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FEMA Region I
99 High Street
Boston, MA 02110

FEMA

October 15, 2012

Ben Rose
State Public Assistance Officer
Vermont Emergency Management
Department of Public Safety
103 South Main Street
Waterbury, Vermont 05671-2101

Re: First Appeal – Town of Townshend, VT, Dam Road Culvert Replacement, FEMA-4022-DR, Project Worksheet 1803

Dear Mr. Rose:

I am responding to your letter of July 19, 2012, in which you transmitted the first appeal of the Town of Townshend (the "Applicant") under major disaster declaration FEMA-4022-DR. The Applicant is appealing the Federal Emergency Management Agency's (FEMA) decision to deny $99,357.50 in funding for a change in the scope of work for the repair of the Dam Road culvert crossing under Project Worksheet (PW) 1803. The Applicant had requested that FEMA provide funding for costs associated with replacing the damaged culvert at Dam Road with an upgraded 7 x 28 foot open-bottomed concrete arched box culvert in lieu of the 14 x 100 foot corrugated metal pipe culvert under the FEMA-approved scope of work. The first appeal asserts that this upgrade was required by the Stream Alteration General Permit promulgated by the Agency of Natural Resources. As explained below, I have determined the Stream Alteration General Permit does not meet the criteria as a state or local code or standard under 44 C.F.R. § 206.226(d). Therefore, the additional funding requested by the Applicant for the upgraded culvert is not eligible for Public Assistance funding.

I. BACKGROUND

A. Agency of Natural Resources Stream Alteration General Permit

Vermont law provides that a person shall not "change, alter, or modify the course, current, or cross section of any watercourse…by movement, fill, or by excavation of ten cubic yards or more in any year" unless authorized by the Secretary of the Agency of Natural Resources.[1] "Watercourse" means "any perennial stream," but does not include roadside ditches and channels.[2] Vermont law further provides that the Secretary of the Agency of Natural Resources may issue a permit for a watercourse alteration only if the change:

(1) Will not adversely affect the public safety by increasing flood hazards;

(2) Will not significantly damage fish life or wildlife;

[1] 10 V.S.A. § 1021(a).
[2] 10 V.S.A. § 1002(10).

(3) Will not significantly damage the rights of riparian owners; and

(4) In the case of waters designated by the Natural Resources Board as outstanding resource waters, will not adversely affect the values sought to be protected by the designation.[3]

The permitting requirements in Vermont's stream alteration law apply to all bridges and culverts affecting a watercourse, except for those connected with state highways.[4]

The Vermont State Legislature has authorized the Agency of Natural Resources to issue general permits for categories of stream alteration projects.[5] Pursuant to this authority, the Agency of Natural Resources issued a Stream Alteration General Permit on April 18, 2011.[6] The Stream Alteration General Permit sets requirements for projects that fall within *reporting* and *non-reporting* categories of projects, and also identifies when a project requires an individual permit.

If a person performs activities that fall within a *non-reporting* category set forth at § C.2.1.1 to C.2.1.9 of the Stream Alteration General Permit, conducts those activities in accordance with the activity-specific requirements set forth in the Stream Alteration General Permit, and are not located in Outstanding Resource Water, then the activities will meet the requirements of the stream alteration statute and a person may proceed to perform those activities without notifying the Secretary of the Agency of Natural Resources (regardless of watershed size).[7] The non-reporting categories of the Stream Alteration General Permit include the replacement of existing culverts at § C.2.1.5 so long as the project meets certain conditions.[8] These conditions provide, *inter alia*, that the structure span length at the streambed elevation is no less than 1.2X bank full width, the Q25 headwater depth + one foot is no higher than the elevation of the lowest superstructure element of a bridge or top of the inlet opening of a buried structure, and the structure does not obstruct the passage of aquatic life indigenous to the waterbody beyond the actual duration of construction.[9] Section C.2.1.5 of the Stream Alteration General Permit does not require any specific method of construction for a replacement culvert or require specific upgrades from a corrugated metal pipe to an open bottomed arched box culvert.

