not capture the impacts of these more recent events. By reviewing the differences in the population of emergency shelter occupants, transitional housing occupants, and homeless individuals between 2023 and 2024, it is revealed that DR-4720 drove a large number of households out of their homes.

The 2024 PIT count was conducted in early 2024 and indicates a slight increase in homelessness across Vermont since early 2023.²⁵ Despite the overall statewide increase, the data shows that the population of unhoused fell amongst the identified MID area counties, from 75 individuals amongst the seven MID area counties to 70 individuals. Every identified MID area experienced a decrease in the number of unhoused individuals except for Washington County which experienced an increase of 53% from 32 to 49 individuals and Windham County which saw a 157% increase from 7 to 18 individuals. It is important to note that while the State of Vermont experienced an increase in the unsheltered population between early 2023 to early 2024 it is possible that flood conditions in the identified MID areas drove individuals and households

²⁵ Source: (Chittenden County Homeless Alliance and the Vermont Coalition to End Homelessness, 2023)

experiencing homelessness out of the identified MID areas and into areas less affected by the disaster.

Table 20: 2023-2024 Vermont Housing and Homelessness Alliance Unsheltered Point-in-time Counts

County	2023 Unsheltered Persons PIT Count	2024 Unsheltered Persons PIT Count	% Change
Caledonia	15	0	-100.0%
Lamoille	0	1	-
Orleans	0	0	0.0%
Rutland	2	0	-100.0%
Washington	32	49	53.1%
Windham ²⁶	7	18	157.1%
Windsor ²⁷	19	2	-89.5%
MID Areas	75	70	-6.7%
Vermont	137	166	21.2%

Source: Housing and Homelessness Alliance of Vermont 2023 & 2024 PIT Count

The number of individuals in transitional shelters decreased significantly in the identified MID area counties and statewide across Vermont. This steep decline is explained in part by the conclusion of a temporary transitional housing program discussed in the 2023 PIT Count Report. The transitional housing program was intended to provide nine months of non-congregate shelter in hotels and motels for people experiencing homelessness due to the COVID-19 pandemic using federal Emergency Rental Assistance (ERA) funding. As this funding was fully disbursed and stays in transitional housing completed between 2023 and 2024, the total number of people experiencing homelessness in transitional housing decreased across the entire state.

²⁶ 2023 PIT Count for Windham County combines SDO (Windham North/Windsor South) and LDO (Windham South).

²⁷ 2023 PIT count for Windsor County is only HDO (Orange/Windsor). It does not include SDO (Windham North/Windsor South), since that count is included with Windham County.

Table 21: 2023-2024 Vermont Housing and Homelessness Alliance Transitional Housing Point-in-time Counts

County	2023 Transitional Housing PIT Count	2024 Transitional Housing PIT Count	% Change
Caledonia	102	10	-90.2%
Lamoille	50	0	-100.0%
Orleans	16	0	-100.0%
Rutland	501	4	-99.2%
Washington	296	15	-94.9%
Windham ²⁸	294	2	-99.3%
Windsor ²⁹	121	0	-100.0%
MID Areas	1,380	31	-97.8%
Vermont	2,040	75	-96.3%

Source: Housing and Homelessness Alliance of Vermont 2023 & 2024 PIT Count

In steep contrast to the population of unhoused individuals and households and transitional shelter occupants, the population of emergency shelters within the identified MID areas increased significantly between 2023 and 2024 from 558 to 1,927 displaced individuals, representing an increase of 245.3%. On a per-county level, the smallest increase in emergency shelter populations within the identified MID areas was still nearly 72% in Orleans County increasing from 32 to 55 individuals. The largest increase was 349% in Rutland County from 151 to 678. The 2023 flooding event displaced hundreds of individuals and forced multiple households into emergency shelters as their primary residences were damaged or destroyed.

²⁸ 2023 PIT Count for Windham County combines SDO (Windham North/Windsor South) and LDO (Windham South).

²⁹ 2023 PIT count for Windsor County is only HDO (Orange/Windsor). It does not include SDO (Windham North/Windsor South), since that count is included with Windham County.

Table 22: 2023-2024 Vermont Housing and Homelessness Alliance Emergency Shelter Point-in-time Counts

County	2023 Emergency Shelter PIT Count	2024 Emergency Shelter PIT Count	% Change
Caledonia	58	135	132.8%
Lamoille	24	56	133.3%
Orleans	32	55	71.9%
Rutland	151	678	349.0%
Washington	118	400	239.0%
Windham ³⁰	127	432	240.2%
Windsor ³¹	48	171	256.3%
MID Areas	558	1,927	245.3%
Vermont	1,118	3,185	184.9%

Source: Housing and Homelessness Alliance of Vermont 2023 & 2024 PIT Count

Observing these data, it can be seen that individuals and households experienced displacement across Vermont due to the July 2023 floods. However, the identified MID areas experienced a disproportionate share of the floods' effects. Experiencing a larger percentage increase in its emergency shelter population than the whole of Vermont, residents of the identified MID areas were more likely to have experienced displacement from their homes.

2.3.2.2 DR-4720 Sheltering and Rental Assistance

In addition to the primarily state-level sheltering programs offered through the CoC, Vermonters sought housing assistance from a variety of federally administered programs. According to the DR-4720-VT Transition Plan, several organizations outside of HUD's CoC operated shelters through the FEMA Mass Care sheltering support program during the immediate response phase of DR-4720.³² The American Red Cross operated three shelters located in Barre, Johnson, and Rutland counties. An

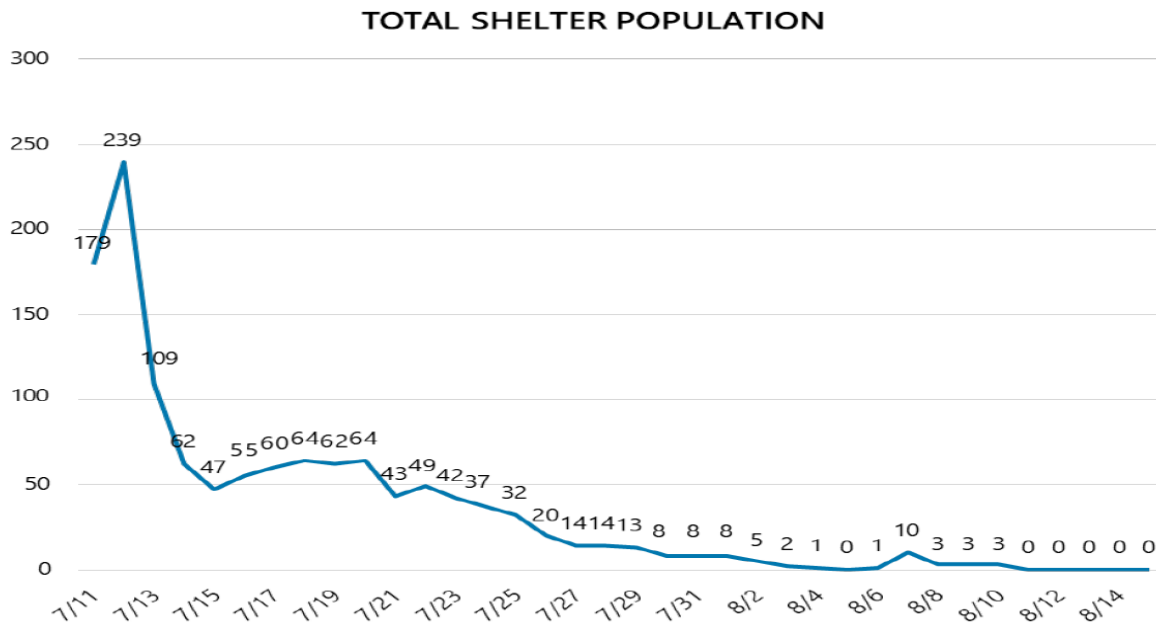
³⁰ 2023 PIT Count for Windham County combines SDO (Windham North/Windsor South) and LDO (Windham South).

³¹ 2023 PIT count for Windsor County is only HDO (Orange/Windsor). It does not include SDO (Windham North/Windsor South), since that count is included with Windham County.

³² Source: (DR-4720-VT Transition Plan Final)

independent shelter was operated in Ludlow County. These shelters saw a peak population of 239 survivors on July 12 and were all closed by August 11, 2023.

Figure 8: Total FEMA Mass Care Shelter Population between July 11, 2023, and August 14, 2023



Source: DR-4720-VT Transition Plan Final

Additionally, many households sought rental assistance through FEMA Individuals and Household Assistance (IHA) for stays in temporary housing while their homes were returned to habitability. There were 6,149 valid registrations for FEMA IHA related to DR-4720, with 1,122 applicants in the identified MID areas receiving a total of \$3,840,182 in rental assistance to recover from displacement. The identified MID areas contained a majority of households in need of rental assistance.

Table 23: FEMA IHA Owners and Renters Rental Assistance

County	Number of Owners Eligible for Rental Assistance	Owner Rental Assistance	Number of Renters Eligible for Rental Assistance	Renter Rental Assistance	Total Rental Assistance
Caledonia	63	\$122,730	5	\$9,758	\$132,488
Lamoille	113	\$331,055	96	\$247,056	\$578,111

County	Number of Owners Eligible for Rental Assistance	Owner Rental Assistance	Number of Renters Eligible for Rental Assistance	Renter Rental Assistance	Total Rental Assistance
Orleans	72	\$160,938	3	\$5,858	\$166,796
Rutland	91	\$216,639	19	\$45,172	\$261,811
Washington	440	\$1,224,734	204	\$506,221	\$1,730,955
Windham	122	\$311,606	12	\$37,260	\$348,866
Windsor	221	\$544,941	19	\$76,214	\$621,155
MID Areas	1,122	\$2,912,643	358	\$927,539	\$3,840,182
Statewide	1,234	\$3,186,653	383	\$987,344	\$4,173,997

Source: [OpenFEMA Dataset: Individuals and Households Program - Valid Registrations - v1](#)

FEMA offered Transitional Shelter Assistance (TSA) through the Individuals and Households Program (IHP), but the State of Vermont opted to utilize the existing FEMA Non-Congregate Sheltering (NCS) program from the COVID-19 pandemic. The State of Vermont requested that FEMA provide NCS for DR-4720 through hoteling on December 4, 2023, which was extended through January 31, 2024, by the Regional Administrator. However, despite the outreach efforts of state long term recovery groups and Disaster Case Managers to advertise the program and solicit applications, only six households utilized NCS by the time it was sunset in April 2024.

Additionally, HUD issued a combined waiver to address needs from the COVID-19 pandemic for several grant programs on June 15, 2022, including the Emergency Solutions Grants (ESG) program which provides resources for street outreach, emergency shelters, homelessness prevention, and rapid rehousing.³³ In this combined waiver, the limitation prohibiting participants from receiving more than 24 months of ESG rental assistance, housing relocation, or stabilization services within a single three-year period was waived for those displaced from the declared disaster area. While these HUD programs are not designated as disaster recovery funds, by extending temporary shelter stays for households with existing need prior to the disaster, they

³³ Source: (U.S. Department of Housing and Urban Development, 2022)

would have reduced the total number of unhoused households seeking shelter immediately after the disaster.

The July 2023 flooding disaster endangered and harmed thousands of households and individuals experiencing homelessness while adding to their ranks. As could be seen in Table 22, an increase in the total number of individuals requiring shelter occurred across Vermont despite numerous efforts to mitigate the effects of DR-4720. This occurred in part because, in addition to individuals who lost their homes prior to the disaster, many Vermonters were forced to flee washed-out homes to emergency shelters. This sudden increase in the number of households and individuals in need of emergency and transitional shelter placed additional stress on Vermont's Continuum of Care, especially within identified MID areas. Exacerbating pre-existing need, DR-4720 increased the need for emergency shelter and affordable options for transitional and permanent housing.

2.3.3 Rental and Owner-Occupied Single Family and Multifamily Housing

Throughout the identified MID areas, the July 2023 flooding disaster left the homes of thousands of Vermonters in various states of damage and ruin. Floodwater tore into neighborhoods, washing away facades while leaving whole floors waterlogged and susceptible to rot. Landslides shifted foundations, sweeping houses out from under their unsuspecting occupants and depositing inches of mud within. Numerous federal and state programs have since provided funding to repair or replace damaged housing, while others directly funded the buyout of homes in floodplains. However, despite the considerable amount of recovery funding provided, a sizable amount of need has not yet been met.

2.3.3.1 FEMA Individual Assistance

Among the most important of the programs utilized for flood recovery is FEMA's Individuals and Households Program (IHP), which includes several programs, including the Individual Assistance (IA) Program. Households may seek FEMA IHP funding for assistance with home repairs, costs associated with temporary housing, and damage to personal property. Within the identified MID areas, homeowner registrants were seeking assistance with long-term repairs to their homes as well as property replacement. It is important to note that as the deadline for registering for this program has passed, no further assistance will be provided. Additionally, while FEMA offered funding and in-kind assistance to homeowners for rent and certain other needs (ONA), these forms of assistance would have addressed the *immediate* needs of registrants and generally do

not factor in estimations of unmet need, which is long-term by nature. To evaluate the remaining unmet need remaining of homeowners in the identified MID areas after receiving FEMA IHP funding, this analysis will primarily focus on the assistance provided for the repair and replacement of real and essential personal property.

Below, Table 24 displays the number of valid IHP registrations compared to the total number of occupied housing units in each MID county. As can be seen, the percentage of occupied units with FEMA IHP registrations related to DR-4720 was relatively small. ACCD conducted outreach to encourage individuals to apply for FEMA assistance, but due to a variety of individual factors—a perceived lack of damage incurred, sufficient insurance coverage, or households’ mistaken belief that they were unqualified to apply—the number of registered households was limited. FEMA IHP registrations represented, on average, only 4.1% of occupied housing units in the identified MID areas. It is possible then that a large number of renters and homeowners in the identified MID areas sustained disaster damage and did not register for FEMA IHP assistance.

Table 24: FEMA IHP Registrations and Occupied Housing Units

County	Number of FEMA IHP Registrations	Total Occupied Housing Units	Estimated % of Occupied Housing Units with FEMA IHP Registrations
Caledonia	347	12,877	2.7%
Lamoille	507	11,424	4.4%
Orleans	386	11,791	3.3%
Rutland	382	25,448	1.5%
Washington	2,343	25,474	9.2%
Windham	334	19,660	1.7%
Windsor	1,043	24,873	4.2%
MID Areas	5,342	131,547	4.1%

Source: [Housing stock | HousingData.org - Directory of affordable rental housing](#); [OpenFEMA Dataset: Individuals and Households Program - Valid Registrations - v1](#)

Once individuals and households are registered for FEMA IHP, they may receive remote or on-site FEMA inspections to determine their level of IHP-eligible damage. A given registration may be denied an inspection for a variety of reasons, such as FEMA

determination of insufficient damage, previous coverage of damage by insurance, inability to prove registrants' occupancy of damaged unit, a lack of willingness by registrants to relocate to new or temporary housing, a failure to verify registrants' identities, registrants' failure to make contact with their FEMA inspector, or discovery of multiple applications completed by the same household. Below, in Table 25 and Table 26 it can be seen that about a quarter of both renters and homeowners registered to the FEMA IHP in the identified MID areas did not receive inspections.

Table 25: FEMA IHP – Owner-Occupied Units Inspected

County	FEMA IHP Inspections	FEMA IHP Applicants	% of Applicants that Received Inspection
Caledonia	221	290	76.2%
Lamoille	222	308	72.1%
Orleans	273	348	78.4%
Rutland	238	309	77.0%
Washington	1,391	1,771	78.5%
Windham	208	297	70.0%
Windsor	654	936	69.9%
MID Areas	3,207	4,259	75.3%

Source: [OpenFEMA Dataset: Individuals and Households Program - Valid Registrations - v1](#)

Table 26: FEMA IHP – Renter-Occupied Units Inspected

County	FEMA IHP Inspections	FEMA IHP Applicants	% of Applicants that Received Inspection
Caledonia	28	45	62.2%
Lamoille	144	193	74.6%
Orleans	27	35	77.1%
Rutland	59	70	84.3%

County	FEMA IHP Inspections	FEMA IHP Applicants	% of Applicants that Received Inspection
Washington	408	549	74.3%
Windham	27	35	77.1%
Windsor	66	90	73.3%
MID Areas	759	1,017	74.6%

Source: [OpenFEMA Dataset: Individuals and Households Program - Valid Registrations - v1](#)

Following inspections, FEMA provides an estimate of the damage within the unit and determines the types of assistance needed. For homeowners, the FEMA IHP program provides two types of housing assistance—repair and replace assistance. Repair assistance is provided to the majority of eligible homeowners to fund repairs to their primary homes. Replace assistance is provided much less frequently to help replace or rebuild a primary residence if it is destroyed or severely damaged. The table below contains the number of inspections issued to homeowners and rates at which repair and replacement assistance was provided for owner-occupied units.

Table 27: FEMA IHP – Owner-Occupied Units Inspected with Repair and Replace Assistance

County	FEMA IHP Inspections	FEMA IHP Repair Assistance	% of Inspections that Received Repair Assistance	FEMA IHP Replace Assistance	% of Inspections that Received Replace Assistance
Caledonia	221	144	65.2%	1	0.5%
Lamoille	222	168	75.7%	0	0.0%
Orleans	273	194	71.1%	0	0.0%
Rutland	238	149	62.6%	0	0.0%
Washington	1,391	985	70.8%	9	0.6%
Windham	208	167	80.3%	1	0.5%

County	FEMA IHP Inspections	FEMA IHP Repair Assistance	% of Inspections that Received Repair Assistance	FEMA IHP Replace Assistance	% of Inspections that Received Replace Assistance
Windsor	654	476	72.8%	1	0.2%
MID Areas	3,207	2,283	71.2%	12	0.4%

Source: [OpenFEMA Dataset: Individuals and Households Program - Valid Registrations - v1](#)

The FEMA IHP registration data does not provide housing assistance data for renters, as they do not own their residences and are subsequently ineligible for housing assistance. However, the FEMA IHP still provides disaster recovery assistance for renters suffering from damage sustained by the rental units they live in. In lieu of repair and replace assistance, renters receive rental and personal property replacement assistance. For the sake of calculating the unmet need left after the full disbursement of FEMA IHP assistance, this analysis is exclusively concerned with personal property assistance, as rental assistance immediately addresses need and does not create an easily calculable unmet need. FEMA categorizes personal property into the following categories: appliances, clothing, room furnishings, essential tools (such as medical equipment), and accessibility items. As with owner-occupied IHP assistance, renters must receive an inspection from FEMA to be eligible for assistance. The total number of FEMA inspections issued for renters as well as the number of inspected renter registrants that received personal property assistance is illustrated in Table 28 below.

