

Lamoille County Multi-Jurisdictional Approach for the Community Rating System

Feasibility Assessment

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Photo credit: Lamoille Tactical Basin Plan

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Multi-jurisdictional Approach for the Community Rating System Feasibility Assessment

COVID-19 Impact Statement

In early March 2020, the COVID-19 pandemic became realized in the United States. Shortly thereafter, states – including Vermont – implemented statewide lockdowns to prevent the spread of the deadly virus. In an effort to stand up necessary pandemic response systems in multiple sectors (e.g. public health, public safety, food systems, etc.), Governor Scott issued a state of emergency that is still ongoing as of the time of this feasibility assessment (September 2020). This state of emergency has redirected state resources and programs to focus on COVID-19. As a result, staff capacity at the federal, state, regional and local levels have been significantly impacted. Similar impacts have been seen nationwide. Further, a majority of the non-essential workforce in Vermont is working remotely. As a result, this feasibility assessment, which would have otherwise been the result of a robust stakeholder engagement effort, was significantly impacted by lack of availability of key stakeholders.

Beyond the impacts of the COVID-19 pandemic on this assessment, economists estimate severe, long-lasting impacts to the economy. In a May 2020 report¹ by the Congressional Budget Office, real Gross Domestic Product (GDP) was not expected to regain its pre-pandemic levels until 2022 or beyond and the September 2020 report² estimated a \$3.1 trillion federal budget deficit for fiscal year 2020. Given the surge in unemployment, redirection of federal funds, and economic forecasts, resources are likely to be minimal for programs across all levels of government. The likelihood of standing up a new program at the municipal level is, therefore, reduced.

Background

This assessment analyzes the feasibility of a multi-jurisdictional approach to joining the National Flood Insurance Program's Community Rating System (CRS). Given the significant administrative burden of joining and maintaining membership in the CRS, coupled with the rural nature of towns in Lamoille County and their unique flood vulnerability, the Lamoille County Planning Commission (LCPC) seeks to understand the opportunity to combine both town and regional resources to apply for entry into the CRS, rather than the traditional single-jurisdictional approach. LCPC has engaged the towns of Hyde Park, Stowe, and Wolcott to perform this assessment, which could theoretically be replicated or expanded intra- or inter-regionally.

The National Flood Insurance Program

The National Flood Insurance Program (NFIP) was created through the National Flood Insurance Act of 1968³ in an effort to both provide affordable insurance premiums to property owners located within riparian and coastal flood zones and limit further development in these high-risk areas. The NFIP is also

¹ <https://www.cbo.gov/publication/56351>

² <https://www.cbo.gov/publication/56661>

³ https://www.fema.gov/media-library-data/20130726-1545-20490-9247/frm_acts.pdf

responsible for mapping flood risks. Through the Flood Disaster Protection Act of 1973, NFIP coverage was made mandatory for properties that are both located in the mapped Special Flood Hazard Area (SFHA), a FEMA-mapped area that estimates an annual flood risk at or above one percent, and have a mortgage with a federally-regulated financial institution. Under the NFIP, coverage is capped at \$250,000 and \$500,000 per insured residential or non-residential properties, respectively⁴.

At its inception, the NFIP was not designed to maintain sufficient funding for extreme disaster events, but language in the law allowed for borrowing from the Treasury for such cases, up to \$250 million. This limit was increased in 1973 to \$500 million, or up to \$1 billion with presidential authorization. The limit was further increased to \$1.5 billion in 1996 and then \$18.5 billion following the historic 2005 hurricane season⁵. Payouts from Hurricane Sandy in 2012 alone increased NFIP debt to \$30 billion⁶. Currently, the borrowing limit is set at \$30.425 billion.

As extreme events continue to rise in both frequency and severity, so do the debts of the NFIP. Recognizing this trend, Congress passed the Biggert-Waters Flood Insurance Reform and Modernization Act (hereafter, Biggert-Waters) of 2012⁷ to transition the NFIP from subsidized flood insurance to actuarial levels. This substantial revision to the NFIP eliminated lower rate classes of the pre-Flood Insurance Rate Map (FIRM) subsidized and grandfathered policies. Quickly, policy holders saw significant surges in their insurance premiums, many of which were required to increase 25% per year until actuarial levels were met. The financial impacts of Biggert-Waters are far-reaching for policy holders, from unaffordable NFIP premiums to significantly reduced property values. For policy holders in New York City, for example, property values were reduced by 3-6%⁸. Robust public outcry to politicians through impacted constituents resulted in the Flood Insurance Affordability Act of 2014⁹, which decreased the rate of premium increases to 18% per year and restored the grandfathering clause.

Even with the increased premiums and sustained, annual rise in NFIP policy holders to bolster the program's reserves, as of December 2019, the NFIP was \$20.525 billion in debt¹⁰.

One way the federal government is attempting to achieve more affordable insurance premiums and reduced risk through restricted development in flood-prone areas is through the NFIP's Community Rating System (CRS).

⁴ <https://www.fdic.gov/regulations/compliance/manual/5/v-6.1.pdf>

⁵ <https://fas.org/sgp/crs/homesec/IN10784.pdf>

⁶ <https://www.ucsusa.org/sites/default/files/2019-09/Overwhelming-Risk-Full-Report.pdf>

⁷ <https://www.govinfo.gov/content/pkg/PLAW-112publ141/pdf/PLAW-112publ141.pdf>

⁸ <http://www.umass.edu/economics/sites/default/files/Mullins.pdf>

⁹ <https://www.congress.gov/bill/113th-congress/house-bill/3370>

¹⁰ <https://fas.org/sgp/crs/homesec/R44593.pdf>

The Community Rating System – Overview, Structure & Savings

The Community Rating System (CRS) was created by FEMA in 1990 to incentivize municipalities to exceed the existing minimum NFIP requirements¹¹. Those communities that achieve certain levels of flood risk reduction through varying community actions are awarded flood insurance premium rate discounts between 5 and 45%. That is, for community’s undertaking and documenting significant community action to reduce flood risk, NFIP policy holders in those community’s will see up to 45% reduction in their premium rates. Under the CRS, communities are encouraged to design and implement a comprehensive approach to floodplain management.

As a community implements and documents their various activities, credits are received and documented on the CRS Quick-Check, which is then rigorously reviewed by FEMA. The more actions that a community completes, the more credit credits it receives, and the more credit credits it receives, the higher the CRS Rate Class, and therefore the greater the NFIP discounts for property owners in that community (**Table 1**).

Table 1. Community Rating System Discounts by Rate Class

CRS Rate Class	Discount for SFHA*	Discount for Non-SFHA**	Credit Credits Required
1	45%	10%	4,500+
2	40%	10%	4,000-4,499
3	35%	10%	3,500-3,999
4	30%	10%	3,000-3,499
5	25%	10%	2,500-2,999
6	20%	10%	2,000-2,499
7	15%	5%	1,500-1,999
8	10%	5%	1,000-1,499
9	5%	5%	500-999
10	0	0	0-499

*Property owners in the Special Flood Hazard Area

**Property owners outside of the Special Flood Hazard Area may be able to access Preferred Risk Policies, if they are located in B, C, and X Zones on their community’s Flood Insurance Rate Map (FIRM) and are shown to have a minimal risk of flood damage.

There are 19 specific actions falling under the four categories of Public Information, Mapping & Regulations, Flood Damage Reduction, and Flood Preparedness (**Table 2**) from which a community can select to implement. A community is responsible for understanding which of the individual actions are feasible for their community, which requires a thorough review of staff capacity, resources to meet the annual administrative requirements of the CRS, political will, and community need. There are maximum credit credits that can be earned under each of the specific activities, and **Table 2** provides a “percentage of communities credited” column so that interested communities can get a general sense of those activities that are more broadly employed and those that are likely more difficult to achieve.

¹¹ <https://www.fema.gov/flood-insurance/rules-legislation/community-rating-system>

For example, 96% of CRS communities (as of October 2016) were credited for “310 Elevation Certificates”, while only 4% received credit for “370 Flood Insurance Promotion.”

Table 2. Credit Credits Awarded for CRS Activities[‡]

Table 110-2. Credit points awarded for CRS activities.*				
Activity	Maximum Possible Points	Maximum Points Earned	Average Points Earned	Percentage of Communities Credited
300 Public Information Activities				
310 Elevation Certificates	116	116	38	96%
320 Map Information Service	90	90	73	85%
330 Outreach Projects	350	350	87	93%
340 Hazard Disclosure	80	62	14	84%
350 Flood Protection Information	125	125	38	87%
360 Flood Protection Assistance	110	100	55	41%
370 Flood Insurance Promotion ⁵	110	110	39	4%
400 Mapping and Regulations				
410 Flood Hazard Mapping	802	576	60	55%
420 Open Space Preservation	2,020	1,603	509	89%
430 Higher Regulatory Standards	2,042	1,335	270	100%
440 Flood Data Maintenance	222	249	115	95%
450 Stormwater Management	755	605	132	87%
500 Flood Damage Reduction Activities				
510 Floodplain Mgmt. Planning	622	514	175	64%
520 Acquisition and Relocation	2,250	1,999	195	28%
530 Flood Protection	1,600	541	73	13%
540 Drainage System Maintenance	570	454	218	43%
600 Warning and Response				
610 Flood Warning and Response	395	365	254	20%
620 Levees	235	207	157	0.5%
630 Dams	160	99	35	35%
* Figures are based on communities that have received verified credit under the 2013 <i>CRS Coordinator's Manual</i> (about 43% of CRS communities), as of October 2016. The maximum possible points are based on the 2013 <i>Coordinator's Manual</i> . Growth adjustments are not included.				

