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

Published 4.21.2025





Contact Information

From:

Ann Karlene Kroll, Director of Federal Programs
ACCD, Department of Housing and Community
Development
AnnKarlene.Kroll@vermont.gov, 802-828-5225

**To receive this information in an alternative format or
for other accessibility requests, or any other
questions please contact:**

Cindy Blondin, Grants Management Analyst
ACCD, Department of Housing and Community
Development
Cindy.Blondin@vermont.gov, 802-828-5219



Change Log Version (Date)	Summary of Changes Made
Version 1 (Month, Day, Year)	Action Plan Approved by HUD

DRAFT



Table of Contents

Agency of Commerce & Community Development (ACCD) Department of Housing and Community Development (DHCD) Vermont 2025 DRAFT HUD -Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan _____ 1

1. Executive Summary	7
1.1 Overview	8
1.2 Disaster Specific Overview	8
1.2.1 Weather System Timeline	9
1.2.2 Disaster Recovery Center Operations for DR-4720-VT	13
1.2.2.1 Individuals and Households Program (IHP)	13
1.2.2.2 Joint Field Office Outreach (JFO)	14
1.2.2.3 Small Business Administration (SBA)	15
1.3 Most Impacted and Distressed Areas	16
1.3.1 HUD-identified MID Areas	16
1.3.2 Grantee-identified MID Areas	17
2. Unmet Needs and Mitigation Needs Assessments Summary	18
2.1 Overview	18
2.2 Background and Process	18
2.3 Unmet Needs Assessment	20
2.3.1 Housing	20
2.3.1.1 Housing Profile	20
2.3.1.2 Emergency Shelters, Interim, and Permanent Housing	22
2.3.1.3 Rental and Owner-Occupied Single Family and Multifamily Housing	25
2.3.1.4 Public Housing (Including HUD-assisted Housing) and Other Affordable Housing	34
2.4 Infrastructure	35
2.4.1 Infrastructure Profile	36
2.4.2 FEMA Public Assistance	37
2.5 Economic Revitalization	39



2.5.1 Local Economy Damage and Impacts	40
2.6 Quantified Disaster Impacts and exacerbated Pre-Existing needs of Housing, Infrastructure, and Economic Development, Other Financial Assistance, and Remaining Unmet Need	44
3. Mitigation Needs Assessment	45
3.1 Background	45
3.2 Previous Mitigation Efforts	46
3.3 Risk Analysis	47
3.4 Mitigation Priorities	48
3.5 Summary of Unmet Mitigation Needs	49
4. Connection between proposed programs and projects and unmet needs, mitigation needs assessments	50
4.1 Proposed Use of Funds.	50
4.2 Allocation and Award Caps	50
4.2.1 General Exception Criteria	53
4.3 Competitive Grants	53
4.3.1 Application Review Process	54
4.3.2 CDBG-DR Project Thresholds	54
4.3.3 CDBG-DR Scoring Matrix - Implementation Projects	56
4.3.4 CDBG-DR Scoring Matrix - Planning Projects	58
4.4 Program Details	59
4.4.1 Administration	59
4.4.2 Planning	60
4.4.3 Housing	60
4.4.3.1 Housing Programs Overview	60
4.4.3.2 Grantee Housing Program	61
4.4.4 Infrastructure	62
4.4.4.1 Infrastructure Programs Overview	62
4.4.4.2 Grantee Infrastructure Program	63
4.4.5 CDBG-DR Mitigation Set-Aside	64



4.4.5.1 CDBG-DR Mitigation Set-Aside Programs Overview	64
4.4.5.2 Grantee CDBG-DR Mitigation Set-Aside Program	65
5. General Requirements	67
5.1 Citizen Participation	67
5.1.1 Consultation of Developing the Action Plan	67
5.1.2 Public Comments	69
5.1.3 Public Hearings	69
5.1.3.1 Accessibility of Public Hearings	69
5.1.3.2 Meaningful Access	70
5.1.3.3 Consideration of Public Comments	70
5.1.3.4 Citizen Complaints	71
5.1.3.5 Fraud, Waste, and Abuse Complaints	71
5.2 Modifications to the Action Plan	71
5.2.1 Substantial Amendment	71
5.2.2 Non-substantial Amendment	72
5.3 Performance Reports	72
6. Appendix	73
6.1 Certifications, Waiver, and Alternative Requirements	73
6.2 References	75



1. Executive Summary

The State of Vermont is required to publish an Action Plan for Disaster Recovery that describes the proposed use of \$67,885,000 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 The HUD guidance for the funding was published January 16, 2025 with an applicability date of January 21, 2025 in 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 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.

On January 8, 2025, HUD issued a Universal Notice which provides Templates to the Grantees for the Action Plans, the Grantees Financial Management and Grant Compliance Certification Requirements, and other rules and regulations that must be complied with to meet all the conditions associated with the funding. The State has developed this draft 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 Universal Notice made changes to the Templates for the Grantees Action Plans and Certification 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 Agency of Commerce and Community

¹ Source: (Public Law 118-158, 2024)

² Source: (FR-6512-N-01, 2025)



Development, Department of Housing and Community Development (collectively “ACCD” herein), the CDBG-DR funding will also be administered by ACCD.

1.1 Overview

The U.S. Department of Housing and Urban Development (HUD) allocated \$67,885,000 in Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to the State of Vermont in response to following DR4720 - 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 unmet need in Vermont.

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 4, and V.T. Route 100 due to flood inundation. The impacts of this weather system resulted in significant housing, infrastructure, and economic damage across the State of Vermont, specifically in the following counties: Addison, Bennington, Caledonia, Chittenden, Essex, Lamoille, Orange, Orleans, Rutland, Washington, Windham, and Windsor.



Table 1: CDBG-DR Disaster Summary

Disaster Summary	
Qualifying Disaster:	4720
HUD-identified MID Areas:	Lamoille County and Washington County
Grantee-Identified MID Areas	Caledonia County, Orleans County, Rutland County, and Windsor County

Table 2: CDBG-DR Allocation Overview

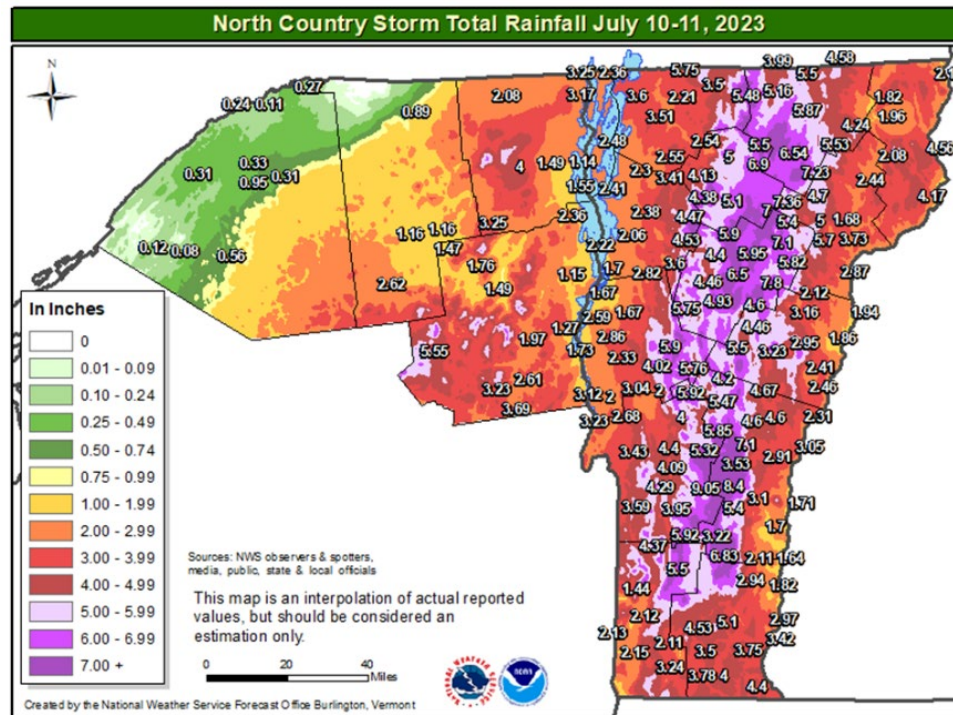
CDBG-DR Allocation Overview	
CDBG-DR Allocation:	\$58,996,000
CDBG-DR Mitigation Set Aside:	\$8,849,000
Total Allocation:	\$67,845,000

1.2.1 Weather System Timeline

On July 7, torrential rainfall caused a mudslide and catastrophic road damage in Rutland County. Between July 9 and July 11, flash and river flooding occurred throughout the State as heavy rainfall continued. Within 48 hours across the state of Vermont, 3 to 9 inches of rain fell, as shown in Figure 1.



Figure 1: 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. Communities along the major rivers such as the Winooski; Lamoille; West; and Connecticut, impacting the communities of Montpelier, Johnson, Middlesex, and Andover were among some of the hardest hit in the State. Over 9 inches of rainfall was recorded in Washington and Windsor counties with Rutland and Orange at 8 inches; Orleans and Lamoille at over 7 inches; Bennington over 6 inches; Addison, Caledonia, Franklin, and Windham at over 5 inches, Chittenden and Essex at over 4 inches, and Grand Isle over 3 inches.