Table 28: FEMA IHP – Renter-Occupied Units with Personal Property Assistance in MID Counties

County	FEMA IHP Inspections	FEMA IHP Personal Property Assistance	% of Inspections that Received Personal Property Assistance
Caledonia	28	2	7.1%
Lamoille	144	34	23.6%
Orleans	27	1	3.7%
Rutland	59	12	20.3%

County	FEMA IHP Inspections	FEMA IHP Personal Property Assistance	% of Inspections that Received Personal Property Assistance
Washington	408	74	18.1%
Windham	27	0	0.0%
Windsor	66	5	7.6%
MID Areas	759	128	16.9%

Source: [OpenFEMA Dataset: Individuals and Households Program - Valid Registrations - v1](#)

Compared to the total number of registered homeowners that received repair or replace assistance, there were far fewer registered renters that received personal property assistance.

To calculate the housing need left unmet by FEMA IHP assistance, the total amount of repair, replace, and personal property assistance is subtracted from the sum of FEMA-verified real and personal property loss. Performing this calculation for the identified MID areas, there is a resulting unmet need of \$1,331,571. While FEMA-inspected real property damage was largely met by repair and replace assistance, there is a much larger gap between the personal property damage verified by FEMA and the amount covered by personal property assistance. The majority of the unmet need yielded by this simple formula then lies with owners and renters with outstanding damage to personal property, as can be seen in Table 29 below.

Table 29: FEMA IHP - Damage, Assistance, and Remaining Unmet Need for Owner- and Renter-Occupied Units

Location	Real Property FEMA Verified Loss	Personal Property FEMA Verified Loss	Repair Assistance	Replace Assistance	Personal Property Assistance	Unmet Need
MID Areas	\$17,661,196	\$2,199,222	\$17,419,009	\$380,457	\$729,381	\$1,331,571
Vermont	\$19,561,318	\$2,394,278	\$19,829,310	\$380,457	\$795,231	\$950,599

Source: [OpenFEMA Dataset: Individuals and Households Program - Valid Registrations - v1](#)

However, while it cannot be overstated how crucial FEMA IHP assistance was to the recovery of the identified MID areas, there were programmatic limits to the extent to which FEMA IHP could meet the disaster recovery needs of homeowners. Firstly, due to the relatively low registration rate for FEMA IHP, it is possible that the full extent of disaster damage sustained by homeowners was not captured among the list of FEMA IHP registrants. Furthermore, FEMA IHP funds are primarily used to restore homes to a habitable level and no further. That is, both repair and replace assistance are intended to make the home habitable, *not* to fully restore it to its pre-disaster condition.³⁴ FEMA defines a habitable home as “one that is safe, sanitary, functional and presents no disaster-caused hazards to the occupants.”³⁵ According to FEMA’s definition of habitable, a home that sustained damage from a disaster can still be occupied by owners or renters so long as it is clean and presents no danger to the occupant. As a result, any additional damage to registrants’ homes beyond the level of habitability would not be covered by the provided IHP housing assistance.

To reiterate, a quarter of all registered homeowners in the identified MID areas *did not* receive inspections. But merely receiving an inspection did not guarantee assistance; over a quarter of the registered homeowners within the identified MID areas that *did* receive inspections did not qualify for repair assistance. Based on this analysis of received assistance alone, the unmet need for owner-occupied units in the identified MID areas is high, as only half of the homeowners who registered for FEMA IHP received repair or replace assistance. Combined with the above fact that FEMA IHP assistance is not intended to fully restore homes to pre-disaster condition, it is certain that FEMA IHP did not fully meet the disaster recovery needs of homeowners in the identified MID areas. This remaining unmet need must be estimated using alternative methods.

2.3.3.2 HUD Damage Categories

After FEMA inspectors have completed inspections of their IHP registrants following a disaster, they will record the damage sustained to each inspected unit. These inspections help determine the extent of loss by reviewing how much of the home or personal property was damaged, and how high floodwaters reached inside the residence. This information, known as “validated loss,” is shared with HUD during the allocation process for the CDBG-DR program. During this process, HUD uses the latest available FEMA IHP verified loss data to categorize the severity of damage to each

³⁴ Source: (Federal Emergency Management Agency, 2013)

³⁵ Source: (Federal Emergency Management Agency, 2020)

inspected household, designate the MID areas, and estimate remaining disaster recovery needs. The HUD Damage Category has five levels: “Minor-Low,” “Minor-High,” “Major-Low,” “Major-High,” and finally, “Severe.” The HUD Allocation Universal Notice outlines each damage category as follows:

For FEMA IHP inspected owner-occupied units:

- **Minor-Low:** Less than \$3,000 of FEMA inspected real property damage or less than \$2,500 of FEMA inspected personal property damage.
- **Minor-High:** \$3,000 to \$7,999 of FEMA inspected real property damage or \$2,500 to \$3,499 of FEMA inspected personal property damage.
- **Major-Low:** \$8,000 to \$14,999 of FEMA inspected real property damage, \$3,500 to \$4,999 of FEMA inspected personal property damage, and/or 1 to 3.9 feet of flooding on the first floor
- **Major-High:** \$15,000 to \$28,800 of FEMA inspected real property damage, \$5,000 to \$9,000 of FEMA inspected personal property damage, and/or 4 to 5.9 feet of flooding on the first floor.
- **Severe:** Greater than \$28,800 of FEMA inspected real property damage, greater than \$9,000 of FEMA inspected personal property damage, determined destroyed and/or 6 or more feet of flooding on the first floor.

For FEMA IHP inspected renter-occupied units:

- **Minor-Low:** Less than \$1,000 of FEMA inspected personal property damage.
- **Minor-High:** \$1,000 to \$1,999 of FEMA inspected personal property damage or determination of “Moderate” damage by the FEMA inspector.
- **Major-Low:** \$2,000 to \$3,499 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor or determination of “Major” damage by the FEMA inspector.
- **Major-High:** \$3,500 to \$7,500 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- **Severe:** Greater than \$7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor or determination of “Destroyed” by the FEMA inspector.

Below, in Table 30, is a count of inspected registrants with each HUD Damage Category in each of identified MID counties.

Table 30: Number of IHP Registrants with each HUD Damage Category by MID County

County	Minor-Low Damage	Minor- High Damage	Major-Low Damage	Major- High Damage	Severe Damage
Caledonia	161	30	35	8	15
Lamoille	147	26	46	29	118
Orleans	199	36	43	19	3
Rutland	187	29	37	20	24
Washington	1,060	223	207	79	230
Windham	146	39	20	14	16
Windsor	461	107	82	26	44
MID Areas	2,361	490	470	195	450
Vermont	2,804	555	539	223	470

Source: [OpenFEMA Dataset: Individuals and Households Program - Valid Registrations - v1](#)

As can be seen, the majority of “Major-Low” to “Severe” damages occurred within the MID counties. More specifically, 87.2% of “Major-Low,” 87.4% of “Major-High,” and 95.7% of “Severe” damages occurred in the identified MID areas.

As discussed in the dedicated FEMA IHP section, FEMA IHP funding primarily covers the costs associated with restoring damaged housing to habitability, but full repairs to pre-disaster status require much more funding. HUD approximates this additional unmet need by applying a set of multipliers to the total recorded verified loss in the “Major-Low” to “Severe” damage categories. Conventionally, the loan amounts offered to SBA Disaster Loan applicants are used to approximate the average cost of repair for each HUD damage category. However, in the case that these data are not available, HUD provides set multipliers for several different disaster types derived from the 2020-2021 disaster years. These multipliers are applied to the total FEMA verified damage sustained by each damage category at least “Major-Low” level or higher to calculate unmet housing need. Furthermore, this process is separated between mobile homes and non-mobile home housing. Mobile homes receive a single set of multipliers for all disaster types that is much larger than those for non-mobile homes due to their increased vulnerability to disaster damage.

Using these HUD-calculated disaster damage multipliers, the Table 31 and Table 32 below show the HUD multiplied unmet housing need for both *non-mobile* and *mobile homes* in the identified MID areas.

Table 31: MID Area HUD-Multiplied Non-Mobile Home Housing Need

HUD Damage Category	Inspected Registrants	HUD Multiplier	Total Estimated Unmet Need
Severe	371	\$64,513	\$23,934,323
Major-High	187	\$57,856	\$10,819,072
Major-Low	403	\$47,074	\$18,970,822
MID Areas	961	-	\$53,724,217

Source: [Individuals and Households Program - Valid Registrations - v1 | FEMA.gov](#)

Mobile homes are a significant portion of Vermont's affordable housing stock, providing a critical housing option for many low- and moderate-income residents. According to application data from the Manufactured Housing Improvement and Repair (MHIR) and Mobile Home Infill Programs (MHIP), 83 mobile homes were flooded and 58 were rendered uninhabitable due to disaster-related damage from DR-4720. In total, 395 mobile home occupants registered for FEMA Individual Assistance. Of the 395 registrants, 348 were located within the identified MID areas and 154 were classified with a HUD damage rating of "Major-Low" or higher, highlighting the vulnerability of mobile homes to severe weather. Using HUD's unmet need multipliers, these homes face a notable unmet need that underscores the importance of targeted recovery for this housing type.

Table 32: MID Area HUD-Multiplied Unmet Housing Need for Mobile Homes

HUD Damage Category	Inspected Registrants	HUD Multiplier	Total Estimated Unmet Need
Severe	79	\$134,834	\$10,651,886
Major-High	8	\$98,463	\$787,704
Major-Low	67	\$77,058	\$5,162,886
MID Areas	154	-	\$16,602,476

Source: [Individuals and Households Program - Valid Registrations - v1 | FEMA.gov](#)

2.3.3.3 National Flood Insurance Program

In addition to documenting damage through inspections, FEMA also collects information from IHP applicants on homeowners and flood insurance coverage. In order to avoid a duplication of benefits, FEMA only covers damages that are not covered by preexisting flood insurance policies. A large number of owners in the MID counties did carry homeowners' insurance at the time of the July 2023 flood.

Table 33: FEMA IHP - Owner-Occupied Units without Homeowner's Insurance in MID Counties

County	FEMA IHP Applicants without Homeowner's Insurance	FEMA IHP Applicants	% of Applicants without Homeowner's Insurance
Caledonia	74	290	25.5%
Lamoille	61	308	19.8%
Orleans	69	348	19.8%
Rutland	62	309	20.1%
Washington	237	1,771	13.4%
Windham	53	297	17.8%
Windsor	132	936	14.1%
MID Areas	688	4,259	16.2%

Source: [OpenFEMA Dataset: Individuals and Households Program - Valid Registrations - v1](#)

Table 34 below shows the number of IHP applicants who did not have flood insurance at the time of the event. This number includes both renters and owners, as renters can obtain flood insurance separate from their standard renter's insurance. As reflected in Table 34, the number of applicants with flood insurance is relatively low, which could be indicative that the homes were not in a Special Flood Hazard Area (SFHA) where flood insurance is a requirement to obtain a mortgage.

Table 34: FEMA IHP – Owner-Occupied and Renter-Occupied Units without Flood Insurance in MID Counties

County	FEMA IHP Applicants without Flood Insurance	FEMA IHP Applicants	% of FEMA IHP Applicants without Flood Insurance
Caledonia	325	347	93.7%
Lamoille	470	507	92.7%
Orleans	373	386	96.6%
Rutland	349	382	91.4%
Washington	2,131	2,343	91.0%
Windham	307	334	91.9%
Windsor	962	1,043	92.2%
MID Areas	4,917	5,342	92.0%

Source: [OpenFEMA Dataset: Individuals and Households Program - Valid Registrations - v1](#)

Among the few IHP registrants that did choose to carry flood insurance policies, there were numerous private and public providers chosen. The National Flood Insurance Program (NFIP) is a voluntary, federal insurance program administered by FEMA that provides flood insurance to property owners who live in communities that participate in the program. The NFIP is intended to ensure the availability of policies in high-risk flood areas where businesses and homes with mortgages from government-backed lenders are required to have flood insurance. NFIP data helps identify households that experienced flood damage and whether they received insurance payouts.

The data in Table 35 below compares the dollar value of damage dealt to buildings in each identified MID area to the total amount paid out under the NFIP program. Unmet need is present when the estimated damage to buildings is greater than the amount which was covered by NFIP. While compensation from the NFIP program is crucial to recovery efforts, NFIP policies have coverage limits that exclude types of damage beyond a variety of thresholds. As NFIP payouts do not cover all damages, there is often still a substantial need to be met following a payout.

While the data reflects only residential need, both rental and owner-occupied structures are included, as well as both single and multi-family units. Additionally, the data reflects

only structural damage and does not reflect content damage or the cost of bringing a structure up to required mitigation standards.

Table 35: NFIP – Estimated Unmet Need for Residential Buildings

County	Number of Residential Building Claims	Total Building Damage	Total Building Net Payment	Estimated Unmet Need
Caledonia	16	\$473,736	\$409,939	\$63,797
Lamoille	31	\$2,431,805	\$2,428,656	\$3,149
Orleans	8	\$247,933	\$203,504	\$44,429
Rutland	38	\$870,913	\$819,877	\$51,036
Washington	176	\$7,912,631	\$7,234,402	\$678,229
Windham	12	\$632,233	\$604,369	\$27,864
Windsor	92	\$4,623,912	\$4,459,698	\$164,214
MID Areas	373	\$17,193,163	\$16,160,446	\$1,032,717

Source: [OpenFEMA Dataset: FEMA NFIP Redacted Claims - v2](#)

2.3.3.4 Residential Property Insurance

In addition to federal NFIP policies, Vermonters affected by DR-4720 made claims against their own personal property insurance policies. According to data retrieved by the Vermont Department of Financial Regulation (DFR) during a flood insurance data call of claims made between July 1 and September 1 of 2023, insurers reported 5,351 claims, the majority of which are likely to be related to damage from the July 2023 floods. While many claims are yet to be closed, there have been a large number of denied and closed claims. There may have been a large number of applicants seeking denials because individuals and households applying for FEMA IHP assistance need to present either proof of insufficient insurance coverage or proof that their claims were denied. As a result, people may have applied to the insurance knowing they would be denied, simply to have the proof required for FEMA IHP.

Table 36: Residential Property Insurance Claims Closed Without Payment

Location	Claims Reported	Claims Closed with Payment	Claims Closed without Payment	% of Claims Closed without Payment
Caledonia	112	23	55	49.1%
Lamoille	138	31	77	55.8%
Orleans	84	25	40	47.6%
Rutland	200	61	104	52.0%
Washington	907	225	515	56.8%
Windham	126	30	73	57.9%
Windsor	497	78	305	61.4%
MID Areas	2,064	473	1,169	56.6%

Source: DFR DR-4720 Flood Insurance Data Call Data

As can be seen, over half of all residential property insurance claims in the identified MID areas were closed without payment. This is due in no small part to the large number of claims made with the express purpose of being denied for the purpose of receiving documentation for FEMA assistance.

Although some of the claims closed without payment were likely filed by claimants registering for the FEMA IHP, these denied claims still represent a form of unmet need. Not every one of the 1,169 claimants denied payment in the identified MID areas may have applied for or qualified for FEMA IHP assistance. Even if some of these denied claimants went on to receive some form of IHP funding, the amount of assistance they would receive would only cover the FEMA-determined cost of repairs that would bring their property back to habitability. There would still be a difference between the assistance received from FEMA IHP and the full cost of returning their property to pre-disaster condition. Thus, there remains an unmet need amongst these 1,169 claims closed without payment within the identified MID areas

To estimate this unmet need, the average Case Incurred Loss per claim closed with payment was calculated within each of the identified MID areas. For each identified MID areas, the average Case Incurred Loss was then multiplied by the total number of claims closed without payment, yielding an estimate of potential need in each location.

Table 37: Estimated Potential Residential Property Insurance Need

Location	Case Incurred Loss	Average Loss per Claim Closed with Payment	Claims Closed without Payment	Estimated Potential Need
Caledonia	\$339K	\$14,723	55	\$809K
Lamoille	\$427K	\$13,796	77	\$1.06M
Orleans	\$481K	\$19,271	40	\$770K
Rutland	\$740K	\$12,136	104	\$1.26M
Washington	\$3.74M	\$16,654	515	\$8.57M
Windham	\$550K	\$18,338	73	\$1.33M
Windsor	\$1.27M	\$16,287	305	\$4.96M
MID Areas	\$7.55M	-	1,169	\$18.7M

Source: DFR DR-4720 Flood Insurance Data Call

It is important to note that some claimants who were denied payment through residential property insurance may later qualify for IHP funding. However, the UNA accounts for IHP assistance provided in the met need calculation.

2.3.3.5 Pre-Application Interest for Buyouts, Elevations, and Mitigation Reconstruction

The State of Vermont has access to funds from FEMA's Hazard Mitigation Grant Program (HMGP) to develop hazard mitigation plans and rebuild in a way that reduces, or mitigates, future disaster losses in affected communities. For DR-4720, the federal cost share funding for HMGP projects is capped at \$66M. To date, projects utilizing \$57.1M of the maximum federal share cap have been submitted to FEMA for award.

FEMA also administers the Flood Mitigation Assistance Swift Current effort, which provides funding to mitigate buildings insured through the NFIP.³⁶ In November 2023, FEMA announced Swift Current funding for DR-4720. Application submittals closed in May 2024, and to date, \$8.8M of the federal share of project costs have been submitted to FEMA for award.

The Vermont Emergency Management Office (VEM) published a “Pre-Application Form” gauging interest in projects and planning ideas from the State, local governments, private non-profits, Regional Planning Commissions, or other stakeholders. Potential projects include buyouts of uninhabitable or damaged homes in floodplains, foundation elevations, and the reconstruction of homes up to current mitigation standards. Unfunded projects within these categories directly involve residential properties and thus represent an unmet housing need. Table 38 below contains data on the number of pre-applications submitted to the “Pre-Application Form” and manually entered data received through email requests. Table 38 contains the count of potential projects for buyouts, elevations, and mitigation reconstruction for residential properties.