If a project does not meet the conditions of a non-reporting category, then the project may potentially fall within a *reporting* category. The Stream Alteration General Permit requires the submission of an application for authorization for the project falling within a reporting category and, following certain review and public comment, the Secretary of the Agency of Natural Resources may approve an application for authorization under the Stream Alteration General

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[3] 10 V.S.A. § 1023(a).
[4] 10 V.S.A. § 1021(e); 19 V.S.A. § 10(12).
[5] 10 V.S.A. § 7501. Before this law in 2010, we understand that the Agency of Natural Resources relied solely on individual permits to carry out the requirements of the stream alteration statute.
[6] Vermont Agency of Natural Resource Stream Alteration General Permit (Apr. 18, 2011) [hereinafter General Permit] (**Attachment 5**).
[7] General Permit, § C.2.1.
[8] General Permit, § C.2.1.5.
[9] General Permit, § C.2.1.5(a) and (b). The General Permit also sets five additional conditions for a replacement culvert project that must be met in order for the project to fall within the non-reporting activity. General Permit, § C.2.1.5(c)-(g).

Permit if the project meets certain conditions.[10] These conditions provide, *inter alia*, that the activity complies with the stream alteration statute, the activity does not obstruct the movement of aquatic life indigenous to the waterbody beyond the actual duration of construction, and the activity is conducted in a manner which minimizes or avoids any discharge of sediment or other pollutants to surface waters in violation of Vermont Water Quality Standards.[11] The Stream Alteration General Permit does not provide any further requirements for activities falling under a reporting category. I understand that a reporting category, for example, would include a replacement culvert project that did not meet the conditions of a non-reporting activity under the Stream Alteration General Permit and did not fall within the requirements to submit an individual permit application. The Stream Alteration General Permit does not establish any specific engineering design standards or measurable performance criteria that would be required to be followed in order to obtain approval for a replacement culvert project falling within the reporting activity, nor does it require any specific method of construction for a replacement culvert or require specific upgrades from a corrugated metal pipe to an open bottomed arched box culvert.

Individual permits are required for an activity that is not statutorily exempt, conducted in a stream with a watershed area of 10 square miles or greater, and not otherwise authorized as a non-reporting activity under the Stream Alteration General Permit.[12] An individual permit is also required for any project if deemed necessary by the Secretary of the Agency of Natural Resources.[13] The Stream Alteration General Permit does not establish any specific engineering design standards or measurable performance criteria that would be required to be followed in order to obtain an individual permit for a replacement culvert, nor does it require any specific method of construction for a replacement culvert or require the upgrade of a corrugated metal pipe culvert to an open bottomed arched box culvert. The grantee and Applicant have not provided any additional written, formally adopted standards set by the Agency of Natural Resources for individual permits involving replacement culverts.

B. Original Determination for Project Worksheet 1803

On September 1, 2011, the President declared a major disaster (FEMA-4022-DR) for the State of Vermont as a result of Tropical Storm Irene during the period of August 27 through September 2, 2011. The major disaster declaration and its subsequent amendments authorized Public Assistance Categories A through G for Addison, Bennington, Caledonia, Chittenden, Essex, Franklin, Grand Isle, Lamoille, Orange, Orleans, Rutland, Washington, Windham, and Windsor Counties. The Town of Townshend is in Windham County.

Tropical Storm Irene damaged the Dam Road culvert crossing, which consisted of an elliptical 16 feet high, 12 feet wide, and 120 feet long corrugated metal pipe culvert that carried Fair Brook beneath Dam Road in Townshend, VT. The corrugated metal pipe was washed downstream and damaged beyond repair.

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[10] General Permit, §§ C.2.2 – C.2.4.
[11] General Permit, § C.2.4.
[12] General Permit, § D.
[13] General Permit, § D.

The Town of Townshend elected to replace the Dam Road culvert with a 7 x 28 foot open-bottomed concrete arched box culvert. Before design and construction of this culvert, I understand that the Vermont Agency of Natural Resources met with Townshend and confirmed that the replacement structure would be the most cost-effective means of complying with the Stream Alteration General Permit.