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 communities inaccessible. Over 100 state-managed roads were closed or experienced delays. Many roads were washed out causing the inability of emergency vehicles to get through to individuals in need of medical assistance. At least 2 lives were lost as a result of the flash flooding with rising rivers and landslides. Shelters were open, including the Barre Auditorium, being managed by American Red Cross.



By the morning of July 11, 2023, there had been more than 214 active rescues performed by the twelve USAR 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.

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.³ The Middlebury River flood also caused a landslide in Ripton, Vermont and Addison County which destroyed one house and led to the evacuation of nearly a dozen other homes.⁴ On July 14th, 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. 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 9 counties.

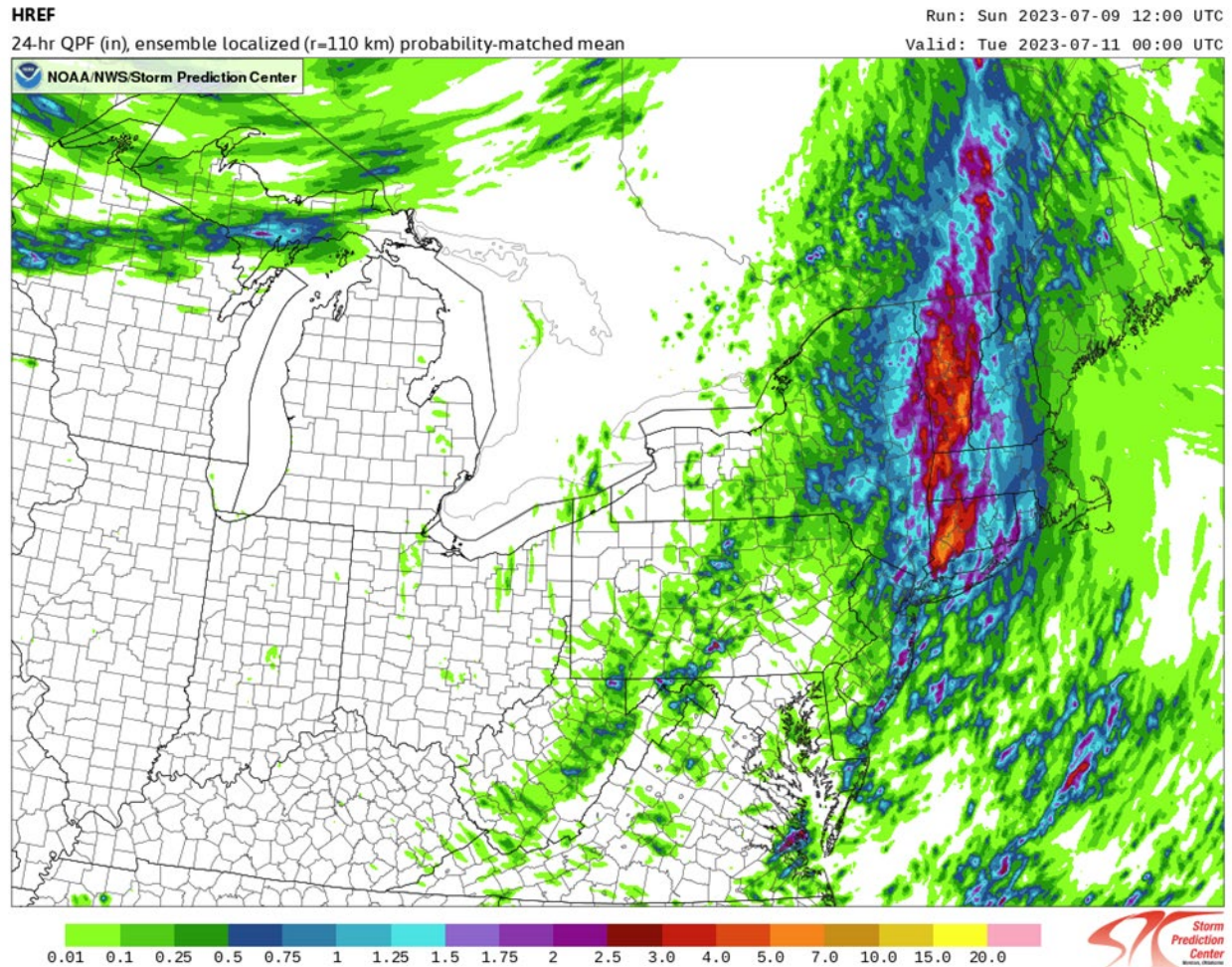
The weather system continued impacting the State on July 16 as additional rainfall occurred in Northeast Vermont, causing the closures of roads due to washouts and inundation. On July 19, another round of rainfall caused Otter Creek to flood again in Rutland and Addison Counties, and Lake Memphremagog's shores and tributaries flooded in Orleans County. On July 20, soil saturation from the previous rainfall in Washington County caused a landslide in Plainfield. The weather system's final day was July 21 wherein five inches of rain fell within eight hours in Hartland, 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 these flash-flooding events in July 2023. The direct environmental impacts from the weather system continued through the following weeks as landslides due to saturated soil were documented across the State up to August 8, 2023.

³ Source: (Flowers, 2023)

⁴ Source: (Heintz, Cotton, Crowley, & D'Auria, 2023)



Figure 2: HREF 24-hr QPF (in), Ensemble Localized (r=110km) Probability-Matched Mean





1.2.2 Disaster Recovery Center Operations for DR-4720-VT

In the immediate aftermath of the event, emergency resources from FEMA were deployed to meet the needs of the nine IA-declared counties:

61 FEMA staff members were deployed to serve the disaster at its peak.

- 793 registrations taken
- 918 documents submitted
- 3,966 survivors visited 14 Disaster Recovery Centers



To conduct a comprehensive initial analysis of needs, Disaster Survivor Assistance teams walked endless miles to knock on over twenty thousand (20,000) doors in their outreach.

1.2.2.1 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 7/14/23 and closed on 1/14/25, 18 months later. In that time, applications were taken for Housing Assistance (HA) and Other Needs Assistance (ONA). The impact of that assistance is shown in Table 3.

Table 3: FEMA IHP Financial Assistance as of 3/25/24

Program	Applicants Approved	Totals Approved
IHP Total Approved	3,610	\$25,920,633
- Housing Assistance (HA)	3,166	\$24,148,582
- Other Needs Assistance (ONA)	1,621	\$1,732,051



Table 4: FEMA IHP Max Grants Awarded of 3/25/24

IHP Max Grant	Total Max Grants	Total HA Max Grant Awarded
IHP Max Grant Award	79	\$3,239,000

1.2.2.2 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. The results of this outreach permitted an additional \$10,325,357 to reach survivors for their recovery, broken out by county and type of assistance in Table 5.

Table 5: FEMA IHP Assistance After JFO Outreach

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



State of Vermont, ACCD - DHCD
Vermont 2025 DRAFT HUD CDBG-DR Action Plan
FEMA Disaster Declaration 4720 for July 2023 Flooding

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
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

Table 5 continued: FEMA IHP Assistance After JFO Outreach

1.2.2.3 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 1/15/2024 assistance provided to Vermont residents and businesses through SBA loans is shown in Table 7.

Table 6: SBA Loan Activity as of 1/15/24

Applications	Home Loans	Business	EIDL	Total
Referrals	4,233	1,108	0	5,341
Received	818	273	67	1,158
Loans Approved	484	76	8	568
Total \$ Approved	\$18,176,900	\$10,633,700	\$689,500	\$29,500,100

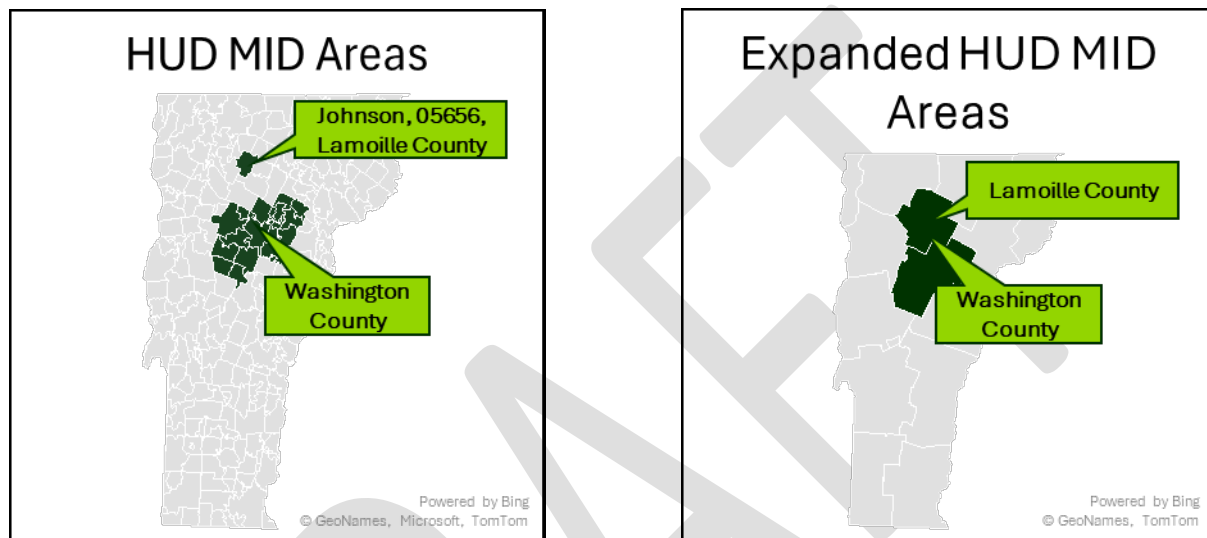
*(DR-4720 SBA report dated 01/15/2024)



1.3 Most Impacted and Distressed Areas

1.3.1 HUD-identified MID Areas

Figure 3: HUD MID Areas



HUD's Universal Notice requires that at least 80% of CDBG-DR funds be used to address unmet needs or mitigation activities in the HUD-identified Most Impacted and Distressed (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 to the whole of Lamoille County, not just zip code 05656, Town of Johnson.