[‡]Table taken from the *CRS Coordinators Manual*¹²

¹² https://www.fema.gov/media-library-data/1493905477815-d794671adeed5beab6a6304d8ba0b207/633300_2017_CRS_Coordinators_Manual_508.pdf

In order to apply for entry to the CRS, a community must have at least 500 verified CRS credits. Provided that minimum credit level is reached, as are five¹³ specific prerequisites, a community will be granted membership to the CRS at a Class 9. The prerequisites for entry are below:

1. The community must have been in the Regular Phase of the NFIP for at least one year.
2. The community must be in full compliance with the minimum requirements of the NFIP. There must be correspondence from the Regional Office of FEMA stating that the community is in full compliance with the NFIP, within six months of the initial CRS verification visit. The FEMA Regional Office or State NFIP Coordinator may need to conduct a Community Assistance Visit if neither has been in the community recently. If a community is determined at any time to be in less-than-full compliance, it will retrograde to a CRS Class 10.
3. The community must maintain FEMA Elevation Certificates on all new buildings and substantial improvements constructed in the Special Flood Hazard Area (SFHA) after the community applies for CRS credit. See 310 Elevation Certificates in **Table 2**.
4. If there are one or more repetitive loss properties in the community, the community must take certain actions, including reviewing and updating the list of repetitive loss properties, mapping repetitive loss areas, describing the causes of the losses, and sending an outreach project to those areas each year. A community with 50 or more repetitive loss properties must also prepare a repetitive loss area analysis or floodplain management plan that addresses its repetitive flood problem.
5. The community must maintain all flood insurance policies that it has been required to carry on properties owned by the community.

As a CRS program is developed, there are several entities that should be part of the program design and implementation:

- **An ISO/CRS Specialist.** FEMA's contractor, Insurance Services Office, Inc. (ISO), is responsible for handling community requests for joining and maintaining membership to the CRS. This CRS Specialist would work directly with the community(ies) to assist and evaluate CRS credits and possible Class Level.
- **An ISO/CRS Resource Specialist.** New in 2017, this person's role is to complete a centralized review of annual recertification documents.
- **A CRS Coordinator.** This person is the dedicated community official responsible for coordinating the community's CRS activities and working with their ISO/CRS Specialist to document and verify their program.
- **The Town's Floodplain Administrator.** In Vermont, this person is often the Zoning Administrator, though the role can be filled by other town staff. This person is responsible for administering and enforcing the NFIP in their community and can also fill the role of CRS Coordinator.
- **FEMA CRS Regional Coordinator.** A community will be assigned a FEMA CRS Regional Coordinator from the FEMA Region I office, who serves as the secondary point of contact (after the dedicated ISO/CRS Specialist) for the community.
- **State NFIP Coordinator.** A helpful resource for communities interested in joining the CRS, the State NFIP Coordinator is responsible for identifying possible statewide standards that can be implemented to benefit all communities interested in CRS participation. They need to be copied

¹³ There are technically six prerequisites, but the sixth only pertains to coastal communities and has therefore been left out of this assessment.

on a community’s letter of interest to join the CRS and should also attend a Community Assistance Visit (CAV) during the CRS application process.

With the basic overview of the CRS and a proposed structure for a community (or multi-community) structure, and before diving into the CRS Activities that Lamoille County Planning Commission and the three pilot towns of Hyde Park, Stowe and Wolcott could potentially implement, it is important to understand the potential financial benefit of joining the CRS.

Based on analysis from a past LCPC staff person, there are 15 structures located within the Special Flood Hazard Area (SFHA) in Hyde Park, 88 structures in Stowe, and 86 structures in Wolcott. After assessing which of these structures carried flood insurance, **Table 3** below was created to document the average amount of savings per policy holder in each of the three towns over CRS Classes 7, 8 and 9.

Table 3. Town NFIP Average Annual Premiums and CRS Class deductions

	TOWNS (# of policyholders)		
	Hyde Park (5)	Stowe (29)	Wolcott (11)
Current Avg. Premium →	\$759	\$1,145	\$1,345
CRS Class (% discount) ↓	Average Annual Per-Premium Savings		
9 (5%)	\$32	\$44	\$60
8 (10%)	\$68	\$84	\$121
7 (15%)	\$103	\$124	\$181

Because the FEMA-mapped SFHA is not always accurate, nor does it importantly consider river corridors as relevant flood-vulnerable areas, many Vermonters (including several in these three towns) carry flood insurance on their property (called Preferred Risk Policies¹⁴). These policies are typically less expensive than those that cover structures in FEMA flood zones but are even more appealing to interested property owners with a discount through the CRS. Increasing flood insurance coverage not only protects property owners from damage to their non-FEMA-mapped homes and businesses, but also creates a larger network of NFIP policies, critical to the long-term viability of the NFIP. In fact, a 2019 study found a significant, positive, and generally increasing effect of CRS participation on flood insurance uptake¹⁵.

With the financial benefits to individual property owners in Hyde Park, Stowe, and Wolcott understood, the section below describes specific CRS activities that can be taken to achieve these discounts.

¹⁴ https://www.fema.gov/sites/default/files/2020-08/fema_preferred-risk-policy-for-homeowners-renters_12-10-2018.pdf

¹⁵ <https://academic.oup.com/aep/advance-article/doi/10.1093/aep/ppz013/5540148>

CRS Activities – Opportunities for LCPC’s Multi-Jurisdictional Approach

It is important to note, before delving into credit opportunities, a limiting factor of Vermont communities on the CRS Class scale. Because Vermont lacks a statewide residential building code, communities do not have a Building Code Effectiveness Grading Schedule (BCEGS) rating through ISO. A BCEGS assesses the building codes in effect for a community and how the community enforces those codes, with a special emphasis on hazard mitigation¹⁶. Without a BCEGS rating, Vermont communities are effectively capped at a CRS Class of 7, as a BCEGS rating is a prerequisite to jump up to a CRS Class 6 (CRS Coordinator’s Manual, 211.b)¹⁷. It is possible for a town to receive a BCEGS rating without a statewide residential building code, but the town would need to adopt its own building code, hire a Code Inspector, and complete a BCEGS assessment. For small, rural towns in Vermont, this is unlikely a feasible path. Therefore, this assessment works under the assumption that the maximum CRS Rate Class Hyde Park, Stowe & Wolcott could achieve is a 7. That said, there are several opportunities for LCPC to assist these three communities in developing and documenting new CRS credit opportunities.

The attached CRS Quick Check for LCPC documents specific actions that can be taken to increase credit credits. Those credits that are likely already available and those that could be implemented by LCPC and the three communities are explicitly identified below. Please note this is not an exhaustive list of all the CRS Activities that could be implemented, but those that are likely the most feasible for initial CRS entry.

- **Public Information**

- 310a. Elevation Certificates (ECs) kept on all new buildings and substantial improvements - **38 credits** earned (*prerequisite to joining the CRS).
- 310b. Existing ECs on file prior to CRS application – 12 credits if some are on file, 24 if majority, 48 if all. For LCPC and these three communities, **12 credits** likely.
- 320a. Publicize LCPC/town staff as resource for reading FIRMs and documenting the conversation. Note that this must be publicized in a community newsletter that reaches everyone (e.g. Town report) and must be kept on file. **30 credits** possible. Note this is a prerequisite for earning credits under Section 320, which has a maximum credit value of 90.
- 320b. Provide inquirers with other non-insurance related information that is shown on the FIRM (e.g. floodways). This can be done verbally for inquirers, provided the conversation/information shared is documented in a log in the town (or LCPC office) or via an informational brochure/flyer. Recommend creating a small informative flyer about flood and erosion risks; make it available in town offices & expressly give to inquirers. **20 credits** possible.
- 320c. Provide information about flood problems not shown on a FIRM. In this brochure, include information about historically flooded/vulnerable areas, local drainage problems, flooding in unmapped areas or the 500-year floodplain. **20 credits** possible.
- 320e. Provide information about erosion, alluvial fans, ice jams. Including information about these non-SFHA hazards in the aforementioned brochure will earn **20 credits**.
- 320g. Provide information about areas that should be protected because of their natural floodplain functions (this will require LCPC and/or ANR assistance) – information from a wetland and/or habitat map qualifies for **20 credits**.
- 330a. Flood-related informational brochure, flyer or another document set out for the public to pick up. This can include the aforementioned brochure, generic flood-related

¹⁶ <https://www.isomitigation.com/bcegs/>

¹⁷ https://www.fema.gov/media-library-data/1493905477815-d794671adeed5beab6a6304d8ba0b207/633300_2017_CRS_Coordinators_Manual_508.pdf

