State of Vermont

FLOODPLAIN MANAGEMENT WORK PLAN



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INTRODUCTION

The Community Assistance Program – State Support Services Element (CAP-SSSE) provides, through a State grant mechanism, a means to ensure that communities participating in the Federal Emergency Management Agency (FEMA) National Flood Insurance Program (NFIP) are achieving the flood loss reduction goals of the NFIP. CAP-SSSE is intended to accomplish this by funding states to provide technical assistance to NFIP communities and to evaluate community performance in implementing NFIP floodplain management activities with the additional goal of building community floodplain management expertise and capability. In order to determine the most effective use of CAP-SSSE resources, FEMA directed states to develop a Floodplain Management Work Plan.

The purpose of the Floodplain Management Work Plan is to develop a comprehensive floodplain management work plan for a five-year period from FY 2005 through FY 2009 that conveys a vision, identifies the activities, and outlines the funds necessary to meet specified performance goals and to achieve an effective State floodplain management program funded through CAP-SSSE. The Floodplain Management Work Plan will be used by the FEMA Regional Office and FEMA Headquarters (HQ) to report to the Department of Homeland Security (DHS) on how CAP-SSSE funds are being utilized by Vermont to assist FEMA in support of flood loss reduction goals.

STATE AUTHORITY

Floodplain management in Vermont is regulated primarily by towns, cities, and villages through the adoption and enforcement of flood hazard bylaws (24 V.S.A. § 4424). The role of the Vermont Agency of Natural Resources is to provide state assistance to local government units in management of flood hazard areas, to coordinate federal, state, and local management activities for flood hazard areas, to encourage local government units to manage flood-prone lands, and to carry out a comprehensive state-wide flood hazard area management program for the state in order to make the state and units of local government eligible for flood insurance under the requirements of the National Flood Insurance Act of 1968 (10 V.S.A. § 753).

VISION FOR FLOODPLAIN MANAGEMENT

VT DEC's vision for floodplain management is to develop a comprehensive and effective State floodplain management program that reduces flood insurance losses, preserves natural floodplain functions, promotes strong local floodplain management expertise and capability, and results in safer communities.

Key objectives toward meeting these goals include:

- Maintaining a comprehensive floodplain management work plan
- Increasing the number of communities that adopt ordinances that meet or exceed NFIP standards
- Improving NFIP compliance

- Maintaining an up-to-date floodplain management database
- Providing model ordinance review and development
- Increasing community floodplain management expertise and capability
- Providing direct technical assistance to NFIP communities
- Coordinating with other State programs that impact floodplain management
- Assisting with hazard mitigation efforts
- Providing post disaster assistance and support to NFIP communities
- Providing assistance to the FEMA Regional Office and the State Map Modernization Coordinator to ensure that CAP-SSSE activities support achievement of Map Modernization program goals and performance measures
- Developing and maintaining an increased level of State expertise
- Increasing other floodplain management activities as necessary that support NFIP implementation and compliance

STRATEGY TO IMPROVE FLOODPLAIN MANAGEMENT

The activities necessary to accomplish the State's vision for floodplain management are: performing ordinance assistance; conducting community assistance visits and community assistance contacts; entering floodplain management data into the Community Information System; research and development of the State's model floodplain ordinance; conducting community workshops and other trainings; providing general technical assistance; coordinating with other State programs and agencies; providing assistance to communities in responding to disasters; providing assistance to the FEMA Regional Office and the State Map Modernization Coordinator to ensure that CAP-SSSE activities support achievement of Map Modernization program goals and performance measures; and developing and maintaining state expertise.

Floodplain Management Work Plan

The Floodplain Management Work Plan conveys a vision, determines the priorities, identifies the activities, and outlines the funds necessary to meet specified performance goals and to achieve an effective State floodplain management program. The Floodplain Management Work Plan may require updating each year during the five years to reflect changes in the State's floodplain management program.

Ordinance Assistance

Adoption of compliant ordinances by communities is critical to achieving NFIP objectives and to avoid suspending any community for failure to properly adopt. VT DEC will provide assistance to communities in adopting NFIP compliant floodplain management ordinances. This will include necessary ordinance revisions based upon new hazard maps provided by FEMA through Map Modernization as well as incorporating any future changes in NFIP floodplain management criteria.

