

PHILIP B. SCOTT
GOVERNOR



State of Vermont
OFFICE OF THE GOVERNOR

**REQUEST FOR MAJOR DISASTER DECLARATION
GOVERNOR'S REQUEST COVER LETTER**

February 21, 2023

The Honorable Joseph R. Biden, Jr.
President of the United States
The White House
Washington, DC

Through: Ms. Lori Ehrlich
Regional Administrator
FEMA Region I
99 High Street
Boston, Massachusetts 02110

Dear Mr. President:

Under the provisions of Section 401 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5121-5207 (Stafford Act), and implemented by 44 C.F.R. § 206.36, I request you declare a Major Disaster for the State of Vermont for the destructive winds, heavy rainfall, flooding, and flash freeze which occurred in most areas of the state during December 22 through December 24, 2022. I am specifically requesting Public Assistance Categories A-G for Caledonia, Chittenden, Essex, Franklin, Grand Isle, Lamoille, Orange, Orleans and Washington Counties, and Hazard Mitigation statewide.

During the late evening of December 22, 2022, and into the morning hours of December 24, 2022, a fast-developing, multi-faceted storm system brought heavy rain, high winds and rapidly dropping temperatures over most of Vermont. Starting in the afternoon hours of December 23, 2022, more than two inches of precipitation fell in portions of the impacted counties. This rainfall, combined with more than an inch of melted water equivalent from the pre-existing snowpack, caused mountain watersheds and streams to exceed bank-full capacity and flood some roads. The weather system packed destructive high winds, some at record velocities, followed by a flash freeze through December 24, 2022. This weather system caused 75,000 power outages statewide at the peak and prolonged power restoration efforts (please refer to the National Weather Service "For the Record" Memo - December 27, 2022, in Enclosure D for more detail).

The National Weather Service began sending out information warning of potential impacts of this system several days in advance, describing it in an email to emergency management officials on December 19, 2022, as a "major storm". As it turned out, the wind gusts were even higher than predicted, topping out at 71mph at the Burlington International Airport, the second highest gust ever recorded at that location.

Statewide Impact Summary

During the peak of this storm over 75,000 power outages were reported as the temperatures plummeted to sub-zero wind chills that lasted for several days. In response to the dangerous situation shelters and warming centers were opened throughout the impacted counties, including three operated or supported by the American Red Cross and seven supported by the Vermont National Guard. Eligible costs validated in the Joint Preliminary Damage Assessment (PDA) exceeded \$2.8M, more than 250% of Vermont's statewide threshold. Impacts were concentrated on six small public utilities, while eight of the nine counties requested exceed \$4.44/capita. Impacts in the ninth county, Caledonia, were concentrated on the Lyndonville Electric Department, which serves economically disadvantaged rural communities.

Vermont has three types of electric utilities: investor-owned utilities (1), municipal electric departments (14), and member-owned rural electric cooperatives (2). Vermont's seventeen (17) electric distribution companies range in size from small municipal electric departments with several hundred customers to one large investor-owned utility, Green Mountain Power (GMP), which covers most of the four southern counties and has more than 260,000 customers statewide.

It is important to note as context for the statewide impact of this storm that GMP suffered economic impact which was larger than all the smaller public utilities combined. During the weekend prior to this storm, another winter storm had knocked out power to 58,000 GMP customers. GMP worked to receive mutual aid resources from throughout the region and Canada to restore power expeditiously. The two back-to-back events – December 17 storm and the December 22-24 storm yielded a combined restoration effort for 219,127 GMP customers. GMP reports they have accrued approximately \$3 million (\$2.96 million) in major storm expenses arising out of the two very significant weather events in December 2022.

The State Emergency Operation Center (SEOC) was partially activated December 23, 2022, through December 25, 2022, to coordinate statewide response to the storm and address local requests for assistance. Representatives from the Agency of Human Services, Agency of Transportation, Agency of Digital Services Public Service Department, Department of Health, Vermont State Police, Division of Fire Safety, Urban Search and Rescue, Department of Environmental Conservation, Department Forest Parks & Recreation, Vermont National Guard, American Red Cross, Vermont 211, Green Mountain Power, Washington Electric Co-Op and Vermont Electric Co-Op supported response operations. While a gubernatorial State of Emergency was not declared, the Vermont State Emergency Management Plan (SEMP) was implemented for this storm event.