- FEMA documents, informational pamphlets prepared by VEM and/or ANR, etc. Maintain copies of each of these flyers in the community's CRS file. 2 credits per brochure – easily **20 credits**, likely more.
- **330a.** Flood-related newsletter, presentation, or other outreach project that is implemented annually (e.g. annual ice jam flooding seminar, quarterly flood-related updates on the Selectboard's agenda, more regular updates at Planning Commission meetings, Town's Annual Report, etc.). Maintain copies in the community's CRS file. 4 credits per – easily **16 credits**, likely more.
 - Note that there is a significant opportunity to generate CRS credits under Activity 330 through development and implementation of a Public Outreach Project. Given all of the work LCPC has carried out in their region relating to flood-vulnerability, hazard mitigation, etc., it is very possible for an outreach project that provides the public with information needed to increase flooding awareness and motivate actions to reduce flood damage, encourage NFIP coverage, and protect the natural floodplains. More information can be found in 330-2 of the CRS Coordinator's Manual, but up to 350 credit are available (most likely **200 credits** for an Outreach Project created primarily by LCPC). Recommend using the CRS Resources website for a walk-through of how this can be achieved¹⁸.
 - **340b.** State or local requirements that sellers must disclose whether a property has been flooded – 26 V.S.A. §2296(4). **5 credits**.
 - **350a.** Flood-related references located in the library. Towns would need to have the brochures recommend above in each of their libraries as free handouts. Up to 10 credits can be achieved through the "Locally-Pertinent Information" section, which includes having specific documents on file at the library (e.g. the community's Flood Insurance Study, Local Hazard Mitigation Plan, and Flood Insurance Rate Map) at the library – **1 credit each**. Additionally, requesting the 9 FEMA flood protection publications (free, under "Library Publications" in Appendix C of the CRS Coordinator's Manual) would also grant an additional 10 credits. Total possible – **20 credits**. Note information must be kept up to date and included in the library's card catalog system, if it has one.
 - **350c.** Provide flood-related information on the community's website. Up to **47 credits** for coverage of the following CRS Priority Topics on the community website (more information in the CRS Coordinator's Manual, Section 350-7):
 - Know your flood hazard
 - Insure your property for your flood hazard
 - Protect people from the hazard
 - Protect your property from the hazard
 - Build responsibly
 - Protect natural floodplain functions
 - **360a, b.** Visit homes and help owners determine how they could reduce their flooding or drainage problem. Up to **25 credits** if a community publicizes this service annually. This would almost certainly be managed by LCPC, though if town staff/volunteers are properly trained, they could fill the role, too. Detailed construction plans are not required, nor specs, just generic floodproofing/risk reduction information. This service must be publicized and communication with any inquirer documented in the CRS file record. An additional **30**

¹⁸ https://crsresources.org/files/300/outreach_projects_for_credit_under_the_crs_2017.pdf

- credits** are awarded if the person(s) responsible for this activity visit the site prior to providing the advice. Note: this activity is a requirement for 360c.
- **360c.** Talk to owners about sources of financial assistance for flood or drainage protection measures. Discussion of funding available through the community, hazard mitigation grants, NFIP's Increased Cost of Compliance, or other private or state-funded programs that can be used for this purpose. **10 credits**.
 - **Note:** If a community is close to a CRS Class threshold, an additional **10 credits** are awarded if the personal responsible for this activity has graduated from the Emergency Management Institute course on retrofitting or grant programs. This has not been calculated in the CRS Quick Check but is an opportunity to consider.
 - **360c.** Talk to owners about sources of financial assistance for flood or drainage protection measures. Discussion of funding available through the community, hazard mitigation grants, NFIP's Increased Cost of Compliance, or other private or state-funded programs that can be used for this purpose. **10 credits**.
- **Mapping & Regulations**
 - **420a.** Percentage of a community's SFHA is kept as park or other public preserved open space. This will vary by town, but open space and parks include athletic fields, golf courses, public parks, and other green space that is preserved as open space. No credit is awarded for acreage that contains buildings (other than public rest rooms and other similar necessary appurtenances). Land must be free from fill, significant pavement or other encroachments on flood flows. Up to **1,450 credits** for this activity, but significant GIS work, evaluation of preservation status, documentation of regulations, etc. is required.
 - **420c.** Parks or publicly preserved open spaces that preserve or restore to original natural state. Similar to 420a (and with similar restrictions), this activity awards credits for areas where the natural floodplain functions are preserved or restored. Up to **350 credits**. Again, significant GIS work, evaluation of preservation status, documentation of regulations, etc. is required.
 - **430a(1-3).** These activities pertain to regulating what can and cannot be built in the SFHA. These activities will require regulatory action through pertinent Town boards.
 - **Prohibition of fill.** Up to **280 credits**. Partial credit can be achieved if compensatory storage requirements for fill are in place.
 - **Prohibition of buildings.** Up to **1,000 credits**, full credit only for prohibiting all new development in the SFHA (unlikely for this study).
 - **Prohibition of storage of hazardous materials.** **50 credits** for prohibition of all outdoor storage. **20 credits** for regulations that prohibit storage of hazard materials anyways in the floodplain. **10 credits** for regulations that require all hazardous materials to be stored indoors and above BFE. **50 credit** max.
 - **430b.** Community freeboard requirement – up to 500 credits. A freeboard requirement adds height above the BFE to provide an extra margin of protection to account for inaccuracies in the FIRMs and must be applied to the lowest floor of the building. Without fill restrictions, 80 credits per foot freeboard required for elevation and floodproofing projects is the general calculation for this activity. The most likely regulation to pass community and political will is a 1-foot requirement. Accordingly, **80 credits** are in the Quick Check, though this can be altered based on community interest in stricter regulations.

- For example, of language to be incorporated into a community’s zoning regulations, see the “Development Standards” under the Special Flood Hazard Area section of Waterbury’s zoning regulations¹⁹.
 - Note that communities that adopt regulations that exceed the NFIP minimum (at or above BFE), will also be more competitive (up to 10 points out of 100 total points) when applying for FEMA Hazard Mitigation grant opportunities²⁰.
 - 430c. Require all new buildings built on fill must be on compacted fill, protected from erosion and scour. Possible **30 credits**, but not included as likely in the Quick Check.
 - 430d. Reduce the substantial improvement threshold below 50% - **20 credits**. Alternatively, **10 credits** for limiting the expansion of the building to no more than 25% of the square footage of the lowest floor OR **10 credits** if the lower threshold applies to either improvements or repairs, but not both. This is a low-credit activity that would need to be considered by the Town’s Planning Commission and Development Review Board (where applicable), and given the potential for political strife, may not be worth the relatively small credit value.
 - 430f. Regulatory language protecting critical facilities to the 500-year floodplain (.2% annual) is required to earn credits under this activity. **30 credits**.
 - 430o. 5 credits for ever Certified Floodplain Manager or Emergency Management Institute NFIP course graduate, up to **25 credits**.
 - 430o. Retain paper records at a secure offsite storage (>1mi from the regulatory office) and/or scan and back up the files digitally. Hard copies could be stored at LCPC office. **5 credits**.
 - 440a. Credits under this activity are awarded for varying levels of GIS-based local data and use by regulatory staff. Depending on LCPC’s role in carrying out this multi-jurisdictional approach, credits will likely vary widely here. Provided LCPC is part of the “community”, up to **58 credits** could be rewarded.
 - 440b. Retain old versions of community FIRMs (e.g. Flood Hazard Boundary Maps, Floodway Maps – <https://msc.fema.gov/>). **15 credits** are easily awarded here.
- **Flood Damage Reduction Activities**
 - 510a. Community has a FEMA-approved Local Hazard Mitigation Plan (LHMP). This activity requires more than just the documentation of the community’s LHMP, but also follow the CRS Planning Steps (CRS Coordinator’s Manual, 510-5) to receive credit. Likely minimum **50 credits**.
 - 520. Buildings removed from the floodplain and their land preserved as open space – easiest to document if a FEMA buyout took place. **3 credits** per building.

Given the feasibility of the above, a CRS Class 9 can be potentially achieved without regulatory changes (approximately 575 credits) for each of the three pilot communities. Including the regulatory changes described above, considered feasible for this region, the communities would likely still only fall in the Class 9 level, which may influence the political will to implement more difficult activities. However, while a priority of the CRS is to reduce costs to NFIP-insured property owners, an additional benefit of the program is to reduce the flood vulnerability of a community, so certain activities, even if they do not achieve a CRS Class jump, are still worth considering. Additionally, many of the regulatory activities (e.g. freeboard requirement) require little maintenance for annual evaluation, which can be appealing when

¹⁹ https://www.waterburyvt.com/fileadmin/files/Zoning_Planning/Zoning_Regulations_3-30-11_Final_Rev.pdf

²⁰ <https://vem.vermont.gov/sites/demhs/files/documents/HMGP%20Application%20Review%20Form%202016.pdf>

compared to the Public Information activities, which are less political, but do require significantly more work annually and are therefore more fluid year-to-year than a regulatory change.

CRS Feasibility Surveys

In the [Community Rating System](#) and [CRS Activities](#) sections of this assessment, interests in and obstacles to joining the CRS are documented. Given the non-trivial administrative burden for entry into the CRS and its annual maintenance requirements, as well as the level of engagement from multiple stakeholders to make CRS involvement viable, an anonymous survey was sent out to municipal officials and town volunteers who may have specific knowledge pertinent to the NFIP and CRS. A second, abbreviated survey was sent to LCPC staff, briefly discussed at the end of this section. It is important to note here that the COVID-19 pandemic made both gathering key individuals and finding time on individual's calendars challenging, so this survey serves as the primary method by which feasibility of CRS involvement can be understood.

The survey included 14 questions and received seven responses representing all three jurisdictions. Survey respondents included town managers, zoning administrators, planning directors, public works directors, and Selectboard members. Though the n-value is relatively low (n=7) for this survey, key themes can be derived from the responses; however, statistical significance cannot be attributed.