Table 38: Pre-Applications for Buyouts, Elevations, and Mitigation Reconstruction Projects

County	Buyout Projects	Elevation Projects	Mitigation Reconstruction Projects	Total Housing Projects
Caledonia	41	7	1	49
Lamoille	27	4	0	31
Orleans	8	1	0	9
Rutland	1	1	0	2
Washington	84	65	1	150
Windham	7	4	0	11
Windsor	17	9	1	27
MID Areas	185	91	3	279

Source: [VEM Pre-Application Form Data](#)

As part of the pre-application form, applicants were asked to submit estimated project costs for each project, captured in Table 39 below. Not all pre-applications have an

³⁶ SOURCE: (Federal Emergency Management Agency, 2024)

associated project cost. Of the 279 potential residential projects in the identified MID areas, 45 or 16.1% of potential projects do not have reported project costs, indicating the total unmet need could be greater. As discussed in 2.2.1 Data Sources and Limitations, reported project costs are estimates provided by respondents and may not consider additional costs or potential duplication of benefits.

The estimated project costs in Table 39 show a significant amount of unmet need in housing and mitigation. The data shows that interest in the program is significantly higher than the available funding, representing an unmet need in this area of recovery. The HMGP allows the State of Vermont to establish funding priorities for DR-4720.³⁷ The State priority for DR-4720 was residential properties; nearly all projects submitted to FEMA to date for HMGP and Swift Current were buyouts, so all Hazard Mitigation funding is applied to buyout costs in the unmet need calculation.³⁸

Table 39: Estimated Costs and Unmet Need for Buyouts, Elevations, and Mitigation Reconstruction Projects

County	Buyout Project Costs	Elevation Project Costs	Mitigation Reconstruction Project Cost	Total Project Costs
Caledonia	\$12,078,887	\$912,000	\$0	\$12,990,887
Lamoille	\$11,413,112	\$1,034,000	\$0	\$12,447,112
Orleans	\$2,270,513	\$0	\$0	\$2,270,513
Rutland	\$195,760	\$0	\$0	\$195,760
Washington	\$39,309,436	\$6,900,000	\$121,350	\$46,330,786
Windham	\$2,990,716	\$353,000	\$0	\$3,343,716
Windsor	\$8,998,668	\$2,002,000	\$365,747	\$11,366,415
MID Areas	\$77,257,092	\$11,201,000	\$487,097	\$88,945,189
Maximum Federal Funds Available for FEMA HMGP ³⁹	(\$66,687,603)	\$0	\$0.00	(\$66,687,603)

³⁷ Source: (Vermont Emergency Management , 2024)

³⁸ Source: (Vermont Emergency Management, 2025)

³⁹ NOTE: Not all HMGP projects submitted to FEMA were in the identified MID Area, so the federal funds available for the MID Area is likely lower.

County	Buyout Project Costs	Elevation Project Costs	Mitigation Reconstruction Project Cost	Total Project Costs
Fiscal Year 2023 Swift Current Federal Funds ⁴⁰	(\$8,895,833)	\$0.00	\$0.00	(\$8,895,833)
Unmet Need	\$1,673,656	\$11,201,000	\$487,097	\$13,361,753

Source: [VEM Pre-Application Form Data](#)

2.3.3.6 Small Business Administration Home Loans

Alongside FEMA, the U.S. Small Business Administration (SBA) offers Disaster Home Loans to homeowners and renters living in the area of an SBA-declared disaster (which frequently overlap with FEMA-declared disasters) to cover the repair and replacement costs of physical damage to a unit. The data in Table 40 below reflects applications for assistance across the identified MID areas.

Table 40: SBA - Count of Initial Disaster Home Loan Applications and Offers

County	Initial Application Count	Offer Count	% of Applicants Offered Loan
Caledonia	31	14	45.2%
Lamoille	83	43	51.8%
Orleans	35	20	57.1%
Rutland	34	14	41.2%
Washington	399	252	63.2%
Windham	29	19	65.5%
Windsor	117	61	52.1%
MID Areas	728	423	58.1%

⁴⁰ NOTE: Not all Swift Current projects submitted to FEMA were in the identified MID Area, so the federal funding amount for the MID Area is likely lower.

Source: SBA Disaster Loan Data as of 05/12/2025

As can be seen, 305 applications did not result in loan offers. While the eligibility requirements for the SBA Physical Damage Disaster Loan for Homeowners are generally more permissive than its counterpart for small businesses, the SBA can decline to extend a homeowner's disaster loan offer for a variety of reasons. For instance, poor credit history, excessive credit utilization, inadequate financial documentation, or even damaged repair costs already being covered by other funding sources can lead to a denied application. For these reasons, a portion of the 305 denied applicants did not receive recovery funding that they may have needed.

Unfortunately, Small Business Administration Disaster Loan data is not yet publicly available for FY23. Vermont does not yet have a data sharing agreement with SBA, so per-applicant data (including verified loss estimates) were not available for the analysis. Instead, the unmet needs assessment applies the HUD multiplier for flooding to FEMA IA inspection data. As this methodology mirrors how SBA Disaster Loan data is used to estimate unmet housing needs, this UNA considers any unmet housing need remaining from the SBA Disaster Loan program accounted for through the HUD multiplied unmet need.

2.3.3.7 Vermont Business Emergency Gap Assistance Program

In combination with Federal aid, awards disbursed by Vermont’s State Business Emergency Gap Assistance Program (BEGAP)⁴¹ provided invaluable relief to homeowners and landlords. BEGAP is a grant program for businesses and nonprofits that suffer physical damage from flooding events. BEGAP funding is provided by physical location, and each applicant can receive grants for up to three physical locations per year. For damages from the 2023 flooding disaster, applicants received grants of up to \$50,000, generally equal to 30% of net uncovered damage remaining after subtracting insurance proceeds and other grants or donations used to defray the costs of repair or replacement. Additionally, applicants with 50 employees or fewer that successfully received BEGAP funding for damages sustained in 2023 under \$500,000 and continued to have unmet need were offered additional supplementary funding up to \$50,000.

Below, in Table 41, were the awards provided to lessors of residential properties, community housing organizations, and condominium associations. Unmet need is calculated by dividing the total BEGAP award by 0.3 to get the total need and then subtracting the BEGAP award and supplemental awards to calculate the unmet need.

Table 41: 2023 BEGAP Awards to Owners of Residential Properties

County	Estimated Total Damages	Total BEGAP Award for Residential Housing (30%)	Supplemental BEGAP Award	Estimated Unmet Need
Caledonia	\$74,021	\$22,206	\$0	\$51,814
Lamoille	\$905,401	\$271,620	\$0	\$633,781
Orleans	\$43,602	\$13,081	\$0	\$30,521
Rutland	\$0	\$0	\$0	\$0
Washington	\$2,548,440	\$764,532	\$50,000	\$1,733,908
Windham	\$0	\$0	\$0	\$0
Windsor	\$91,105	\$27,331	\$0	\$63,773

⁴¹ Source: (Vermont Agency of Commerce and Community Development, 2024)

County	Estimated Total Damages	Total BEGAP Award for Residential Housing (30%)	Supplemental BEGAP Award	Estimated Unmet Need
MID Areas	\$3,662,569	\$1,098,770	\$50,000	\$2,513,797

Source: [Business Emergency Gap Assistance Program \(BEGAP\) | Agency of Commerce and Community Development](#)

2.3.4 Public Housing (Including HUD-assisted Housing) and Other Affordable Housing

Vermont has eight local Public Housing Authorities (PHA) and one statewide housing authority—The Vermont State Housing Authority (VSHA) who maintain units of affordable housing through HUD’s Public Housing program. As of the 2025 Housing Needs Assessment, this network of PHAs own or manage a total of 3,358 units across 103 properties, with the second largest share of 361 units located in Washington County. Rutland, Windham, and Windsor Counties also have approximately 300 units each.

Table 42: MID Area Public Housing Authorities’ Properties and Units

Housing Agency	Location	Properties	Units
Rutland Housing Authority	Rutland County	4	290
Barre Housing Authority	Washington County	7	361
Montpelier Housing Authority	Washington County	9	236
Brattleboro Housing Authority	Windham County	7	307
Springfield Housing Authority	Windsor County	7	319
Vermont State Housing Authority	Statewide	25	586
All PHAs	Statewide	103	3,358

Source: [Vermont Housing Needs Assessment | Agency of Commerce and Community Development](#)

A stable supply of affordable housing is crucial for the wellbeing of low-income families and individuals. One measure of the availability of affordable housing units is the average length of time new applicants spend on waitlists maintained by Public Housing Authorities. In 2023, the average waitlist for all public housing was 14 months.⁴² Several Public Housing Authority Directors indicated having to close their waitlists due to individuals waiting multiple years for available units. As discussed in the 2025 Housing Needs Assessment, Vermont has had a longstanding shortage of all affordable housing both publicly- and privately-owned. In 2023, the effects of this shortage had already been amplified by the COVID-19 pandemic, as the number of lower-income households rapidly increased following a growth in the rate of unemployment. This means that during the July 2023 flooding disaster, Vermont's public housing supply was already overwhelmed, and was only further strained by the flood damage to PHA units as well as the displacement of residents from non-public housing. To address this acute shortage of affordable housing, the State of Vermont has established or utilized numerous programs designed to 1) construct or rehabilitate affordable housing for purchase or rent by low-income households and/or 2) provide direct rental assistance to tenants in need.

2.3.4.1 Publicly Subsidized Affordable Housing Construction and Rehabilitation

Vermont has several programs to help support the construction and repair of affordable housing to increase its availability to individuals with low or moderate incomes. These programs include development financing through the Vermont Housing Finance Agency (VHFA), funding from the Vermont Housing & Conservation Board, and federal assistance through the IRS' Low Income Housing Tax Credit (LIHTC) program. At the federal level, the HUD CDBG program provides annual grants to both the State of Vermont and certain municipalities such as Burlington, to acquire property, relocate and demolish, rehabilitate structures, and improve energy efficiency. The HUD HOME program, administered by the City of Burlington and the Vermont Housing & Conservation Board, also supports this effort by funding the development of rental housing, homeowner repairs, and tenant-based rental assistance. In rural areas with populations under 35,000, the USDA Rural Development Section 515 Rural Rental Housing program provides direct loans to create or rehabilitate affordable multifamily housing.

⁴² Source: (Vermont Housing Finance Agency, 2024)

Table 43: Rental Units Built with IRS Low Income Housing Tax Credit Between 1988 and 2024

Category	Total LIHTC Units	% of Total LIHTC Units	Total Set Aside Low-Income Units	% of Low-Income Units
MID Areas	3,897	38.8%	3,425	42.2%
Vermont	10,033	100.00%	8,120	100.00%

Source: [Low-Income Housing Tax Credit \(LIHTC\): Property Level Data | HUD USER](#)

At the State and local level, several programs directly support the development and preservation of affordable housing. The VHFA offers low-interest construction and permanent mortgage financing for affordable rental housing projects as well as administering the State's Affordable Housing Tax Credit program. This program is allocated according to Vermont's Qualified Allocation Plan, aligning with the State's specific affordable housing goals such as supporting projects in high-need areas and serving lower-income households. The Vermont Housing Improvement Program (VHIP), administered by DHCD, provides grants to support the development or rehabilitation of rental homes on existing residential properties. Additionally, the Vermont Housing and Conservation Board plays a key role by funding the acquisition, rehabilitation, and construction of affordable housing through partnerships with nonprofit housing organizations. While these federal and state programs play a critical role in maintaining affordable housing across the State, new affordable housing units are not being constructed at a high enough rate to accommodate the increased need following DR-4720.

Table 44: Apartments in Buildings Developed with Public Funding

County	Apartments in Buildings Developed with Public Funding	Renter Occupied Housing Units	% of All Rental Occupied Housing Units
Caledonia	528	3,056	17.3%
Lamoille	396	3,150	12.6%
Orleans	335	2,398	14.0%
Rutland	1,371	7,304	18.8%

County	Apartments in Buildings Developed with Public Funding	Renter Occupied Housing Units	% of All Rental Occupied Housing Units
Washington	1,311	7,247	18.1%
Windham	1,417	5,655	25.1%
Windsor	1,251	6,309	19.8%
MID Areas	6,609	35,119	18.8%

Source: [Vermont Housing Needs Assessment 2025-2029](#), Census Bureau ACS-5 Year Estimates

2.3.4.2 Publicly Subsidized Rental Assistance

According to Vermont's 2025 Housing Needs Assessment, the State has 14,670 publicly subsidized rental apartments across 451 complexes developed through federal and state housing programs, representing 19% of the State's rental housing stock. About half of Vermont's original public housing units administered by Public Housing Authorities (PHAs) have been converted into primarily Section 8 Project-Based Voucher (PBV) housing through HUD's Rental Assistance Demonstration (RAD) program. Another major source of affordable housing is the federal LIHTC program, which requires participating apartments to rent to households earning less than 50% or 60% of the HUD-calculated Area Median Income (AMI) for up to 30 years, with rents capped at no more than 30% of a household's income. Vermont also has 7,400 Section 8 Housing Choice Vouchers which help lower-income residents afford housing by covering part of their rent. Tenants in the program usually pay no more than 30% of their monthly income, and the voucher covers the remaining rent balance as long as the housing meets federal quality standards.

Table 45: MID Area Section 8 Housing Choice Vouchers (HCV) by Issuing Public Housing Authority (2020-2023)

Housing Agency	Location	Number of Vouchers 2020	Number of Vouchers 2023
Rutland Housing Authority	Rutland County	236	338

Housing Agency	Location	Number of Vouchers 2020	Number of Vouchers 2023
Barre Housing Authority	Washington County	106	91
Montpelier Housing Authority	Washington County	109	120
Brattleboro Housing Authority	Windham County	119	322
Springfield Housing Authority	Windsor County	40	162
Vermont State Housing Authority	Statewide	2,896	3,609
MID Areas	All Vouchers	3,506	4,642

Source: [Vermont Housing Needs Assessment 2025-2029](#); U.S. Dept of Housing and Urban Development (HUD), Housing Choice Voucher (HCV) dashboard

The number of Section 8 Housing Choice Vouchers (HCV) provided to low-income households within the identified MID areas has increased from 3,506 in 2020 to 4,642 in 2023. The vouchers are used by low-income households to access and afford rental housing, particularly in units managed and developed with public funding. This increase highlights the rising need for assistance to afford housing within the identified MID areas. The State of Vermont is attempting to meet this need as best as possible, with the Vermont State Housing Authority administering more than half of the State's HCV eligible units. The remainder of HCV eligible units is distributed across the residents of private and non-profit landlords, including housing trusts and LIHTC recipients. However, about 20% of Section 8 Vouchers are Project Based Vouchers (PBVs) that tie the subsidy to a specific housing unit that recipients must apply for. While this system is effective, there is a limited supply of eligible units which can be applied for, leaving those who do not apply or are rejected to search Vermont's already constricted rental housing market for other affordable housing.

Table 46: Apartments with Monthly Project Based Rental Assistance

County	Apartments with Monthly Project Based Rental Assistance	Renter Occupied Housing Units	% of All Rental Units in Publicly Funded Buildings
Caledonia	231	3,056	7.6%
Lamoille	189	3,150	6.0%
Orleans	187	2,398	7.8%
Rutland	880	7,304	12.0%
Washington	903	7,247	12.5%
Windham	707	5,655	12.5%
Windsor	749	6,309	11.9%
MID Areas	3,846	35,119	11.0%

Source: [Vermont Housing Needs Assessment 2025-2029](#), Census Bureau ACS-5 Year Estimates

As of 2024, there are 3,846 project-based rental assistance units across the identified MID areas in buildings that were developed using public funding. These units constitute 11% of the identified MID areas renter occupied housing units. The limited supply of these units, and general low vacancy rates across the identified MID areas, shows the need for additional avenues to affordable housing units beyond the programs implemented within Vermont at this time.

2.3.4.3 Persistent Affordable Housing Shortage

Vermont continues to face a persistent and growing shortage of affordable housing. According to the State's Housing Needs Assessment, publicly subsidized rental units are falling short of meeting the high demand for affordable options. VSHA reported a vacancy rate of just 1.8% in its units, which is below the already low statewide vacancy rate of 5%. This highlights the increased pressure on available subsidized housing. Across the State, this demand has exceeded capacity, with several Public Housing Authorities (PHAs) being forced to close their waitlists. Additionally, the statewide waitlist for Section 8 Housing Choice Vouchers (HCVs) was closed in November 2023 following DR-4720.

Furthermore, Vermont's affordable housing stock is shrinking due to gaps in long-term affordability protections. There are properties built with public subsidies which are able to exit the affordable housing portfolio due to the absence of affordability clauses in funding program contracts. For instance, the "qualified contract process" allows owners of rental developments built under the LIHTC program to convert units to market-rate after only 15 years, half of the program's intended 30-year affordability period. These mechanisms have made it easier for affordable units to transition to market-rate, putting further pressure on the affordable housing supply.

Additionally, the July 2023 flood event caused damage to PHA properties, resulting in the need for repair and renovation of several public housing units. For example, affordable housing units managed by the Montpelier Public Housing Authority sustained damages when a culvert on North Street, Montpelier became overwhelmed with water. As a result of this event, the first floor and two apartments of Lane Shops Apartments, a HUD housing development, were flooded resulting \$10,703 in damages. The Barre City Housing Authority sustained over \$14,000 in damage when flood waters overran elevator pits and destroyed a dumpster lift at the Washington Apartments on 14 Washington Street.

Despite the pressing need for additional housing, the cost of constructing/developing new affordable housing is prohibitively expensive for those who need it most. For instance, the Housing Needs Assessment discovered that developing a single apartment in a multifamily building for a low-income household would have cost about \$500,000 in 2023 and the median price for a newly-build single-family house was about \$616,500. Even with federal or state assistance, it is difficult to afford such high costs to construct new housing. As these construction and renovation prices continue to rise, the public portfolio of affordable housing will continue to shrink. Evidently there is a persistent, unmet need for affordable only across the whole of Vermont, especially in the identified MID areas, where there is a higher population of low-income individuals and families and a higher amount of housing affected by disaster damages.

2.3.5 Housing Summary

Following DR-4720, the State of Vermont's housing stock sustained at least \$218 million in damage within the identified MID areas. These damages include flooding, the loss of personal property, and the complete destruction of homes. These damages impacted the daily lives of the people of Vermont by exacerbating the cost-burden created by the lack of affordable housing and creating dangerous household conditions that can lead to housing instability. To address the remaining unmet need of \$107 million and mitigate the impacts of future severe weather events, the State has allocated

the largest allocation of CDBG-DR funds to the Housing Construction and Rehabilitation program. The State is also ensuring that the Housing program funds infrastructure projects directly in support of housing to address further unmet infrastructure needs tied to housing within communities.