Throughout the event local warming centers were opened in the towns of Alburgh, Charlotte, Hinesburg, North Hero, Richmond, and Shelburne. Local shelters were opened in Barre City, Calais, Enosburg, and Orwell from December 23, 2022, to December 24, 2022. The American Red Cross operated regional shelters in Barre City and Enosburg from December 23, 2022, to December 24, 2022, and provided service to one and three clients respectively. The Vermont National Guard operated warming centers at armories in Bennington, Lyndonville, Newport, St. Albans, Swanton, Vergennes and Williston from December 23, 2022, to December 24, 2022. Barre City, Castleton, Chittenden Town, Elmore, Milton, Rutland City, Stowe, and Williston all activated Local Emergency Operations Centers (EOCs).

The State Emergency Operations Center responded to 86 calls from local emergency management officials regarding power outages and other storm-related needs at essential facilities including healthcare facilities and correctional institutions. The Vermont State Police responded to 73 storm-related incidents.

The Office of the Chief Medical Examiner has confirmed one storm-related death in Castleton due to a treetop which fell in the strong winds. One Washington Electric Cooperative (WEC) line worker was injured by a falling tree.

The Vermont Agency of Transportation (VTrans) deployed District Technicians to assist communities with damage assessments, and all VTrans Districts (1-9), began initial damage assessments promptly upon notification of storm impacts.

Initial Damage Assessments demonstrated wind-related damage to many homes throughout the state. Much of this damage is expected to be insurable. Based on this information and the scope of the damage to homes Individual Assistance is not requested.

Residential Home Damage Summary:

	Total	Minor	Major	Destroyed
Single Family	29	23	5	1
Mobile Home	9	7	2	0
Apartments	3	3	0	0
TOTAL:	41	33	7	1

On January 3, 2023, Vermont Emergency Management Director Erica Bornemann requested a Joint Preliminary Damage Assessment (PDA) for Public Assistance for Caledonia, Chittenden, Essex, Franklin, Grand Isle, Lamoille, Orange, Orleans, and Washington Counties. Local, state, and federal representatives convened virtually on January 13, 2023, to commence validation of selected damages reported.

Preliminary Damage Assessment (PDA) Results

This virtual PDA focused on six of Vermont's 16 public utilities. The hardest-hit counties were Essex (\$17.23 per capita) and Lamoille (\$16.26 per capita). Washington County, where most communities are served by Washington Electric Coop, has per capita impact of \$8.14.

Furthermore, within the impacted counties the damages were concentrated within the communities served by specific utilities. Here are four examples:

Stowe Electric Department

Stowe Electric Department is a small utility which serves 4,300 customers in Lamoille County. They had 13 broken poles. They received mutual aid assistance from a crew in Massachusetts. At the height of the storm, 3,500 of the 4,300 customers were impacted, and it took until December 26, 2022, to get all power restored. Stowe Electric had already seen two rate increases in the previous six months prior to this event.

Lyndonville Electric Department

Similarly, in Caledonia County, although the damages did not reach the county threshold of \$134,235, the Lyndonville Electric Department faced a crisis. Approximately half of their 3,000 customers were without power going into the Christmas Holiday as the flash freeze and sub-zero wind chills moved in. Electrical service was lost multiple times on the same lines as trees fell. Lyndonville's cost estimate within Caledonia County were \$59,006, which is a big financial hit for a small community. Lyndonville Electric Department's service area includes customers scattered through 13 small towns, including East Haven, Glover, Kirby, Lyndonville, Sutton, and Victory, all of which are recognized as Economically Disadvantaged Rural Communities based on average income and/or unemployment levels.

Comparable impacts at much larger scale were experienced by the larger utility cooperatives.

Washington Electric Cooperative (WEC)

Below is an excerpt from a letter to WEC Members from WEC General Manager Louis Porter:

“WEC has recovered from experiencing one of its most destructive storms in recent history. At the start of our restoration efforts, 5,700 members were without power – in the midst of winter and during the Christmas holiday. While there have been major storms that left more WEC members without power, we cannot remember one that cost more money (just under \$1 million at current estimates) or that resulted in more broken poles (38 so far).”

WEC reported several unprecedented issues in this storm. This utility serves approximately 12,000 members and much of their system is located away from roadways in extremely rural sections of central Vermont. Several employees instrumental to overseeing the storm response were unavailable due to positive COVID test results, and several line workers experienced injury and accident in the course of service. It took almost a week to fully restore service.

