



M. Jodi Rell
GOVERNOR
STATE OF CONNECTICUT

May 26, 2010

Elizabeth A. Zimmerman
Assistant Director
Recovery Directorate

Through: Mr. Paul Ford, Acting Regional Administrator
FEMA Region 1
99 High Street, Sixth Floor
Boston, MA 02110

RE: Individual Assistance for FEMA 1904-DR

Dear Ms. Zimmerman:

This letter is to appeal the denial by FEMA, dated April 27, 2010, of my request for Individual Assistance (IA) for the counties of Fairfield, Middlesex, New Haven, New London, and Windham Counties in response to a severe weather system beginning March 12, 2010 and terminated on May 17, 2010.

EXECUTIVE SUMMARY:

TOTAL DAMAGE OVERVIEW

Combining the initial Individual Assistance declaration request data with the additional damage data that has been collected and validated for this appeal, the total damage estimates per county are as follows:

Damage Level	New London	Fairfield	New Haven	Middlesex	Windham	Total
Affected	567	174	106	65	52	964
Minor	682	318	66	55	62	1183
Major	216	93	15	7	13	344
Destroyed	3	3	0	0	1	7
Totals	1468	588	187	127	128	2498

Since the first IA declaration request:

- The number of raw damage reports has nearly tripled and the number of validated damage reports has doubled;
- The overall amount of estimated housing assistance needed in these five counties has more than tripled, from \$5.1 million to \$16.5 million, which is also over three times the average housing assistance for a medium state, as provided in 44 CFR Section 206.48(b)(6);
- Estimated housing assistance costs per capita (using FEMA reimbursement rates for the various categories of damage) range from \$38.71 per person for New London County to a statewide per capita of \$5.06 per person;
- Only 7% of residents filing damage reports indicated that their damage is fully covered by insurance.

INCREASED REPORTS OF DAMAGE

In my original request for Individual Assistance for Connecticut residents affected by the March severe weather in which 3 people died, FEMA estimated through its Preliminary Damage Assessment process (PDA) that 1315 residences would need assistance. We have since received 3136 additional reports of damage. Some of the 3136 reports were duplicates, or had already been included in the original IA request. These duplicates were removed, leaving reports of 2110 additional residences needing assistance of some kind, and there is field evidence that there are many more that have not yet been reported.

We also recognize, however, that although each of these 2110 reports represent actual damage, not all of the 2110 reports may meet FEMA damage standards for destroyed, major or minor damage. Therefore, we have applied a 5-step verification process, including the results of actual field visits using FEMA PDA teams, to narrow this number downward to 1183 validated reports of damage, nearly doubling the number of validated reports of homes needing assistance based on the FEMA rating system from 1315 in the original request to a new total of **2498** homes.

Exhibit A (attached) contains three tables which provide detailed breakdown of homes impacted by this disaster: Total Damage; Initial Declaration Request, and; Additional Damage Data Collected and Verified for Appeal.

VERIFICATION OF DAMAGE REPORTS

The State of Connecticut has taken this very conservative approach, utilizing a 5-step verification process, in order to maximize the credibility of these reports of damage. In our experience, as confirmed by a FEMA representative at the JFO for DR 1904, PDAs are not normally used by states in the appeal process, although, after an appeal is filed, FEMA may conduct a PDA to verify data. Unlike in an original IA request, an IA appeal contains damage numbers which go

beyond those which have been developed through a PDA. Nonetheless, in this appeal, Connecticut twice requested PDA teams as a field verification tool to further validate our data. The same FEMA representative indicated that this was an efficient approach. And, although we have significantly reduced the number of raw reports through a 5-step data validation process, our field verification visits conducted jointly with FEMA actually found 50% more damaged homes than had been reported. This demonstrates that there are far greater numbers of damage than have been reported.

LEVELS OF DAMAGE

Perhaps most significantly, the total reported number of homes that are destroyed or have suffered major damage has risen from the original number of 159 to a new cumulative total (using validated reports) of 351. Taken together, Connecticut residents have suffered:

- 7 destroyed homes;
- 344 homes with major damage;
- 1183 homes with minor damage;
- 964 affected homes;
- 2498 Total number of impacted homes.

A total of 1593 residents also reported that their homes now contain mold, which is likely to cause further damage.

INDIVIDUAL ASSISTANCE COSTS

Individual assistance costs are now estimated to be in excess of \$16.5 million, which is \$11.4 million more than the \$5.1 million estimated in the original request.