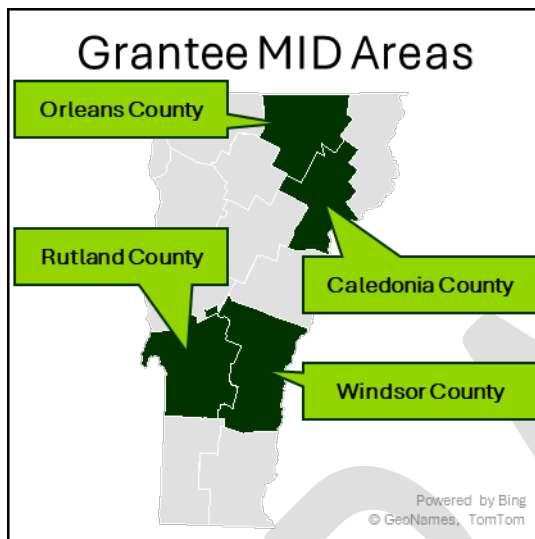
The State is expanding the HUD MID area of zip code 05656 to include the entirety of Lamoille County based on recent historical data showing that the County has been repeatedly impacted by significant flooding along the Lamoille River and is likely to continue experiencing weather events that cause flooding. Three of the largest floods recorded in Lamoille County occurred during weather events in 2023 and 2024. 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, plans for future flood mitigation, supplementing FEMA Public Assistance funding to cover the cost share of the Village



Wastewater Treatment Plant, and ensuring adequate funding is available for other potential housing development, infrastructure, and mitigation projects.

1.3.2 Grantee-identified MID Areas

Figure 4: Grantee MID Areas



The Universal Notice authorizes grantees to spend up to 20% of CDBG-DR funds to address the unmet needs or mitigation activities in State-Identified MID areas. The State of Vermont has designated four counties as State-Identified MID areas, based on damage reports and regional State data collected post-disaster. The State-identified MID areas include: Rutland County, Caledonia County, Orleans County, and Windsor County. 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 code 05822); Town of Glover (zip code 05839); Town of Coventry (zip code 05825). **Windsor County**: Town of Weston (zip code 05161); Town of Ludlow (zip code 05149).

All State-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 and Mitigation Needs Assessments 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) to support program and funding decisions for use of CDBG-DR funding. The Unmet Needs Assessment discusses three cost categories: Housing, Infrastructure, and Economic Revitalization. The UNA includes a preliminary analysis and review of housing needs, infrastructure damage to critical public facilities and transportation systems, and economic impacts faced by local businesses including workforce disruptions.

Table 7: Met and Unmet Needs Overview by Category⁵

Category	Need Met	Unmet Need
Housing	\$83,248,533.01	\$86,618,471.43
Infrastructure	\$447,968,818.61	\$49,774,313.18
Economic Revitalization	\$10,355,009.73	\$34,516,699.10
Total	\$541,572,361.35	\$170,909,483.71

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 costs covered by private

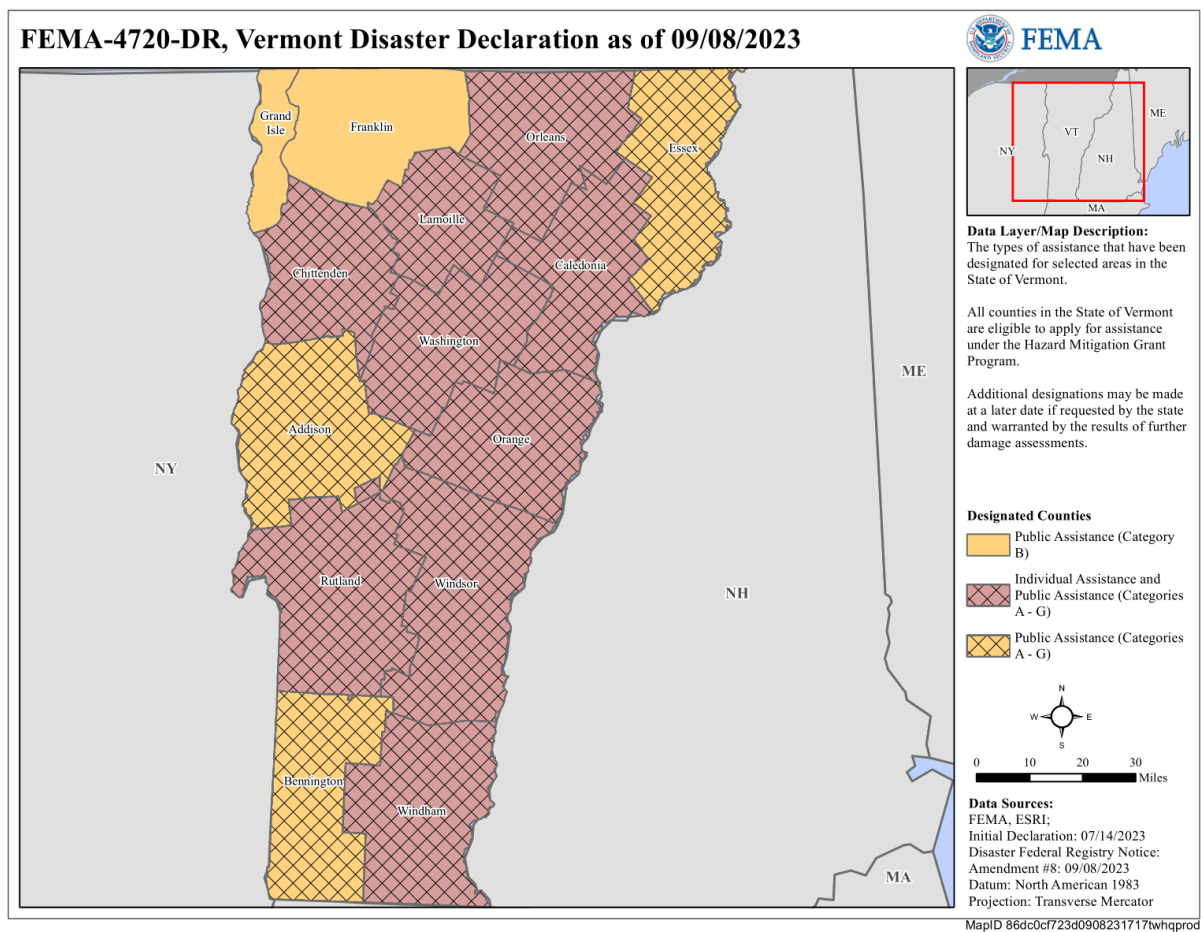
⁵ The current unmet needs data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



State of Vermont, ACCD - DHCD
Vermont 2025 DRAFT HUD CDBG-DR Action Plan
FEMA Disaster Declaration 4720 for July 2023 Flooding

insurance. The total cost of pre-assistance damages is quantified and compared against the amount of assistance received. By looking at the most current data available, the estimate of unmet need can be determined. Each of the areas identified in the Universal Notice (Housing, Infrastructure and Economy) are assessed and calculated individually to determine the unmet need estimate. Please note that the current analysis consists of preliminary analyses and does not represent the full scope of potential findings. A more comprehensive analysis will be included in the final draft of the action plan.

Figure 5: FEMA-DR-4720 Vermont Disaster Declaration as of 9/8/23⁶



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

⁶ Source: (FEMA, 2025)



2.3 Unmet Needs Assessment

2.3.1 Housing

The State of Vermont conducted a Housing Needs Assessment for 2025 - 2029, published in June 2024, following the events of DR-4720.⁷ This assessment 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, damages to residential homes and rental units provides valuable information on the current recovery need that has not been met through other sources.

2.3.1.1 Housing Profile

The Housing Needs Assessment determined that Vermont has a had a longstanding shortage of affordable housing, which was exacerbated during the COVID-19 pandemic as the number of lower income households increased. The assessment also found that Vermont's housing stock has physical vulnerabilities that increase the likelihood of damage. Generally, Vermont has an aging housing stock with around 20,000 homes exhibiting quality concerns.