2.4 Infrastructure

Vermont's infrastructure, much like the State's housing stock, is aging and increasingly vulnerable to damage from severe weather events. The American Society of Civil Engineers conducted an Infrastructure Assessment across the State of Vermont to develop the 2023 Report Card for Vermont's Infrastructure, published February 2023. The report highlights the State's longstanding infrastructure challenges and its heightened vulnerability to natural disasters. The State's infrastructure received a C grade, noting that Vermont's infrastructure requires substantial maintenance and is highly susceptible to severe weather events. This assessment was used in combination with a review of the impacts of the July 2023 flood events on water treatment facilities, roads, and bridges in the state to total the current recovery need not yet met by other sources of funding.

The impact of the vulnerabilities documented in the Report Card was clearly demonstrated by the widespread damage resulting from DR-4720. Critical infrastructure, including water treatment facilities, roads, and bridges were significantly impacted. This damage is reflected in the more than 2,000 applications for FEMA Public Assistance (PA) and the over 5,400 reported instances of damage related to DR-4720.⁴³ Although Vermont has met the damage cost threshold required for a 90/10% federal-state cost-sharing agreement, the State's share of costs for PA projects still requires a substantial amount of funding. Supplemental program funds have been beneficial but still fall short of covering the costs of emergency recovery and rebuilding. The flooding, landslides, and soil erosion caused by DR-4720 brought the State's infrastructure vulnerabilities to the forefront and added to the preexisting need for improvements. Below,

Table 47 provides a summary of the Infrastructure Unmet Need.

Table 47: Summary of Infrastructure Unmet Need

⁴³ Source: (Federal Emergency Management Agency)

Funding Source	Total Damages	Assistance Provided	Unmet Need
FEMA Public Assistance and Additional Estimated Damages	\$506,614,687	\$455,953,218	\$50,661,469
Hazard Mitigation Pre-Application Interest for Infrastructure Projects	\$162,030,836	\$0	\$162,030,836
Infrastructure Total	\$668,645,523	\$455,953,218	\$212,692,305

2.4.1 Infrastructure Profile

The 2023 Report Card for Vermont's Infrastructure⁴⁴ found that Vermont's infrastructure is facing significant challenges due to aging systems and the increasing frequency of severe weather events. The July 2023 floods exploited preexisting vulnerabilities in Vermont's infrastructure, causing extensive damage to various operational facilities—such as the wastewater treatment facility in the Town of Johnson in Lamoille County—and severely impacting the state's transportation infrastructure.

According to data maintained by the Vermont 211 Community Services Hotline, a free community resources information and referral services, there were over 6,422 calls made in July 2023 alone for information, advocacy support, listening support, or referrals to programs and resources. In the wake of federally declared disasters such as DR-4720, Vermont 211 distributes information about public recovery efforts while helping record and track property damages reported by the public. Among the various calls made during and after the 2023 floods, several were made by callers later referred to disaster or utility recovery and relief services.

⁴⁴ Source: (American Society of Civil Engineers, n.d.)

Table 48: Vermont 211 Referrals Between July 2023 and December 2023

County	Disaster Services	Utilities
Caledonia	129	9
Lamoille	211	12
Orleans	161	13
Rutland	118	27
Washington	898	18
Windham	96	19
Windsor	265	22
MID Areas	1,878	120

Source: [Vermont 211 Statistical Reports — VT 211](#)

Between July and December 2023, there were a total of 2,359 referrals made by Vermont 211 to Disaster Services. Of this total, 1,878—over 79% were for individuals living in the identified MID areas. It is likely that behind these calls for disaster services were individuals reporting damages to local bridges, utility facilities, and other buildings and equipment. This means that the identified MID areas likely sustained a larger proportion of the infrastructure damage inflicted by DR-4720.

According to the National Oceanic and Atmospheric Administration (NOAA), over 100 state and U.S. highways running through Vermont were damaged or closed due to high water levels at the peak of the flooding.⁴⁵ The State also closed 64 bridges and 409 miles of rail. This disruption affected both major routes and local roads, isolating communities and hindering emergency response efforts. The flooding caused extensive washouts and structural damage to roads and bridges, making roads impassable and making evacuations necessary.

⁴⁵ Source: (National Oceanic and Atmospheric Administration, 2023)



An SUV trapped in the middle of a road following a landslide from DR-4720

Beyond the road, flooding impacted citizens in their own homes by reducing access to basic necessities—potable water, reliable waste removal, and even electricity. During DR-4720, 18 drinking water systems were impacted, leaving 40,000 residents with diminished or uncertain access to clean drinking water. Wastewater systems were damaged, affecting 33 municipal systems. Of these 33 systems, 3 facilities serving communities in the identified MID areas—the Town of Hardwick, Village of Johnson, and Town of Ludlow—were catastrophically damaged. Wastewater treatment plants are an integral part of public infrastructure, preventing the pollution of both ground and surface water while reducing the likelihood of public health hazards. Though the projects to repair these three facilities are still being planned and scoped, current estimates quote a total of \$61,309,424.93 worth of damage.⁴⁶

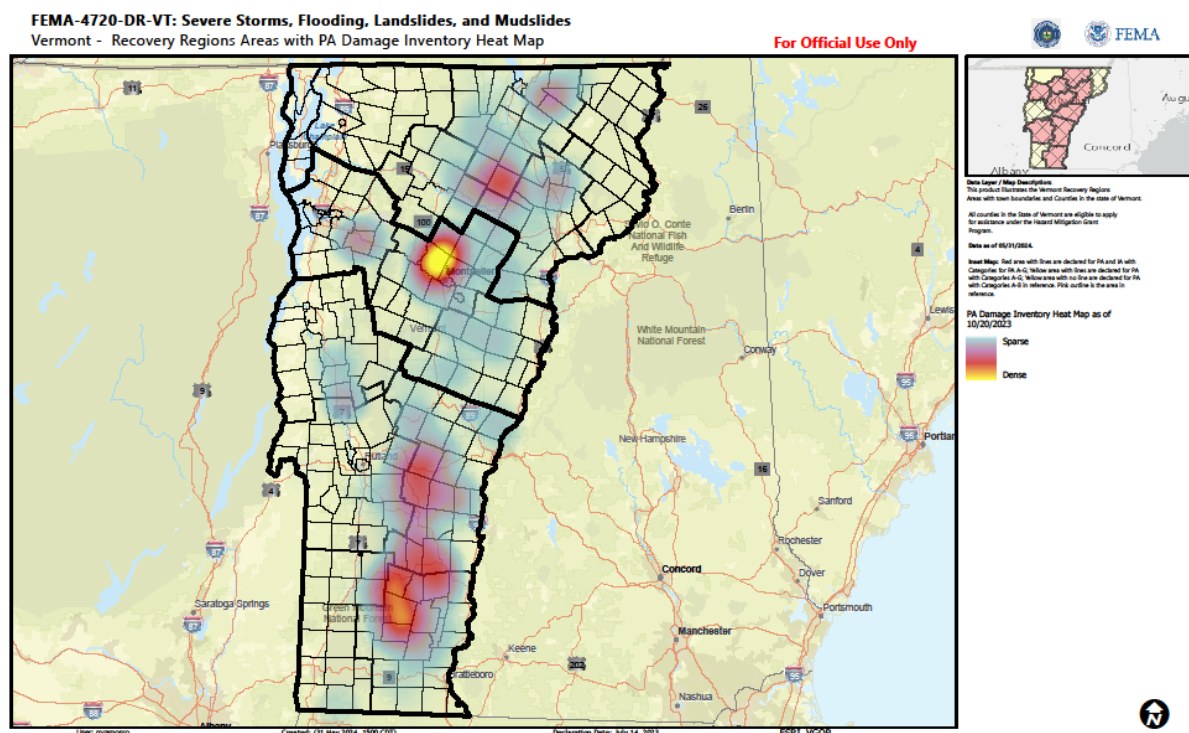
2.4.2 FEMA Public Assistance

The core of Vermont's response to infrastructural damage caused by the 2023 floods is FEMA Public Assistance. Following federally declared disasters, FEMA provides supplemental grants to state, local, tribal, and territorial governments (SLTT) as well as certain types of private non-profits to allow communities to quickly respond to and recover from major disasters or emergencies. Recipients operate public assistance programs where applicants with FEMA PA-eligible damage caused by the disaster can apply for a portion of the obligated PA funding to cover the costs of a repair project. This

⁴⁶ Source: (Federal Emergency Management Agency)

assistance takes on the form of a federal and recipient cost share, where 75% to 100% of the recovery project cost is covered by federal funds and the remaining costs are covered by the recipient. The state of Vermont has reached the estimated damage cost threshold for a 90/10% cost sharing split with the Federal Government, which means that the estimated unmet infrastructure need can be calculated as 10% of total estimated FEMA PA project costs.

Figure 9: Map of FEMA PA Damages Generated 5/31/24



Source: FEMA PA Damages Data as of 10/20/23

There are 1,079 active and obligated FEMA PA infrastructure projects across Vermont for the July 2023 floods, which catalogue the extensive damage caused by the event. As of April 15, 2025, FEMA has obligated \$172 million across the State under the FEMA PA program. Table 49 and Table 50 below provide costs and categories of work for FEMA PA funding in the identified MID areas. Category A (Debris Removal) and Category B (Emergency Protective Measures) are excluded from the table, as the Federal Cost Share is 100%, and so they do not represent unmet needs.

The remaining five categories of FEMA PA (C-G) capture the recovery needs of infrastructure. Investments in these categories aim to repair and reduce the repeated loss of roadways and facilities during severe weather events as well as ensure the continuity of critical infrastructure. As mentioned, the State of Vermont has reached the estimated damage cost threshold and received authorization for a 90/10% cost sharing

split with the Federal Government⁴⁷. However, the remaining unmet costs for FEMA PA projects remain large. In the identified MID areas alone, the State estimates over \$506 million in approximate project costs for categories C-G. With a 10% cost share, the estimated remaining costs are \$50.6 million.

Table 49 contains active FEMA PA projects for DR-4720 categories C-G (infrastructure). Some projects have been excluded from Table 49, as their total estimated project costs have not yet been finalized. The majority of Grants Portal entries for the removed projects currently report obligated advances for project planning and scoping. As this scoping progresses, and is completed, the total estimated damages and project costs for each removed project are predicted to be significantly higher than the amounts in Grants Portal. Estimated damages from these projects have been captured and reported separately in Table 50.

Table 49: FEMA PA Best Available Costs for Grants Portal Projects in Category C-G by County

County	Active Project Count in Grants Portal	Best Available Project Cost	Best Available Remaining Project Cost (10%)
Caledonia	52	\$10,740,019	\$1,074,002
Lamoille	67	\$8,594,116	\$859,412
Orleans	66	\$13,231,979	\$1,323,198
Rutland	37	\$4,783,064	\$478,306
Washington	361	\$295,539,036	\$29,553,904
Windham	84	\$8,737,455	\$873,745
Windsor	223	\$37,786,086	\$3,778,609
MID Areas	890	\$379,411,754	\$37,941,175

Source: FEMA PA Grants Portal Project Data as of 4/15/25

⁴⁷ Source: (FEMA, 2024)

Table 50: FEMA PA Additional Estimated Damages Not Yet Captured in Grants Portal in Category C-G by County

County	Additional Projects	Estimated Damages Not Yet Captured in Grants Portal	Estimated Remaining Project Cost (10%)
Caledonia	2	\$20,073,132	\$2,007,313
Lamoille	3	\$29,508,275	\$2,950,828
Orleans	0	\$0	\$0
Rutland	1	\$1,826,141	\$182,614
Washington	6	\$57,158,580	\$5,715,858
Windham	1	\$134,100	\$13,410
Windsor	4	\$18,502,704	\$1,850,270
MID Areas	17	\$127,202,932	\$12,720,293

Source: Additional Estimated Damages as of 4/15/25

Below, Table 51 combines the best available project costs with the estimated damages and breaks down the total FEMA PA estimated project cost in the identified MID areas by project category. As can be seen, the majority of projects fall into Category C and involve Roads and Bridges, while the project category that involves the highest amount of damage is Category E—Buildings and Equipment.

Table 51: FEMA PA Estimated Project Costs in MID Area by Infrastructure Category

FEMA Project Category	Estimated Projects in MID Area	Estimated Project Costs	Estimated Remaining Cost (10%)
C - Roads and Bridges	585	\$110,229,298	\$11,022,930
D - Water Control Facilities	14	\$19,857,094	\$1,985,709
E - Buildings and Equipment	120	\$243,663,510	\$24,366,351

FEMA Project Category	Estimated Projects in MID Area	Estimated Project Costs	Estimated Remaining Cost (10%)
F - Utilities	47	\$76,368,005	\$7,636,801
G - Parks, Recreational Facilities, and Other Items	141	\$56,496,780	\$5,649,678
Total	907	\$506,614,687	\$50,661,469

Source: FEMA PA Grants Portal Project Data; Additional Estimated Damages as of 4/15/25

Below, Table 52 splits the total estimated FEMA PA project cost by county, and displays a total count of infrastructure projects, their best available project cost, and the best available estimate of the remaining project costs.

Table 52: FEMA PA Best Available Project Costs in Category C-G by MID County

County	Total Projects	Estimated Project Costs	Estimated Unmet Need (10%)
Caledonia	54	\$30,813,151	\$3,081,315
Lamoille	70	\$38,102,391	\$3,810,239
Orleans	66	\$13,231,979	\$1,323,198
Rutland	38	\$6,609,205	\$660,921
Washington	367	\$352,697,616	\$35,269,762
Windham	85	\$8,871,555	\$887,155
Windsor	227	\$56,288,789	\$5,628,879
MID Areas	907	\$506,614,687	\$50,661,469

Source: FEMA PA Grants Portal Project Data; Additional Estimated Damages as of 4/15/25

As shown in Table 52, Washington and Windsor Counties had the highest number of FEMA PA-eligible infrastructure projects. However, this does not necessarily mean that these two counties sustained the most acute and widespread damage. For instance, Lamoille County has a very high amount of damage relative to its total number of

projects. Despite having only a third of the total number of projects that Windsor County has, Lamoille County's total estimated damage is about two thirds the total estimated damage in Windsor County.

Per the findings above, Vermont sustained a massive amount of flooding damage during the July 2023 disaster to numerous pieces of infrastructure. While the federal share of FEMA PA has generously funded the majority of the cost of recovery projects, the sheer number and magnitude of projects has contributed to an increasingly large state share.

It is estimated that Vermont's FEMA PA permanent projects for roads and bridges, water control facilities, public buildings and contents, public utilities, and parks, recreation, and other facilities from the July 2023 floods will cost over \$600 million. The widespread damage DR-4720 inflicted on infrastructure throughout Vermont highlighted the vulnerabilities across the state's transportation, water, and electrical systems. To plan the restoration and reinforcement of crucial infrastructure, Vermont developed its Hazard Mitigation Plan. Through this Hazard Mitigation Plan, Vermont has identified priority projects such as reinforcing roads prone to washouts, floodproofing critical facilities, and restoring floodplain function near critical transportation corridors. The completion of these projects would vastly improve the quality of Vermont's infrastructure and fortify it against similar flooding disasters, however, as observed through the FEMA PA data, infrastructure projects are enormously expensive. As a result, the State of Vermont intends to fund portions of this unmet need with CDBG-DR funds.

2.4.3 Pre-Application Interest for Infrastructure (including Bridge or Culvert Upsizing, Natural Resource Projects, and Utility Resilience)

As discussed in 2.3.3.5 Pre-Application Interest for Buyouts, Elevations, and Mitigation Reconstruction, the State of Vermont has access to funds from FEMA's Hazard Mitigation Grant Program (HMGP) to develop hazard mitigation plans and rebuild in a way that reduces, or mitigates, future disaster losses in affected communities.

The Vermont Emergency Management Office (VEM) issued a "Pre-Application Form" gauging interest in infrastructure projects and planning ideas from the State, local governments, private non-profits, Regional Planning Commissions, or other stakeholders. Potential projects represent infrastructure that sustained some level of damage from flooding and were not eligible for FEMA PA funding. Table 53 below contains data on the number of pre-applications submitted to the "Pre-Application Form" and manually entered data received through email requests. Table 53 contains the

count of potential projects for infrastructure, bridge or culvert upsizing, natural resource projects, and utility resilience.

Table 53: Pre-Applications for Infrastructure, Bridge or Culvert upsizing, Natural Resource Projects, and Utility Resilience.

County	Infrastructure	Bridge or Culvert Upsizing	Natural Resource Projects	Utility Resilience	Total
Caledonia	3	16	1	0	17
Lamoille	11	12	1	2	15
Orleans	7	2	0	1	3
Rutland	6	23	2	0	25
Washington	54	25	4	0	29
Windham	10	29	1	2	32
Windsor	5	24	2	3	29
MID Areas	96	131	11	8	150

Source: [VEM Pre-Application Form Data](#)

As part of the pre-application form, applicants were asked to submit estimated project costs for each project, captured in Table 54 below. Not all pre-applications have an associated project cost. Of the 150 potential infrastructure projects in the identified MID areas, 35 or 23.3% of potential projects do not have reported project costs, indicating the total unmet need could be greater. As discussed in 2.2.1 Data Sources and Limitations, reported project costs are estimates, provided by respondents and may not consider additional costs or potential duplication of benefits.

The estimated project costs in Table 54 show a significant amount of unmet need in infrastructure and mitigation. The data shows that interest in the program is significantly higher than the available funding, representing an unmet need in this area of recovery. HMGP allows the State of Vermont to establish priorities for funding related to DR-4720.⁴⁸ The State priorities for DR-4720 were residential properties; nearly all projects submitted to FEMA to date for HMGP were residential property buyouts, so no assistance is applied for the unmet need calculation.⁴⁹

⁴⁸ Source: (Vermont Emergency Management , 2024)

⁴⁹ Source: (Vermont Emergency Management, 2025)

Table 54: Estimated Costs and Unmet Need for Infrastructure, Bridge or Culvert Upsizing, Natural Resource, and Utility Resilience Projects

County	Infrastructure	Bridge or Culvert Upsizing	Natural Resource Projects	Utility Resilience	Total
Caledonia	\$4,945,172	\$5,136,690	\$2,000,000	\$0	\$12,081,862
Lamoille	\$13,908,120	\$20,292,956	\$625,000	\$3,329,650	\$38,155,726
Orleans	\$6,140,000	\$552,409	\$0	\$736,313	\$7,428,722
Rutland	\$1,525,000	\$19,171,893	\$1,918,560	\$0	\$22,615,453
Washington	\$10,280,042	\$21,373,012	\$5,659,150	\$0	\$37,312,204
Windham	\$5,279,161	\$16,297,605	\$3,670,800	\$954,000	\$26,201,566
Windsor	\$1,745,000	\$13,477,354	\$203,000	\$2,809,950	\$18,235,304
MID Areas	\$43,822,495	\$96,301,918	\$14,076,510	\$7,829,913	\$162,030,836

Source: [VEM Pre-Application Form Data](#)

2.4.4 Infrastructure Summary

Following DR-4720, the State of Vermont's infrastructure portfolio sustained at least \$370 million in damage within the identified MID areas. These damages include roads and bridges that were washed out, water control facilities and utilities overrun by floods, and overwhelmed stormwater systems. Each of these pieces of infrastructure are critical to the stability, health, and daily lives of the people of Vermont. To address the remaining unmet need of nearly \$50 million and mitigate the impacts of future severe weather events, the State has allocated the second largest allocation of CDBG-DR funds to the infrastructure program. The State is also ensuring that the Housing program funds infrastructure projects directly in support of housing to address further unmet infrastructure needs within communities.