PER CAPITA HOUSING ASSISTANCE COSTS

Although per capita housing assistance cost amounts are not publicly identified as one of the IA factors, it is significant to note that, using the additional data collected, the housing assistance costs (using FEMA reimbursement rates for the various categories of damage) for New London County are \$38.71 per person, based on the total estimated housing damage in the County (including both initial request and appeal damage numbers) divided by the population of New London County. For Windham County, the per capita cost is \$6.81 per person; for Fairfield County, the per capita cost is \$4.79 per person and; for Middlesex County, the per capita cost is \$3.61 per person. Statewide, the per capita housing assistance cost is estimated at \$5.06 per person (including damage from other counties not part of this appeal.)

INSURANCE COVERAGE

Insurance coverage for this damage is insufficient. Residents filing damage reports indicate the following:

- 67% either have no insurance at all, or have determined that their insurance does not cover the damage they sustained;
- An additional 8% report that their damage is only partially covered by insurance;
- Only 7% report that their damage is fully covered by insurance.

SPECIAL POPULATIONS AND OTHER FACTORS

But the damage numbers alone do not tell the whole story. Over 25% of the homeowners reporting damage and income identified themselves as low income (this despite the fact that 2-1-1 officials indicated that persons reporting damage were very reluctant to identify as low income). Windham County and New London County are among the most impoverished or at risk. For example, from the 2000 census:

- Percentage of Windham County residents aged 5 and over who are disabled: 19.3%
- National median value of a home: \$119,600
 - In New London County, median value of a home in the Borough of Jewett City: \$97,700.
- National percentage of individuals living below poverty line: 12.4%
 - Percentage of individuals living below poverty line in the City of New London in New London County: 15.8%

The Towns of Windham and New London are both on the U.S. Department of Labor's "labor surplus" list, indicating that these are areas where the average unemployment rate was at least 20% above the average unemployment rate for all states, the District of Columbia, and Puerto Rico during the previous two calendar years.

In its Regional Summary, Analysis, and Recommendation Report for Individual Assistance dated April 12, 2010, FEMA found that many of the low-income individuals affected by the flooding and tree damage would probably not be eligible for SBA disaster loans and do not have the financial resources to pay for needed repair. Also, FEMA found that the State of Connecticut's loan program would not be applicable to many of the low income residents: "*Without federal assistance, many of these individuals may have a difficult time recovering from this disaster.*"

Joint FEMA/State teams were used to perform on-site verification visits. Teams walking the neighborhoods where one damaged home had been reported found others on the same street that had not been previously reported. These teams found 50% more damaged homes than had been reported. Also, 8 homes that had been reviewed during the PDA process in support of the original IA request were re-examined by FEMA/State teams during this appeal process. **Of the 8,**

the classification of 7 of the homes became worse, and one stayed the same. In fact, one home that had originally been classified as “affected” was re-classified as “major.” This demonstrates that the situation in Connecticut, if anything, is more serious than was originally thought.

GIS mapping of the damages across the five counties is provided in the attached **Exhibit B**. This mapping provides a visual representation of the large concentrations of verified damage reports; the extensive number of field verifications performed by joint PDA teams, and finally; the correlation between the clusters of damage and the field validation process.

This GIS mapping demonstrates that whole neighborhoods have suffered damage. Although the estimated number of major or destroyed homes is significant (current estimate is at 351), this disaster has also resulted in a large number of homes identified as having suffered minor damage under FEMA classifications (current estimate is 1183).

If Connecticut is granted an IA declaration, the numbers of affected residents will be considerably larger than the numbers currently reported; just as neighboring Rhode Island’s IA declaration was based on 455 impacted residences, but thousands are receiving assistance. Our data shows that we can expect the same level of response to a successful IA declaration in Connecticut, because the political boundary that separates Rhode Island from Connecticut is not a barrier to damage suffered as a result of the same storm system.

Connecticut is identified as a “medium” state under 44 CFR 206.48(b)(6), but we are a smaller “medium” state, placed in a category that includes states such as Michigan, New Jersey and Virginia. Nonetheless, the estimated amount of housing assistance needed here (\$16.5 million) is over triple the “average” (not “minimum”) estimated amount of housing assistance needed in a medium state disaster, as indicated in the CFR (\$4.6 million.) Furthermore, Connecticut does not have county government, which means that, rather than the three tax bases that most states have, Connecticut has only two sources of non-federal governmental aid—local and state.

The Stafford Act gives the President discretion to provide assistance to the residents of a State when “a disaster is of such severity and magnitude that effective response is beyond the capabilities of the state and affected local governments and that Federal assistance is necessary.” 42 U.S.C. 517. In granting the Public Assistance declaration request for the March 12, 2010 through May 17, 2010 severe weather system in Connecticut (DR 1904), the President has already recognized that the resources of Connecticut and its municipalities have been overwhelmed.