Housing affordability has long been an issue for Vermont, as half of all Vermont renters are cost-burdened, and one-in-four pay more than 50% of their income on housing costs. As of the 2024 Housing Needs Assessment, Vermont's rental vacancy rate is 3%, indicating the lack of affordable options for renters.

Initial findings in the assessment note that around 20% of the state's manufactured home lots are located in floodplains, making them especially susceptible to flood damage. Following a series of storms and floods across Vermont in July 2023, FEMA reported that at least 4,000 homes were damaged. With the increasing frequency of flooding events and housing stock highly susceptible to damage, it is imperative that funding be used to rebuild and rehabilitate homes damaged by the events of DR-4720. The 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

⁷ Source: (Development, 2024)



existing structures, and implementing flood risk mitigation strategies to ensure long-term availability and affordability across the State.

Table 8: Data Sources Used in Unmet Needs Assessment

Data Source	Location
Vermont Housing Needs Assessment (2025-2029)	Vermont Housing Needs Assessment Agency of Commerce and Community Development
VHFA Housing Programs Data	Housing programs HousingData.org - Directory of affordable rental housing
FEMA Individuals and Households Assistance Program Data (Owners, Renters, and Valid Registrations)	API Calls to The OpenFEMA Database
Vermont Housing and Homelessness Alliance Point-in-time Count	Vermont Housing and Homelessness Alliance Point-in-time Count 2023-2024 Data Report
HUD Annual Point-in-time Count	HUD Annual Point-in-time Count 2022-2025 Data Report
Vermont DR-4720 FEMA Mass Care Shelter Count	Vermont DR-4720 Final Transition Plan
FEMA DR-4720 Hazard Mitigation Grant Program (HMGP) Application Data	FEMA HMGP Data for DR-4720



2.3.1.2 Emergency Shelters, Interim, and Permanent Housing

Hazard events can significantly impact those who are experiencing homelessness. The State's Agency of Human Services (AHS) is the lead agency in providing assistance to the lowest income, most vulnerable Vermonters. The agency helps provide funding to emergency overnight and day shelters, supportive services for homeless families and individuals, and 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, families, and persons. CoC shelters are operated by a network of nonprofit organizations and provide valuable sheltering assistance across the State of Vermont.

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. A 2023 PIT count was conducted in early 2024, which showed an increase in homelessness from early 2023.⁸ Most importantly, the population of emergency shelters increased by 1,064 within the MID Area for an increase of approximately 247%. The 2023 Flooding Event displaced thousands of individuals and forced multiple households into Emergency Shelters as their primary residences were damaged or destroyed. It is important to note that since this PIT was conducted, Vermont experienced multiple other flooding events and as the 2024 PIT count was conducted in January, it does not capture the impacts of these more recent events.

⁸ Source: (Chittenden County Homeless Alliance and the Vermont Coalition to End Homelessness, 2023)



Table 9: 2023-2024 Vermont Housing and Homelessness Alliance Point-in-time Counts by Housing Status and MID County

Housing Type/Year	Caledonia	Lamoille	Orleans	Rutland	Washington	Windsor ⁹	Total
Emergency Shelter 2023	58	24	32	151	118	48	431
Emergency Shelter 2024	135	56	55	678	400	171	1495
Transitional Housing 2023	102	50	16	501	296	71	1036
Transitional Housing 2024	10	0	0	4	15	0	29
Unsheltered 2023	15	0	0	2	32	19	68
Unsheltered 2024	0	1	0	0	49	2	52

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

According to the DR-4720-VT Transition Plan, several organizations operated shelters through the FEMA Mass Care sheltering support program during the immediate response phase of DR-4720.¹⁰ For instance, the American Red Cross operated 3 shelters located in Barre, Johnson, and Rutland. An independent shelter was operated

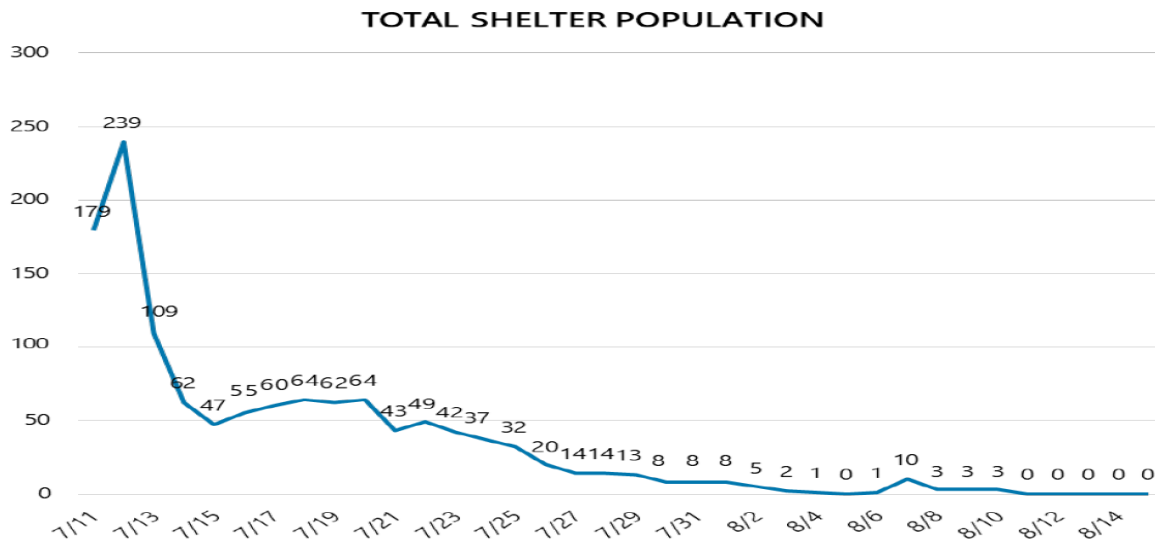
⁹ Note: Windsor County was combined with Orange County during the 2023 PIT Count

¹⁰ Source: (DR-4720-VT Transition Plan Final)



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

Figure 6: Total FEMA Mass Care Shelter Population between July 11th, 2023, and August 14th, 2023



Source: DR-4720-VT Transition Plan Final

Additionally, the State of Vermont requested that FEMA provide non-congregate sheltering (NCS) through hoteling on December 4th, 2023, which was extended through January 31st, 2024, by the Regional Administrator. A total of 6 households utilized NCS by the time it was sunset in April 2024.

Table 10: HUD Annual Point-in-time Counts by Housing Status in Vermont¹¹

Housing Type	January 2022 Point-in-time Count	January 2023 Point-in-time Count	January 2024 Point-in-time Count
Emergency Shelter	2,624	1,118	3,217
Transitional Housing	111	2,040	74
Unsheltered	45	137	167
Total	2,780	3,295	3,485

¹¹ Source: (Department of Housing and Urban Development, 2024)



Source: [HUD Exchange Point-in-Time Count and Housing Inventory Count 2022-2024](#)

There were 6,149 valid registrations for FEMA Individuals and Household Assistance related to DR-4720, with applicants requiring and receiving a total of \$3,491,315.77 in rental assistance due to displacement. Additionally, HUD issued a combined waiver for several grant programs on July 27th, 2023, including the Emergency Solutions Grants (ESG) program which provides resources for street outreach, emergency shelters, homelessness prevention, and rapid rehousing. 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. As can be seen, in Table 11, an increase in the total number of individuals requiring shelter across Vermont occurred despite numerous efforts to mitigate the effects of DR-4720.

2.3.1.3 Rental and Owner-Occupied Single Family and Multifamily Housing

According to 2023 ACS 5-Year estimates, there are 111,887 occupied housing units in the MID areas. Owner-occupied housing units represent 75% of all occupied housing units in the MID area, while renter-occupied housing units account for the remaining 25% of occupied housing units in the MID area.

Table 11: Renter and Owner-Occupied Households in Grantee and HUD MID Counties

County	Total Occupied Housing Units	Number of Owner-Occupied Housing Units	Percent of Housing Units Occupied by Owners	Number of Renter-Occupied Housing Units	Percent of Housing Units Occupied by Renters
Caledonia	12,877	10,066	78%	2,811	22%
Lamoille	11,424	8,309	73%	3,115	27%
Orleans	11,791	9,426	80%	2,365	20%
Rutland	25,448	18,496	73%	6,952	27%
Washington	25,474	18,611	73%	6,863	27%
Windsor	24,873	18,618	75%	6,255	25%
Total	111,887	83,526	75%	28,361	25%

Source: [Physical Housing Characteristics for Occupied Housing Units](#)



FEMA Individual Assistance

FEMA's Individuals and Households Program (IHP) –includes Individual Assistance and other programs. As the deadline to register for this program has passed, no more assistance will be provided. The table below represents the number of IHP registrations compared to the total number of occupied housing units in each MID county. The percentage of occupied units with FEMA IHP registrations is relatively small. ACCD conducted outreach to encourage individuals to apply for FEMA assistance, but despite those efforts the number of registered households was limited.