Vermont Task Force 1 emergency responders navigating along a road through fallen trees after DR-4720

2.5 Economic Revitalization

Having devastated homes and infrastructure throughout the state, it is no surprise that DR-4720 disrupted Vermont’s economic activity. In addition to residential buildings, numerous commercial facilities were inundated with floodwater during the July 2023 flooding disaster, leading to the destruction of storefronts, merchandise, and equipment. Damage to homes would displace employer and employee alike, halting the operations of countless businesses and increasing unemployment. Damage to Infrastructure would disturb safe travel to and from commercial areas while delaying or interrupting commercial freight operations. The 2023 floods caused significant damage to Vermont’s economy, particularly within the identified MID areas.. Though the damage to the economy was quite large overall, the relative size of the remaining unmet economic revitalization need is much smaller compared to unmet housing and infrastructure needs.

Table 55: Summary of Unmet Economic Revitalization Needs

Funding Source	Total Damage	Assistance Provided	Unmet Need
Vermont BEGAP	\$45,307,616	\$14,314,596	\$30,993,020
Economic Revitalization Total	\$45,307,616	\$14,314,596	\$30,993,020

2.5.1 Economic Profile

Vermont's economy is largely reliant on tourism, outdoor recreation, and industries such as agriculture and manufacturing, with a recent increase in technology and food sectors. According to a Business and Economic Analysis performed in 2024, there was an estimated total of 46,700 businesses in Vermont in 2023 with a combined annual revenue of \$64.7B. Of these businesses, an estimated 88 were affected by DR-4720 due to business districts being destroyed and closures from facility damage, which has cascading effects on local economies.⁵⁰ This resulted in a \$643.7M loss in annual revenue. There are an estimated 372,700 employees in Vermont, with around 1,400 exposed to damages as a result of DR-4720. In 2023, the vast majority of these affected employees resided in Washington, Rutland, Windsor, Windham, and Lamoille County.

Vermont's leading industries are agriculture, manufacturing, and tourism. While farming is no longer the leading industry in Vermont, it remains a vital piece of the economic landscape. The state is still the leader in milk production in New England and the number one supplier of maple syrup in the United States. Vermont's manufacturing industries are mostly small companies that provide specialized products focusing on wood and paper products as well as printing. Computer and technology industries have begun to move into the state. Additionally, there are 218 total food manufacturing businesses. Then tourism accounts for the second largest industry in Vermont. Businesses with the NAICS Leisure and Hospitality Title employed 34,500 employees in August 2023. As identified in this Unmet Needs Assessment, there was damage from DR-4720 across each of these economic categories.

2.5.2 Local Economy Damage and Impacts

Vermont's economic landscape sustained widespread and long-lasting damage from DR-4720. Due to flooding and landslides caused by the weather events, small businesses; downtown commercial centers; and critical economic sectors such as agriculture suffered extensive losses. In letters of support requesting funding for additional disaster recovery funding from the Economic Development Administration, regional planning commissions and economic development corporations across the state of Vermont reported severe loss of equipment, inventory, and income among businesses. According to an agricultural damage survey conducted by the Vermont Agency of Agriculture, Food, and Markets⁵¹, the agricultural industry sustained severe

⁵⁰ Source: (Federal Emergency Management Agency, 2023)

⁵¹ Source: (Vermont Agency of Agriculture, Food, and Markets, 2023)

damage in the form of crop destruction, livestock losses, and harm to vital farm infrastructure such as barns and irrigation systems.



Floodwater inundates a warehouse and service vehicles

Commerce was also disrupted across the state as flooding inundated storefronts and strained supply chains as key transportation corridors were closed. According to a Vermont Department of Financial Regulation Flood Insurance Data Call⁵², 3,534 NFIP claims, 2,676 private flood insurance claims, and 299 excess flood insurance claims were submitted across Vermont following the July 2023 floods. Additionally, general insurance claim data maintained by DFR reports 606 commercial property insurance claims, 77 commercial auto insurance claims, 14 inland marine insurance claims, 11 business interruption insurance claims, and 8 farm owners insurance claims from policy holders in the identified MID areas. Across the State of Vermont, severe damages to businesses necessitated revitalization efforts to enable long-term economic recovery.

2.5.3 Vermont Business Emergency Gap Assistance Program

There were substantial efforts to mitigate the economic damage caused by DR-4720. At the state level, Vermont's State Business Emergency Gap Assistance Program (BEGAP)⁵³ was among the most impactful. BEGAP is a grant program for businesses and nonprofits that suffer physical damage from flooding events. BEGAP funding is

⁵² Source: (Vermont Department of Financial Regulation, n.d.)

⁵³ Source: (Vermont Agency of Commerce and Community Development, 2024)

provided by physical location, and each applicant can receive up to three grants per flood year. For damages from the 2023 flooding disaster, applicants received grants of up to \$50,000, generally equal to 30% of net uncovered damage remaining after subtracting insurance proceeds and other grants or donations used to defray the costs of repair or replacement. Additionally, applicants with 50 employees or fewer that successfully received under \$500,000 in BEGAP funding for damages sustained in 2023 and continued to have unmet need were offered additional supplementary funding up to \$50,000. Through the 2023 BEGAP grant program, Vermont distributed \$21.7M in recovery assistance to 553 affected businesses across the State.

Organizations belonging to a wide variety of sectors were eligible for BEGAP funding: Healthcare & Social Assistance, Accommodations & Food Services, Agriculture, Services (Professional, Tech, Scientific), Retail, Manufacturing, Arts & Entertainment, Landlords (Residential, Commercial, and Mixed Used), and Other. To best capture unmet need for economic revitalization, Table 56 summarizes the total BEGAP awards received by HUD and Grantee MID counties by applicants in the Healthcare & Social Assistance, Accommodations & Food Services, Agriculture, Services (Professional, Tech, Scientific), Retail, Manufacturing, Arts & Entertainment, and Commercial or Mixed Used Landlords. Additionally, landlord applicants that listed their sector as “Other” were manually searched on the Vermont Business Registry to be sorted into one of the three landlord sector types. Applicants in these sectors received about \$12.31M of the total \$21.7M of 2023 BEGAP funding.

As BEGAP grants are less than or equal to 30% of the cost to recover from physical damages, the 2023 BEGAP grant program attempted to address a total unmet economic need of \$40.6M. It is important to note that some applicants may have had damage costs so large that the max grant size of \$50,000 may not represent 30% of their net unmet need, meaning that this analysis potentially underestimates the total unmet economic revitalization need partially addressed by BEGAP.

Table 56: 2023 Vermont Business Emergency Gap Assistance Program Awards and Supplemental Awards to MID Counties as of March 27, 2025

County	Estimated Total Damages	BEGAP Award (30%)	BEGAP Supplemental Award	Estimated Unmet Need
Caledonia	\$2,617,167	\$785,150	\$0	\$1,832,017
Lamoille	\$5,627,496	\$1,688,249	\$124,910	\$3,814,337

County	Estimated Total Damages	BEGAP Award (30%)	BEGAP Supplemental Award	Estimated Unmet Need
Orleans	\$3,092,017	\$927,605	\$3,136	\$2,161,276
Rutland	\$1,762,058	\$528,617	\$0	\$1,233,441
Washington	\$22,892,375	\$6,867,712	\$494,156	\$15,530,506
Windham	\$1,027,187	\$308,156	\$50,000	\$669,031
Windsor	\$8,289,315	\$2,486,795	\$50,110	\$5,752,411
Total	\$45,307,616	\$13,592,285	\$722,311	\$30,993,020

Source: [Business Emergency Gap Assistance Program \(BEGAP\) | Agency of Commerce and Community Development](#)

2.5.4 Small Business Administration Business Disaster Loan and Economic Injury Disaster Loan

Federally, the Small Business Administration (SBA) disbursed an estimated \$11.4M in the Business Disaster Loan and Economic Injury Disaster Loan programs to a total of 67 business owners. Despite this substantial aid, the cumulative damages to business led to an increase of 12,626 weeks of federal unemployment insurance claimed between 2022 and 2023 (at an average weekly benefit of \$501.78), and a decrease of 2,400 non-farm employees.

The SBA Business Physical Disaster Loan program allows the owners of businesses located in a declared disaster area to apply for financial assistance. This assistance is meant to cover losses not fully covered by insurance or other sources to real property, fixtures, equipment, inventory, and outstanding mortgages.

Table 57: SBA –Count of Initial Business Disaster Loan Applications and Offers

County	Initial Application Count	Offer Count	% of Applicants Offered Loan
Caledonia	16	7	43.8%
Lamoille	44	10	22.7%
Orleans	7	1	14.3%
Rutland	12	3	25.0%
Washington	115	40	34.8%
Windham	10	5	50.0%
Windsor	57	15	26.3%
MID Areas	261	81	31.0%

Source: SBA Disaster Loan Data as of 05/12/2025

The eligibility requirements for the SBA Physical Disaster Damage Business Loan are more stringent than those for the Home Loan. In addition to a poor credit history, excessive credit utilization, inadequate financial documentation, or even damage repair costs already being covered by other funding sources, Disaster Business Loans can be denied for insufficient business cash flow. Additionally, the Business Loan requires collateral for loans over \$50,000, though the use of an owner's primary residence as collateral is not required for loans under \$200,000 if an asset of equal value to the loan is collateralized instead. Disaster Business Loans were offered at a much lower rate compared to the Disaster Home Loans, at a little under 31% compared to the Home Loan's 58%. This could represent the fact that insurance covered a larger proportion of need by small business owners, or that a higher number of business owners simply did not qualify or require additional SBA assistance.

While the Disaster Business Loan program is open to businesses of any size and most private non-profits, the SBA Emergency Injury Disaster Loan is limited to small businesses, small agricultural cooperatives, and most private nonprofit organizations located in the declared disaster area. EIDL funding is primarily intended to provide the necessary working capital to help small businesses impacted by a disaster survive until normal operations resume.

Table 58: SBA – Count of Initial Emergency Injury Disaster Loan (EIDL) Applications and Offers

County	Initial Application Count	Offer Count	% of Applicants Offered Loan
Caledonia	3	1	33.3%
Lamoille	12	1	8.3%
Orleans	5	0	0.0%
Rutland	10	2	20.0%
Washington	22	3	13.6%
Windham	6	0	0.0%
Windsor	11	2	18.2%
MID Areas	69	9	13.0%

Source: SBA Disaster Loan Data as of 05/12/2025

Likely due to its narrower eligibility requirements, the total number of EIDL applicants is much lower than the totals for the Disaster Home or Business Loans. The percentage of EIDL offers is also much lower than that of Disaster Home or Business Loans. However, just as with the Disaster Business Loan, EIDL applicants may have been denied due to a poor credit history, excessive credit utilization, inadequate financial documentation, damage repair costs already being covered by other funding sources, or insufficient business cash flow. The EIDL program also requires collateral for all loans over \$50,000, with a preference for real estate, though loans under \$200,000 will not require applicants to use their primary residence as collateral if they have assets of equal value to the loan. With only 9 out of 69 total applications offered a loan, there is evidence of an outstanding need for recovery funds among small businesses.

Unfortunately, Small Business Administration Disaster Loan data is not yet publicly available for FY23. Vermont does not yet have a data sharing agreement with SBA, so per-applicant data (including verified loss estimates) were not available for the analysis. As a result, the exact dollar amount of unmet need remaining from SBA Disaster Loans could not be quantified.

2.6 Quantified Disaster Impacts and Exacerbated Pre-Existing Needs of Housing, Infrastructure, and Economic Development, Other Financial Assistance, and Remaining Unmet Need

Following the Unmet Needs Assessment of DR-4720 damages, it was determined that housing was the category with the greatest outstanding unmet need. While it is true that infrastructure recovery represents the largest dollar amount of unmet need at over \$212 million, and that economic revitalization efforts would benefit from additional support, unmet housing needs are the most severe and immediate risk to households and individuals in the identified MID areas. Below, Table 59 highlights the identified dollar amount of Unmet Need across the different cost categories.

Table 59: Cost Categories and Unmet Needs

Cost Categories	A Direct and Indirect Need	B Financial Assistance Budgeted and Obligated	A-B Unmet Need
Housing	\$218,775,961	\$111,421,500	\$107,354,461
Infrastructure	\$668,645,523	\$455,953,218	\$212,692,305
Economic Development	\$45,307,616	\$14,314,596	\$30,993,020
Total	\$932,729,100	\$581,689,314	\$351,039,786

Vermont's housing market suffers from several persistent challenges that continue to amplify the impact of unmet housing needs within the identified MID areas. The price of purchasing, building, and renting housing has continued to rise year after year as demand quickly outstrips supply. Low-income individuals and households struggle to find affordable housing as regional housing authorities are forced to close down waitlists. In such a constricted housing market, Vermonters fleeing the flooding disaster faced prolonged displacement. Additionally, despite the substantial aid provided through the FEMA IHP, the full cost to repair and replace property damaged by the floods likely exceeded disbursed funding. Without safe, affordable shelter, Vermonters are unable to benefit from investments in infrastructure and economic revitalization. Accordingly,

Unmet housing needs take precedence over both unmet infrastructure and economic revitalization needs.

Per the findings of the UNA, the State of Vermont has chosen to provide a majority of the CDBG-DR allocation to the housing program to address the devastating impact of unmet housing need. The housing recovery assistance that will be provided by this allocation will support the stability of individuals and families directly impacted by DR-4720, restoring damaged homes and bridging the affordability gap for LMI households across the identified MID areas. Funds allocated to the housing program will also address portions of the infrastructure need by supporting infrastructure projects directly in support of housing. The remainder of the allocation will be used to fund the state share of infrastructure and mitigation projects. These projects, primarily funded through FEMA PA, will repair and modernize impacted facilities and utilities while reducing the impact of future severe weather events in communities across the identified MID areas. None of the CDBG-DR allocation will be given to economic revitalization as the State was largely able to provide sufficient assistance through direct grants and other funding sources after the storm.

3. Mitigation Needs Assessment

A Mitigation Needs Assessment (MNA) looks at the natural threats and hazards in a region to identify how resilience and mitigation measures can be built into recovery programs and projects. The State of Vermont's 2023 State Hazard Mitigation Plan (SHMP)⁵⁴ provides an in depth analysis on how mitigation funds can best be used in the recovery from the July 2023 floods to mitigate impact from future hazards. The SHMP explains that the State is highly vulnerable to flooding, extreme heat, and severe storms. In order to mitigate the impacts of these likely events, the SHMP identifies the following as key goals of Vermont's mitigation efforts:

- Restoring and protecting natural systems such as floodplains
- Enhancing the resilience of the built environment – communities, infrastructure, and buildings
- Fostering coordinated mitigation planning across State and Local agencies

Along with the FEMA approved SHMP, this Mitigation Needs Assessment aligns with the Universal Notice and available data to identify priority mitigation strategies. In addition to the State Hazard Mitigation Plan, 177 Vermont cities, towns and villages have a local hazard mitigation plan (LHMP), further emphasizing the importance the state and its residents place on mitigation efforts.

3.1 Background

The State of Vermont is located in a mountainous region, situated between the Appalachian, Adirondack, and White Mountain ranges. The population of Vermont is the second smallest in the United States, with most of the population living in small, rural communities situated in valleys and near bodies of water, leaving these communities vulnerable to hazards such as flooding and erosion. These identified hazards, working in conjunction with Vermont's SHMP, serve as key factors that may influence data interpretation and the relevance of findings in the Mitigation Needs Assessment.

Vermont's SHMP has documented major flooding and fluvial erosion events dating back to 1927. Prior to the July 2023 flood event, Tropical Storm Irene caused severe flooding and fluvial erosion in August 2011. The storm dropped as much as 11" of rain, causing nearly every river and stream to flood resulting in catastrophic fluvial erosion. The resulting damage was extensive, with impacts to transportation, buildings and infrastructure, public health and safety, water supply, wastewater treatment facilities,

⁵⁴ Source: (Vermont Department of Public Safety, 2023)

agriculture, mobile home parks and more. Vermont's history with flooding and fluvial erosion events has emphasized the need for additional mitigation efforts. The most recent floods of July 2023 have further illustrated that need to lessen the vulnerability of Vermont's communities.