After demographic questioning, they were asked how concerned they were about flood-related impacts in their respective communities (**Figure 1**). It is important to understand how key decision makers in towns view an issue before understanding the political will to potentially effect change. That is, if there was little-to-no concern for the cost of insurance, for example, there would likely be no impetus for undertaking the floodplain management activities required to enter the CRS.

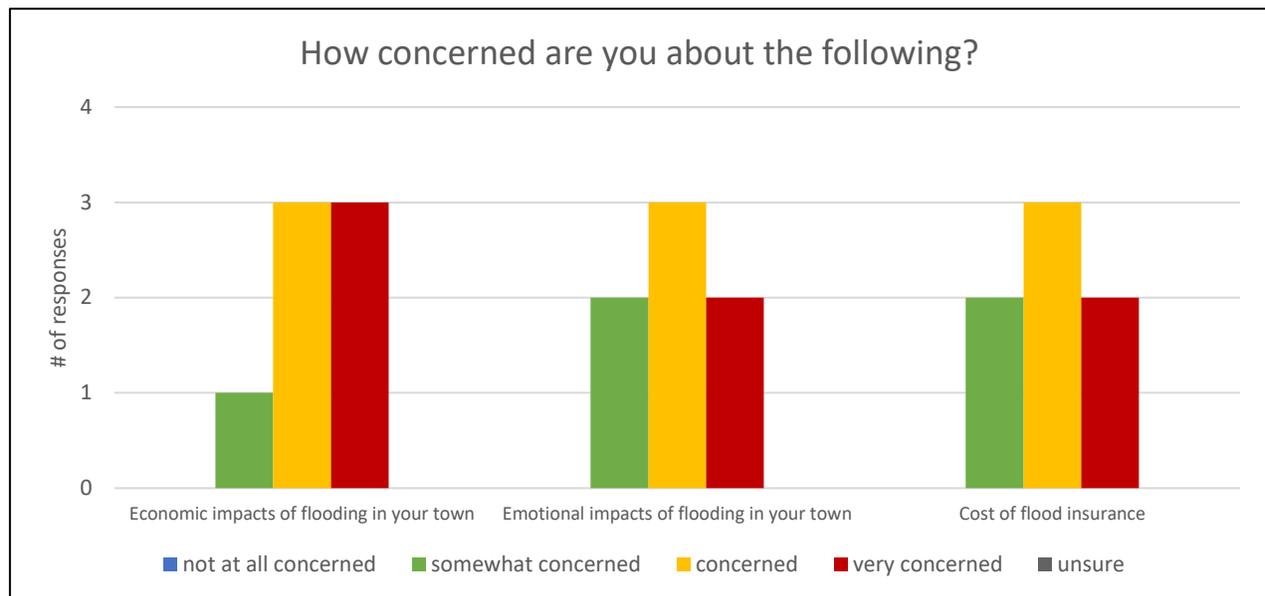


Figure 1. Survey responses to “How concerned are you about the following?”, for the economic impacts of flooding in your town, the emotional impacts of flooding in your town, and the cost of flood insurance.

Three in seven survey respondents reported “concern” for the economic impacts of flooding, the emotional impacts of flooding, and the cost of flood insurance, while those numbers adjusted slightly to 3/7, 2/7 and 2/7, respectively, at the “very concerned” level. No survey respondents expressed a lack of concern or uncertainty across each of the issues, while 1/7, 2/7 and 2/7 respondents were “somewhat concerned” about the issues, respectively. Given these responses, it is fair to say that there is slightly more concern for the economic impacts of flooding when compared to the emotional impacts of flooding and the cost of insurance, which there is general consensus for “concern” across all three issues.

After assessing levels of concern for flood-related impacts to their respective communities, survey respondents were asked about their familiarity with flooding in their town, the NFIP, and the CRS (**Figure 2**). Here, it is important to understand if decision-makers in town are well-informed on these issues as part of the broader understanding of feasibility.

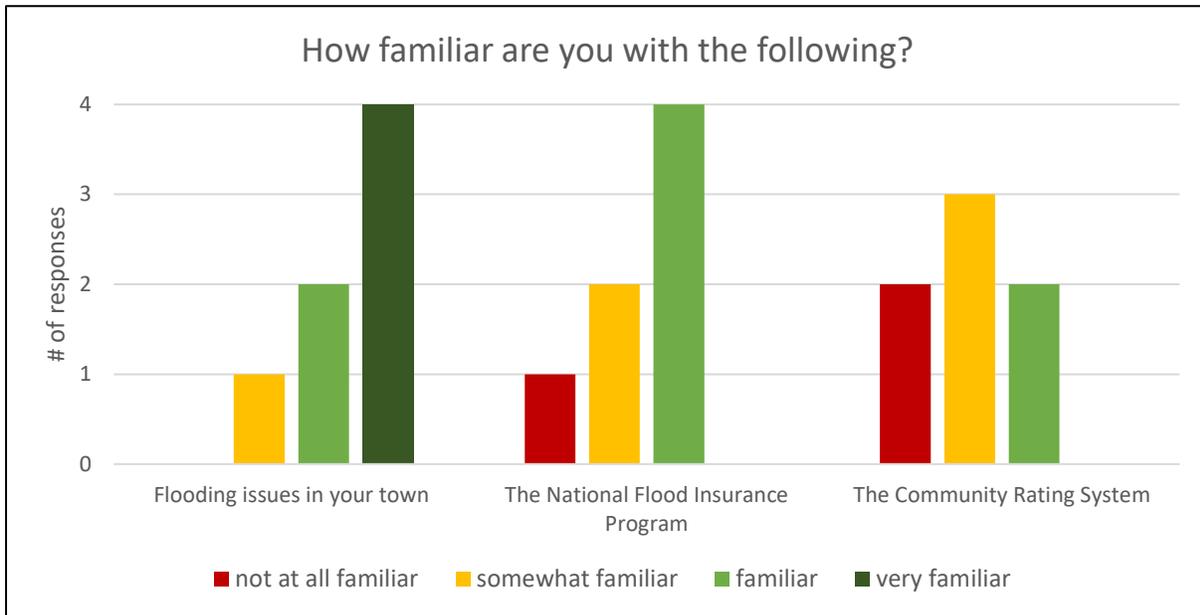


Figure 2. Survey responses to “How familiar are you with the following?”, with flooding issues, the National Flood Insurance Program, and the Community Rating System.

Among the three issue areas with which survey respondents were asked to assess their familiarity, more than half said they were very familiar with flooding issues in their towns. Decreasing familiarity was seen across the issue areas (flooding issues in town, the National Flood Insurance Program, and the Community Rating System), respectively. The majority of respondents (5 of 7) reported no (2) to some (3) familiarity with the CRS. As the respondents represent a range of municipal staff or officials, many of whom would likely be involved with CRS design and implementation, it is clear that significant education of the program will be needed to effectively and appropriately convey a potential CRS effort to community members and prior to a FEMA Community Assistance Visit (CAV).

The next question asked of respondents was intentionally direct to assess, from their unique perspective, if their town would be willing to create a volunteer committee, which could be needed in order to design and implement an approach to CRS (**Figure 3**). The majority of respondents (4 in 7) said

their community would be willing to create a volunteer committee, while two were uncertain and one respondent said their community would be unwilling to undertake this effort.

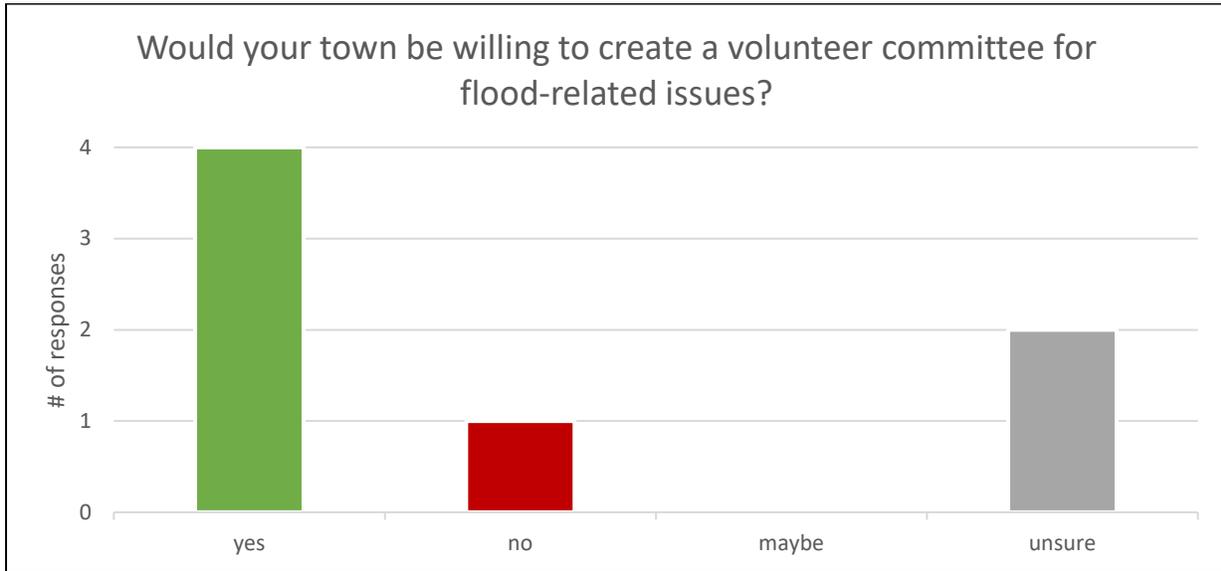


Figure 3. Survey responses to “From your perspective, would your town be willing to create a volunteer committee for flood-related issues and initiatives in order to join the CRS?”, with yes, no, maybe and unsure as answer options.

