



**FEMA**

November 30, 2015

Ray Doherty, State Hazard Mitigation Officer  
Vermont Division of Emergency Management Homeland Security  
45 State Drive  
Waterbury, VT 05671-1300

Re: Proposed Tree Planting at Acquisition Sites  
Acquired with Hazard Mitigation Grant Program (“HMGP”) Funds

Dear Mr. Doherty:

This is in response to your email dated April 27, 2015 regarding the proposal for the planting of trees on eleven (11) parcels of land, which were acquired using HMGP funds under FEMA-4022-DR. The eleven (11) sites you specifically identified are;

- Town of Bethel, 2811 Gilead Brook Road = 150 trees
- Town of Bethel, 132 Spring Hollow Road = 300 trees + 500 Willow Stakes
- Town of Bethel, 251 Marsh Meadow Road = 160 trees + 500 Willow Stakes
- Town of Granville, 4266 Route 100 = 110 trees + 200 Willow Stakes
- Town of Pittsfield, 6 and 11 Parmenter Place and 3604 VT Route 11 = 300 trees + 300 Willow Stakes
- Town of Royalton, 43 Royalton Hill Road = 160 trees
- Town of Braintree, 2044 Thayer Brook Road = 315 trees
- Town of Rochester, 205 and 209 N Main Street = 300 trees

In a subsequent email dated April 27, 2015 you submitted a corrected list of property locations as the original May 4, 2015 list contained errors. The revised list proposed planting trees on nine (9) parcels of land, which were acquired using HMGP funds under FEMA-1995, 4001 & 4022-DR. The nine (9) sites you specifically identified are;

- Town of Granville, 4401 and 4463 VT RT 100 (1995-4R) = 110 trees + 200 willow stakes
- Town of Pittsfield, 6 and 11 Parmenter Place and 3604 RT 100 (4022-16R) = 300 trees + 300 willow stakes
- Town of Bethel, 251 Marsh Meadow Road (4001-1R) = 160 trees + 500 willow stakes
- Town of Bethel, 132 Spring Hollow Road (4022-11F) = 300 trees + 500 willow stakes
- Town of Bethel, 2811 Gilead Brook Road (4022-11F) = 150 trees
- Town of Royalton, 43 Royalton Hill Road (1995-8R) = 160 trees

Your email states the purpose of these plantings is to protect and reinforce the streambank/ riparian buffer at these nine locations. I have reviewed your request and consulted with FEMA Headquarters Floodplain Management and Insurance Branch and have determined that plantings are permissible on acquisition sites except when they are proposed in the regulatory floodway.

Upon my complete review of your request and the site plans provided, I am approving the plantings as proposed for the following four (4) locations which are located outside the regulatory floodway;

- Town of Bethel, 2811 Gilead Brook Road (4022-11F) = 150 trees
- Town of Bethel, 132 Spring Hollow Road (4022-11F) = 300 trees + 500 willow stakes
- Town of Granville, 4401 and 4463 VT RT 100 (1995-4R) = 110 trees + 200 willow stakes

The remaining five (5) sites, listed below, will require special conditions because all or parts of the proposed planting sites fall within a regulatory floodway. Before these communities plant the trees and shrubs within the regulatory floodway, they must meet one of two conditions. First, they could apply for a conditional Flood Insurance Rate Map (FIRM) and floodway revision. The community must fulfill the requirements outlined in 44 CFR § 60.3(d)(4) for a conditional FIRM and floodway revision as established under the provisions of § 65.12 and they must receive the approval of the FEMA administrator; § 65.12 covers this approval process. Second, the community can do a no-rise analysis to show that the plantings won't increase the Base Flood Elevation (BFE) in the floodway. In accordance with 44 C.F.R. § 60.3 (d)(3) any project in a floodway must be reviewed to determine if the project will increase flood heights. An engineering analysis must be conducted before a permit can be issued. The community's permit file must have a record of the results of this analysis, which can be in the form of a No-rise Certification. This No-rise Certification must be supported by technical data and signed by a registered professional engineer. The supporting technical data should be based on the standard step-backwater computer model used to develop the 100-year floodway shown on the FIRM or Flood Hazard Boundary Map. The step-backwater analysis will need to assess the expected BFE impact based on the size of the trees at full maturity.

- Town of Bethel, 251 Marsh Meadow Road (4001-1R) = 160 trees + 500 willow stakes
- Town of Royalton, 43 Royalton Hill Road (1995-8R) = 160 trees
- Town of Pittsfield, 6 and 11 Parmenter Place and 3604 Route 100 (4022-16R) = 300 trees + 300 willow stakes.

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For your reference I am enclosing the White River Partnership Worksheets you provided with your request along with the proposed planting locations overlaid on the existing FIRMs. If you have any questions, please do not hesitate to call me at (617) 956-7524.

Sincerely,



Richard H. Verville, Chief  
Hazard Mitigation Assistance Branch  
FEMA Region I

Enclosures:

White River Partnership riparian site plans (6)  
Riparian floodplain overlay maps (6)