The New England tradition of not asking for help has been strained in this disaster. As one resident of Groton in New London County reported to 2-1-1:

“My home has extensive foundation damage that is beyond my means to invest in fixing. I will have to foreclose on the property if no assistance is available. I have never collected public assistance for anything in 25 years I have worked.”

The attached Supplemental Justification in Support of this Individual Assistance Appeal (**Exhibit C**) provides a detailed explanation of the State’s 5-step verification process, because it is critical for FEMA to understand the basis for having confidence in the numbers presented in this appeal. Part I of the Supplemental Justification outlines the additional damage that has been reported, and details the data collection process, as well as the 5-step process used to validate that data.

Part II of the Supplemental Justification explains in detail how the reported damage shows that Connecticut meets the factors which are considered to measure the severity, magnitude and impact of the disaster and to evaluate the need that Connecticut has for individual assistance, including, but not limited to, concentration of damages, insurance coverage, trauma, and special populations.

In summary, I renew my request that Connecticut be granted a major disaster declaration for Individual Assistance for the five counties of Fairfield, Middlesex, New Haven, New London, and Windham Counties in response to a severe weather system beginning March 12, 2010. I base this request on the validated data that Connecticut has collected for this appeal, which more than tripled the overall amount of estimated housing assistance needed, as well as more than doubling the number of residents reporting damage, after only two weeks of data collection. Clearly, the damage Connecticut has sustained is of sufficient magnitude, severity and impact to warrant an Individual Assistance disaster declaration.

If you require additional information in processing this request, please contact William Hackett, State Coordinating Officer (SCO), at 860-256-0818 or Brenda Bergeron, Alternate SCO, at 860-256-0816.

I greatly appreciate FEMA’s prompt reconsideration of Individual Assistance for the residents of Connecticut.

Sincerely,

A handwritten signature in blue ink that reads "M. Jodi Rell". The signature is fluid and cursive, with the first letters of "M.", "Jodi", and "Rell" being capitalized and prominent.

M. Jodi Rell
Governor

EXHIBIT A
Total Damage

Damage Level	New London	Fairfield	New Haven	Middlesex	Windham	Total
Affected	567	174	106	65	52	964
Minor	682	318	66	55	62	1183
Major	216	93	15	7	13	344
Destroyed	3	3	0	0	1	7
Totals	1468	588	187	127	128	2498

Reflects Total of Initial Declaration Request Table (Below) plus Additional Damage Data Collected and Verified for Appeal (Below)

Initial Declaration Request

Damage Level	New London	Fairfield	New Haven	Middlesex	Windham	Total
Affected	366	118	90	53	42	669
Minor	201	216	16	13	41	487
Major	80	65	1	0	8	154
Destroyed	1	3	0	0	1	5
Totals	648	402	107	66	92	1315

These figures were reported under the original Individual Assistance Request of April 12, 2010.

Additional Damage Data Collected and Verified for Appeal

Damage Level	New London	Fairfield	New Haven	Middlesex	Windham	Total
Affected	201	56	16	12	10	295
Minor	481	102	50	42	21	696
Major	136	28	14	7	5	190
Destroyed	2	0	0	0	0	2
Totals	820	186	80	61	36	1183

The additional damage data collected went through a five step verification process to ensure that the data was accurate.

EXHIBIT B

Connecticut Disaster Data

March 12, 2010
to May 17, 2010

- + PDA
- Collected & Verified 2-1-1 calls
- IA Granted
- County Line



Produced by the
Connecticut Department of
Emergency Management
& Homeland Security