In order to assess change in interest in creating a single volunteer committee with multiple communities represented, **Figure 4** indicates that three survey respondents thought that their community would be more likely to join a committee representing multiple communities, while two reported both equal likelihood or uncertainty. No respondents indicated that their community would be less likely to join a multi-community committee in order to join the CRS.

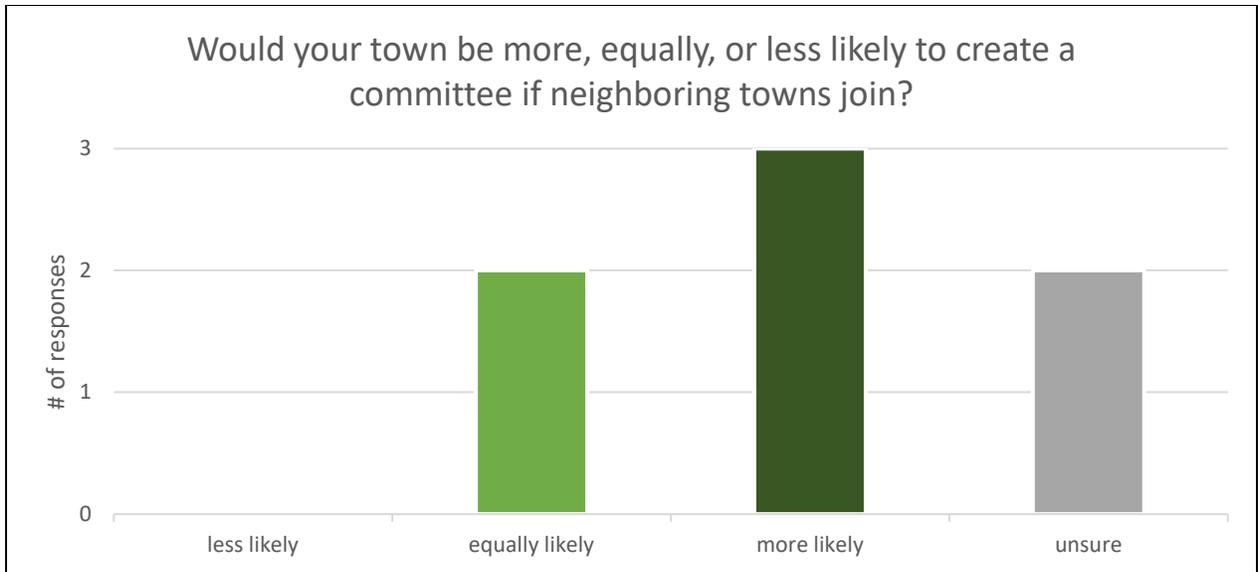


Figure 4. Survey responses to “From your perspective, would the town be more or less likely to join a volunteer committee with representatives from several towns in Lamoille County focused on flood-related issues and initiatives?”, with more, less, equally likely or unsure as answer options.

In rural towns across Vermont, it is typical to find residents filling multiple volunteer roles. For example, the town’s road foreman may also site on the town’s Planning Commission, while the chair of the Historical Society is also a member of the Selectboard and the town’s rotary club. Because of this reality, towns may be reluctant to stand up additional volunteer councils, committees or boards, recognizing that an individual’s time is limited and only so much of it can be spent volunteering. **Figure 5** represents an alternative to the creation of a brand-new committee, regardless of the number of communities that join, by posing the option to fold CRS-related efforts under an existing committee.



Figure 5. Survey responses to “Instead of a separate committee, from your perspective, would the town be willing to hold quarterly flood-related meetings as part of its regular town board meetings (e.g. Planning Commission, Selectboard)?”, with yes, no, maybe, or unsure as answer options.

Interestingly, when comparing **Figures 3** and **5**, there was a decrease in “yes” responses, with four reporting interest in creating a volunteer committee (**Figure 3**) and only two reporting interest in holding quarterly flood-related meetings of existing town committees (**Figure 5**). This slight decrease in firm interest is worth exploring, though a possible rationale is that existing town committees already have a lot to cover for their town, and an additional meeting around a completely new topic area could pose too much a burden on these volunteers. Reasoning aside, despite this drop in clear “yes” responses, there was slightly more interest in the quarterly meeting of existing town committee’s alternative, with five reporting positively (“yes” or “maybe”) versus only four in the creation of a new committee question. The new committee option had more uncertainty (two responses) when compared to the alternative option (one response).

Another means by which the administrative burden on town volunteers can be reduced is through support of the local Regional Planning Commission (RPC). The RPC representing Hyde Park, Stowe, and Wolcott is the Lamoille County Planning Commission (LCPC), which provides regular, cross-sector support of its municipalities. As professional planners, LCPC staff are able to assist their municipalities with a variety of planning efforts, including but not limited to municipal plans, energy plans, and emergency plans. Given the established relationship between LCPC and its municipalities, it would be expected that some level of assistance from LCPC would be needed in order to design, implement and document the activities for these communities to become members (and maintain membership) in the CRS.

The three towns in this feasibility study represent different levels of professional town staff, economic development, flood risk/vulnerability, volunteer capacity, etc. In order to ascertain how much support each of these towns would likely need to become CRS members, respondents were asked to assess their respective LCPC assistance needs for a handful of CRS-related activities (**Figure 6**).

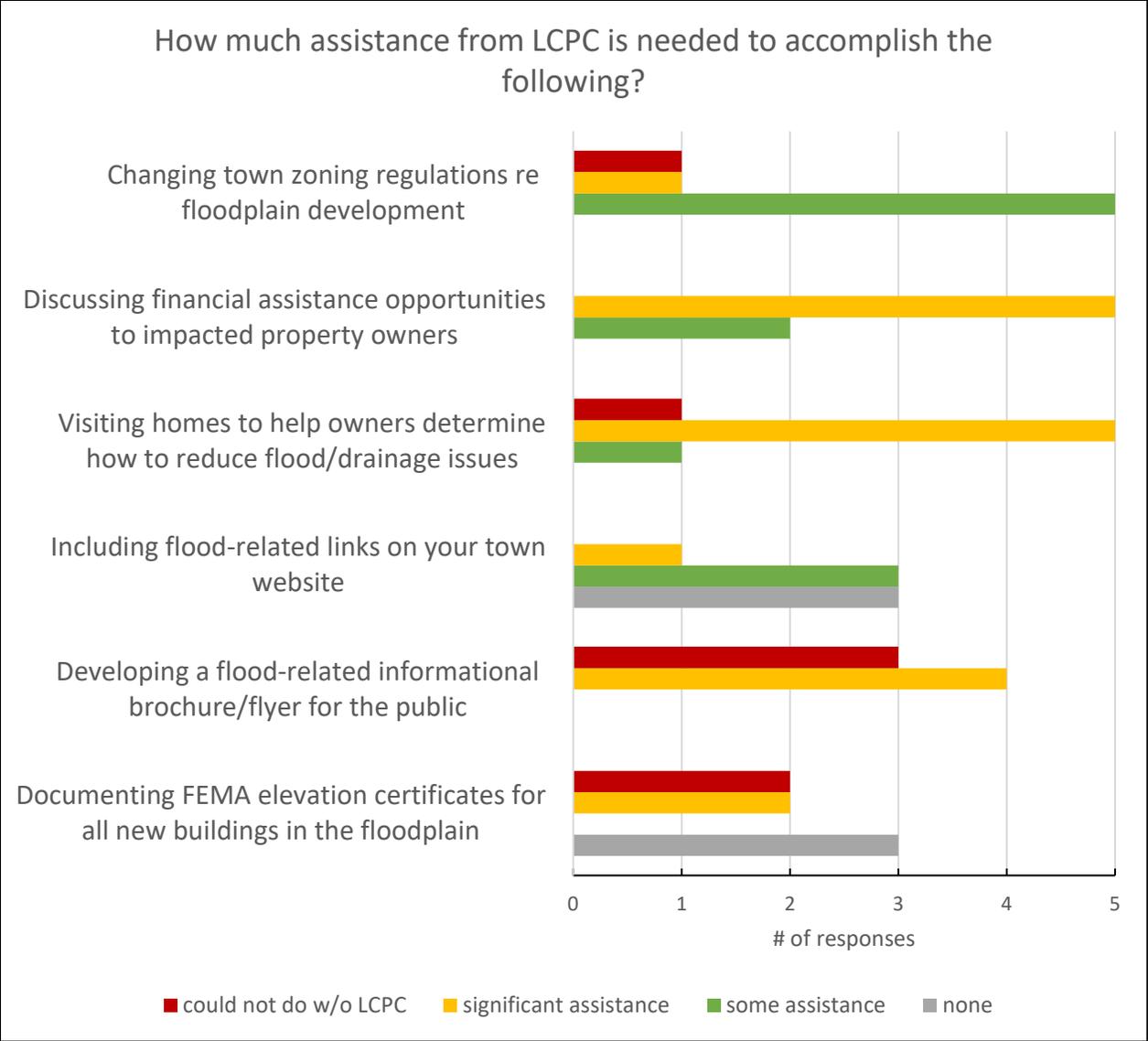


Figure 6. Survey responses to “From your perspective, how much assistance would your town need from the Regional Planning Commission (LCPC) to accomplish the following, provided training was made available to town volunteers?”, with “could not complete without LCPC assistance”, “significant assistance from LCPC”, “some assistance from LCPC”, and “none, the town can complete solo” as answer options.