Community Assistance Visits and Community Assistance Contacts

VT DEC will conduct Community Assistance Visits (CAVs) and Community Assistance Contacts (CACs). CAVs will be prioritized for those communities with the most repetitive loss properties, the most development, and those with the highest likelihood of compliance problems. For other communities, VT DEC will make maximum use of the CAC process and other contacts with communities to identify potential compliance problems and needs for technical assistance. VT DEC will provide appropriate follow-up to CAVs and CACs by providing technical assistance to correct program deficiencies and remedy violations to the maximum extent possible. VT DEC will coordinate with the FEMA Regional Office, as necessary, to clarify what follow-up is to be provided. VT DEC will refer community compliance problems that they are unable to resolve to the FEMA Regional Office. CAVs will be used as opportunities to verify repetitive loss data and identify possible mitigation activities that address repetitive loss properties. All CAVs and CACs will be entered into the Community Information System (CIS).

Floodplain Management Data in the Community Information System

The Community Information System (CIS) provides data and information about floodplain management, mapping, and insurance for NFIP communities. All NFIP information will be updated and entered into CIS including: CAVs, CACs, ordinance adoption, and other fields as allowed. Data entry into CIS will enable VT DEC and FEMA personnel to track progress on accomplishing the CAP-SSSE performance criteria and will enable more efficient reporting to DHS.

State Model Floodplain Ordinance Research and Development

Many Vermont communities have adopted flood area ordinances that allow for map revisions to be automatically adopted. In most instances, there is language in the ordinance that states that the "current NFIP maps" are adopted. It has come to FEMA's attention that these automatic adoption provisions may not be in conformance with some state laws. The VT DEC has contacted the State's legal council and to date there has been no response. VT DEC will follow up with the State's legal council in order to determine the legality of automatic adoption provisions.

Community Workshops and Other Trainings

VT DEC will conduct workshops and other trainings for local officials and floodplain managers to support implementation and enforcement of community floodplain management regulations and to promote hazard identification and local and state planning activities. Consideration will be given on how best to take advantage of the Association of State Floodplain Mangers (ASFPM) Certified Floodplain Manager (CFM) Program including encouraging community floodplain managers to become CFMs.

General Technical Assistance

VT DEC will continue to provide direct technical assistance to communities and individuals to resolve floodplain management issues related to the NFIP. General technical assistance will also include assisting communities in participating in the NFIP Community Rating System (CRS) and in undertaking activities credited by CRS.

Coordination with Other State Programs and Agencies

VT DEC will coordinate with other State administered programs that impact on floodplain management such as the Flood Mitigation Assistance Program, The Hazard Mitigation Grant Program, the Pre-Disaster Mitigation Program, the State Dam Safety Program, and other state land use and water resources programs. VT DEC will also coordinate with other state agencies on adoption and implementation of State Executive Orders and regulations that meet State NFIP participation requirements.

Assistance to Communities in Responding to Disasters

VT DEC will provide post disaster assistance and support to NFIP communities. Examples of these activities include: technical assistance implementing substantial damage requirements, including use of the Substantial Damage Estimating Software; assistance to communities enrolling into the NFIP; general floodplain management technical assistance; assistance with the promotion and use of the NFIP Increased Cost of Compliance (ICC) coverage; and assistance with a variety of hazard mitigation initiatives. Generally, these activities are not included in the annual CAP-SSSE agreement, but negotiated if and when a disaster occurs. The CAP-SSSE Agreement will be modified to reflect these changes.

Map Modernization Activities

Map Modernization Management Support (MMMS) Map Modernization activities will require a potentially large increase in CAP-SSSE work including: coordination of meetings; development of mapping priorities; the scoping of studies; adoption of maps as a basis for regulation; and similar technical assistance. VT DEC will work closely with the FEMA Regional Office and the State Map Modernization Coordinator to ensure that CAP-SSSE activities support achievement of the goals of the Multi-Hazard Map Modernization program and to ensure that new flood maps are adopted by NFIP communities in accordance with the performance goals and measures as established by the Vermont Multi-Hazard Map Modernization Business Plan.