Table 12: Occupied Housing Units and FEMA IHP Applicants in MID Counties¹²

County	Number of FEMA IHP Registrations	Total Occupied Housing Units	% of Occupied 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%
Windsor	1,043	24,873	4.2%
Total	5,008	111,887	4.5%

Source: [Physical Housing Characteristics for Occupied Housing Units](#); [OpenFEMA Dataset: Individuals and Households Program - Valid Registrations - v1](#)

The table below represents the number of units that received inspections by FEMA compared to the number of actual applicants, as only those who receive an inspection are eligible for assistance. Not all housing units applied for FEMA IHP funding. FEMA IHP registrations represent, on average, 4.5% of occupied housing units in the MID area. Additionally, the analysis focused only on IA funding. Though FEMA offers funding for rent and other needs (ONA), the IHP program is long term, so the analysis focuses on unmet needs beyond the immediate needs.

¹² NOTE: The current FEMA IHP data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



Table 13: FEMA IHP – Owner-Occupied Units Inspected in MID Counties¹³

County	FEMA IHP Inspections	FEMA IHP Applicants	% of Applicants that Received Inspection
Caledonia	221	290	76%
Lamoille	222	308	72%
Orleans	273	348	78%
Rutland	238	309	77%
Washington	1,391	1,771	79%
Windsor	654	936	70%
Total	2,999	3,962	76%

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

Table 14: FEMA IHP – Renter-Occupied Units Inspected in MID Counties¹⁴

County	FEMA IHP Inspections	FEMA IHP Applicants	% of Applicants that Received Inspection
Caledonia	28	45	62%
Lamoille	144	193	75%
Orleans	27	35	77%
Rutland	59	70	84%
Washington	408	549	74%
Windsor	66	90	73%
Total	732	982	75%

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

The table below focuses on repair and replacement assistance for owner-occupied units. FEMA considers repair costs when the cost to repair does not exceed 50% of the cost to replace. Replacement costs are used to help replace a primary residence if it is

¹³ NOTE: The current FEMA IHP data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.

¹⁴ NOTE: The current FEMA IHP data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



destroyed or severely damaged. Both types of assistance are intended to make the home livable, and not to fully restore it to its pre-disaster condition.¹⁵

FEMA does offer additional funding types to owners, however, to fully assess unmet needs, the analysis focuses on long term programs. The data does not provide numbers for renters, as they are not eligible under this program. FEMA expects landlords to carry insurance and therefore are responsible for their losses.

Based on this analysis, the unmet need for owner-occupied units is high, as only half of the owners who applied for the program received repair assistance.

Table 15: FEMA IHP – Owner-Occupied Units with Repair Assistance in MID Counties¹⁶

County	FEMA IHP Repair Assistance	FEMA IHP Inspections	% of Inspections that Received Repair Assistance	FEMA IHP Applicants	% of Applicants that Received Repair Assistance
Caledonia	144	221	65%	290	50%
Lamoille	168	222	76%	308	55%
Orleans	194	273	71%	348	56%
Rutland	149	238	63%	309	48%
Washington	985	1,391	71%	1,771	56%
Windsor	476	654	73%	936	51%
Total	2,116	2,999	71%	3,962	53%

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

¹⁵ Source: (Federal Emergency Management Agency, 2013)

¹⁶ NOTE: The current FEMA IHP data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



Table 16: FEMA IHP – Owner-Occupied Units with Replace Assistance in MID Counties¹⁷

County	FEMA IHP Replace Assistance	FEMA IHP Inspections	% of Inspections that Received Replace Assistance	FEMA IHP Applicants	% of Applicants that Received Replace Assistance
Caledonia	1	221	0%	290	0%
Lamoille	0	222	0%	308	0%
Orleans	0	273	0%	348	0%
Rutland	0	238	0%	309	0%
Washington	9	1,391	1%	1,771	1%
Windsor	1	654	0%	936	0%
Total	11	2,999	0%	3,962	0%

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

The analysis of unmet need for renters is focused on personal property assistance. As with owner-occupied IHP assistance, renters must receive an inspection from FEMA to be eligible for assistance, as illustrated in the table below. FEMA categorizes personal property into the following categories: appliances, clothing, room furnishings, essential tools, accessible items. This data is used as a proxy for the amount of damage that would have occurred to rental units and losses incurred by renters.

As with owner-occupied IHP, FEMA provides additional funding types to renters, but this assessment focuses on IHP as it is based on the value that FEMA inspects.

¹⁷ NOTE: The current FEMA IHP data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



Table 17: FEMA IHP – Renter-Occupied Units with Personal Property Assistance in MID Counties¹⁸

County	FEMA IHP Personal Property Assistance	FEMA IHP Inspections	% of Inspections that Received Personal Property Assistance	FEMA IHP Applicants	% of Applicants that Received Personal Property Assistance
Caledonia	2	28	7%	45	4%
Lamoille	34	144	24%	193	18%
Orleans	1	27	4%	35	3%
Rutland	12	59	20%	70	17%
Washington	74	408	18%	549	13%
Windsor	5	66	8%	90	6%
Total	128	732	17%	982	13%

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

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 will not cover anything that has been covered by insurance. A large number of owners in the MID counties did carry homeowners' insurance at the time of the July 2023 flood.

¹⁸ NOTE: The current FEMA IHP data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



Table 18: FEMA IHP - Owner-Occupied Units with Homeowner's Insurance in MID Counties¹⁹

County	FEMA IHP Applicants with Homeowner's Insurance	FEMA IHP Applicants	% of Applicants with Homeowner's Insurance
Caledonia	216	290	74%
Lamoille	247	308	80%
Orleans	279	348	80%
Rutland	247	309	80%
Washington	1,534	1,771	87%
Windsor	804	936	86%
Total	3,327	3,962	84%

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

The table below indicates the number of IHP applicants who had flood insurance at the time of the event. This number includes both renters and owners, as renters can obtain flood insurance, and it is not covered under standard renter's insurance. As reflected in the table, the number of applicants with flood insurance is relatively low, which could be indicative that the home was not in a Special Flood Hazard Area (SFHA) where flood insurance is a requirement to obtain a mortgage.

Table 19: FEMA IHP – Owner-Occupied and Renter-Occupied Units with Flood Insurance in MID Counties²⁰

County	FEMA IHP Applicants with Flood Insurance	FEMA IHP Applicants	% of FEMA IHP Applicants with Flood Insurance
Caledonia	22	347	6%
Lamoille	37	507	7%
Orleans	13	386	3%
Rutland	33	382	9%
Washington	212	2,343	9%
Windsor	81	1,043	8%
Total	398	5,008	8%

¹⁹ NOTE: The current FEMA IHP data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.

²⁰ NOTE: The current FEMA IHP data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



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

FEMA National Flood Insurance Plan

The National Flood Insurance Plan (NFIP) is a voluntary program administered by FEMA that provides flood insurance to property owners who live in communities that participate in the program. The data in the table below is aggregated to reflect the average dollar value of damage to each building for which a claim was filed compared to the amount paid out under the NFIP program. The unmet need results when the damage to a building is greater than the amount which was covered by NFIP.

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 mitigation requirement costs.

Table 20: NFIP – Estimated Unmet Need for Residential Buildings in MID Counties²¹

County	Number of Residential Building Claims	Average Building Damage	Average Building Net Payment	Total Estimated Unmet Need
Caledonia	16	\$29,608.50	\$25,621.17	\$63,797.30
Lamoille	31	\$78,445.32	\$78,343.75	\$3,148.74
Orleans	8	\$30,991.63	\$25,438.05	\$44,428.57
Rutland	38	\$22,918.76	\$21,575.72	\$51,035.54
Washington	176	\$44,958.13	\$41,104.56	\$678,229.07
Windsor	92	\$50,259.91	\$48,474.98	\$164,213.63
Total	361	\$45,875.15	\$43,091.63	\$1,004,852.85

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

FEMA Hazard Mitigation Program

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. This funding is currently capped at \$66M, with \$32M obligated throughout the State. The Vermont Emergency

²¹ NOTE: The current NFIP data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



Management Office (VEM) issued a survey gauging interest from potential applicants for this funding. The table below contains key data points from the “Pre-App Form Data” of the survey results, along with manually entered data received through email requests. The data shows that interest in the program is significantly higher than the available needs, representing an unmet need in this area of recovery.

This analysis included preliminary information on applications for floodproofing, buyouts, elevations, and mitigation reconstruction which are all for housing units. The numbers below are estimates, as not all applications have an associated project cost and reported project costs do not consider duplication of benefits.

Table 21: HMGP Pre-Application Interest and Project Cost for Buyouts, Elevations, Floodproofing, and Mitigation Reconstruction in MID Counties²²

County	Total HMGP Pre-Applications	Estimated Project Cost
Caledonia	46	\$15,190,894.00
Lamoille	39	\$9,902,518.00
Orleans	15	\$2,932,223.00
Rutland	11	\$52,508,278.00
Washington	181	\$62,389,868.59
Windsor	35	\$9,377,440.00
Total	327	\$152,301,221.59

Source: VEM Pre-App Form Data

In the MID areas, there is an estimated need of \$152M, and with a federal funding cap amount of \$66M, there is at least \$85M of unmet need in the MID Counties.