3.2 Previous Mitigation Efforts

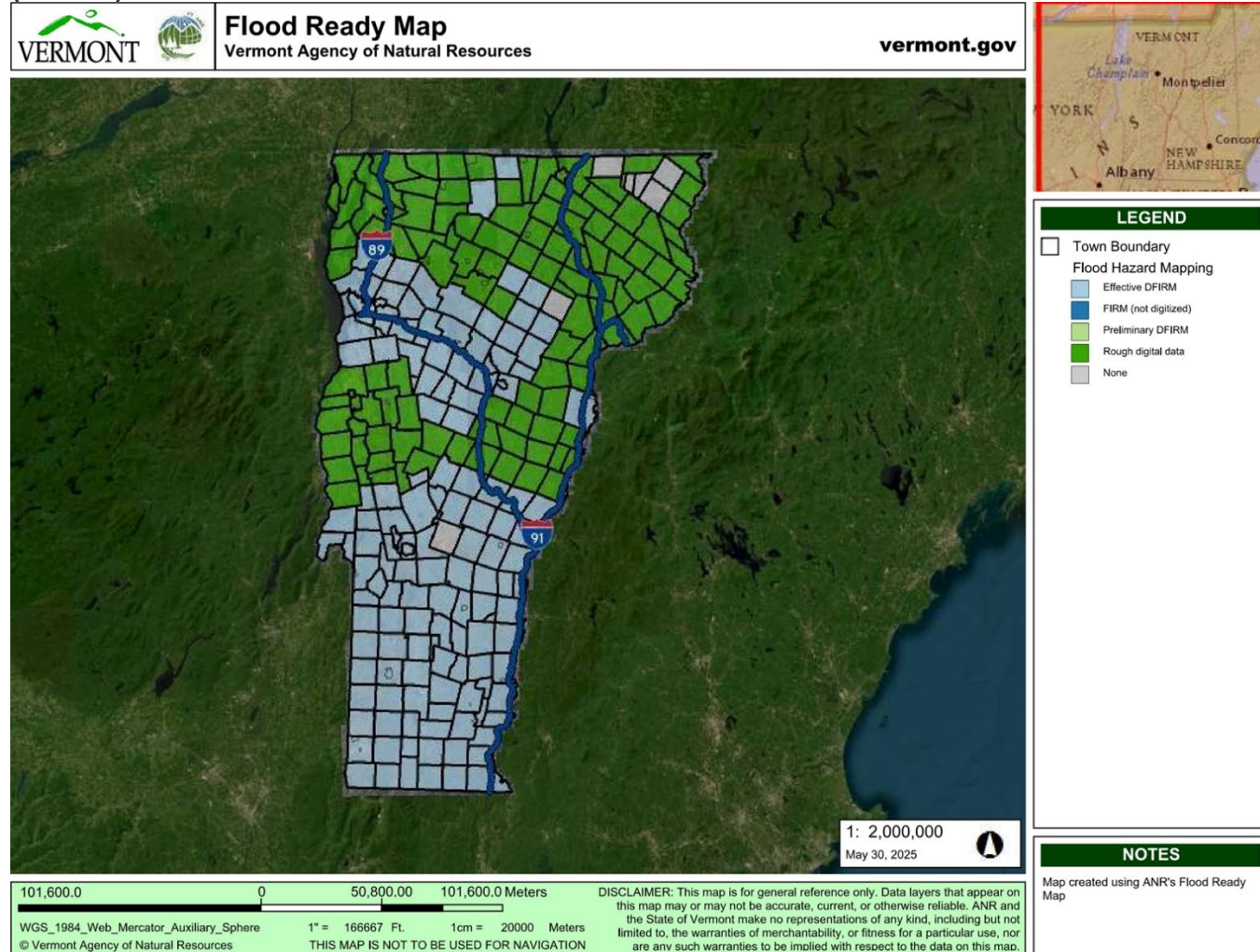
Understanding the importance of mitigation efforts, the State of Vermont has pursued several sources of Hazard Mitigation funding, including the FEMA Hazard Mitigation Grant Program⁵⁵ (HMGP) as well as Section 406 Hazard Mitigation Funding for Public Assistance Projects.⁵⁶ Sections 2.3.3.5 Pre-Application Interest for Buyouts, Elevations, and Mitigation Reconstruction and 2.4.3 Pre-Application Interest for Infrastructure of the Unmet Needs Assessment contain reference and analysis of ongoing mitigation efforts by the State. These sections discuss the State's access to funds from FEMA's HMGP for developing hazard mitigation plans and projects to rebuild in a way that reduces future disaster losses in affected communities, with \$57.1M of the \$66M federal share of project costs having been submitted to FEMA. Through this analysis, there are mitigation efforts included in the unmet needs calculations where applicable to the relevant program.

Both the State and Local Hazard Mitigation Plans are critical in illustrated mitigation efforts taken as well as current outstanding needs. Figure 10 below shows the state of Digital Flood Insurance Rate Maps across the townships of Vermont, noting the efforts of the State and localities to best prepare for floods. Following Figure 10 and Figure 11 are examples, though not a comprehensive list, of Vermont's hazard mitigation efforts conducted in conjunction with municipalities and adhering to the State and Local Hazard Mitigation Plans.

⁵⁵ Source: (FEMA, 2025)

⁵⁶ Source: (FEMA, 2024)

Figure 10: Flood Ready Map of Vermont, Digital Flood Insurance Rate Maps (DFIRM)



Source: [Vermont Agency of Natural Resources](https://www.vermont.gov/natural-resources/flood-ready-map)

River Corridor Easement Program

This program promotes the protection of river corridors by providing financial incentives to landowners to allow for passive restoration of channel stability by allowing the natural erosive forces of the river to establish its least erosive form over time. The program's goal is to reduce the likelihood that a river will overflow, thus lessening the impact that severe weather would have on communities along the river. Figure 11 below is a river corridor map of Vermont, showing the areas vulnerable to flooding.

Figure 11: Vermont River Corridor Map



Source: [2023 Vermont State Hazard Mitigation Plan](#)

Data Source: [Vermont Open Geodata Portal](#)

Emergency Watershed Protection Program

The USDA Natural Resources Conservation Service's Emergency Watershed Protection Program (EWP)⁵⁷ is available to assist property owners facing exigent risk of property loss due to ongoing erosion after a qualifying storm. The program seeks to provide residents with protection from flooding and erosion, while restoring the capacity of local watersheds to mitigate the impacts of future flooding events.

Dam Resilience Funding

Dam resilience projects and dam safety programs require continual attention and funding due to the risk that is posed by aging dam infrastructure throughout the State. Various sources of funding are offered for activities such as dam safety training, dam inspections, increased coordination and outreach between the state and federal

⁵⁷ Source: (U.S. Department of Agriculture, n.d.)

government as well as with the community. The proper upkeep of the State's dams allows for effective control of water flow, providing benefits such as water storage and flood control. These benefits help reduce the severity of flooding and severe weather events that may impact the regions along the major rivers in Vermont.

2023 SHMP Annual Report 2024

Published in January 2025, Vermont's 2023 SHMP Annual Report 2024 provides progress updates on the State's pursuit of its mitigation goals alongside project highlights. The State has continued restoring and protecting natural systems by initiating twelve mitigation actions across the DEC Rivers Team, State Geologist, and other agencies. These actions are focused on water monitoring, ecological restoration, and drought resistance.

In pursuit of increased resilience for the built environment, the State has pursued efforts such as the Vermont Agency of Transportation's (VTrans) Resilience Improvement Plan to help identify and fund flood-resistant transportation upgrades. The Department of Public Service (PSD) aligned the State Energy Security Plan with the SHEMP by identifying how systems on the energy grid depended on each other and the risks associated with those interdependencies. These initiatives are designed to improve safety, protect critical infrastructure, and reduce long-term recovery costs.

The State coordinated mitigation planning efforts by supporting local governments through the provision of grant funding, technical assistance, and specialized planning tools. The Vermont Agency of Natural Resources developed and launched pilot programs to assist towns in resilience planning while the Vermont Emergency Management allocated over \$500,000 in FEMA funds to update Local Hazard Mitigation Plans. State agencies have also collaborated with local governments to assist in implementing the Flood Safety Act (Act 121) to strengthen floodplain protections and centralize dam safety oversight.

Barre City, July 14, 2023 - A series of vehicles under floodwater from Barre City, July 14, 2023 (courtesy UVM Geospatial) DR-4720



3.3 Risk Analysis

Per the State Hazard Mitigation Plan⁵⁸, a vast majority of communities have multiple vulnerabilities to likely hazards. An assessment of hazard impacts was last conducted in 2023 in which 14 hazards were ranked to determine hazard mitigation priorities. Of those potential hazards, the two highest ranked hazards were found to be fluvial erosion and inundation flooding, both of which occurred during the July 2023 floods. Flooding was also found to be the most common recurring hazard event in the state. Per the report, more than 75% of flood damages in Vermont are associated with fluvial erosion. The hazards and explanations of their relative probability and impact scores are detailed in Table 60 below.

Table 60: 2023 Hazard Assessment

Hazard Impacts	Probability	Potential Impact					Score
		Built Environment	People	Economy	Natural Environment	Average	
Fluvial Erosion	4	4	4	4	4	4	16
Inundation Flooding	4	4	4	4	2	3.6	14
Heat	4	2	4	3	2	3	11
Wind	4	3	2	2	2	2.6	9
Snow	4	2	3	2	1	2.4	8
Ice	3	2	3	3	2	2.6	7.5
Drought	3	1	3	3	3	2.6	7.5
Infectious Disease Outbreak	3	1	4	4	1	2.6	7.5
Cold	3	2	2	2	2	2.2	6.75
Invasive Species	3	2	3	3	3	2.8	6.75
Landslides	3	3	1	1	2	2	6
Wildfire	2	3	3	3	3	2.8	6
Earthquake	2	2	2	2	2	2	4
Hail	3	1	1	2	1	1.6	3.75

Inundation Flooding and Fluvial Erosion can have profound impacts on Vermont's residents. Evacuation is often hard for residents due to Vermont's mountainous terrain. Flooding can cause road blockages, leaving residents of many villages isolated and cut

⁵⁸ Source: (Vermont Department of Public Safety, 2023)

off from neighboring towns due to road blockages. Most flood related damage experienced in Vermont is due to fluvial erosion.

3.4 Mitigation Priorities

The State aims to focus CDBG-DR funding on floodplain restoration projects. A floodplain is an area of land in which inundation flooding occurs. Restoring floodplains across Vermont plays a critical role in achieving the goals of the SHMP. Floodplains act as a natural buffer during storm events, absorbing and slowing floodwater to protect communities and infrastructure located downstream from the event. As Vermont faces an increasing number of extreme weather events, the restoration of floodplains will help mitigate the future impacts of the State's frequent flooding.

Through its Hazard Mitigation Plan, Vermont has identified priority projects such as reinforcing roads prone to washouts, floodproofing critical facilities, and restoring floodplain function near critical transportation corridors. These investments aim to reduce the repeated loss of roadways and facilities during severe weather events, to ensure the continuity of critical infrastructure.

The State Hazard Mitigation Plan has identified several mitigation activities that can help reduce the impact of future hazards, including Floodplain Restoration through the cleanup of lots, post-buyout and Riverbank Stabilization.

3.5 Summary of Mitigation Needs Assessment

Due to its unique geography, with most communities situated in valleys and near bodies of water, the State of Vermont has focused its mitigation efforts on restoring natural systems, building resilience into communities and infrastructure, and increasing the coordination of mitigation plans across State and Local agencies.

These efforts have led to 177 Vermont localities developing their own hazard mitigation plans, the State mobilizing FEMA Hazard Mitigation Grant Program funds and Section 406 Hazard Mitigation Funding for Public Assistance Projects, and multiple State agencies aligning their plans with the SHMP. The State has pursued multiple projects through these methods to mitigate the impact of its highest ranked, most likely hazards - Inundation Flooding and Fluvial Erosion.

Despite the progress noted in the SHMP Annual Report 2024, there are still mitigation needs that the State must pursue to assure its communities are prepared for floods and other severe weather events. Funding from FEMA HMGP is being used for efforts across the State, including home buyouts and acquisitions to assist in floodplain restoration. The State plans to bolster and build on these previous efforts, in line with its

2023 SHMP, by utilizing CDBG-DR Mitigation funds to pursue cleanup and restoration activities across the identified MID areas, including cleanup of brownfield sites associated with Buyout properties. In addition to floodplain restoration, the State will fund infrastructure repair, construction, and upgrade activities to modernize its aging infrastructure portfolio to hold up against future floods and severe weather events. Site improvements are a critical tool for assuring that infrastructure along Vermont's major rivers are prepared to hold up against future flood impacts.

Table 61: Data Sources Used in Mitigation Needs Assessment

Data Source	Location
4720 HMGP Data	4720 HMGP Application Interest Survey Submissions, Project Applications, and Awards

4. Connection between proposed programs and projects and unmet needs, mitigation needs assessments

4.1 Proposed Use of Funds.

This section outlines the proposed allocation of CDBG-DR funds to support the implementation of key programs in the service of meeting the crucial objectives identified by Unmet Needs Assessment and Mitigation Needs Assessment. Table 62 below details the CDBG-DR Program Allocation against the unmet needs found in those program cost categories.

Table 62: CDBG-DR Program Allocation and Funding Thresholds

Eligible Cost Category	Unmet Need	% of Unmet Need	CDBG-DR Allocation Amount	% for Mitigation Set-aside	% to be Expended in HUD- and Grantee-identified MID*
Administration (5% cap)	-	-	\$3,392,250	-	-
Planning (15% cap)	-	-	\$3,000,000	-	100%
Housing	\$107,354,461	30.6%	\$41,550,000	-	100%
Infrastructure	\$212,692,305	60.6%	\$15,000,000	-	100%
Economic Revitalization	\$30,993,020	8.8%	-	-	100%
Mitigation Set-Aside	-	-	\$4,902,750	100%	100%
Total	\$351,039,786	100%	\$67,845,000	100%	100%

*At least 80% of the allocation will be spent in the HUD-identified MID area and up to 20% will be spent in the Grantee-identified MID area.

4.2 Allocation and Award Caps

The State of Vermont has been allocated \$67,845,000 in CDBG-DR funds for the purpose of assisting recovery in the most impacted and distressed communities following the flooding events in July 2023 as acknowledged in the Disaster Declaration-DR-4720. The State will use the funds to address unmet needs in the areas of housing, municipal infrastructure and facilities, mitigation, and planning.

HUD requires that recipients of CDBG-DR funds must direct assistance to the most impacted and distressed (MID) areas. Accordingly, Vermont must use at least 80% (\$54,276,000) of the allocation in the HUD-Identified MID area of Washington County and Lamoille County. Up to the remaining 20% (\$13,569,000) is available for recovery efforts in the Grantee-Identified MID area of Rutland County, Orleans County, Caledonia County, Windham County, and Windsor County. In both the HUD- and Grantee-identified MID area, at least 70% of the total CDBG-DR allocation will be used to fund projects that benefit LMI individuals and areas. The State will monitor projects to ensure these expenditure requirements are met.

The State will use 5% (\$3,392,250) for administration to ensure the appropriate and compliant management of the VCDP CDBG-DR program over the next six years. The remaining balance of \$64,452,750 will be allocated for the established programs of housing, municipal infrastructure, mitigation, and planning to address unmet needs in each category pursuant to Table 63 below. In an effort for large impactful projects, the State has set the maximum award amount at \$10,000,000 with a minimum award amount of \$500,000 for housing and infrastructure. Planning-Only activities will have a maximum award amount of \$2,00,000 with a minimum award amount of \$100,000. Mitigation Program activities will have a maximum award amount of \$4,902,750 and a minimum award amount of \$500,000.

Table 63: Funding Allocations

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % of CDBG-DR Allocation to Mitigation Set-aside	Estimated % to LMI
Administration	\$3,392,250	5%	-	-
Planning	\$3,000,000	4%	-	-
Housing	\$41,550,000	61%	-	70%
Infrastructure	\$15,000,000	22%	-	70%
CDBG-DR Mitigation Set-Aside	\$4,902,750	7%	100%	70%
Total	\$67,845,000	100%	7.2%*	70%
% of Total	100%	100%	-	70%

*Per the AAN, The State may use the maximum of \$8,849,000 for projects with no tie-back to DR-4720. The State has allocated \$4,902,750 for projects with no tie-back. Other projects will include mitigation related activities, but will require a tie-back.

At a minimum, 70% of program funds must meet the Low- and Moderate-Income (LMI) National Objective. The Housing Construction and Rehabilitation program will seek to prioritize the new construction of housing units to be made available to LMI households at or below 80% of area median income while the rehabilitation projects will prioritize the renovation and restoration of housing units occupied by LMI households. Based on the findings from the UNA, Vermont has allocated the majority of its CDBG-DR funding to the housing program to address the greater unmet need, support the recovery of homes damaged by DR-4720, and bridge the affordability gap for LMI households in the identified MID areas. As discussed in the unmet need section, the greatest impact was seen to these LMI households due to the aging housing stock, low vacancy rates, and the lack of affordable housing. To achieve these housing goals of serving a minimum of 70% LMI households the State will invite non-profit housing developers and community-based development organizations already serving LMI tenants in the HUD- and Grantee-identified MID areas that were directly impacted by the flooding events in July 2023. Additionally, LMI households will be prioritized and invited to apply in the earliest

applicable phase. All projects funded within the housing program will be required to demonstrate a clear tieback to DR-4720.

Additionally, it is anticipated that multiple infrastructure projects in direct support of new housing construction will be considered as municipalities seek to extend water and sewer services to identified sites of replacement housing to be constructed for those impacted by DR-4720. In these cases, priority will be given to project applications that can demonstrate a clear benefit to LMI individuals and households.

The Urgent Need National Objective may be used when necessary to respond to the urgency and location of the disaster-related impact and when the existing conditions pose a serious and immediate threat to the health or welfare of the community. The Urgent Need National Objective may serve projects within the Infrastructure Program which demonstrate immediate need under the State's Hazard Mitigation Plan and as identified by Vermont Emergency Management, but may otherwise be ineligible because they do not meet the LMI Area-Wide (LMA) requirement. These projects include, but are not limited to, replacement of culverts, bridges, and roadways, and other vital infrastructure, such as water or wastewater infrastructure, impacted by DR-4720 within the State or HUD identified disaster areas. As demonstrated in the unmet needs assessment, Vermont's stormwater mitigation and roadway infrastructure was disproportionately impacted by DR-4720. This type of infrastructure is required to address the immediate impacts of DR-4720 which threaten the health and safety of communities, and individuals ability to travel between them.

Pursuant to the Universal Notice, the Urgent Need National Objective, and associated Waiver is available for 36 months from the date of the State's AAN. After 36 months, the State will be required to follow criteria established in section 104(b)(3) of the HCDA (42 U.S.A. 5304(b)(3)) and its implementing regulations in 24 CFR part 570 when using the urgent need national objective.

Along with Infrastructure in direct support of housing, it is anticipated that multiple municipalities within the HUD-Identified and Grantee-Identified MID areas will seek funding to address unmet needs for repair and replacement of culverts, bridges, and roadways. For these infrastructure projects benefiting entire communities the LMI National Objective will be met through LMI Area-Wide (LMA) as applicable. As noted above, if the project is deemed ineligible for LMA but remains a high priority project based on the State's Hazard Mitigation Plan and identified by Vermont Emergency Management than the National Objective of Urgent Need will be utilized provided that there is a demonstrated tie-back to DR-4720.

The State will make all reasonable efforts to minimize the displacement of persons or entities in the implementation of its projects. In the event that displacement is

unavoidable, the State will comply with all applicable laws and guidelines, including the Uniform Relocation Act and its Residential Anti-Displacement and Relocation Plan to support any impacted individuals, including ensuring that the needs of persons with disabilities are adequately addressed.

The State of Vermont will oversee the identified programs and will be the responsible entity under 24 CFR 58 for Environmental Review requirements. All Environmental Review supporting documentation and decision letters will be uploaded and retained in the IGX online grants management system. Note: State grantees who exercise HUDs environmental review responsibilities must follow the requirements per 24 CFR 58.4(b)(2) and 24 CFR 58.18.