Develop and Maintain State Expertise

VT DEC will develop and maintain the expertise and capability necessary to conduct CAP-SSSE activities. VT DEC will have a least one State Floodplain Management staff person dedicated to CAP-SSSE or other floodplain management activities. The Floodplain Management Staff will participate in floodplain management associations, national conferences, and other training opportunities to help maintain this expertise and capacity.

Other Activities

VT DEC will undertake other floodplain management activities as necessary that directly support NFIP implementation and NFIP compliance such as: increasing community enrollment in the NFIP, encouraging community participation in the Community Rating System (CRS); and mitigating repetitive loss properties on the target list.

PROGRAM GOALS AND PREFORMANCE MEASURES

Specific program goals and performance measures have been developed in order to provide a basis in which to evaluate the success of the State floodplain management program in achieving greater floodplain management compliance at the community level.

ACTIVITY	PROGRAM GOAL	PERFORMANCE MEASURE
Floodplain Management Work Plan	Continually maintain and improve a comprehensive floodplain management work plan	Annual review and update (if necessary); Submit any revisions of Floodplain Management Work Plan to FEMA Regional Office
Ordinance Assistance	Improve the number of communities that adopt compliant ordinances that meet or exceed NFIP standards; Improve the percentage of communities that adopt new maps by the FIRM effective date or prior to the 30 day letter being sent	Track the number of communities with compliant ordinances that meet or exceed NFIP standards and compare to subsequent years; Compare number of communities receiving new maps with how many adopted the new maps and have compliant ordinances; Compare number of communities that received 30-day letter with the number in subsequent years
CAVs and CACs	Increase the number of CAVs and CACs to communities that result in increased compliance	Visit approximately 45 communities/year (5-year cycle) and enter all CACs and CAVs in CIS
Floodplain Data in CIS	Maintain up-to-date floodplain management database in CIS	Enter 100% of floodplain data into CIS; Compare State floodplain database to CIS database
Ordinance Research and Development	Determine the legality of automatic adoption provisions	Modify the State Model Floodplain Ordinance to provide acceptable standard
Community Workshops and Trainings	Increase community floodplain management expertise and capability through trainings and CFM program	Document number of floodplain management trainings and participants; Compare number of CFMs in the State with the number in subsequent years
General Technical Assistance	Continue to provide direct general technical assistance	Quantify general technical assistance calls and categorize the type of call and constituent group, enter all calls into CIS
Coordination with Other Programs and Agencies	Coordinating with other State programs that impact floodplain management	Document meetings with other State agencies describing how these improved floodplain management
Assistance to Communities in Disasters	Providing post disaster assistance and support to NFIP communities	Modify CAP-SSSE Agreement when necessary to reflect post disaster assistance and support to NFIP communities
Map Modernization Activities	Work closely with the FEMA Regional Office and the State Map Modernization Coordinator to ensure that CAP-SSSE activities support achievement of Map Modernization program goals and performance measures	Outline outreach strategy for communities to ensure compliance with Map Modernization program goals and performance measures; Document ordinance updates

ACTIVITY	PROGRAM GOAL	PERFORMANCE MEASURE
Develop and Maintain State Expertise	Develop and maintain an increased level of State expertise	Establish participation in ASFPM and have State floodplain management staff attain CFM credentials
Other Activities	Increase other activities as necessary that support NFIP implementation and compliance	Evaluate community compliance by examining number of NFIP violations; Determine any non-participating flood prone communities that should be enrolled in NFIP; Compare number of CRS communities/class improvements with the number in subsequent years; Determine projects for HMGP or applications for PDM that address mitigation of repetitive loss structures

VT DEC will submit documentation or other evidence, on at least a quarterly basis, that demonstrates work completed. CAVs and CACs and ordinance update information will be entered into CIS. CAV reports with supporting documentation and copies of reviewed ordinances will be provided to the FEMA Regional Office in hard copy. Annual performance reporting and the Floodplain Management Work Plan will be submitted through the FEMA Regional Office to the Community Assistance Section at FEMA Headquarters.