Vermont Electric Cooperative (VEC)

When VEC outages peaked on December 23, 2022, nearly half of their 32,000 members had lost power. It took 5.5 days before the last of 293 separate outage events were resolved. With the number of outages and widespread system damages, a Major Storm Event was declared. The Vermont Public Utilities Commission's definition for a Major Storm Event is that it satisfies all three of the following criteria: (1) extensive mechanical damage to the utility infrastructure has occurred; (2) more than 10% of the customers in a service territory are out of service due to the storm or the storm's effects; and (3) at least 1% of the customers in the service territory are out of service for at least 24 hours. This storm overwhelmingly surpassed all of those criteria for VEC.

Because this storm had such a large footprint covering multiple states, mutual aid crews were being held back for local storm response. Eventually, VEC was able to retain mutual aid contractors through agreements with New England Public Power Association (from four entities from Massachusetts), National Rural Electric Cooperatives Association (two entities from New York) and through Vermont utility mutual aid agreements (one entity). Tree clearing contractors, pole setting crews and flagging crews were also retained to assist in the response.

In many cases, crews had to cut their way through fallen trees before they could attempt to assess damage and restore power. Many initial outages were restored only to find some members still without power due to further damages deep into the rights-of-way.

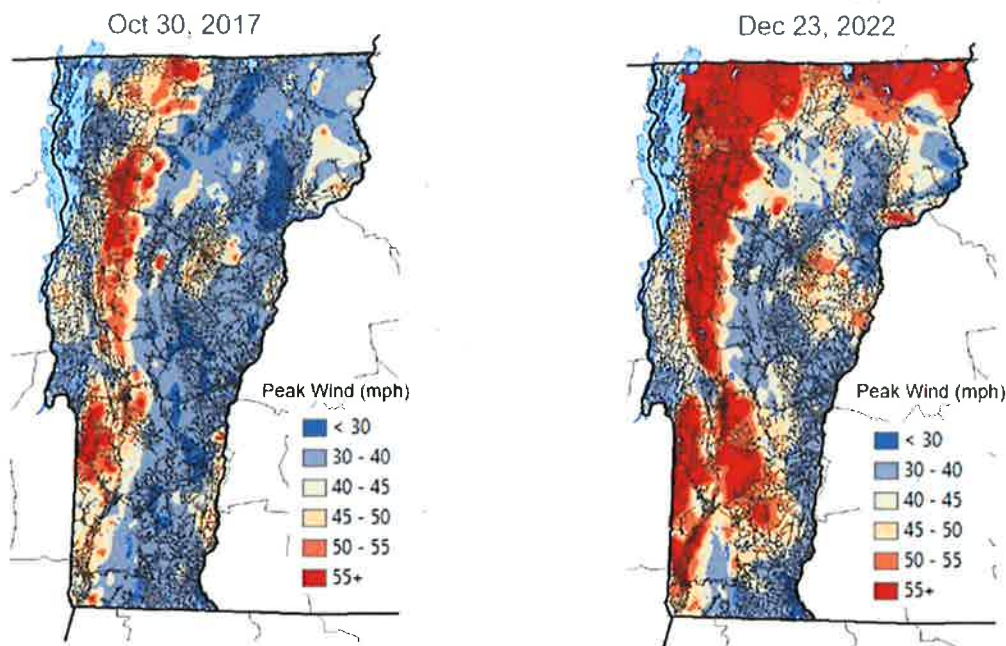
During the PDA, VEC provided this list of 10 Major Storm Events it has weathered since 2010. This storm ranks as one of the most expensive and destructive during that time.