Options for levels of assistance ranged from “could not do without LCPC assistance” to “no assistance needed”. Importantly, the language for this question included the assumption that training would be provided to town volunteers, as there would certainly be a learning curve at the beginning of the process that should be mitigated to improve likelihood of success. Even with the assumption that training would be provided, however, survey respondents made it clear that some level of assistance would be needed for nearly all of the activities, with only three respondents answering “no assistance needed” for both the “including flood-related links on your town website” and “documenting FEMA elevation certificates for all new buildings in the floodplain.” To more clearly visualize the varying levels of LCPC assistance required, the relevant CRS activities are noted below in descending order (#1

representing the activity generating the most assistance, while #6 represents the least amount of LCPC assistance needed)*:

1. Developing a flood-related informational brochure/flyer for the public (7 responses)
2. Visiting homes to help owners determine how to reduce flood/drainage issues (6 responses)
3. Discussing financial assistance opportunities to impacted property owners (5 responses)
4. Documenting FEMA elevation certificates for all new buildings in the floodplain (4 responses)
5. Changing town zoning regulations regarding floodplain development (2 responses)
6. Including flood-related links on your town website (1 response)

**Note: The (responses) number groups the “could not do without LCPC assistance” and “significant assistance from LCPC”, which together represent significant involvement of LCPC in accomplishing the related task.*

Though the activities represented in **Figure 6** do not represent the comprehensive suite of options for a community to take to gain CRS credit, they do represent some of the more pertinent/possible options for Vermont municipalities. From this abbreviated list, survey respondents made clear that in order to create flood-related informational brochures for the public, significant assistance from LCPC would be required or the task could not be accomplished. Home visits and discussing financial assistance opportunities with property owners would also require significant assistance from LCPC, and which would certainly necessitate the training the question assumes.

Figure 6 should be used by leadership at LCPC to understand potential implications of staff resources to stand up a multi-jurisdictional approach to joining the CRS, and to prioritize which efforts necessitate the most LCPC assistance against those that generate the largest CRS credit gain.

The next set of questions focused on the respondents’ perspective on community and political will to implement certain actions for which they would receive CRS credits. As indicated by the strong responses to questions regarding the requiring of flood elevation certificates for all new and substantial improvements (6 “yes” responses, 1 “unsure”) and retention of flood-related documents (e.g. elevation certificates, flood maps, etc.) at the town office for public use (unanimous support, or 7 “yes” responses), it is clear that the towns are willing to make changes in their local zoning regulations and town office policies to require and retain flood-related documentation (**Figure 7**). In addition to receiving additional CRS credits, flood elevation certificates are useful documents for property owners to have on file. They are required for many FEMA hazard mitigation grant opportunities, can assist property owners in their understanding of their flood vulnerability, provide application requirements for Letters of Map Amendments (LOMAs), among others²¹. Generally, it is good policy for property owners located within the floodplain to have flood elevation certificates for the aforementioned reasons, but they do come at a cost of anywhere between \$200-\$2,000, depending on property type, occupancy type, demand, location, available data, and quality²².

²¹ https://www.fema.gov/media-library-data/1428941960043-a8f37b7e3af25f47396bbff04e7bf036/FEMA-HFIAA_ECFAcSheet_040715.pdf

²² <https://www.massivecert.com/blog/what-does-elevation-certificate-cost#:~:text=The%20national%20average%20cost%20for,timing%2C%20data%2C%20and%20quality.>

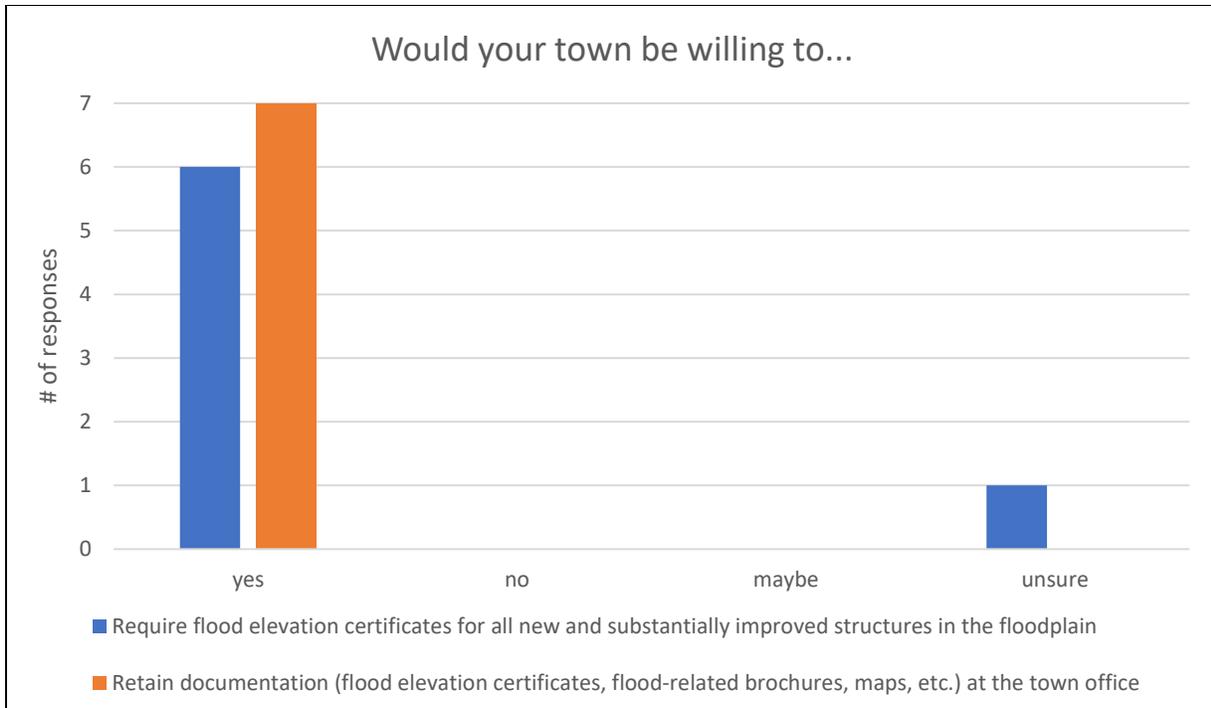


Figure 7. Survey responses to “From your perspective, would the town be willing to require flood elevation certificates for all new buildings and substantial improvements in the floodplain?” and “From your perspective, would the town be willing to retain documentation (flood elevation certificates, flood-related informational brochures, flood maps, etc.) at the town office for public use?”, with yes, no, maybe, or unsure as answer options.

When asked about broadly about supporting changes in their town in order to reduce the cost of flood insurance for impacted property owners, three respondents assumed the community would have a mid-range level of interest, on a sliding scale from 1 (not interested) to 5 (very interested) (**Figure 8**). Four additional respondents ranked their community interest as slightly higher, two of whom indicating a level 4 and the other two a level 5. The average response to this question was 3.9 on this sliding scale, indicating a strong level of interest in supporting community changes. When asked about the level of interest on the same 1-5 sliding scale, respondents indicated a slightly less enthusiastic level of community interest in keeping flood-vulnerable areas undeveloped for parks or other publicly-reserved open space. The majority of respondents (4) indicated a level 3 community interest, with an average community interest level of 3.3. This specific question was asked as an example of a CRS credit-earning activity that not only prevents development from at-risk/flood-vulnerable areas but also affords communities the opportunity to create “floodplain parks”, which have proven successful in other towns across the state (e.g. Northfield’s Dog River Park) to attract community members and visitors alike. This is also one of the CRS activities that can provide for a large sum of credits, depending on number of acres preserved.