Small Business Administration

The U.S. Small Business Administration (SBA) provides funding to homeowners and renters after a disaster to cover the repair and replacement of physical damage to a unit. The data in the table below reflects applications for assistance across the entire state, with just more than half of all loans approved.

²² NOTE: The current HMGP data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



Table 22: SBA – Home Loans in Vermont²³

Location	Loans Approved	SBA Home Loan Applicants	% of Applicants Approved for SBA Home Loan
Vermont	484	818	59%

Source: DR-4720-VT Transition Plan Final

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

Vermont has eight local housing authorities and one statewide housing authority who operate units in HUD’s Public Housing program. As of the 2024 Housing Needs Assessment, the Vermont Public Housing Authority (PHA) owns or manages 3,358 units across 103 properties, with the second largest share located in HUD identified MID Washington County. State identified MID’s Rutland and Windsor County also have approximately 300 units each.

Damage from the 2023 flood event resulted in the need for repair and renovation of several public housing units. The Public Housing Authority reported that Montpelier Public Housing Authority sustained damages when a culvert on North Street, Montpelier became overwhelmed with water and the first floor and two apartments of Lane Shops Apartments, a HUD housing development, were flooded resulting \$10,703 in damages. 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.

In 2023, the average waitlist for all public housing was 14 months.²⁴ Several Public Housing Authority Directors indicated having to close their waitlists due to individuals waiting multiple years for available units. An already overwhelmed public housing authority was further strained by the damage to PHA units as well as the displacement of residents due to flood damage.

²³ NOTE: The current SBA data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.

²⁴ Source: (Vermont Housing Finance Agency, 2024)



Table 23: ACCD 2024 Stock of Rental Homes and Apartments in Buildings developed with Public Funding in MID Counties

County	Rental Units in Publicly Funded Buildings	% of All Rental Units in Publicly Funded Buildings	% of Vermont Population
Caledonia	528	4%	5%
Lamoille	396	3%	4%
Orleans	335	2%	4%
Rutland	1,371	9%	9%
Washington	1,311	9%	9%
Windsor	1,251	9%	9%
Total	5192	36%	40%

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

Table 24: Summary of Housing Unmet Needs²⁵

Funding Source	Need Met	Unmet Need
FEMA National Flood Insurance Program	\$16,560,930.00	\$1,004,852.85
FEMA Hazard Mitigation Grant Program	\$66,687,603.01	\$85,613,618.58
Total	\$83,248,533.01	\$86,618,471.43

2.4 Infrastructure

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. This assessment was used in combination with

²⁵ NOTE: The current Housing unmet needs data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



a review of the impacts of the July 2023 flood events on water treatment facilities, roads, and bridges in the state to determine the current recovery need that has not been met through other sources.

2.4.1 Infrastructure Profile

The 2023 Report Card for Vermont's Infrastructure²⁶ 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 exacerbated the issues facing Vermont's infrastructure, as the event caused extensive damage to various operational facilities, such as the wastewater treatment facility in the Town of Johnson in Lamoille County; and severely impacted the state's transportation infrastructure.

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, recreations, and other facilities from the July 2023 floods will cost \$400 million. The widespread damage from DR-4720 to infrastructure across Vermont highlighted the vulnerabilities across the state's transportation, facility, and utility infrastructure systems. 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. Additional municipal funding programs such as the Emergency Rental Assistance Program²⁷, while beneficial, still do not fully cover the cost of emergency relief across the remaining estimated cost share amount. The State of Vermont intends to cover portions of this unmet need with CDBG-DR funds.

According to the National Oceanic and Atmospheric Administration, at the peak of the flooding, over 100 state and U.S. highways were damaged or closed due to high water levels.²⁸ 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.

²⁶ Source: (American Society of Civil Engineers, n.d.)

²⁷ Source: (Vermont State Housing Authority, 2023)

²⁸ Source: (National Oceanic and Atmospheric Administration, 2023)



During DR-4720, 18 drinking water systems that serve 40,000 residents were impacted. Wastewater systems were damaged, with 33 municipal systems damaged and 3 facilities catastrophically damaged.

Table 25: Data Sources Used in Infrastructure Unmet Needs Assessment

Data Source	Location
DR-4720 Damages Data	DR-4720 Public Assistance Project and Damages Data

2.4.2 FEMA Public Assistance

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 11th, 2025, FEMA has obligated \$172 million across the State under the FEMA PA program. The table below provides preliminary costs and categories of work for FEMA PA funding in the MID areas. Category A (Debris) and Category B (Emergency Protective Measures) are excluded from the table, as the Federal Cost Share is 100%, so there is no unmet need.

The remaining five categories, shown in Table 28 below, show infrastructure need in the MID areas. Investments in these categories aim to reduce the repeated loss of roadways and facilities during severe weather events, to ensure the continuity of critical infrastructure. In attempting to meet these needs, the State of Vermont has reached the estimated damage cost threshold and received authorization for a 90/10% cost sharing, split with the Federal Government. However, the remaining costs for FEMA PA projects remain large. The State estimates over \$497 million in approximate damages in the MID areas for Categories C-G. With a 10% cost share, the estimated remaining costs are \$49.7 million.



State of Vermont, ACCD - DHCD
Vermont 2025 DRAFT HUD CDBG-DR Action Plan
FEMA Disaster Declaration 4720 for July 2023 Flooding

Table 26: FEMA PA Estimated Damages in Category C-G by MID County as of 4/11/25²⁹

County	Estimated Category C-G Projects	Estimated Damages	Estimated Remaining Costs (10%)
Caledonia	54	\$30,813,151.47	\$3,081,315.15
Lamoille	70	\$38,102,391.09	\$3,810,239.11
Orleans	66	\$13,231,978.83	\$1,323,197.88
Rutland	38	\$6,609,205.36	\$660,920.54
Washington	367	\$352,697,615.55	\$35,269,761.56
Windsor	227	\$56,288,789.49	\$5,628,878.95
Total	822	\$497,743,131.79	\$49,774,313.18

Source: FEMA PA Grants Portal Project Data; Additional Estimated Damages

Table 27: FEMA PA Estimated Damages in MID Area by Category as of 4/11/25³⁰

FEMA Project Category	Estimated Projects in MID Area	Estimated Damages	Estimated Remaining Costs (10%)
C - Roads and Bridges	505	\$101,720,511.37	\$10,172,051.14
D - Water Control Facilities	14	\$19,857,094.27	\$1,985,709.43
E - Buildings and Equipment	118	\$243,540,068.49	\$24,354,006.85
F - Utilities	47	\$76,368,005.15	\$7,636,800.52
G - Parks, Recreational Facilities, and Other Items	138	\$56,257,452.51	\$5,625,745.25
Total	822	\$497,743,131.79	\$49,774,313.18

Source: FEMA PA Grants Portal Project Data; Additional Estimated Damages

²⁹ NOTE: The current FEMA PA data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.

³⁰ NOTE: The current FEMA PA data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



Table 28: Summary of Infrastructure Unmet Need³¹

Funding Source	Need Met	Unmet Need
FEMA Public Assistance and Additional Estimated Damages	\$447,968,818.61	\$49,774,313.18

2.5 Economic Revitalization

An economic unmet needs assessment was conducted to determine the impacts of the July 2023 flood event on the State of Vermont's economy in order to determine the greatest remaining recovery needs that have not been addressed by other sources.

Table 29: Data Sources Used in Economic Revitalization Unmet Needs Assessment

Data Source	Location
US Department of Labor Employment & Training Administration Unemployment Insurance Data	UI Data Summary, Employment & Training Administration (ETA) - U.S. Department of Labor, Employment & Training Administration (ETA) - U.S. Department of Labor
2024 Business and Economic Analysis Data	Combined Vermont Historical Impact Dataset 2024 Business and Economic Analysis Dashboard
2023 Nonfarm Employment Data	Vermont Department of Labor Statewide Nonfarm Payroll Employment June 2023 to August 2023
2023 SBA Business Loan Data	Vermont DR-4720 Recovery Transition Plan
Vermont 2023 BEGAP Disbursement Data	Vermont 2023 Business Emergency Gap Assistance Program Awards Data

³¹ NOTE: The current Infrastructure unmet needs data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



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, resulting in a \$643.7M loss in annual revenue. There are an estimated 372,700 employees in Vermont, with around 1400 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 still 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.

Tourism accounts for the second largest industry in Vermont. Businesses with the NAICS Leisure and Hospitality Title employed 34,500 employees in August 2023.

2.5.1 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. The agricultural industry sustained severe damage due to crop destruction, livestock losses, and harm to vital farm infrastructure such as barns and irrigation systems. Commerce was also disrupted across the state as flooding inundated storefronts and strained supply chains as key transportation corridors were closed. According to the Vermont Department of Financial Regulation, 5,351 claims were submitted in Flood Insurance Claims following the July 2023 floods. The events highlighted the economic vulnerabilities across Vermont to severe weather events, underscoring the need for revitalization efforts that support long-term economic recovery.