On May 9, 2012, FEMA obligated project worksheet reference number PA-01-4022-PW-01803(0) (PW 1803) with an estimated cost of $444,231.37 for the repair of the Dam Road culvert crossing, which included a 14 x 100 foot corrugated metal pipe culvert that would replace the original culvert.[14] FEMA determined that a 14 x 100 foot corrugated metal pipe culvert was the least cost practicable option of complying with the meeting the Q25 +1 foot freeboard requirement standard under the Vermont Agency of Transportation's 1998 Hydraulics Manual[15] and 2011 Town and Road Bridge Standards.[16] FEMA based its decision on the replacement culvert by analyzing the Hydrology and Hydraulics Study performed by the Vermont Agency of Transportation (VTrans), which stated that the pre-disaster culvert design was hydraulically adequate.[17]

FEMA determined in PW 1803 that the Stream Alteration General Permit process is discretionary and not uniformly applied across the State and therefore not consistent with 44 C.F.R. § 206.226(d). Therefore, FEMA determined that the costs to comply with these permitting requirements for the Dam Road culvert are not eligible for Public Assistance. As the cost for the 7 x 28 foot open-bottomed concrete arched box culvert was more than the cost for 14 x 100 foot corrugated metal pipe culvert under the approved scope of work, FEMA identified PW 1803 as an improved project. Upon further review, FEMA determined that some parts of the chosen solution were appropriate for inclusion under a hazard mitigation proposal and included hazard mitigation funding under PW 1803.

C. First Appeal

The Applicant submitted its first appeal to the Vermont Emergency Management (VEM) for PW 1803 via email on May 23, 2012. In this e-mail, the Applicant stated that it should be eligible for an additional $137,000 in repair work for the costs of the upgraded box culvert.[18] The Applicant's appeal did not elaborate or present any argument as to why FEMA's determination was incorrect.

You forwarded the Applicant's appeal to the Regional Administrator in a letter dated July 19, 2012.[19] In your forwarding letter, you stated that the Town of Townshend designed and installed

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[14] Project Worksheet PA-01-4022-PW-01803(0) (PW 1803) (**Attachment 7**).
[15] Vermont Agency of Transportation Hydraulics Manual (1998). Due to its size, this document is not attached to this first appeal response.
[16] Town Road and Bridge Standards, Town of Townshend, Vermont (Jan. 4, 2011) (**Attachment 4**).
[17] Hydraulics Unit Report from Leslie Russell, P.E., Hydraulics Project Engineer to John Alexander, District Technician District 2 (Sep. 15, 2011) (**Attachment 3**).
[18] Email from Kim Ellison, Finance Officer, Town of Townshend to Ben Rose, State of Vermont (May 23, 2012) (**Attachment 1**).
[19] Letter from Ben Rose, Public Assistance Officer, Vermont Emergency Management, to Don R. Boyce, Regional Administrator, FEMA Region I (Jul. 19, 2012) (**Attachment 2**).

the upgraded replacement culvert based on the requirements under Stream Alteration General Permit. Specifically, you stated that the replacement structure accommodates 1.2 times the bank-full width of the stream and the open-bottom structure allows the passage of aquatic organisms, which are both requirements under the Stream Alteration General Permit. Therefore, you argued that the Regional Administrator should reimburse Townshend for the increased costs of the upgraded culvert. You also indicated that more recent information from the Town of Townshend indicates that Townshend's total costs for the completed work were $543,588.87, which leaves only $99,357.50 in dispute under PW 1803 (as opposed to $137,000 that was originally in dispute under PW 1803).

You incorporated by reference into Townshend's first appeal the information and memorandum provided by VTrans in a related but separate first appeal dated May 24, 2012. In this separate first appeal, VTrans (the grantee) had appealed the information contained in the document entitled "DR-4022 Culvert/Bridge Guidance" that was promulgated by the Public Assistance Office for FEMA-4022-DR. The Regional Administrator denied this first appeal because VTrans did not identify the final Project Worksheets for which it was appealing FEMA's determinations, specify the monetary value in dispute for each Project Worksheet, or identify the specific applicants for whom VTrans was submitting the first appeal. Notwithstanding, the Regional Administrator stated that an eligible applicant, subgrantee, or the grantee may appeal any of FEMA's determinations for Project Worksheets involving upgrades to bridges and culverts, and noted that he had received the first appeal from Townshend involving this issue.