Event	Start	Stop	Days to 0	Max Out Concurrently	Total Customer Hours Out	Separate Outages	Broken Poles	Cost
Wind Storm December 2010	Dec. 01, 2010 02:00	Dec. 05, 2010 20:00	~ 5.8	12,584	462,246	284	78	\$1.79M
Hurricane Irene 2011	Aug. 28, 2011 06:00	Aug. 30, 2011 22:00	~ 2.5	5,432	116,188	218	5	\$1.30M
Ice Storm Gemini 2013	Dec. 21, 2013 15:00	Dec. 31, 2013 16:00	~ 10	13,001	642,250	721	22	\$5.99M
Ice Storm Damon 2014	Dec. 09, 2014 19:00	Dec. 20, 2014 21:00	~ 11	4,941	421,013	704	23	\$2.92M
Wind Storm Philippe 2017	Oct. 30, 2017 02:00	Nov. 05, 2017 18:00	~ 6.7	17,115	604,058	480	70	\$1.6M
May Wind Storm 2018	May. 04, 2018 17:00	May. 07, 2018 22:00	~ 3.2	6,345	117,539	164	0	\$0.30 M
Snow Storm Bruce 2018	Nov. 27, 2018 07:00	Nov. 30, 2018 19:00	~ 3.5	14,205	254,148	524	4	\$0.72 M
Halloween Storm 2019	Oct. 31, 2019 19:00	Nov. 05, 2019 00:00	~ 4.2	18,225	215,467	329	16	\$1.01 M
Wind-Snow Event April 2022	Apr. 19, 2022 04:00	Apr. 22, 2022 00:00	~ 2.8	14,400	96,019	231	4	\$0.03 M
Winter Storm Elliot December 2022	Dec. 23, 2022 02:00	Dec. 28, 2022 15:00	~ 5.5	13,790	298,567	293	48	~\$1.7 M

Winter Storm Elliot (since 2010, 10 major events)

- 3rd in number of broken poles
- 4th or 5th most expensive
- 5th longest in days to recover
- 5th in max out concurrently
- 5th highest customer hours out
- 6th in separate outage events

Wind Snow Storm - Mapping Comparison



In the nine counties assessed, 98.67% of the Public Assistance damages validated during this PDA were for Category F (Public Utilities) and 1.33% were for Category A (Debris).

While the validated PDA total was \$2,830,917, the initial damage assessment compiled by Vermont Agency of Transportation (VTrans) personnel also itemized more than \$500,000 in local road damages (excluding state aid roads which are covered by Federal Highway Administration). This was mostly in the five southernmost counties which did not reach county thresholds and have not been included in this request. In Windham County, for example, the Towns of Halifax, Marlboro, and Newfane reported local road damages which, combined with VTrans debris costs, added up to \$187,500, below the county threshold but significant, nonetheless. Likewise, in Windsor County the Town of Andover reported approximately \$20,000 of road damages, and the towns of Bridgewater, Hartford, Norwich, Pomfret, Sharon, Stockbridge, West Windsor and Windsor reported emergency response costs which, combined with VTrans road repair and debris removal costs, added up to \$234,016, just \$57,753 below the county threshold.

Demographics of Impacted Counties

Vermont is rural and sparsely populated. All of the impacted counties, with the partial exception of Chittenden, have high percentages of residents who are living in poverty and/or disabled. Combined with high energy costs, this puts residents at high economic risk, particularly in winter months. Many of the towns impacted by this event meet the Economically Disadvantaged Rural Communities criteria under Income (2021) and/or Unemployment (2020). These communities include:

- In **Caledonia County**, Groton, Kirby Lyndonville, East Haven and Newark;
- In **Chittenden County**, Buell's Gore;
- In **Essex County**, Ferdinand, Brighton, East Haven, Victory, Lunenburg and Concord;
- In **Franklin County**, Richford, Enosburgh and Montgomery;
- In **Lamoille County**: Eden;
- In **Orange County**, Topsham and Chelsea;
- In **Orleans County**: Lowell, Coventry, Charleston, Brownington, Irasburg, Albany, Barton, Glover, Sutton and Kirby; and
- In **Washington County**: Cabot and Roxbury.

Overall, six of the nine requested counties have median household income below the national average (based on the most recent-available 2010 data).

Additional Factors for Consideration for the Public Assistance Program

The U.S. Department of Agriculture Farm Service Agency reports 94 farms, mostly maple sugar makers in northwestern Vermont, incurred damages to their sugarbushes. Assessment of costs is ongoing. This damage came at a detrimental time of year for sugar-makers as they prepare for their first sap runs, which are expected to come early due to an unusually warm autumn and early winter.

Towns in Vermont obtain insurance through the Vermont League of Cities and Towns' Property and Casualty Intermunicipal Fund (PACIF). Roads, water crossings and drainage structures are not covered, and insurance coverage is not generally commercially available. Insurance policies of the impacted utilities were provided and reviewed by FEMA during the PDA process and eligible cost estimates have taken account of potential insurance proceeds where applicable.

State/ Local Resources for Assistance

Vermont's resource referral hotline, VT 2-1-1, was available during and after the event to receive residential damage reports. Initial assessments by municipalities led VEM and the Vermont Individual Assistance Recovery Officer at the Agency of Human Services to determine that un-insured or under-insured losses were not of a magnitude to warrant Individual Assistance.