The 2023 Flooding disaster put Vermont's agriculture and commerce to a partial halt, leading to numerous damages to business and farms while leading to an increase in unemployment. This is illustrated by an agricultural damage survey conducted by the Vermont Agency of Agriculture, Food, and Markets³²; Unemployment insurance claims to the US Department of Labor Employment & Training Administration; and Flood Insurance claims data collected by the Vermont Department of Financial Regulation³³. Additionally, letters of support requesting funding for additional disaster recovery funding from the Economic Development Administration sent by regional planning commissions and economic development corporations report severe loss of equipment, inventory, and income among businesses.

There were substantial efforts to mitigate these economic damages caused by DR-4720. A One Year Lookback at DR-4720³⁴ states that Vermont's State Business Emergency Gap Assistance Program (BEGAP)³⁵ distributed \$20.2M in recovery assistance to 553 affected businesses across the State. As shown in Table 31, HUD and Grantee MID counties received \$10.4M in BEGAP funding in 2023.

Table 30: 2023 Vermont Business Emergency Gap Assistance Program Awards to MID Counties as of October 3rd, 2024³⁶

County	Total BEGAP Award	Remaining Physical Damage
Caledonia	\$730,056.72	\$2,433,522.40
Lamoille	\$1,373,602.47	\$4,578,674.90
Orleans	\$889,615.53	\$2,965,385.10

³² Source: (Vermont Agency of Agriculture, Food, and Markets, 2023)

³³ Source: (Vermont Department of Financial Regulation, n.d.)

³⁴ (Vermont Office of the Governor, 2024)

³⁵ Source: (Vermont Agency of Commerce and Community Development, 2024)

³⁶ The current BEGAP data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



State of Vermont, ACCD - DHCD
Vermont 2025 DRAFT HUD CDBG-DR Action Plan
FEMA Disaster Declaration 4720 for July 2023 Flooding

Rutland	\$353,595.18	\$1,178,650.60
Washington	\$4,698,177.22	\$15,660,590.73
Windsor	\$2,309,962.61	\$7,699,875.37
Total	\$10,355,009.73	\$34,516,699.10

Table 30 continued: 2023 Vermont Business Emergency Gap Assistance Program Awards to MID Counties as of October 3rd, 2024

Source: [Vermont 2023 BEGAP Awards as of October 3rd, 2024](#)

Federally, Small Business Administration (SBA) provided an estimated \$11.3M in business and economic injury loans to 84 businesses. 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 2400 non-farm employees.

Table 31: SBA – Business Loans in Vermont³⁷

Location	Loans Approved	SBA Business Loan Applicants	% of Applicants Approved for SBA Business Loan
Vermont	76	273	27%

Source: DR-4720-VT Transition Plan Final

³⁷ NOTE: The current SBA data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



Table 32: Department of Labor Unemployment Insurance Claims in Vermont 2022-2024³⁸

Year	Initial Unemployment Insurance Claims	Total Weeks Claimed
2022	22,855	129,867
2023	22,314	142,493
2024	21,090	134,757

Source: [US Department of Labor Employment & Training Administration, Unemployment Insurance Data 2022-2024](#)

Table 33: Summary of Unmet Economic Revitalization Needs³⁹

Funding Source	Need Met	Unmet Need
Vermont BEGAP	\$10,355,009.73	\$34,516,699.10

³⁸ NOTE: The current Unemployment Insurance data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.

³⁹ The current Economic Revitalization unmet needs data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



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

Table 34: Cost Categories and Unmet Needs⁴⁰

Cost Categories	A Direct and Indirect Need	B Financial Assistance Budgeted and Obligated	A-B Unmet Need
Housing	\$168,867,024.44	\$82,248,553.01	\$86,618,471.43
Infrastructure	\$497,743,131.79	\$447,968,818.61	\$49,774,313.18
Economic Development	\$44,871,708.83	\$10,355,009.73	\$34,516,699.10
Total	\$711,481,865.06	\$540,572,381.35	\$170,909,483.71

⁴⁰ The unmet needs data analysis is preliminary and does not represent the full scope of findings. A more comprehensive analysis will be included in the final draft of the action plan.



3. Mitigation Needs Assessment

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 Plan⁴¹ 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. 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, 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.

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 cause 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, 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.

⁴¹ Source: (Vermont Department of Public Safety, 2023)



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 Program⁴² (HMGP) as well as Section 406 Hazard Mitigation Funding for Public Assistance Projects⁴³. As mentioned above, both the State and Local Hazard Mitigation Plans are critical in illustrated mitigation efforts taken as well as current outstanding needs.

The State of Vermont has pursued several sources of Hazard Mitigation funding, including the FEMA Hazard Mitigation Grant Program (HMGP) as well as Section 406 Hazard Mitigation Funding for Public Assistance Projects. As mentioned above, both the State and Local Hazard Mitigation Plans are critical in illustrated mitigation efforts taken as well as current outstanding needs.

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.

Emergency Watershed Protection Program

The USDA Natural Resources Conservation Service's Emergency Watershed Protection Program (EWP)⁴⁴ is available to assist property owners facing exigent risk of property loss due to ongoing erosion after a qualifying storm.

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 government as well as with the community.

⁴² Source: (FEMA, 2025)

⁴³ Source: (FEMA, 2024)

⁴⁴ Source: (U.S. Department of Agriculture, n.d.)



3.3 Risk Analysis

Per the State Hazard Mitigation Plan⁴⁵, little development of mitigation activities has occurred, leaving a vast majority of communities as vulnerable as ever. 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 the table below.

Table 35: 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

⁴⁵ Source: (Vermont Department of Public Safety, 2023)



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

Table 35 continued: 2023 Hazard Assessment

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 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.

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 Unmet Mitigation Needs

Table 36: 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.

Table 37: CDBG-DR Program Allocation and Funding Thresholds, excluding the 15% Mitigation Set-Aside*

Eligible Cost Category	Unmet Need	% of Unmet Need	% of Funding to be Expended in MID Areas	CDBG-DR Allocation Amount
Administration (5% cap)				\$3,392,250.00
Planning (15% cap)			100%	\$1,000,000.00
Housing	\$87,133,127.87	51%	100%	\$42,795,000.00
Infrastructure	\$49,774,313.18	29%	100%	\$7,500,000.00
Economic Revitalization	\$34,516,699.10	20%	\$0	\$0
Total	\$171,424,140.15	100%	100%	\$54,687,250.00

*This table does not include the \$13,157,750 of estimated CDBG-DR Mitigation Set-Aside which is roughly equal to 19.2% of the overall allocation.

4.2 Allocation and Award Caps



State of Vermont, ACCD - DHCD
Vermont 2025 DRAFT HUD CDBG-DR Action Plan
FEMA Disaster Declaration 4720 for July 2023 Flooding

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 #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 80% (\$54,276,000) of the allocation in the HUD-Identified MID areas of Washington County and Lamoille County. The remaining 20% (\$13,569,000) is available for recovery efforts in the State-Identified MID areas of Rutland County, Orleans County, Caledonia County and Windsor County.

The State will use the 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 the table 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. Planning-Only activities will have a maximum award amount of \$500,000 with a minimum award amount of \$100,000.

Table 38: Funding Allocations

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-aside	Estimated % to HUD identified MID Areas	Estimated % to LMI
Administration	\$3,392,250	5%			
Planning	\$2,000,000	3%	50%		
Housing	\$47,550,000	70%	10%	80%	70%
Infrastructure	\$10,000,000	14%	25%	80%	70%



State of Vermont, ACCD - DHCD
Vermont 2025 DRAFT HUD CDBG-DR Action Plan
FEMA Disaster Declaration 4720 for July 2023 Flooding

CDBG-DR Mitigation Set- Aside	\$4,902,750	7%	100%	80%	70%
Total	\$67,845,000		19%*	80%	70%
% of Total	100%	100%	-	80%	70%

Table 38 continued: Funding Allocations

*\$13,157,750 is the total amount estimated for CDBG-DR Mitigation Set-Aside which is roughly equal to 19.2% of the overall allocation.

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. 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 that were directly impacted by the flooding events in July 2023. 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 victims of DR-4720. In these cases, priority will be given to project applications that can demonstrate a clear benefit to LMI individuals and households.

Along with Infrastructure in direct support of housing, it is anticipated that multiple municipalities within the HUD-Identified and State-Identified MID areas will seek funding to address unmet needs for repair and replacement of culvers, bridges, and roadways. For these infrastructure projects benefiting entire communities the LMI National Objective will be met through LMI Area-Wide (LMA) as applicable, 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 of Vermont will oversee the identified programs and 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.

The State of Vermont received a CDBG-DR mitigation set-aside. As a result, the State is required to use at least 15% of the overall award for mitigation activities as described in (section I.C.1.b of the Universal Notice.). To achieve this requirement 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 14% of infrastructure funds will be identified as direct mitigation activities. The State is also allocating \$4,902,750 (7% of CDBG-DR allocation) 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 overall proposed identified amount of funding for direct mitigation activities across all programs totals \$13,157,750, or roughly 19.2%, of the overall \$67,845,000. This exceeds the minimum requirement of \$10,176,750 (15%) to be used to complete mitigation activities.