II. DISCUSSION

Section 406(e) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act authorizes FEMA to reimburse the costs of repair and replacement of a facility based on the design of the facility as it existed immediately before the disaster event and in "conformity with current applicable codes, specifications, and standards…"[20] FEMA's implementing regulation at 44 C.F.R. § 206.226(d) and FEMA Disaster Assistance Policy (DAP) No. 9527.4 provide that, in order for a state or local repair or replacement standard which changes the pre-disaster construction of a facility to be eligible for assistance, the standard must:

- Apply to the type of repair or restoration required;
- Be appropriate to the pre-disaster use of the facility;
- Be found reasonable, in writing, and formally adopted and implemented on or before the disaster declaration date;
- Apply uniformly to all similar types of facilities within the jurisdiction; and
- Have been enforced during the time the standard was in effect.[21]

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[20] Robert T. Stafford Disaster Relief and Emergency Assistance Act, Pub. L. No. 93-288, § 406(e)(1) (1974) (codified as amended at 42 U.S.C. § 5172(e)(1)) [hereinafter Stafford Act].
[21] Stafford Act, § 406(e)(1); 44 C.F.R. § 206.226(d); FEMA Disaster Assistance Policy No. 9527.4, *Construction Codes and Standards* (Feb. 5, 2008) [hereinafter DAP 9527.4].

FEMA does not generally fund code or standard-mandated work if the code or standard does not meet the five criteria, even though the work may be required in order to obtain a building, environmental, or other permit.[22] In order for code or standard to apply uniformly, there can be no discretion in its application. The code or standard cannot allow selective application and it cannot be subjective to discretionary enforcement by public officials.[23]

The Stream Alteration General Permit does not meet the requirements of 44 C.F.R. § 206.226(d) and FEMA DAP No. 9527.4. The Stream Alteration General Permit establishes a permitting process that allows discretion to the Agency of Natural Resources to implement different standards for culvert replacements depending on whether the activity is a non-reporting activity, is a reporting activity, or requires an individual permit.[24] Therefore, the Stream Alteration General Permit does not apply uniformly to all replacement culvert projects within the State of Vermont.

A Vermont town that replaces an existing culvert does not need to report the activity to the Agency of Natural Resources pursuant to § C.2.1.5 of the Stream Alteration General Permit if, *inter alia*, the structure span length at the streambed elevation was no less than 1.2X bank full width and the Q25 headwater depth + one foot is no higher than the elevation of the lowest superstructure element of a bridge or top of the inlet opening of a buried structure. If, however, the town's project did not fall within the criteria of § C.2.1.5 and fell within the reporting category of § C.2.2,[25] the town would need to submit an application for authorization from the Secretary of the Agency of Natural Resources. The Secretary may grant an application for authorization if the application and its corresponding project meet the conditions of § C.2.4 of the Stream Alteration General Permit.

The conditions at § C.2.4 require, *inter alia*, that the activity is in compliance with the stream alteration statute, the requirements of the Stream Alteration General Permit for the passage of aquatic organisms, and the requirement that the activity is conducted in a manner which minimizes or avoids any discharge of sediment or other pollutants to surface waters in violation of Vermont Water Quality Standards. These conditions do not mandate that a culvert replacement project falling within the reporting category meet the 1.2X bank full width design criteria, mandate that a replacement culvert meet with the Q25 headwater depth + one foot criteria, or mandate any other specific engineering design standards or measurable performance criteria for a replacement culvert. Therefore, the application approval process for a reporting activity provides the Agency of Natural Resources discretion to make decisions on a case by case basis upon review of plans and specifications that an applicant submits.

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[22] DAP No. 9527.4, § VII(B)(4).
[23] DAP No. 9527.4, § VII(C).
[24] 44 C.F.R. § 206.226(d)(4); DAP No. 9527.4, § VII(C)(4); See Letter from Deborah Ingram, Assistant Administrator, FEMA Disaster Assistance Directorate, to Mark Ghilarducci, Secretary, California Emergency Management Agency re: *Second Appeal–San Diego County, PA ID 073-99073-00, Bridge Replacement, FEMA-1731-DR-CA, Project Worksheet (PW) 779* (May 21, 2012) (available at http://www.fema.gov/appeals/viewAppeal.do?action=Browse&viewType=letter&appealId=5181).
[25] *See, e.g.* General Permit, § C.2.2.1(c) ("An application for an authorization under this general permit shall be submitted for the following categories of activities…C.2.2.1. Activities in perennial streams with watershed areas less than 10.0 square miles:…(c) Do not meet the activity-specific requirements in C.2.1.2 through C.2.1.8;").