For planning purposes only
Map Date 25 May, 2010

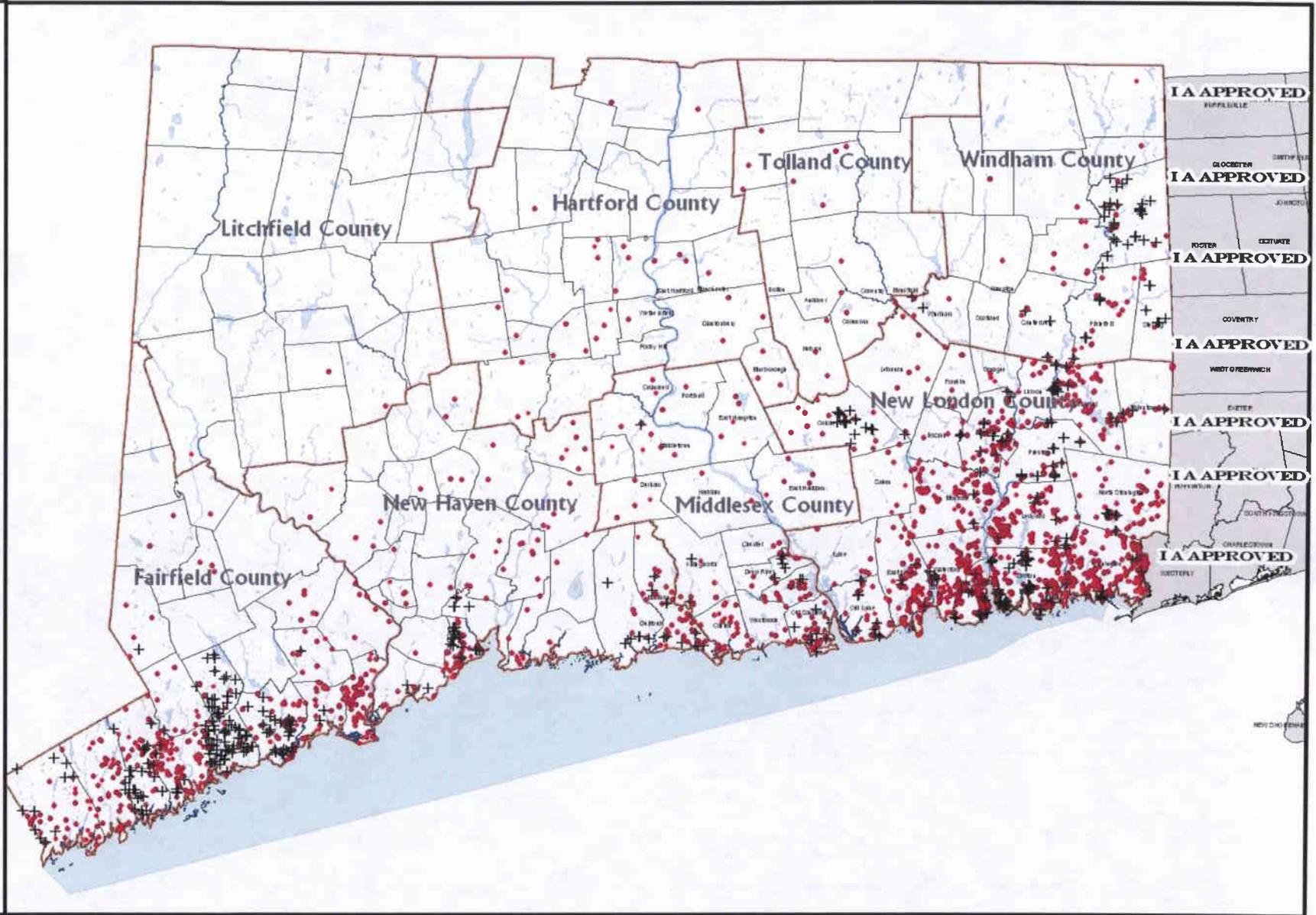


EXHIBIT C
STATE OF CONNECTICUT
SUPPLEMENTAL JUSTIFICATION
IN SUPPORT OF INDIVIDUAL ASSISTANCE APPEAL

May 26, 2010

PART I. Additional Data Shows Severe Effect of Disaster on Connecticut Residents

The following sections outline the original data collection results, describe the additional data that has been collected for this appeal, as well as the process used to collect it, and detail the 5-step verification process used to validate that data.

A. Original IA Declaration Request

The original IA declaration request identified a total of 1315 residential units with damage in the five counties. The breakdown by FEMA category was:

- 154 residential units identified as suffering major damage;
- 5 residential units were identified as destroyed;
- 487 residential units were identified as receiving minor damage, and;
- 669 residential units were identified as affected;
- 1315 total residential units identified as impacted.

A complete chart of the initial damage assessment, broken down by county, is attached as part of **Exhibit A** (See “Initial Declaration Request Table.”) It should be noted that, at the direction of FEMA staff, the damage data in the first request for Individual Assistance was not broken down by counties, as it had originally been prepared by state staff. Rather, state staff members were told by FEMA to consolidate the damage numbers into one statewide total.

B. Results of Additional Data Collection For Individual Assistance

Part B examines the data collection process used for this appeal, the results of the data collection, and the 5-step verification process used by Connecticut to validate this data.

1. Data Collection Process Used for Appeal

The Department of Emergency Management and Homeland Security (DEMHS) utilized the Connecticut 2-1-1 Infoline (operated by the United Way of Connecticut) as a means to gather

data. Working with representatives from 2-1-1, DEMHS created a questionnaire for use by individuals who sustained damage from the severe weather. Contained within this questionnaire were the definitions provided by FEMA for what constitutes a destroyed, major, minor, or affected home. Residents responded to questions asked by trained 2-1-1 operators to describe their damages, which was then entered into a form corresponding to the FEMA damage classifications. All of the data was aggregated daily and reported back to DEMHS for analysis.