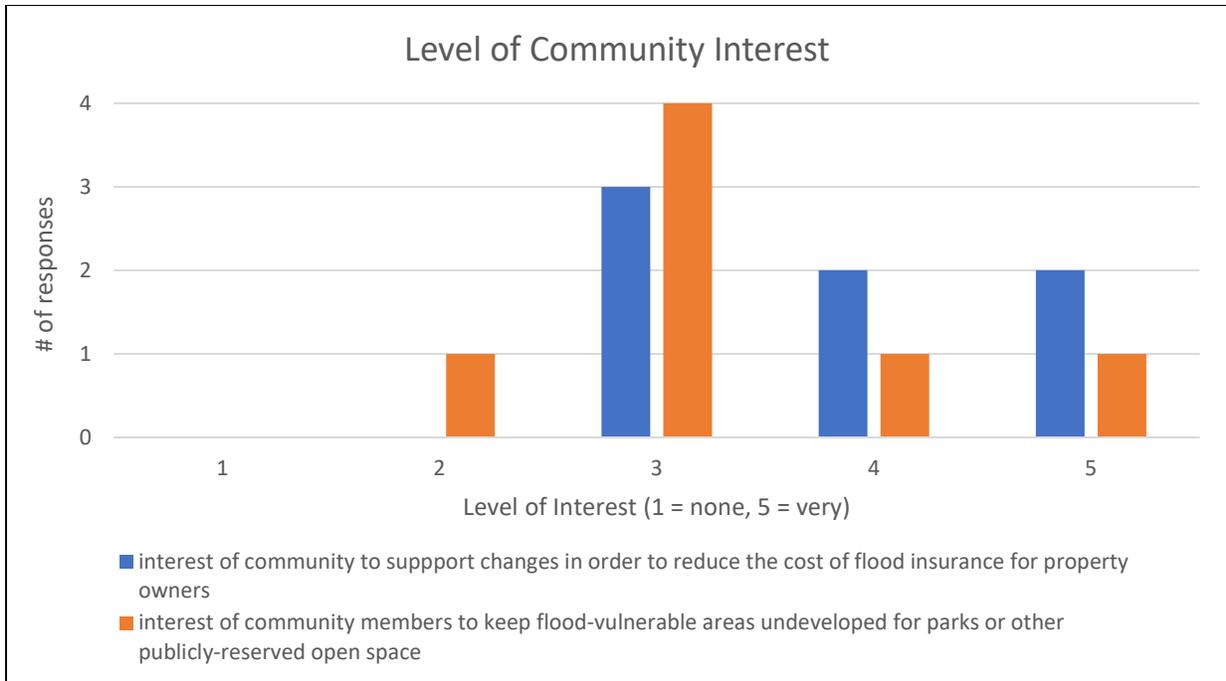


Figure 8. Survey responses to “From your perspective, what is the interest of your community to support changes in order to reduce the cost of flood insurance for property owners?” and “From your perspective, how would you rank the interest of community members to keep flood-vulnerable areas undeveloped for parks or other publicly-preserved open space?”, with a sliding scale of “not at all interested” (1) to “very interested” (5) as answer options.

Similar to the question regarding level of community interest in keeping flood-vulnerable areas in town as open space, respondents were then asked about the level of likelihood that their town would adopt zoning regulations in order to actively encourage developers to dedicate floodplain as open space (CRS Activities 420a, 420c). Somewhat interestingly, there was a greater likelihood that the town take regulatory action to pass such a policy than there is community interest in supporting the same change, with an average likelihood of 4, per respondents (**Figure 9**).

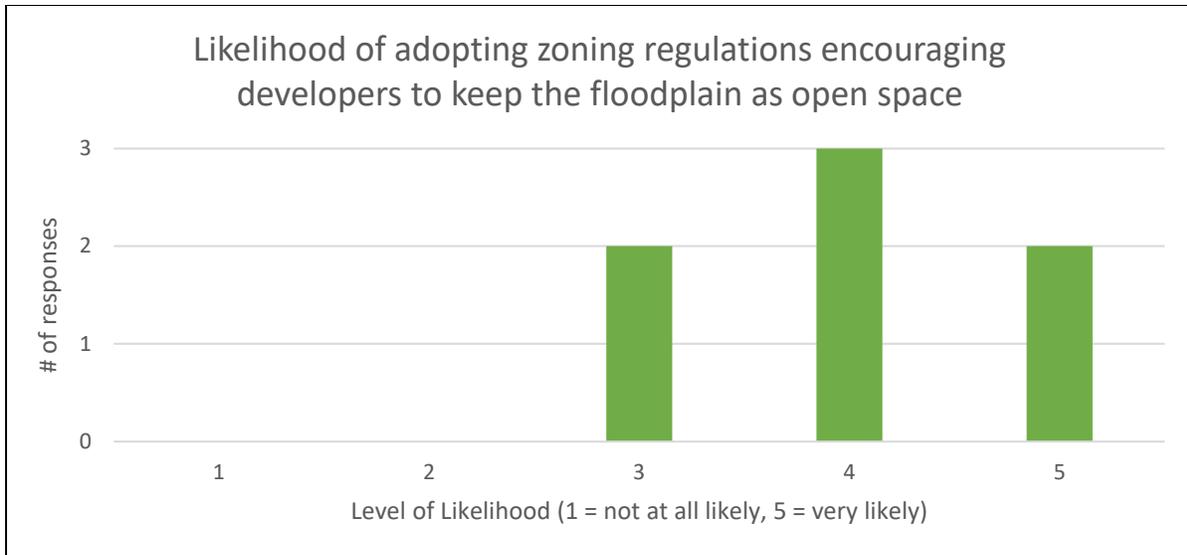


Figure 9. Survey responses to “From your perspective, what is the likelihood that the town would adopt zoning regulations encouraging developers to keep the floodplain as open space?”, with a sliding scale of “not at all likely” (1) to “very likely” (5) as answer options.

Respondents were given a final, open ended prompt to provide any additional thoughts, concerns, etc. that they have with respect to flooding in thier community, flood insurance, the Community Rating System, political will, town capacity, etc. Only four responses were received (**Figure 10**), but it is worth noting that one respondent was unable to assess town’s capacity and related reliance on LCPC, while another noted that there have been no complaints about flood insurance in their community, nor any requests to join CRS. One respondent recommended that flood elevation certificate data be added to the State’s Natural Resource Atlas²³ for improved public access, which would benefit all CRS-interested communities, provided towns appropriately convey this resource through their town websites and/or informational handouts.

²³ <https://anrmaps.vermont.gov/websites/anra5/>

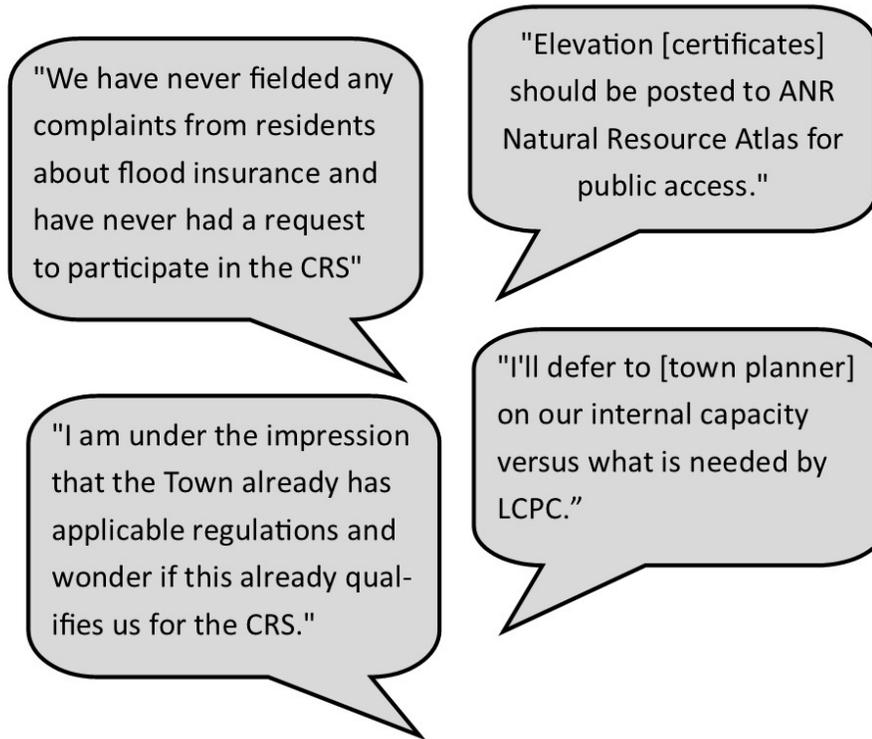


Figure 10. Survey responses to the following open-ended prompt: Please provide any additional thoughts, concerns, etc. that you have with respect to flooding in your community, flood insurance, the Community Rating System, political will, town capacity, etc.

Pertinent staff at LCPC were also sent a survey with similar questions as those posed to municipal officials above. Survey results indicate that there is strong concern for impacts related to flooding for towns in Lamoille County, and that familiarity with the CRS is minimal. When asked to assess their towns' willingness to take certain actions in order to earn CRS credits, *perception* of willingness is as follows:

- Somewhat Willing to:
 - Create a volunteer committee for flood-related issues and initiatives in order to join the CRS
 - Hold quarterly, flood-related meetings of existing town boards (e.g. Planning Commission, selectboard)
 - Create a volunteer committee with representatives from each town for flood-related issues and initiatives in order to join the CRS
 - Adopt zoning regulations encouraging developers to deep floodplain as designate open space
- Willing to:
 - Require flood elevation certificates for all new buildings & substantial improvement in the floodplain
 - Retain documentation (elevation certificates, flood-related brochures, flood maps, etc.) at their town office

- Keep flood-vulnerable areas undeveloped for parks or other publicly-preserved open space
- Support other changes in order to reduce the cost of flood insurance for property owners

LCPC staff were also asked to identify their perception of RPC assistance needed to complete the same activities identified in **Figure 6**, for which answers ranged from “some assistance from LCPC needed” to “could not be completed without LCPC.” There was not a single activity that LCPC identified as their municipalities being able to complete without any LCPC support.

- Some Assistance from LCPC Needed:
 - Documenting FEMA elevation certificates for all new buildings in the floodplain
 - Including flood-related links on your town’s website
 - Changing town zoning regulations regarding floodplain development
- Significant Assistance from LCPC Needed:
 - Developing a flood-related informational brochure/flyer for the public
- Could Not Complete without LCPC:
 - Visiting homes to help people understand how to reduce flooding/drainage problems
 - Discussing financial opportunities to impacted property owners

When asked the number of staff likely needed to assist the three towns in applying for and maintaining membership in the CRS, the perceived number of staff was two. Please note that this does not indicate two full-time employees (FTEs), but rather two dedicated staff that are, together, responsible for CRS program development and support for interested communities. The survey results also indicated that LCPC staff are uncertain if they have the staff capacity and resources to carry out this work.