If a town's replacement culvert project did not fall within the criteria § C.2.1.5 or the reporting categories at § C.2.2, the town would need to apply for an individual permit to the Agency of Natural Resources.[26] The Stream Alteration General Permit does provide any specific engineering design standards or measurable performance criteria for a replacement culvert, and the State has not provided any other written, formally adopted standards for individual permits that provide specific engineering design standards or measurable performance criteria that would be required to be followed in order to obtain the individual permit. As such, the individual permitting process provides the Agency of Natural Resources discretion to make decisions on a case by case basis upon review of plans and specifications that an individual permit applicant submits.

Here, you have argued that the 1.2X bank full width criteria under § C.2.1.5 of the Stream Alteration General Permit required Townshend to upgrade the Dam Road culvert to an open-bottomed concrete arched box culvert. However, if the Town did not want to meet the activity-specific requirements of § C.2.1.5 (including the 1.2X bank full width criteria), it could have submitted an application for authorization for the project to the Agency of Natural Resources pursuant to § C.2.2.2 - § C.2.2.4 if the project fell within the reporting category. The Stream Alteration General Permit does not mandate that a culvert replacement project falling within the reporting category meet the 1.2X bank full width design criteria for all replacement culverts or any other specific engineering design standards or measurable performance criteria. If the Town elected not to meet the activity-specific requirements of § C.2.1.5 and the project did not fall within the reporting category, the Town would have needed to submit an individual permit. The Stream Alteration General Permit does not require replacement culvert projects under an individual permit to meet the 1.2X bank full width criteria, nor does it set forth any other specific engineering design standards or measurable performance criteria. This means that the Agency of Natural Resources is not required to uniformly apply the 1.2X bank full width for all replacement culvert projects, which means that the upgrade to the 7 x 28 foot open-bottomed concrete arched box culvert that you assert is required by the 1.2X bank full width criteria is not eligible for Public Assistance.

You incorporated by reference into Townshend's first appeal the information and memorandum provided by VTrans in a related but separate first appeal dated May 24, 2012, and I wanted to address two points raised by VTrans in that appeal. First, VTrans asserted that the varying standards that may apply to a replacement culvert or other project under the Stream Alteration General Permit based on whether the project is a non-reporting and reporting activity or requires an individual permit fall within the concept of "professional judgment."[27] The grantee argues that virtually all environmental regulations involve some kind of professional judgment in their application, and that this judgment should not disqualify the Stream Alteration General Permit from meeting the criteria of 44 C.F.R. § 206.226(g).

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[26] General Permit, § D ("An individual stream alteration permit shall be required for any activity that is: (a) Not a statutorily Exempt Activity…(b) Conducted in a stream with a watershed area of 10 square miles or greater; and (c) Not otherwise authorized as a non-reporting activity in C.2.1.2 through C.2.1.8.").

[27] See Appeal by the State of Vermont from the Federal Emergency Management Agency's Denial of Public Assistance for Bridges and culverts Damaged or Destroyed by Tropical Storm Irene, from Daniel D. Dutcher, Assistant Attorney General, Vermont Agency of Transportation, p. 21 (May 24, 2012) (**Attachment 6**).

In support of this proposition, VTrans notes FEMA's second appeal decision under FEMA-1734-DR for the Lewis County Mays and East Dryad bridges.[28] The design standard in question under that second appeal applied to bridge replacement projects, and required elevating bridges to a minimum of three feet above the 100-year flood level "or as determined by field review." Although the inclusion of the phrase "or as determined by field review" meant the applicant in question was not required to uniformly apply this standard to all bridge projects, FEMA determined the standard in question was eligible for funding. The facts of the current matter, however, are distinguishable from FEMA's decision under FEMA-1734-DR. Here, there is no such universal design standard or a measurable performance criterion that applies to all culvert replacement projects from which the State can make adjustments based on professional judgment in. For example, the Stream Alteration General Permit does not expressly require the 1.2X bank full width design criteria for all replacement culvert projects that the Agency of Natural Resources approves as part of the application for authorization as a reporting activity or as part of an individual permit.