2. Raw Data Collection Results

Additional damage reports were collected via 2-1-1 for 2 weeks, from Friday, May 1, 2010 to Friday, May 14, 2010. During that time, a total of 3136 reports were made to 2-1-1. Of these reports, 80 were classified as destroyed, 999 as major, 1503 as minor, and 554 as affected (before verification steps, some residences were reported more than once.) The data was then put through the 5-step verification process described below.

3. Process Used to Verify Data Collected

The State of Connecticut used a five-step verification process to ensure that the damage reports received through the 2-1-1 data collection process and presented in this appeal credibly reflect the damages suffered by Connecticut residents. Through this verification process, the raw 2-1-1 reports were narrowed from 3136 to 2110, and then finally to 1183. The strictness of this verification process was designed to eliminate damage reports that did not meet the high standard of validity established by the State as necessary to support a successful appeal.

The first validation step was to separate residence damages from business damages. Secondly, any address which had previously been reviewed in a PDA was removed. Third, all multiple reports regarding the same address were eliminated. Next, DEMHS and 2-1-1 staff made follow-up calls, not only to verify the initial report, but also to collect more information. These first four verification steps narrowed the data down from 3136 to 2110 reports. Finally, two separate field verification visits using 13 PDA teams were performed as a method to validate the remaining data. This 5th verification step further narrowed the 2-1-1 data downward from 2110 to 1183 validated reports of damage, in order to improve the reliability of the results.

The following sections describe the verification process in more detail.

a. Initial Data Verification

In order to ensure that the information and numbers reported in this appeal were accurate, DEMHS performed a number of verification activities. Daily, as the data was being reported, DEMHS staff went through the data and deleted any multiple reports and those records that were incomplete (e.g., damage to vehicle rather than home, did not provide a physical address). Reports of residential damage were separated from reports of business damage. Next, the data

was compared to the FEMA IA PDA “street sheets.” Any addresses that were already seen and classified by FEMA during any of the previous PDA field visits for DR 1904 were deleted from the 2-1-1 reports to avoid double counting (they are still accounted for in the PDA numbers.)

Also, in an additional effort to ensure that the information obtained was accurate and consistent with FEMA classifications, DEMHS, in conjunction with 2-1-1, made follow-up calls for a sample of reports. Approximately 400 calls were made to residents, not only to verify their information, but to also solicit additional data. If the further information did not support the initial description, the damage was reclassified for the data summary included as part of **Exhibit A** (See “Additional Damage Data Collected and Verified for Appeal.”)

b. On-Site Verification Visits Using PDA Teams

Based on the above, in order to further confirm that the information being reported was in fact correct, the State requested two additional field verification visits in the form of PDA teams from FEMA to validate the information that was reported to 2-1-1. On May 14th, 7 joint FEMA / State PDA teams canvassed areas in Fairfield and New London Counties to validate damage reports. Again, on May 20th, 6 joint teams verified additional 2-1-1 reports.

DEMHS provided the FEMA teams with 90 addresses to validate these reports of damage. In fact, the teams came back with almost 50 % more damaged homes than they were sent out to view. This is documented evidence of even more damage than has been reported, consistent with the experience in other states affected by this disaster.

For example, in New London County, the May 14th Jewett City/Griswold joint FEMA/State Team was given 8 homes to view. Upon inspection, all 8 were confirmed as damaged, including 7 classified as majors and one as minor. While in the neighborhood, and based only on the homes to which the team was able to gain access, additional damaged homes were discovered, including at least one previously unreported major and several additional minors.

In another example of validation, 8 homes that had been reviewed during the PDA process in support of the original IA request were re-examined by FEMA/State teams during this appeal process. **Of the 8, the classification of 7 of the homes became worse, and one stayed the same.** In fact, one home that had originally been classified as “affected” was re-classified as “major.”

c. The 5th Verification Step—Using Field Visit Validation to Narrow the Data

The fifth step of the data verification process used field visits by joint PDA teams to gauge the accuracy of the 2-1-1 damage classifications remaining after all the 2-1-1 reports had gone through the first four steps of the verification process. In other words, the first four steps narrowed the 3136 initial reports down to 2110. The 5th verification step was the most rigorous step. Using the results of the 13 PDA team visits extrapolated across all 2110 reports, the number of validated reports was narrowed to roughly half, or 1183 damage reports. This was done to ensure greater accuracy in meeting FEMA's damage classifications.