Vermont's Emergency Relief and Assistance Fund (ERAF) provides the non-federal share of declared disasters for eligible applicants and is funded through the Vermont General Fund. For State Fiscal Year 2024, there is a projected (\$1,505,378) gap between anticipated ERAF demand and previous appropriations, necessitating an additional appropriation from the General Fund through Budget Adjustment. This new disaster is expected to create only minor additional ERAF demand from municipally owned utilities. Public utility ratepayers will need to absorb energy cost increases associated with the 25% non-federal share of power restoration costs caused by this storm.

Vermont Disaster History

The impacts of the December 22, 2022, through December 24, 2022, storm event exceeded the currently available capabilities of the State of Vermont. Since 2013, Vermont has experienced 10 federally declared and numerous non-declared disasters:

- DR4120 (May 2013 flooding),
- DR4140 (June-July 2013 flooding),
- DR4163 (December 2013 ice storm),
- DR4178 (April 2014 flooding),
- DR4207 (December 2014 severe winter storm),
- DR4232 (June 9, 2015 flooding),
- DR4330 (June-July 2017 flooding),
- DR4356 (October 29-30, 2018 severe storm and flooding),
- DR4380 (May 4-5, 2018 severe storm),
- DR4445 (April 15, 2019 severe storm and flooding),
- DR4474 (Severe storm and flooding, October 31- November 1, 2019) and
- DR4621 (Severe storms and flooding, July 29, 2021-July 30, 2021).

In addition, Vermont is still in an open incident period for DR4532 responding to the COVID-19 pandemic.

Hazard Mitigation Damage Avoidance

Vermont and FEMA have been successful in recent years in making use of available funding via Section 404 (42 U.S.C. § 5170c) and Section 406 (42 U.S.C. § 5172).

The impacts of the December 22, 2022, through December 24, 2022, disaster would have been more severe if not for mitigation work previously accomplished, particularly by Vermont Electric Cooperative (VEC). For example, hazard mitigation efforts under Section 406 (42 U.S.C. § 5172) accomplished following DR4356 and DR4207 resulted in significantly increased resilience to winter storm events in the rural town of Starksboro in Addison County. According to VEC officials, the relatively low damages in Starksboro from this event can be largely attributed to previous mitigation measures, and Addison County is not included in this request.

As another example, since Tropical Storm Irene, Section 404 Hazard Mitigation acquisitions have removed more than 150 structures from flood prone locations throughout Vermont. Some of those might have flooded again during this event had they not been removed. We are committed to continuing our ongoing effort to build resiliency and reduce flood vulnerability using Section 406 and Section 404 Hazard Mitigation.

The Honorable Joseph R. Biden, Jr.
February 21, 2023
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Conclusion

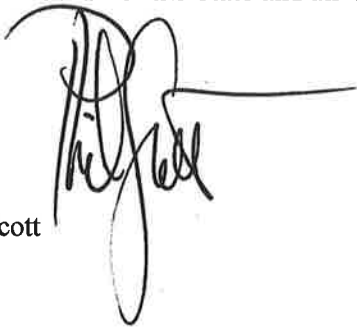
For most of the towns impacted by this statewide storm, it was one of the worst public and private utility disasters in recent Vermont history.

For Vermont local jurisdictions and especially public utilities, the greatest remaining unmet recovery need associated with this storm is for financial assistance to help avoid economic shock to businesses and families as ratepayers. Without federal assistance the ability of Vermont's power sector to recover in a timely manner to avoid long-term economic damage would be at risk.

The total statewide estimated costs of public infrastructure damage from this disaster are more than double the statewide indicator for Vermont. The magnitude and severity exceed the capabilities of the State and affected local governments without federal assistance. Accordingly, I request a Major Disaster Declaration under the Stafford Act for (1) Public Assistance in Caledonia, Chittenden, Essex, Franklin, Grand Isle, Lamoille, Orange, Orleans and Washington Counties, and (2) Hazard Mitigation statewide.

Thank you on behalf of the State and all Vermonters for your continued support.