Second, VTrans asserted in its appeal of May 24, 2012, that the Agency of Natural Resources uniformly requires stream equilibrium[29] and aquatic organism passage requirements under the Stream Alteration General Permit for all projects, which would include culvert replacement projects under a non-reporting activity, reporting activity, and an individual permit.[30] Even if FEMA accepted this proposition, VTrans has not demonstrated how the approved scope of work involving a 14 x 100 foot corrugated metal pipe culvert under PW 1803 would not achieve stream equilibrium and aquatic organism passage, and has not demonstrated that these stream equilibrium and aquatic organism passage provisions specify/require an upgrade from a corrugated metal pipe to an open-bottomed concrete arched box culvert.[31]

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[28] Letter from Elizabeth Zimmerman, Assistant Administrator, FEMA Recovery Directorate to Gerald Urbas, Deputy State Coordinating Officer, State of Washington Military Department re: *Second Appeal–Lewis County, PA ID 041-99041-00, Mays and East Dryad Bridges, FEMA-1734-DR-WA, Project Worksheets (PWs) 110 and 111* (Mar. 25, 2010) (available at http://www.fema.gov/appeals/viewAppeal.do?action=Browse&viewType=letter&appealId=4421).

[29] General Permit, § B ("Equilibrium Standard" means the activity does not change the physical integrity of the stream in a manner which departs from, further departs from, or impedes attainment of the channel width, depth, meander pattern, and longitudinal slope associated with natural equilibrium conditions. Equilibrium conditions occur when water flow, sediment, and woody debris are transported by the stream channel in such a manner that the stream maintains its dimension, general pattern, and slope without unnaturally aggrading (raising) or degrading (lowering) the channel in such a manner that the stream maintains its dimension, general pattern, and slope without unnaturally aggrading (raising) or degrading (lowering) the channel bed elevation[.] The requirements of 10 VSA § 1023(a) are met through attainment and maintenance of equilibrium conditions.").

[30] See Appeal by the State of Vermont from the Federal Emergency Management Agency's Denial of Public Assistance for Bridges and culverts Damaged or Destroyed by Tropical Storm Irene, from Daniel D. Dutcher, Assistant Attorney General, Vermont Agency of Transportation, p. 13 (May 24, 2012).

[31] See DAP No. 9527.4, Appendix A, Case 6 ("Case 6: During a declared event, a culvert is washed out causing road damage. Restoring the predisaster design of the damaged road requires replacing the washed out culvert. The permit application to replace the culvert is denied by the state natural resources department, which recommends that a spanning bridge be constructed. There was no written and formally adopted standard that specifies an upgrade from culverts to spanning bridges. The decision of the state permitting official is discretionary and not based on a written, formally adopted, and implemented code. The upgrades are not eligible for funding, pursuant to 44 CFR § 206.226(d)(3) and Section VII(C)(3) of this policy.").

III. CONCLUSION

I have determined the Stream Alteration General Permit does not meet the criteria of 44 C.F.R. § 206.226(d). Because the Stream Alteration General Permit does not meet these criteria, the additional funding requested by the Applicant for the upgraded open-bottomed concrete arched box culvert at Dam Road is ineligible for Public Assistance, even though the work may be required in order to obtain a permit from the Agency of Natural Resources. Therefore, I am denying the Applicant's first appeal.

The Applicant or the grantee may appeal this decision to the Assistant Administrator for the Recovery Directorate pursuant to the procedures set forth in 44 C.F.R. § 206.206. Please inform the Applicant of my decision and of the ability to appeal.

Sincerely,

Paul F. Ford
Acting Regional Administrator
FEMA Region I

PFF:ts

Attachments

(1) Email from Kim Ellison, Finance Officer, Town of Townshend to Ben Rose, State of Vermont (May 23, 2012)

(2) Letter from Ben Rose, Public Assistance Officer, Vermont Emergency Management, to Don R. Boyce, Regional Administrator, FEMA Region I (Jul. 19, 2012)

(3) Hydraulics Unit Report from Leslie Russell, P.E., Hydraulics Project Engineer to John Alexander, District Technician District 2 (Sep. 15, 2011)

(4) Town of Townshend, Vermont, Town Road and Bridge Standards (June 2011)

(5) Vermont Agency of Natural Resource Stream Alteration General Permit (Apr. 18, 2011)

(6) Appeal by the State of Vermont from the Federal Emergency Management Agency's Denial of Public Assistance for Bridges and culverts Damaged or Destroyed by Tropical Storm Irene, from Daniel D. Dutcher, Assistant Attorney General, Vermont Agency of Transportation, to Don R. Boyce, Regional Administrator, FEMA Region I (May 24, 2012) (without attachments and enclosures)

(7) Project Worksheet PA-01-4022-PW-01803(0) (PW 1803)