The 5th verification step was calculated as follows: The 13 field verification PDA teams (7 teams sent out on May 14th and 6 on May 20th) were given a total of 90 homes to visit. These teams were not told what level of damage had been reported via 2-1-1 for these homes. In fact, although conversations with FEMA representatives indicated that they may have believed that they were seeing only damage that had been reported via 2-1-1 as major or destroyed, the addresses supplied to the PDA teams included a sampling of all FEMA classifications of reported damage. Based on the field observations of the PDA teams, the percentage of homes actually meeting each of the FEMA classifications was calculated, using the PDA field team results. These percentages were then applied to the 2110 reports that had already gone through the first four steps of the verification process, in order to arrive at a validated estimate of reports meeting the FEMA classifications-- remembering, however, that each of the 2110 reports represents actual damage. Using this procedure, for example, only 40% of all 2-1-1 reports of major damage are being considered as meeting the FEMA definition of major damage for purposes of this appeal.

At the end of this 5th step, for purposes of this appeal, only 38% of the original 2-1-1 reports remain to be included within the FEMA damage classification framework of destroyed, major, minor or affected homes. This has been done in order to provide conservative, reliable damage classification numbers. **NEVERTHELESS, it is also realistic to state that virtually every one of the 2110 reported homes has sustained damage as a result of this disaster, and would remain eligible to apply for assistance if the declaration is approved.**

This is a very conservative approach to the data collection for this appeal. To the best of our knowledge, including experience with a 2007 IA declaration appeal in Connecticut, reports of damage for an appeal are typically not verified by any PDA teams (in contrast to initial declaration requests, which normally do involve PDA teams.) Connecticut has taken this very conservative approach in order to demonstrate and document that the reports of damage being used in this appeal, after they have gone through the 5-step verification process, are highly reliable and credible, and clearly demonstrate levels of damage meeting the requirements for an IA declaration.

PART II. Effect of Damage Meets Stafford Act Individual Assistance Factors

Part II of this appeal demonstrates that the damage that Connecticut has sustained is of sufficient magnitude, severity and impact to warrant an Individual Assistance disaster declaration. The original request for an Individual Assistance declaration, dated April 12, 2010, contains significant details regarding economic, historical and human impact, as well as information regarding the state's economic condition. The Regional Summary, Analysis, and Recommendation report submitted by FEMA Region I also describes how Connecticut meets the factors for Individual Assistance. It is important to review these previous documents to understand completely the extent of impact on the state's residents. Examples from these submissions include:

- The Towns of Windham and New London are both on the U.S. Department of Labor's "labor surplus" list, indicating that these are areas where the average unemployment rate was at least 20% above the average unemployment rate for all states, the District of Columbia, and Puerto Rico during the previous two calendar years.
- FEMA found that many of the low-income individuals affected by the flooding and tree damage would probably not be eligible for SBA disaster loans and do not have the financial resources to pay for needed repair. Also, FEMA found that the State of Connecticut's loan program would not be applicable to many of the low income residents: *"Without federal assistance, many of these individuals may have a difficult time recovering from this disaster."*
- Numerous evacuation operations had to be conducted, especially in Middlesex and New London Counties. Hundreds of elderly residents and children were evacuated from their homes, or care centers.
- In New London County, residents told PDA teams that they are overwhelmed and exhausted, indicating a need for crisis counseling.
- Significant language barriers exist in New London County, particularly in Groton and Montville.

A. Average Amount of Individual Assistance by Size of State

44 CFR Section 206.48(b)(6) provides average amounts of Individual Assistance per disaster, as determined by the size of the State. A comparison of Connecticut's damages in this disaster, DR 1904, to the information provided in the chart indicates that the impact to Connecticut residents is sufficient to warrant an IA declaration. First, Connecticut is considered a "medium" state, which puts the average dollar amount of household assistance at \$4.6 million and the average number of homes estimated as having sustained major or destroyed damage at 582. Combining the original estimates with validated additional classifications of damage puts the number of major or destroyed homes at 351 and the estimated household assistance at over \$16.5 million.

A look at the list of “medium” states shows that **Connecticut is one of the smaller “medium” states**, seventh in population out of 27 states, including Michigan, New Jersey, Virginia and others. In fact, our neighboring state of Massachusetts is considered a medium state as well, although Connecticut’s population of approximately 3.5 million is considerably less than Massachusetts, which has a population of almost 6.5 million. Nonetheless, even in the damage assessment in the original declaration request, the preliminary estimate of household assistance needed was \$5.1 million, well above the average of \$4.6 million. **It is important to emphasize that this is an “average” and not a “minimum” number.**

Although the number of major or destroyed homes is significant, DR 1904 has also resulted in a very significant number of homes identified as having suffered minor damage.

Currently, the estimated number of homes considered minor under FEMA classifications is 1183. Although these homes may still be habitable, the GIS mapping of the damage demonstrates that whole neighborhoods have been affected. In addition, 1593 callers indicated that their homes now contain mold, which is likely to cause further damage.