NEEDS ANALYSIS AND GAP ASSESSMENT

CAP-SSSE funds are used for activities that support the NFIP by fostering effective floodplain management programs in participating communities and providing assistance to non-participating communities in enrolling in the NFIP. As CAP-SSSE funds are not intended to fund all floodplain management activities undertaken by the State (only those identified by the FEMA Regional Office), VT DEC will continue to show a strong commitment to floodplain management and support additional NFIP floodplain management objectives and initiatives.

The following FTE and costs projection budget represents the total amount of federal funds required to successfully perform the proposed CAP-SSSE activities on an annual basis for each of the five years. While it is anticipated that we will not have a need for additional FTEs over the next five year time period, the budget will need to be increased on annual basis to account for the cost of inflation (2.5% estimate). VT DEC will update the budget on an annual basis to reflect this increase as well as any other currently unanticipated increased costs that may be necessary to perform additional CAP-SSSE activities.

	ACTIVITY	FTE	COSTS
Personnel Costs	Floodplain Management Work Plan	0.05	$ 3,250
	Ordinance Assistance	0.1	$ 6,500
	CAVs and CACs	0.3	$ 19,500
	Floodplain Data in CIS	0.05	$ 3,250
	Ordinance Research and Development	0.05	$ 3,250

	ACTIVITY	FTE	COSTS
	Community Workshops and Trainings	0.1	$ 6,500
	General Technical Assistance	0.5	$ 32,500
	Coordination with Other Programs and Agencies	0.05	$ 3,250
	Assistance to Communities in Disasters	TBD	TBD
	Map Modernization Activities	0.1	$ 6,500
	Develop and Maintain State Expertise	0.1	$ 6,500
	Other Activities	0.1	$ 6,500
	Total Personnel Costs	**1.5**	**$ 97,500**
Other Costs	Travel / Training		$ 10,000
	Indirect		$ 16,500
	Fringe Benefits		$ 25,000
	Overhead		$ 13,000
	Total Other Costs		**$ 64,500**
Total Costs			**$ 162,000**

VT DEC funding will provide the 25% non-federal match required by CAP-SSSE funding.

A gap exists between the level of funding required to achieve proposed CAP-SSSE activities (1.5 FTE) and what VT DEC is currently funded to achieve (0.75 FTE). In order to successfully fulfill the Floodplain Management Work Plan's vision, the VT DEC will need to increase staffing levels by 0.75 FTE in order to perform all of the specified CAP-SSSE activities as proposed in this plan.

Assuming current funding levels for the next five years, VT DEC would not be able to complete 50% of the activities required to achieve the goals of the Floodplain Management Work Plan.

SUMMARY

The Floodplain Management Work Plan is a comprehensive floodplain management work plan that conveys the VT DEC's vision for floodplain management, identifies the activities necessary to accomplish the State's vision for floodplain management, and outlines the funds necessary to meet specified performance goals and to achieve an effective State floodplain management program funded through CAP-SSSE.
VT DEC's vision for floodplain management is to develop a comprehensive and effective State floodplain management program that reduces flood insurance losses, preserves natural floodplain functions, promotes strong local floodplain management expertise and capability, and results in safer communities.

The activities necessary to accomplish the State's vision for floodplain management are: performing ordinance assistance; conducting community assistance visits and community assistance contacts; entering floodplain management data into the Community Information System; research and development of the State's model floodplain

ordinance; conducting community workshops and other trainings; providing general technical assistance; coordinating with other State programs and agencies; providing assistance to communities in responding to disasters; providing assistance to the FEMA Regional Office and the State Map Modernization Coordinator to ensure that CAP-SSSE activities support achievement of Map Modernization program goals and performance measures; and developing and maintaining state expertise.

In order to successfully fulfill the Floodplain Management Work Plan's vision, the VT DEC will need to increase staffing levels by 0.75 FTE in order to perform all of the specified CAP-SSSE activities as proposed in this plan. Assuming current funding levels for the next five years, VT DEC would not be able to complete 50% of the activities required to achieve the goals of the Floodplain Management Work Plan. As CAP-SSSE funds are not intended to fund all floodplain management activities undertaken by the State (only those identified by the FEMA Regional Office), VT DEC will continue to show a strong commitment to floodplain management and support additional NFIP floodplain management objectives and initiatives.