The State of Vermont received a CDBG-DR mitigation set-aside. As a result, the State may use for the set-aside for mitigation activities as described in (section I.C.1.b of the Universal Notice.). Further, the State will also track general mitigation activities as they are incorporated into each program. Each applicant will be required to identify specific mitigation actions as part of the application and provide a distinct cost breakout in the funding request. It is expected that 10% of housing funds and 25% of infrastructure funds will be identified as direct mitigation activities to prevent damage from future floods and severe weather events. The State is allocating \$4,902,750 of the available mitigation set-aside funds as a direct Mitigation program for mitigation activities that will not require a direct tie-back to DR-4720, as allowed under section III.D.4 of the updated Universal Notice. The State has elected not to utilize the maximum set-aside of \$8,849,000, as there is significant need within the State and Hud identified MID areas which will have tie-backs to DR-4720.

4.2.1 General Exception Criteria

The State of Vermont may make exceptions to award caps when necessary to comply with federal accessibility standards or to accommodate persons with disabilities. In such cases, requests for increases to award caps will be subject to an evaluation based on (a) documented need and (b) cost reasonableness.

4.3 Competitive Grants

The State of Vermont will make available the \$64,452,750 to Vermont municipalities, non-profit and for-profit organizations through a competitive grant application process. There will be four overall programs which these organizations can apply to for funding: the Housing program, the Infrastructure program, Planning, and the Mitigation program. Each program will have its own set of funding established for project activities.

Applications will be accepted on a rolling basis with each application to be scored based on project need, impact, and feasibility. Applications meeting the scoring threshold will be brought forward to a Vermont Community Development Board meeting to make a recommendation to the Agency Secretary for a final funding decision.

4.3.1 Application Review Process

The Vermont Community Development Program-Disaster Recovery (VCDP-DR) applications will be created and submitted through the *IGX online grants management* system. The grant applications will be assigned to a Grants Management Analyst who will review the application for threshold criteria compliance. If threshold items are found to be missing, staff will work with the applicant to obtain them and clear the application of its threshold review prior to advancing the application for a full review. If the threshold items render the application ineligible, the application will be rejected. If no threshold items are found, the application will be cleared to be reviewed and scored by the VCDP-DR team. The VCDP-DR team will review the application for competitiveness (need, impact, and feasibility) and compliance factors and score the application according to the Scoring Matrix detailed below.

Other state agencies (Central Vermont Recovery Office [Governor's Office], Vermont Emergency Management, and Agency of Human Services) may be consulted on an as needed basis for input as to the need and priority of the proposed project.

The application will first be scored individually by each VCDP-DR team member, and then a Team meeting will be held to discuss the application, review the scoring to develop an average score across all participating team members. At the next scheduled Vermont Community Development Board meeting, the assigned Grants Management Analyst will present the CDBG-DR application and its scoring. The applicant will not be present at the board meeting or at the team scoring meeting. The Vermont Community Development Board will then make a funding recommendation, along with appropriate award conditions, to the Secretary of the Agency of Commerce and Community Development (ACCD). The Secretary will make the final decision on whether to fund or decline the CDBG-DR application, in concert with the Governor's Office.

4.3.2 CDBG-DR Project Thresholds

All projects proposed must meet the CDBG-DR Project Thresholds established by ACCD. Compliance with these thresholds is a prerequisite for eligibility and funding consideration.

Project Thresholds for all applications:

- Valid Authorizing Municipal Official to submit the application
- Adoption of the resolution for grant application authority
- Public Hearing Notice & Hearing (Municipal and State-Direct applications)
- Project addresses presidentially declared disaster impact(s)
- Project takes place in either HUD-Identified or Grantee-Identified MID area(s)
- Activities of the project are eligible per federal register
- Activities of the project meet a National Objective
- Activities of the project meet a State Objective
- Evidence of site control
- Duplication of Benefit and Unmet Needs Statement
 1. Affidavit will be required if awarded
 2. Subrogation Agreement will be required if awarded
- Flood damage affidavit
- Certification and information release form

4.3.3 CDBG-DR Scoring Matrix – Housing, Infrastructure, and Mitigation Projects

The following Scoring Matrix serves as a standardized rubric for evaluating projects proposed to ACCD. The Matrix outlines key evaluation criteria for Implementation Projects (these will include Housing, Infrastructure and Mitigation projects) and corresponding point values that ACCD will use to assess the overall Need, Impact, and Feasibility of each proposal.

Need	Max Points (60)
Vermont Community Index Score	10 Points
VEM Priority Project List	10 Points
Project Need is well documented	10 Points
Appropriateness of Solution	10 Points
Strength of Tie-Back to DR-4720	10 Points
Project addresses mitigation measures	10 Points

Impact	Max Points (40)
Project LMI Benefit	10 Points
Coordination with local/regional planning efforts	10 Points
Use of mitigation measures in construction methods	10 Points
Community better positioned to meet post disaster	10 Points

Feasibility	Max Points (40)
Demonstrated capacity and experience to carry out the project	10 Points
Project Long Term Viability	10 Points
Project cost effectiveness and reasonability	10 Points
Project readiness	10 Points

4.3.4 CDBG-DR Scoring Matrix - Planning Projects

The following Scoring Matrix serves as a standardized rubric for evaluating projects proposed to ACCD. The Matrix outlines key evaluation criteria for Planning Projects and corresponding point values that ACCD will use to assess the overall Need, Impact, and Feasibility of each proposal.

Need	Max Points (50)
Vermont Community Index Score	10 Points
Project need is well documented	10 Points
Strength of Tie-Back to DR-4720	10 Points
Project addresses mitigation measures	10 Points
Appropriateness of Solution	10 Points

Impact	Max Points (30)
Coordination with local and regional planning efforts	10 Points
Community is more resilient for next disaster	10 Points

Impact	Max Points (30)
Community better positioned to meet post disaster residents	10 Points

Feasibility	Max Points (30)
Demonstrated or access to capacity and experience to carry out the project	10 Points
Project Cost effectiveness and reasonability	10 Points
Project Readiness	10 Points

4.4 Program Details

4.4.1 Administration

Vermont will allocate \$3,392,250 of the total CDBG-DR award for administrative costs associated with the life of the grant. This represents the maximum amount permissible for administrative costs per the CDBG-DR appropriation language of Public Law 118-158 and HUD's requirements under the Universal Notice. Vermont advises HUD that it may seek to recover pre-award and/or pre-application costs related to administrative expenses consistent with the guidance provided by Section III.B.14 of the Universal Notice. Such costs may be incurred back to the date of the presidential disaster declaration date (date of declaration for DR-4270-VT).

Table 64: Grantee Administration Activity Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation
Administration Total	\$3,392,250	5%
Total	\$3,392,250	5%

4.4.2 Planning

Vermont will allocate \$3,000,000 of the total CDBG-DR award for costs associated with Planning Activities. Vermont's goal is to provide the maximum possible amount for recovery activities given the discrepancy between estimated unmet needs and the CDBG-DR award. Due to the limited appropriation, Vermont will seek to promote planning activities that directly support recovery activities and watershed mitigation while leveraging key partners across the State.

Table 65: Grantee Planning Activity Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation
Watershed Mitigation and Future Resiliency (Planning)	\$3,000,000	4%
Planning Total:	\$3,000,000	4%
Total	\$3,000,000	4%

4.4.3 Housing

4.4.3.1 Housing Programs Overview

The State of Vermont proposes implementing a series of housing programs to address housing damage caused by the July 2023 flood events. These programs will address needs across the housing spectrum, specifically homeowners, small rental, and large multi-family housing. Within these programs Vermont will address several key priorities as stated by HUD in the Universal Notice, most notably supporting affordable housing units and replacement housing for owner-occupied units, infrastructure in support of housing, and completing the property clean-up pre/post FEMA property buyout.

Table 66: Housing Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation for LMI Benefit
Housing Construction and Rehabilitation	\$41,550,000	70%
Housing Program Total:	\$41,550,000	70%
Total	\$41,550,000	70%

4.4.3.2 Grantee Housing Program

Program Title: Housing Construction and Rehabilitation

The State of Vermont's Housing Construction and Rehabilitation program will provide funding for the construction of new affordable housing, rehabilitation and reconstruction of existing damaged housing units for both Single Family and Multi-Family homes, buyouts/acquisition of damaged homes, and Infrastructure in Support of Housing. All projects under this program must demonstrate a tie-back to DR-4720 and unmet needs from the event.

Eligible Activities: Buyout/Acquisition; Clearance, Rehabilitation, Reconstruction and Construction of Buildings; Removal of Architectural Barriers; New Housing Construction;

Relocation; Lead-Based Paint Hazard Evaluation and Reduction, Asbestos Removal, Infrastructure in Direct-Support of Housing.

National Objective: Low- and Moderate-Income (LMI); Urgent Need

Lead Agency and Distribution Model:

- The State of Vermont's Agency of Commerce and Community Development (ACCD) will oversee the program.
- Distribution process will be a combination of the Partner/Subrecipient Model with eligible applicants and State driven direct implementation.
 - ACCD may accept competitive applications and grant funds to carry out qualifying objectives; or
 - ACCD may implement the program directly and/or select State entities, municipalities, or organizations to carry out program objectives.

Program Description: Reconstruct, rehabilitate, or construct affordable rental and homeownership units that support community adaptation goal outside of floodplains and flood impacted corridors in the HUD-identified and Grantee-Identified MID areas. Additionally, the program may facilitate the buyout and acquisition of damaged homes to assist residents in relocating to safer areas.

Provide funding for infrastructure directly-in-support of housing projects that will support communities in the development of housing and becoming more resilient to current and future severe weather events.

Eligible Geographic Areas: Projects must be in the HUD-Identified or Grantee-Identified MID area.

Other Eligibility Criteria: Eligible applicants will include other state agencies, private developers, local governments, public or non-profit organizations, and Community Development Housing Organizations (CDHOs).

Maximum Amount of Assistance Per Beneficiary: Grants of a minimum of \$500,000 to a maximum of \$10,000,000.

Maximum Income of Beneficiary: 80% of area median income (AMI) for occupants for units to qualify as providing LMI benefit.

Mitigation Measures: Applicants must identify specific mitigation actions as part of the basic application and distinct cost breakout in funding request.

Reducing Barriers for Assistance: Vermont is committed to reducing impediments to assistance wherever possible. Throughout its recovery activities, the State will seek to proactively engage impacted communities to ensure that needs are met.

4.4.4 Infrastructure

4.4.4.1 Infrastructure Programs Overview

The State of Vermont proposes implementing an infrastructure program to assist impacted municipalities in addressing remaining unmet needs for bridge and culvert improvements or replacement, water/sewer infrastructure, and road rebuilding or relocation. Within these activities Vermont will address several key priorities as stated by HUD in the Universal Notice.

Table 67: Grantee Infrastructure Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation for LMI Benefit
Infrastructure	\$15,000,000	70%
Infrastructure Program Total:	\$15,000,000	70%
Total	\$15,000,000	70%

4.4.4.2 Grantee Infrastructure Program

Program Title: Infrastructure

The State of Vermont's Infrastructure program will provide funding to repair, upgrade, and modernize the State's critical infrastructure in response to damage sustained from DR-4720. The program aims to reduce the long-term vulnerability of the State's roads, bridges, stormwater systems, water and wastewater facilities, and other critical infrastructure systems by investing in resilient infrastructure solutions to restore infrastructure damage from DR-4720 and mitigate the impacts of future severe weather events. All projects under this program must demonstrate a tie-back to DR-4720 and unmet needs from the event.

Eligible Activities: Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements; Code Enforcement; Disposition; Non-Federal Match⁵⁹;

National Objective: Low- and Moderate-Income (LMI); Urgent Need;

Lead Agency and Distribution Model:

- The State of Vermont's Agency of Commerce and Community Development will oversee the program.
- Distribution process will be a combination of the Partner/Subrecipient Model with eligible applicants and State driven direct implementation.
 - ACCD may accept competitive applications and grant funds to carry out qualifying objectives; or
 - ACCD may implement the program directly and/or select State entities, municipalities, or organizations to carry out program objectives.

Program Description: Projects may include bridge and culvert improvements or replacement, water/sewer infrastructure, and road rebuilding or relocation.

Eligible Geographic Areas: Projects must be in the HUD-Identified or Grantee Identified MID area.

Other Eligibility Criteria: Eligible applicants will include other state agencies, local governments, public or non-profit organizations, and CBDOS.

Maximum Amount of Assistance Per Beneficiary: Grants of a minimum of \$500,000 to a maximum of \$10,000,000.

Maximum Income of Beneficiary: N/A

Mitigation Measures: Applicants must identify specific mitigation actions as part of the basic application and distinct cost breakout in funding request.

Reducing Barriers for Assistance: Vermont is committed to reducing impediments to assistance wherever possible. Throughout its recovery activities, the State will seek to proactively engage impacted communities to ensure that needs are met.

4.4.5 CDBG-DR Mitigation Set-Aside

⁵⁹ Non-federal match is limited to \$250,000 per project funded by USACE.

4.4.5.1 CDBG-DR Mitigation Set-Aside Programs Overview

The Universal Notice defines mitigation activities as “activities that increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, and lessening the impact of future disasters.” Activities for mitigation must meet the Universal Notice definition of mitigation activities and, in addition, must:

- Address the current and future risks identified in the State Hazard Mitigation Plan (SHMP)
- Be considered CDBG-eligible under Title I of the Housing and Community Development Act (HCDA) or pursuant to a waiver or alternative requirement; and
- Meet a National Objective – Low and Moderate Income or Urgent Need

Table 68: CDBG-DR Mitigation Set-Aside Allocation Summary

Eligible Cost Category	Unmet Need	% of Unmet Need	% of Funding to be Expended in HUD and Grantee-identified MID*	CDBG-DR Mitigation Set-Aside Allocation Amount	% of Funding to be Expended in HUD and State-identified MID*
Administration	-	-	\$3,392,250	-	-
Planning (15% cap)	-	-	\$3,000,000	-	-
Housing	\$107,354,461	30.6%	\$41,550,000	-	100%
Infrastructure	\$212,692,305	60.6%	\$15,000,000	-	100%
Economic Revitalization	\$30,993,020	8.8%	-	-	-
CDBG-DR Mitigation Set Aside Program	-	-	\$4,902,750	\$4,902,750	100%
Total	\$351,039,786	100%	\$67,845,000	\$13,907,750	100%

*At least 80% of the allocation will be spent in the HUD-identified MID area and up to 20% will be spent in the Grantee-identified MID area.

Table 69: Grantee CDBG-DR Mitigation Set Aside Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation for LMI Benefit	Does this Program have tie back to disaster?
CDBG-DR Mitigation Set Aside Program	\$4,902,750	70%	No
Total:	\$4,902,750	70%	

4.4.5.2 Grantee CDBG-DR Mitigation Set-Aside Program

Program Title: River and Floodplain Risk Reduction

The State of Vermont's River and Floodplain Risk Reduction program will provide funding for activities designed to mitigate the impacts of future floods and other severe weather event-related hazards in the identified MID areas. In accordance with Vermont's Hazard Mitigation Plan, the program will be a targeted effort to increase the resilience of communities and infrastructure along the major rivers, reduce the long-term risk of loss of life, and lower future impacts to property from severe weather events.

Eligible Activities: Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements; Disposition; Non-Federal Match⁶⁰

National Objective: Low- and Moderate-Income Area Benefit; Urgent Need;

Lead Agency and Distribution Model:

- The State of Vermont's Agency of Commerce and Community Development will oversee the program.
- Distribution process will be a combination of the Partner/Subrecipient Model with eligible applicants and State driven direct implementation.
 - ACCD may accept competitive applications and grant funds to carry out qualifying objectives; or

⁶⁰ Non-federal match is limited to \$250,000 per project funded by USACE.

- ACCD may implement the program directly and/or select State entities, municipalities, or organizations to carry out program objectives.

Program Description: Provide funding for floodplain restoration, dam removal, bridge and culvert improvements or replacement, flood storage improvements, and riverbank stabilization to reinforce areas and communities along rivers to mitigate the impacts of future flood and severe weather event hazards.

Eligible Geographic Areas: Projects must be in the HUD-Identified of Grantee-Identified MID area.

Other Eligibility Criteria: Eligible applicants will include other state agencies, local governments, public or non-profit organizations, and CBDOs.

Maximum Amount of Assistance Per Beneficiary: Grants of a minimum of \$500,000 to a maximum of \$4,902,750.

Maximum Income of Beneficiary: N/A

Mitigation Measures: Applicants must identify specific mitigation actions as part of the basic application.

Reducing Barriers for Assistance: Vermont is committed to reducing impediments to assistance wherever possible. Throughout its recovery activities, the State will seek to proactively engage impacted communities to ensure that needs are met.

5. General Requirements

5.1 Citizen Participation

5.1.1 Consultation of Developing the Action Plan

Outreach and citizen participation efforts started within days of the Allocation Announcement Notice (AAN). In the days immediately following the AAN staff reached out to regional non-profit housing developers, local regional planning commissions (RPCs), regional development corporations (RDCs), and local community organizations to gather valuable information on remaining unmet needs from the flooding events in July 2023 associated with DR-4720.

Additionally, in an effort to better understand the comprehensive ongoing recovery needs and help prepare the Draft Action Plan, ACCD also consulted Vermont Emergency Management (VEM), and the Central Recovery Office (CRO) located within the Governor's Office. ACCD held a joint community outreach meeting in Lamoille County on February 28, 2025, in conjunction with the CRO to gather direct comments regarding any remaining unmet needs from impacted communities in Lamoille County. ACCD held a second public outreach meeting on March 20, 2025, in Washington County to solicit remaining unmet needs from impacted communities.

The Draft Action Plan was distributed and made available on April 21, 2025, for public comments, and posted on the [ACCD CDBG-Disaster Recovery website](#). ACCD solicited public comment for 30 days. Staff conducted a virtual public hearing on May 15, 2025, to present the draft Action Plan and seek input. The virtual meeting was noticed via email to ACCD's outreach list, in ACCD's newsletter, and in the Bennington Banner, a state-wide newspaper of record, a minimum of two weeks before the hearing took place. The public hearing was held virtually, with an optional in-person component in Weston Vermont at the Weston Theatre Company. The entire hearing was available for viewing virtually via a YouTube live stream and Microsoft Teams. The public was able to participate by asking questions in the Microsoft Teams chat, or by using their camera and/or audio to verbally ask questions in real time, or by asking questions in person. ACCD staff responded to questions in real time, and alternated between answering questions from those attending virtually, and those attending in-person.