Calls and notes to 211, as well as personal interviews with residents, show the depression and frustration that such damage can cause. The despair is repeatedly clear, as in this quote from a New London County homeowner: *“I have never in 12 years had water damage or any water-- this storm was beyond anything I have ever seen, the economic situation is dire and to have to be forced to replace and repair to just be able to have hot water or heat or even to control the damage is a financial burden. Even a small help to give support is where taxpaying citizens should receive assistance.”*

Connecticut Has No County Government

Finally, another factor to consider in determining that Connecticut has been overwhelmed by DR 1904 is the fact that **the State does not have county government. This means that, rather than the three tax bases that most states have, Connecticut has only two sources of non-federal governmental aid-- local and state.** As was detailed at length in the first request, the State’s current financial woes have put a serious strain, not only on state government, but on each municipality. There is no county government to help relieve that burden in times of crisis.

B. Insurance

When FEMA conducted the initial PDA for the original declaration request, it appeared that much of the damage in Fairfield County would be covered by insurance, although even at that early stage in the data collection process, it was clear that insurance was not going to cover much of the damage in the other affected counties of New London, New Haven, Middlesex and Windham. Subsequent data collection has revealed, however, that **most of the residents reporting damage to 2-1-1 have learned either that they do not have insurance to cover the damage they sustained, or that their insurance coverage is insufficient.** Of the callers who answered the questions on insurance:

- 67% report either that they have no insurance at all or that they know that their insurance does not cover the damage they sustained;
- Another 8% report that their damage is only partially covered by insurance.
- Only 7% report that their damage is fully covered by insurance.

FEMA PDA teams in Fairfield County found that, although the insurance rate was fairly high, in some cases, insurance had lapsed due to the families' current economic conditions. In Middlesex County, the PDA teams found that none of the renters and a small percentage of the homeowners had flood insurance, and none of the residents surveyed had the appropriate homeowners/renters insurance for their damages (e.g., sewer back up.) This problem was also found in other counties, particularly New London.

The concern repeated over and over again is that, although the homeowner had flood insurance, only a portion of the damage is covered. For example, in New London County, a Norwichtown resident had flood insurance, but that insurance covered only \$54,000 out of \$116,000 in damages.

The words of this Norwich homeowner convey the situation of the residents of New London County: *"I am appalled at this entire situation. I thought by having flood insurance that I would be covered. There are too many loop holes with this type of insurance... We are not looking to get rich. We just want life to go back to what it was before the floods. I was recently laid off from my job of 16 years. We are on the tightest budget ever. ... If FEMA doesn't help us, we will lose our home."*

For many people, the damages suffered were unprecedented. This East Lyme, New London County resident wrote: *"I have lived in my home for 18 years and have never had water in my basement... We do not live in a flood zone, therefore flood insurance was not an option."*

Connecticut is offering a limited loan program, the Connecticut Homeowner's Emergency Loan Program, through the Connecticut Housing Investment Fund, Inc. The program covers certain damage occurring only between March 28, 2010 and April 1, 2010 (not the whole disaster period). The program does not cover, for example, renters' damage. Basement and household damage such as carpeting, tiling, hardwood, painting, and cabinets are not covered. Applicants must have good credit, and a lien is placed on the property, and interest is charged. Structural repairs are covered up to \$20,000. A review of the Connecticut residents who called in to report damage through 2-1-1 shows that many would not be able to pay back a loan, or that damages sustained go beyond the limits of the loan program, either in cost or type of damage. For example, one resident of Norwich reports extensive damage for which her homeowners insurance has denied coverage; her husband has been out of work for 15 months. Another Norwich resident stated that her damages, even after insurance, exceed \$30,000. An elderly Groton couple has been unable to live in their home since March 30, 2010, insurance does not

cover the damage, and, on their fixed income of social security and Navy retirement, they cannot afford even a loan, much less to rebuild.

C. Concentration of Damages: The Political Boundary That Separates States is not a Barrier to Damage.

The attached GIS mapping of the original plus additional damage reports received (**Exhibit B**) demonstrates the concentration of damage from this storm system. This is especially true in New London County, which borders Rhode Island, a state which did receive an IA declaration. The map shows that residents in Connecticut can literally look across the river that flooded their homes and see FEMA-funded construction projects occurring for their Rhode Island neighbors.

The estimated per capita housing assistance costs for the residents of New London County is \$38.71 per person, based on the total estimated housing assistance in the County (including both initial request and appeal damage numbers) divided by the number of New London County residents. The housing assistance cost is based on FEMA's reimbursement rates for each damage classification.