CRS Multi-Jurisdictional Approach

In the absence of county government in Vermont, towns often rely on their Regional Planning Commission (RPC) to act as that resource and conduit. It is apparent in the Feasibility Survey (**Figure 6**) that, in order for the three towns in this study to apply for entrance into the CRS, significant assistance from the Lamoille County Planning Commission (LCPC) will be required. Should LCPC and these towns choose to move forward with this multi-jurisdictional approach, they would be the first in the state to do so, though not the first in the country. This section provides a handful of examples of multi-jurisdictional administration of the CRS, which can be used as a launching point for LCPC to understand opportunities and approaches that could be replicated or adapted in their region.

First, informal groups of people interested in working on the CRS either at the community or multi-community scale, or CRS User Groups, are active across the country to share success stories, offer support, and swap information that can be helpful to both new and existing CRS communities²⁴. There are several dozen CRS User Groups²⁵ that can be contacted by LCPC and/or participating communities as a support network, should the three jurisdictions choose to go the route of the multi-jurisdictional CRS

²⁴ https://www.fema.gov/media-library-data/20130726-1758-25045-2579/april_crs_update_final2.pdf

²⁵ <https://crsresources.org/100-2/crs-users-groups/>

application. The CRS User Group that should be contacted first for information is the Cape Cod User Group, as they represent the only User Group in FEMA Region I.

Looking to Florida as a model for multi-jurisdictional efforts, Lee County in the southwestern portion of the state has focused a great deal of effort on its Public Information strategy²⁶. They recommend engaging a diverse group of stakeholders willing to volunteer on a flood-based committee to undertake the Public Information strategy and ensure success among its participating communities. This committee is responsible for:

- Assessing jurisdictional public information needs and gaps,
- Identifying target audiences,
- Formulating important flood-related messages for their communities,
- Identifying outreach projects to convey those messages,
- Examining other public information initiatives and opportunities at the state or other regional levels for synergies,
- Preparing a public outreach report/proposal to be adopted by participating jurisdictions,
- Implementing, monitoring, evaluating & updating the program to ensure continued membership in the CRS

As noted in the detailed [CRS Activities](#) section, there is a significant amount of CRS credits that can be earned under the Public Information category. Development of an outreach project will prove additionally beneficial in that it can be minorly adapted for new communities interested in joining the proposed pilot group, provided town-specific information is appropriately incorporated. As with Lee County, Florida's public information approach, a single jurisdiction cannot manage this work alone, and will require volunteer assistance from all participating communities, as well as significant steering and support by LCPC (de facto county government).

In a review of other multi-jurisdictional approaches to the Public Information category of the CRS, adapting for Vermont and Lamoille-specific opportunities and realities, a few outreach ideas are listed below:

- Develop an annual letter to all property owners in the floodplain or those that fall under repetitive loss or severe repetitive loss status under the NFIP. Information in the annual letter should include:
 - the FIRM (what it is, where to find it, how to use it, etc.)
 - a "how do I know if I'm in the floodplain?" section, which includes a link to the FEMA Map Service Center, along with the contact information for the appropriate municipal/regional/state staff person to support an inquirer (ideally this would be the town's floodplain administrator)
 - updates to flood events over the course of the past year (note this section would need to be updated annually)
 - information on the NFIP and resource links for those interested
 - a link to the community's Local Hazard Mitigation Plan and the VT State Hazard Mitigation Plan for more information (ideally this would include a basic, high-level overview of their contents)

²⁶ <https://www.leegov.com/dcd/Documents/FloodMapping/ApprovedPPI.pdf>

- information on flood regulations and their implications for remodeling or building in flood hazard areas (note this may differ at the community level, as towns may choose to adopt different regulations, or none at all)
- an example flood elevation certificate – annotated for ease-of-use/understanding (ideally, a laminated copy of this would be kept at the town office for public use, too)
- Develop and host an annual spring flooding seminar:
 - ANR/VTrans/VEM already host a couple spring flooding seminars each year in a handful of regions across the state. LCPC and participating communities could replicate/adapt this approach at the community/regional level in a standalone, public meeting or to be presented at a town board meeting (e.g. Selectboard, Planning Commission, etc.)
 - Information conveyed at this seminar/meeting is similar to that of the annual letter described above
- Develop an annual letter or email to all local real estate agents and lenders:
 - Information included in this correspondence would be similar to that of the annual letter to property owners described above, but adapted to include a property transfer/valuation lens that would help inform this specific community of the risks of buying in the SFHA (or other flood-prone areas) and what protections can be taken by sellers and/or potential buyers
- Create a “Know Your Risks” brochure and keep copies in the town office and on the flood section on town websites (as described in the [CRS Activities](#) section), which:
 - Is updated annually
 - Includes the town’s emergency shelter location information
 - Includes the town’s Local Emergency Operations Center information
 - Includes information and resources for individuals to sign up for VTAlert emergency notification system

In this approach, LCPC will likely need to create the process by which annual maintenance in the CRS can be achieved. This process will need to explicitly identify relevant documentation protocols, file structure, website maintenance, and community involvement. The survey taken by both municipal staff and volunteers, as well as the survey specific to LCPC, yielded nearly unanimous feedback that LCPC will be the driver of the CRS in their region, despite the number and location of interested towns. In this regard, please understand that community involvement is critical to long-term success of CRS involvement. Without input and engagement from municipal staff and volunteers, involvement will prove too burdensome for LCPC.

Key Takeaways & Next Steps

The CRS is a difficult, administratively burdensome program for a town to join, but the implications for reducing costs to property owners in flood-vulnerable areas, as well as potentially reducing flood damage, makes the program appealing. Concentrating some of the administrative work to benefit multiple towns reduces redundancies and barriers for small, rural towns to join the program. It is clear, both through the municipal and LCPC survey responses, that much of this work will likely fall with staff at LCPC.

Given the uncertainty of governmental budgets in the next several years due to both the COVID-19 pandemic and the unknown outcome of the general election on November 3rd, both the interested towns and LCPC staff will need to consider how much staff and/or volunteer time they can commit to this CRS project.

The municipal survey responses make it clear that there is a noteworthy lack of education and awareness around the NFIP and the CRS among decision-makers in the three pilot towns. In order to be successful in this proposed multi-jurisdictional approach, a dedicated set of meetings or trainings are needed to ensure that the towns upholding their community participation in the CRS – even if LCPC is carrying the majority of the administrative weight, as acknowledged above – are able help implement the program. Before this series of meetings, **it is recommended that LCPC host an initial meeting with pertinent representatives from each town to discuss the opportunities recommended in the [CRS Activities](#) and [CRS Multi-Jurisdictional Approach](#) sections of this assessment and the likelihood that they can be implemented.** Once the towns have a firmer understanding of the workload required of them/town volunteers, as well as the cost savings they would afford community members, LCPC can decide about the viability of this multi-jurisdictional approach. It is also recommended that Rebecca Pfeiffer (State NFIP Coordinator, Dept. of Environmental Conservation) attend this initial meeting to share insights from her work with other Vermont communities who have successfully joined the CRS. It could also be beneficial for **LCPC staff to request time with one (or more) Vermont towns currently participating in the CRS, for informed feedback on CRS involvement²⁷.**

One of the tasks identified by municipal survey respondents as a top need from LCPC is the development of informational brochures that can be placed in publicly owned buildings for public use and made available digitally on town websites. Though these brochures will have a non-trivial start up cost to create, the documentation, retention and revision should prove less burdensome for LCPC and towns alike. The Public Information activities are likely the easiest to achieve for this project, as they do not require regulatory action and are therefore inherently less controversial or vulnerable to public scrutiny. However, these activities will largely fall on LCPC to create and maintain. Similarly, in the [CRS Activities](#) section of this assessment, **it is recommended that LCPC, partnering with interested communities, create an outreach project**, which would open the towns up to a substantial amount of CRS credits. As above, this outreach project would require considerable efforts to design, and would require annual revision to stay relevant and maintain the applicable CRS credits.

Conclusion

It is important to remember, should LCPC and any of their communities move forward with standing up a CRS program, that while the start-up costs of beginning the process of application to the CRS – and all of the pertinent regulatory, programmatic, community changes that would need to take place to gain entry – it is often the significant demand of annual maintenance that proves difficult for communities. Document retention, filing, staff/volunteer turnover, etc. prove challenging for small, rural towns with limited capacity. Even with the assistance of LCPC, considerable time will need to be allotted to meet the demands of CRS certification maintenance, which should not be overlooked when determining whether to move forward.

²⁷ <https://floodready.vermont.gov/node/792>

In consideration of the various findings and recommendations of this assessment, it is entirely feasible that the Lamoille County Planning Commission, with dedicated individuals representing all interested communities, create a multi-jurisdictional approach to joining the Community Rating System. The question, therefore, is not whether this approach is possible, but whether it is reasonable. Accordingly, LCPC should thoroughly review the recommendations in this assessment, convey those opportunities that have the greatest success of likelihood to pertinent staff and officials from Hyde Park, Stowe, and Wolcott, and make an informed decision that weighs both the resource and capacity costs against the financial and flood-reduction benefits of moving forward with creation of a multi-jurisdictional approach to the Community Rating System.