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. 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 Community Development Board meeting for a funding recommendation to make 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 Community Development Specialist 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 Community Development Board meeting, the assigned CD Specialist will present the VCDP-DR application and its scoring. The applicant will not be present at the board meeting or at the team scoring meeting. The 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. The Secretary will make the final decision on whether to fund or decline the VCDP-DR application.

4.3.2 CDBG-DR Project Thresholds

All projects proposed must meet the CDBG-DR Project Thresholds established by the 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 State-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 - Implementation Projects

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

Need	Max Points (60)
HUD-MID or State-MID	10 max points
VEM Priority Project List	10 max points
Project Need is well documented	10 max points
Appropriateness of Solution	10 max points
Strength of Tie-Back to DR-4720	10 points
Project addresses mitigation measures	10 points

Impact	Max Points (50)
Project LMI Benefit	10 Max Points
Readiness to proceed within 12 months	10 Max Points
Coordination with local/regional planning efforts	10 Max Points



Use of mitigation measures in construction methods	10 Max Points
Community better positioned to meet post disaster	10 Max Points

Feasibility	Max Points (30)
Demonstrated capacity and experience to carry out the project	10 Max Points
Project Long Term Viability	10 Max Points
Project cost effectiveness and reasonability	10 Max Points



4.3.4 CDBG-DR Scoring Matrix - Planning Projects

The following Scoring Matrix serves as a standardized rubric for evaluating projects proposed to the 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)
HUD-MID or State-MID	10 Max Points
Project need is well documented	10 Max Points
Strength of Tie-Back to DR-4720	10 Max Points
Project addresses mitigation measures	10 Max Points
Appropriateness of Solution	10 Max Points

Impact	Max Points (40)
Readiness to proceed within 12 months	10 Max Points
Coordination with local and regional planning efforts	10 Max Points
Results with community better prepared for next disaster	10 Max Points



Results with community better positioned to meet post disaster residents	10 Max Points
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Feasibility	Max Points (20)
Demonstrated capacity and experience to carry out the project	10 Max Points
Project Cost effectiveness and reasonability	10 Max 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 39: 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 \$2,000,000 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 40: Grantee Planning Activity Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation
Watershed Mitigation and Future Resiliency (Planning)	\$2,000,000	3%
Planning Total:	\$2,000,000	3%
Total	\$2,000,000	3%

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 2023 flood. 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 post FEMA property buyout.



Table 41: Housing Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation for LMI Benefit
Housing Construction and Rehabilitation	\$32,550,000	70%
Housing Program Total:	\$32,550,000	70%
Total	\$32,550,000	70%

4.4.3.2 Grantee Housing Program

Program Title: Multi-Family Construction and Rehabilitation

The State of Vermont's Multi-Family Construction and Rehabilitation program will provide funding for the construction of new affordable housing as well as rehabilitation and reconstruction of existing damaged housing units for both Single Family and Multi-Family homes.

Eligible Activity(ies): Acquisition; Clearance, Rehabilitation, Reconstruction and Construction of Buildings; Removal of Architectural Barriers; New Housing Construction; Relocation; Lead-Based Paint Hazard Evaluation and Reduction, Infrastructure in Support of Housing.

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

Lead Agency and Distribution Model: State of Vermont will oversee the program.

Distribution process will be a combination of local governments and direct implementation.

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.

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



Other Eligibility Criteria: Eligible applicants will include 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: Project proposals should include mitigation measures and include distinct cost breakout in funding request.

Reducing Barriers for Assistance: Vermont will establish requirements for the number of accessible units and units available for individuals/families experiencing homelessness.

4.4.4 Infrastructure

4.4.4.1 Infrastructure Programs Overview

The State of Vermont proposes implementing 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 42: Grantee Infrastructure Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR allocation for LMI Benefit
Infrastructure	\$25,000,000	70%
Infrastructure Program Total:	\$25,000,000	70%
Total	\$25,000,000	70%



4.4.4.2 Grantee Infrastructure Program

Program Title: Infrastructure

Eligible Activity(ies): Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements; Code Enforcement; Disposition; Non-Federal Match;

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

Lead Agency and Distribution Model: State of Vermont will oversee the program.

Distribution process will be a combination of local governments and direct implementation.

Program Description: Provide funding for infrastructure projects that will support communities in the development of housing and becoming more resilient to current and future natural disasters. 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 of Grantee Identified MID areas.

Other Eligibility Criteria: Eligible applicants will include local governments, public or non-profit organizations, and CHDOs/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: 80% of area median income (AMI)

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

Reducing Impediments for Assistance: The State of Vermont will establish program criteria that will guide eligible applicants in identifying eligible projects.



4.4.5 CDBG-DR Mitigation Set-Aside

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, be lessening the impact of future disasters.” Activities funded by HUD’s additional 15% allocation for mitigation must meet the definition of mitigation activities and, in addition, must:

- Address the current and future risks identified in the SHMP
- Be considered CDBG-eligible under Title I of the HCDA or pursuant to a waiver or alternative requirement; and
- Meet a national objective

Table 43: 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 CDBG-DR Allocation Mitigation Set-Aside
Planning (15% cap)	-	-		\$1,000,000	50%
Housing	\$87,133,237.87	51%	100%	\$4,755,000	10%
Infrastructure	\$49,774,313.18	29%	100%	\$2,500,000	25%
Total	\$136,392,784.61	80%	100%	\$59,550,000	19.2%



Table 44: 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: Floodplain Restoration and Riverbank Stabilization

Eligible Activity(ies): Acquisition, Construction, Reconstruction, and Installation of Public Facilities and Other Site Improvements; Disposition; Non-Federal Match

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

Lead Agency and Distribution Model: State of Vermont will oversee the program.

Distribution process will be a combination of local governments and direct implementation.

Program Description: Provide funding for floodplain restoration, dam removal, and riverbank stabilization.

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

Other Eligibility Criteria: Eligible applicants will include local governments, public or non-profit organizations, and CHDOs/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: State of Vermont will establish program criteria that guide will eligible applicants in identifying eligible projects.

DRAFT



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. The ACCD will solicit public comment for 30 days. Staff will conduct a public hearing on May 15, 2025, to present the draft Action Plan and seek input.



Table 45: 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
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	
Public Housing Agencies	The State consulted with the Barre Housing Authority and Montpelier Housing Authority
HUD-approved housing counseling agencies	
State Housing Finance Agencies	
Other Stakeholders	



5.1.2 Public Comments

The proposed Action Plan and any substantial amendments will be 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 will hold a public hearing, with sufficient information published about the subject of the hearing to permit informed comments. Public hearings will be announced in the newspaper, posted to the ACCD website, and emailed to our "All Interested Parties" List. By State law, citizens will be 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 must include 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) to 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.



5.1.3.2 Meaningful Access

For both virtual or 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 46: Comments Received and Grantee Response Sample Table

Comments Received	Grantee Response



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 Policy.

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 Notice⁴⁶. 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 the course of carrying out a project or becomes 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;
- the allocation or re-allocation of more than 25%;

⁴⁶ Source: (FR-6512-N-01, 2025)



- or the deletion or the addition of an activity.

Under the State of Vermont's Citizen Participation Plan for Disaster Recovery⁴⁷, any substantial amendment must follow the procedure of being authorized by the Secretary of the Agency of Commerce and Community Development and will be made public by postings and public notices in the newspapers, and posted on the [ACCD CDBG-Disaster Recovery website](#). The Agency will receive and consider public comments at accd-cdbgdr@vermont.gov on the substantial amendments for 30 days and receive approval from HUD before implementing the 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

The ACCD will prepare a performance report each year on the progress of the Action Plan in accordance with the requirements of the U.S. Department of Housing & Urban Development⁴⁸. Citizens will be afforded notice of the performance report through posting and newspapers. The performance report will be available at the ACCD website at <http://accd.vermont.gov> for review and will be emailed to any citizen who may request a copy.

The ACCD will receive and consider comments on the performance report for 15 days before the report is submitted to HUD. Comments may be sent to accd.cdbgdr@vermont.gov.

⁴⁷ Source: (Vermont Department of Housing and Community Development, 2021)

⁴⁸ Source: (U.S. Department of Housing and Urban Development, 2021)



6. Appendix

6.1 Certifications, Waiver, and Alternative Requirements

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

- a) **Uniform Relocation Act and Residential Anti-displacement and Relocation Plan** – The grantee certifies that it:
 - (1) will comply with the acquisition and relocation requirements of the Uniform Act, and implementing 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** - The grantee 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** - The grantee certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.
- d) **Citizen Participation** - The grantee 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** - State grantee 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** - The grantee 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. The grantee 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** - The grantee 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** - The grantee 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) **24 CFR 91.325(a)(1),(a)(3), and (a)(7); and 24 CFR 91.325(b)(5),(b)(6), and (b)(7).**



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