Table 70: Partners Consulted in Action Plan Development

Partners Consulted	Describe Consultation
Federal Partners (FEMA, SBA)	The State of Vermont ACCD consulted with FEMA, SBA and HUD to coordinate various response and recovery resources.
Local/State Government	The State has been in regular communication with various regional planning commissions, regional development corporations, State Agencies including Vermont Emergency Management (VEM), Vermont Agency of Agriculture, local municipalities including City of Montpelier Disaster Recovery Office, City of Barre, Town of Plainfield
Indian Tribes	N/A – There are no federally recognized tribes within the State of Vermont. Therefore the State did not consult with Indian Tribes.
State and local emergency management agencies that have primary responsibility for the administration of FEMA funds	The State is in regular communication with the Vermont Emergency Management (VEM)
Agencies that manage local Continuum of Care	The State Office of Economic Opportunity (OEO) was consulted as they coordinate with partners in the Agency of Human Services and the CoCs and chair multiple committees within each CoC
Public Housing Agencies	The State consulted with the Barre Housing Authority and Montpelier Housing Authority, and the Vermont State Housing Authority.
HUD-approved housing counseling agencies	The state consulted local homeownership centers in flood-impacted areas which include Downstreet Housing, Rural Edge, and Windsor Windham Housing trust.

State Housing Finance Agencies	The state consulted the Vermont Housing Finance Agency, and the Vermont Housing and Conservation Board.
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5.1.2 Public Comments

Prior to submission, the proposed Action Plan and any substantial amendments are published on the State's official CDBG-DR disaster recovery website for a minimum of 30 days. This period provides an opportunity for residents and community stakeholders to review the draft Action Plan and provide feedback.

To ensure meaningful participation, those with visual impairments may request assistance in order to review the Action plan draft, substantial amendments, and other materials. Printed copies will also be available on Mondays and Wednesdays between 9:00 AM and 4:00 PM at the Vermont Agency of Commerce and Community Development located at 1 National Life Drive, Dean C Davis Building, 6th Floor, Montpelier, VT 05620 for those with limited internet access.

Comments may be submitted to accd.cdbgdr@vermont.gov

5.1.3 Public Hearings

The State held a virtual public hearing on May 15, 2025, with sufficient information published about the subject of the hearing to permit informed comments. The draft Action Plan was published to ACCD website prior to the notice for the meeting, and for the minimum 30 days for comment. The public hearing, and any future public hearings will be announced in the newspaper, posted to ACCD website, and emailed to our "All Interested Parties" List. By State law, citizens are notified of the public hearings at least fifteen (15) days prior to a public hearing being held.

All public hearings will be held at times and locations convenient to potential and actual beneficiaries, and accommodations will be made for people with disabilities. All hearings will be held in accessible locations, and sign language interpreters will be made available upon advance request.

5.1.3.1 Accessibility of Public Hearings

Additionally, for both virtual and in-person hearings, the citizen participation plan includes how the grantee will complete the following: (1) hold hearings at times and locations convenient to potential and actual beneficiaries, (2) provide accommodations for persons with disabilities, and (3) ensure effective communication for individuals with disabilities, including through the provision of auxiliary aids and services. See 24 CFR 8.6 for HUD’s regulations about effective communication. ACCD maintains a compliant citizen participation plan as part of its agency policies.

5.1.3.2 Meaningful Access

For both virtual and in-person hearings, the grantee shall provide reasonable notification and access for residents in accordance with the grantee’s certifications, timely responses to all citizen questions and issues, and public access to all questions and responses.

5.1.3.3 Consideration of Public Comments

Grantees must provide a reasonable time frame (no less than 30 calendar days) and reasonable method(s) (including but not limited to electronic submission) for receiving comments on the Action Plan or substantial amendment. The grantee must consider all oral and written comments on the Action Plan or any substantial amendment. Any updates or changes made to the Action Plan in response to public comments should be clearly identified in the Action Plan. A summary of comments on the Action Plan or amendment, and the grantee’s response to each, must be included with the Action Plan or substantial amendment. Grantee responses shall address the substance of the comment rather than merely acknowledge that the comment was received.

Table 71: Comments Received and Grantee Response

Comments Received	Grantee Response
Reading the CDBG-DR Priority List - will the mitigation set-aside for resilience projects be \$8.8M or \$4.9M? I think I saw both numbers but am uncertain how to interpret that.	The Admin Plan sets aside \$4.9M for projects not requiring a tie-back to the 2023 disaster. The State is required to use at least \$8.8M toward mitigation efforts, which may include housing or infrastructure activities.

Comments Received	Grantee Response
<p>How was the determination made to identify Ludlow and Weston as impacted areas? Cavendish should be added to the Impacted Towns in Windsor County. We had extensive town wide damage and some of our businesses are yet to recover if they are even going to be able to.</p>	<p>The State MID identifies the whole of Windsor County as eligible to apply. The plan highlights specific examples of damage but includes the entire County.</p>
<p>Is the State trying to meet the 70% LMI requirements within each Program category or is it aggregated?</p>	<p>The State will attempt to meet the 70% LMI benefit for each program but ultimately it is aggregated over all programs.</p>
<p>Why weren't any of the Northern towns made a MID?</p>	<p>There was insufficient unmet need in the data analyzed to justify expanding the area to additional counties. The State focused on serving the most impacted areas with limited State MID funding available.</p>
<p>What is the potential for claw back on the \$67.8 million allocation?</p>	<p>Claw back would occur if the State and its subgrantees violated the terms of the federal Grant Agreement and federal regulations. The State has never received a claw back order for any CDBG program to-date.</p>

Comments Received	Grantee Response
<p>How can an individual apply for a direct grant?</p>	<p>They would need to go through an organization or municipality. If an individual needs assistance, they would need to speak with a local organization which has capacity to administer the grant, like local nonprofits or capstone community organizations.</p>
<p>There are buyouts which were originally going to be funded by FEMA but are no longer going to be funded. Would these be a good fit for a mitigation set-aside project? They are properties that will be returned to the floodplains</p>	<p>Buyouts are part of the housing program. Homes taken off of FEMA's list would potentially be eligible for full buyout under this program. Disaster Recovery funds can also be used for the non-federal match for a project.</p>
<p>In a prior version of the action plan, \$25 million was made available for infrastructure, which has been reduced to \$10 million. If infrastructure protects housing, is it eligible for the housing program or is it infrastructure and limited to the \$10 million?</p>	<p>HUD's most recent guidance is that Infrastructure in Direct Support of Housing should be counted under the housing program. The revision is in response to this guidance.</p>
<p>Why was economic development deprioritized over the iterations of the Action Plan?</p>	<p>The data analysis and public engagement process showed the greatest need is for housing and infrastructure. The State previously committed significant State funds toward economic recovery through various programs.</p>

Comments Received	Grantee Response
<p>Are application costs still built into project costs? Are single audit costs still built into project costs?</p>	<p>Yes, to both. Predevelopment costs are also included in the project costs.</p>
<p>For those who haven't applied for block grants, can you explain how this isn't a typical application?</p>	<p>The application process will be similar to the standard CDBG application but will have additional requirements relating to prior assistance received, mitigation impact, and other disaster recovery specific requirements for the implementation of the grant itself.</p>
<p>What kind of monitoring is involved and who performs it?</p>	<p>Monitoring is conducted by ACCD under HUD guidelines and begins the day the grant is signed. ACCD monitors to assure grantees meet HUD guidelines. Grantees will also need to attend an in-person, two-day training regarding the prevention of fraud, waste and abuse.</p>
<p>How is the 70% LMI calculated?</p>	<p>HUD's website/guidance provides the data and calculation. Recipients may also use local income survey data, if methodologically sound. Benefitting LMI is one of the available national objectives.</p>

Comments Received	Grantee Response
Is this a reimbursement grant?	Yes, requisitions will be submitted through our online system where we will review every invoice for regulatory compliance, prior to releasing funds.
Will there be guidance on if it's worthwhile to apply?	ACCD staff are available to discuss projects and how competitive or eligible they may be. There will be a simplified pre-application process to assist vetting projects.
How would a 501(c)(3) be able to access the information to see if it's worth applying?	Vermont will be hiring staff with expertise to guide interested parties.
We have several housing projects that have started but the private sector can't do them because of higher costs, and they generally need to be 20 or more units to be effective. There are some permitted projects that are smaller. Are CDBG-DR restrictions different so that these might be viable?	Like regular CDBG, CDBG-DR is subject to 24 CFR Part 58 environmental regulations that prohibit federal funding to projects that have already committed choice limiting actions. If a project is eligible, CDBG-DR can fill the funding gap in certain cases. CDBG-DR still has minimum affordability requirements for projects, depending on whether they are new construction or rehabilitation.
Many of us are volunteers, how is this assistance made available to us? How do these organizations access assistance?	Municipalities, non-profit and community organizations may apply for

Comments Received	Grantee Response
	<p>funding for eligible projects. ACCD will be putting out a Notice of Funding Opportunity (NOFO) detailing the types of projects and organizations that are eligible.</p>
<p>Does the Build America Buy America Act apply?</p>	<p>No. CDBG-DR is exempt from the Build America Buy America (BABA) requirement. However, BABA may apply if another source of federal funding that triggers the regulation is used in the project.</p>
<p>Are Washington and Lamoille County eligible for more than 80% of the funds?</p>	<p>Yes, 80% is a minimum. 20% is the maximum that can be spent outside of the HUD identified areas.</p>
<p>How did HUD identify Washington and Lamoille Counties as MIDs</p>	<p>HUD receives high-level FEMA data which is used to identify the most impacted and distressed areas.</p>
<p>Middlesex Select Board was allocated funds by FEMA for DR-4720, but they have yet to see that money. How would CDBG funds come into play if the FEMA funds do not come through?</p>	<p>These CDBG-DR funds will be for the July 2023 flooding events. We have been working with VEM to understand the unmet needs and will see where the highest priority projects are to see where CDBG-DR could serve as a match to HMGP funds. If FEMA or other federal funding is</p>

Comments Received	Grantee Response
	denied, CDBG-DR may be able to fill the unmet need.
Can you explain how the Maximum Income of Beneficiary is calculated for a municipal infrastructure project?	It is generally based on census-identified household income by municipality. See HUD's website for more information.
DEC and LCPC request that brownfield assessment and remediation of buyout properties and floodplain restoration be identified as a potential use of CDBG-DR funds in the draft Action Plan.	In response to comments and analysis of the Buyout unmet need data, the final version of the Action Plan has been amended to explicitly include this use.
Why is Addison County not listed in the Action Plan? Route 125 was severely damaged, and the rip rap has eroded. Addison County has an estimated \$900k in damage.	The CDBG-DR funds are targeted at the most highly impacted areas. While all of Vermont suffered damages, Addison County was ultimately not identified by HUD or the State as meeting the threshold for damage.
Waterbury is doing its part to help develop more housing. We are also working on developing housing on town owned land. One significant challenge is that Waterbury does not have a tax increment financing district, so there is guaranteed means of recapturing our development costs or municipal investment in infrastructure. Direct funding towards these efforts would assist us greatly.	The Action Plan commits CDBG-DR funding to the greatest extent possible for the implementation of building new housing units and infrastructure in support of housing. Waterbury is eligible to apply as part of the identified HUD MID area Washington County.

Comments Received	Grantee Response
<p>Waterbury has also sought funding to conduct a broad hydrology modeling of the Winooski River to better identify flood mitigation opportunities. Thus far that funding has not been awarded. An increase of funding towards planning could assist every City and Town abutting the Winooski River if a broader study could be completed.</p>	<p>Hydrology studies are an eligible use under planning activities or may be incorporated into an implementation grant. The Action Plan proposes to use the CDBG-DR funding to the greatest extent possible for the implementation of building new housing units and infrastructure in support of housing.</p>
<p>Please seriously reconsider the areas that are eligible for this to include Ludlow, Chester and Cavendish. Each town is pursuing investments to help with mitigation of future events, but likely can't make the math work without assistance from CDBG-DR.</p>	<p>In response to further data analysis and public comment, the Grantee-identified MID areas now include Rutland County, Caledonia County, Orleans County, Windham County, and Windsor County. This means projects throughout the entire county are eligible to apply for assistance.</p>
<p>As a town with 12 buyouts, and 4 that have been identified as potentially contaminated with a recommendation (but not requirement) from FEMA for a phase 1 testing, please allow municipalities to access funds to pay for those phase 1 tests--if we don't do the phase 1, we are liable for any potential future problems that might arise from any possible contaminants.</p>	<p>The Action Plan allows pre-buyout cleanup as an eligible activity under Housing. This could cover Phase I's and potentially Phase II's. The State invites an application from a State-wide provider to oversee the cleanup and buyout program.</p>

Comments Received	Grantee Response
<p>We request that the final action plan include national green building rating systems available for residential construction. In particular, we advocate the HCD to recognize the NGBS in the Final Action Plan. The NGBS is rigorous yet cost-effective for all different types of residential construction.</p>	<p>Vermont's priority is to always build with green systems to the best possible standards. It is a HUD requirement that whenever CDBG-DR funds are used for residential construction green building rating systems must be used and wherever possible meet LEED standards. So, it will be a requirement in Vermont's CDBG-DR Housing Program Policy.</p>
<p>The Montpelier Commission for Recovery and Resilience (MCRR) was formed after a series of post-flood community-wide forums where our city came together to confront the challenges posed by increasing precipitation and to prioritize solutions. The Action Plan should be crafted to allow for the funding of the following work:</p> <ul style="list-style-type: none"> • Comprehensive Assessment of Flood Vulnerable Buildings • Advanced Modeling of the Winooski River Watershed • Support for "Working as a Watershed" Initiatives 	<p>These activities are available under the Planning allocation. The final action plan includes an increase to the Planning allocation in response to public comment and analysis of need.</p>

5.1.3.4 Citizen Complaints

The State of Vermont will consider any comments or views of citizens received in writing, or orally at public hearings. The State, through ACCD, will respond to written complaints related to the Action Plan and any amendments. Upon request, ACCD will transcribe oral complaints for signature by the complaining person or organization. Where practicable, ACCD will respond to complaints within 15 working days of receiving the written complaint.

5.1.3.5 Fraud, Waste, and Abuse Complaints

The State of Vermont maintains a robust Whistleblower Policies and passes on those requirements to State contractors and grantees.

5.2 Modifications to the Action Plan

Over the course of the grant there may be situations that cause grantee to modify the components of this Action Plan to adjust with our evolving disaster recovery needs. Such changes will result in either a substantial amendment or a non-substantial amendment to the Action Plan.

5.2.1 Substantial Amendment

The CDBG-DR Action Plan will be amended as described by the Universal Notice⁶¹. HUD views the Action Plan as a living document that may be subject to amendments from time to time in response to new information and data that is realized during carrying out a project or become known during the Grant Agreement period. Each Amendment to the Action Plan must be sequentially numbered and the section being amended must be identified in detail of what is being changed, added, or deleted. An amended budget chart must be included that shows how funds are reallocated. The entire Action Plan as amended must be viewable as a single document.

A substantial amendment is defined as:

- a change in program benefit or eligibility;
- a proposed reduction in the overall benefit requirement;
- the allocation or re-allocation of more than 20% of the total allocation;
- the addition or deletion of an activity;
- an update to the submitted initial Action Plan if the original submission was incomplete.

Under the State of Vermont's Citizen Participation Plan for Disaster Recovery⁶², any substantial amendment must follow the procedure laid out in the CDBG-DR Universal Notice and must be authorized by the Secretary of the Agency of Commerce and Community Development. Proposed changes will be made public by postings and public notices in the newspapers, and posted on the [ACCD CDBG-Disaster Recovery](#)

⁶¹ Source: (FR-6512-N-01, 2025)

⁶² Source: (Vermont Department of Housing and Community Development, 2021) and updated 2025 Citizen Participation Plan

[website](#). The Agency will receive and consider public comments regarding proposed changes at accd-cdbqdr@vermont.gov. The public comment period will be available for a minimum of 30 days. ACCD must receive approval from HUD before implementing any substantial amendments.

5.2.2 Non-substantial Amendment

The State of Vermont will notify HUD at least five days before any non-substantial amendment to the Action Plan becomes effective. Any non-substantial amendment will be numbered sequentially and posted on the [ACCD CDBG-Disaster Recovery website](#). The State is not required to seek public comment.

5.3 Performance Reports

ACCD will enter performance report information into the HUD Disaster Recovery Grant Reporting (DRGR) System Quarterly of each of the Projects funded under the approved Action Plan in accordance with the requirements of the U.S. Department of Housing & Urban Development⁶³. The Quarterly performance report will be available at the ACCD website at <http://accd.vermont.gov> for review no later than three calendar days after the HUD CPD staff member approves the report in the DRGR.

If HUD CPD rejects Quarterly report, the State must make revisions within 30 calendar days and resubmit the report in the DRGR.

⁶³ Source: (U.S. Department of Housing and Urban Development, 2021)

6. Appendix

6.1 Certifications, Waiver, and Alternative Requirements

The State of Vermont ACCD, as grantee, makes the following certifications with its action plan:

- a) **Uniform Relocation Act and Residential Anti-displacement and Relocation Plan** – ACCD certifies that it:
 - (1) will comply with the acquisition and relocation requirements of the Uniform Act, and implement regulations at 49 CFR 24, as such requirements may be modified by waivers or alternative requirements;
 - (2) has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR 42, and 24 CFR 570, as amended by waivers and alternative requirements.
- b) **Authority of Grantee** - ACCD certifies that the Action Plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- c) **Consistency with the Action Plan** - ACCD certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.
- d) **Citizen Participation** - ACCD certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).
- e) **Consultation with Local Governments** - ACCD certifies that it has consulted with all disaster-affected local governments (including any CDBG-entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.
- f) **Use of Funds** - ACCD certifies that it is complying with each of the following criteria:
 - (1) Purpose of the funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and

distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 et seq.).

(2) Maximum Feasibility Priority. With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.

(3) Overall benefit. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.

(4) Special Assessment. ACCD will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

- g) **Grant Timeliness** - ACCD certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.
- h) **Order of Assistance** - ACCD certifies that it will comply with the statutory order of assistance listed at Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG-DR assistance for the costs of carrying out the same activity.
- i) Further, as required by Paragraph 64 of HUD's March 19, 2025, memorandum revising Appendix B of HUD's Universal Notice issued on January 8, 2025, ACCD hereby provides assurance that it shall comply with the following certifications:
 - a. General Certifications at 24 CFR 91.325(a)(1), (3), and (7)
 - b. Community Development Block Grant Program Certifications at 24 CFR 91.325(b)(5), (6), and (7).

6.2 References

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