Sincerely,



Philip B. Scott
Governor

PBS/kp

Enclosures:

OMB No. 1660-0009/FEMA Form 010-0-13

A: Individual Assistance

B: Public Assistance

C: Requirements for Other Federal Agency Programs

U.S. Dept. of Commerce "December 22-24th Major Storm Impacts Vermont" Memorandum dated January 31, 2023

ENCLOSURE A

TO MAJOR DISASTER REQUEST - INDIVIDUAL ASSISTANCE

Estimated Requirements for Individual Assistance under the Stafford Act:

No Individual Assistance requested.

ENCLOSURE B

TO MAJOR DISASTER REQUEST

PUBLIC ASSISTANCE

DAMAGE ASSESSMENT WORKSHEET

Event Name: December 23, 2022 Severe Winter Storm Elliot
Event Date(s): December 23, 2022

FINAL VERMONT												
State	\$1.77											
County	\$4.44											
Date:	2/9/2023	PUBLIC DAMAGE							GOAL			
Report #:	A	B	C	D	E	F	G	TOTAL	POP 2020	\$/CAP	\$/4.44/CAP	SHORT
Addison Co	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	37,363	\$0.00	\$165,892	(\$165,892)
Bennington Co	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	37,347	\$0.00	\$165,821	(\$165,821)
Caledonia Co	\$15,401	\$0	\$0	\$0	\$0	\$83,700	\$0	\$99,101	30,233	\$3.28	\$134,235	(\$35,134)
Chittenden Co	\$0	\$0	\$0	\$0	\$0	\$766,814	\$0	\$766,814	168,323	\$4.56	\$747,354	\$0
Essex Co	\$0	\$0	\$0	\$0	\$0	\$101,988	\$0	\$101,988	5,920	\$17.23	\$26,285	\$0
Franklin Co	\$0	\$0	\$0	\$0	\$0	\$392,615	\$0	\$392,615	49,946	\$7.86	\$221,760	\$0
Grand Isle Co	\$0	\$0	\$0	\$0	\$0	\$68,326	\$0	\$68,326	7,293	\$9.37	\$32,381	\$0
Lamoille Co	\$0	\$0	\$0	\$0	\$0	\$421,757	\$0	\$421,757	25,945	\$16.26	\$115,196	\$0
Orange Co	\$22,114	\$0	\$0	\$0	\$0	\$215,406	\$0	\$237,520	29,277	\$8.11	\$129,990	\$0
Orleans Co	\$0	\$0	\$0	\$0	\$0	\$181,803	\$0	\$181,803	27,393	\$6.64	\$121,625	\$0
Rutland Co	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	60,572	\$0.00	\$268,940	(\$268,940)
Washington Co	\$0	\$0	\$0	\$0	\$0	\$486,592	\$0	\$486,592	59,807	\$8.14	\$265,543	\$0
Windham Co	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	45,905	\$0.00	\$203,818	(\$203,819)
Windsor Co	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	57,753	\$0.00	\$256,423	(\$256,424)
State Agencies/Other	\$0	\$0	\$0	\$0	\$0	\$74,401	\$0	\$74,401	State POP	\$/CAP	\$/1.77/CAP	SHORT
TOTALS	\$37,515	\$0	\$0	\$0	\$0	\$2,793,402	\$0	\$2,830,917	643,077	\$4.40	\$1,138,246	\$0

NOTES:	DEBRIS CLEARANCE	PROTECTIVE MEASURES	ROAD SYSTEM	WATER CONTROL	BUILDINGS & EQUIPMENT	PUBLIC UTILITY	PARKS & OTHER	643,077	State Population total check-sum
PDA Percentages	1.33%	0.00%	0.00%	0.00%	0.00%	98.67%	0.00%		

DAMAGE ASSESSMENT WORKSHEET

Date:	PUBLIC DAMAGES - STATE AGENCIES NOT SPECIFIC TO ANY COUNTY							
Report #:	A	B	C	D	E	F	G	TOTAL
ANR								\$0
AOT								\$0
Forest & Parks								\$0
Rails to Trails								\$0
VAST								\$0
VT Electric Coop								\$0
VEM								\$0
Washington Co Elec Coop								\$0
Hardwick Electric Co-Op						\$74,401		\$74,401
Totals	\$0	\$0	\$0	\$0	\$0	\$74,401	\$0	\$74,401

ENCLOSURE C
TO MAJOR DISASTER REQUEST

Estimated Assistance from Other Federal Agency Programs

County	SBA Home Loans	SBA Business Loans	FSA Loans	NRCS	FHWA	USACE	OTHER
All Counties	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Totals							