Although per capita damage amounts are not publicly identified as one of the IA factors, using the total validated damage reports for each county, the housing assistance costs (based on FEMA reimbursement rates) per person in New London County is \$38.71. For Windham County, the per capita cost is \$6.81 per person, for Fairfield County, the per capita cost is \$4.79 per person, and for Middlesex County, the per capita cost is \$3.61 per person. In fact, although the damages in Connecticut were almost exclusively concentrated in the five counties for which this IA declaration is sought, the statewide per capita housing costs amount is \$5.06.

Within the Connecticut counties that were hardest hit, certain towns were particularly affected. For example, in Windham County, with only about 100,000 residents, the towns of Plainfield and Killingly alone had almost 50 reports of damaged homes. Windham County has the highest unemployment rate in the state at over 11%, and both towns are designated as Distressed Municipalities by the state.

Because Connecticut does not have county government, each town in Connecticut functions as an independent governmental body, similar to the Independent Cities in Virginia and perhaps elsewhere in the country, which have received declarations of their own, without regard to the county in which they reside geographically. The concentration of damages in a distressed community is devastating to an already economically depressed population.

D. Trauma Experienced by Connecticut Residents

In my first letter requesting an IA declaration, I listed examples of how the severe weather has affected the lives of Connecticut residents. At least three deaths were directly attributable to the storm. The examples of impacts and trauma continue to pour in. In Fairfield County, a Stamford family lost all of their belongings when the home they rented caught fire when power was restored following the storms. The Red Cross helped them with immediate needs such as clothing but they continue to suffer from this disaster.

As discussed elsewhere, the elderly and the disabled are especially hard hit. One 2-1-1 entry from Groton reads: *“My wife and I have been living in a hotel since the day of the flood, March 30, 2010. My wife and I rely on a small income of social security and my navy retirement. My insurance does not cover this and I cannot afford it. We need help from FEMA desperately along with other residents in Connecticut!”*

As the subsequent PDA teams made their field verification visits, it became clear that many residents are frustrated, angry and depressed. The PDA team which visited Griswold in New London County found that most of the affected residents were either disabled, elderly and living on a fixed income, or the working poor. Many of the impacted houses are old mill housing built in the late 1800's or early 1900's, with field stone foundations. The lyme mortar holding the foundation together disintegrated, displacing the stones. One 80 year old woman on small fixed income used all her savings to do some repairs, but is without heat because she ran out of money to fix her furnace. Another elderly man with Parkinson's disease has his even more elderly father living with him: they are living without heat or hot water and no means to pay for repairs.

Through the 2-1-1 data collection process, which did not specifically target outreach to businesses, 110 businesses in the five counties reported damage. In New London County, 2 businesses were destroyed completely, while 36 reported suffering major damage. At least one of the destroyed businesses was a café in an historic district of the small town of North Stonington—the whole building washed away, leaving both a physical and an emotional hole in the community.

E. Special Populations-- Especially Elderly , Low Income and Disabled Residents-- Were Particularly Hard Hit by This Disaster

The on-site evidence gathered by the PDA teams, the 2-1-1 reports, and the statistical information regarding the hardest hit areas all demonstrate that special populations, especially the elderly, low income and disabled Connecticut residents, were particularly affected by this disaster.

As described in the Executive Summary, of those residents reporting damage who answered the questions on income, over 25% identified themselves as low income (even though 2-1-1 officials

reported that 2-1-1 callers are very reluctant to report themselves as low income.) Particularly in Windham County and New London County, some of the hardest hit communities are also among the most impoverished or at risk. For example, from the 2000 census:

- Percentage of Windham County residents aged 5 and over who are disabled: 19.3%
- National median value of a home: \$119,600
 - In New London County, median value of a home in the Borough of Jewett City: \$97,700.
- National percentage of individuals living below poverty line: 12.4%
 - Percentage of individuals living below poverty line in the City of New London in New London County: 15.8%

In addition, much of the affected population is elderly. All of the five counties for which IA has been requested meet or exceed the national average of elderly residents. Many of the municipalities have aging populations. For example:

- National percentage of elderly: 12.4%
 - Percentage of elderly in Norwich: 15.4%
 - Percentage of elderly in:
 - Fairfield County: 13.3%
 - New Haven County: 14.5%
 - New London County: 13%
 - Middlesex County: 13.6%
 - Windham County: 12.3%

The percentage of disabled residents in the affected counties ranges from just over 15% in Middlesex County to almost 20% in Windham County. As with the elderly, however, a significant number of the people reporting damage to 2-1-1 or visited by the PDA teams were disabled. For example, in Fairfield County, a Trumbull family is still struggling after the March storms. Unable to fix the damage to their roof, water continually leaked through the ceilings into their home. In addition, they received 10 inches of water in their basement and their furnace is no longer functional. All four family members are disabled and rely on walkers. Two of the family members are also on oxygen. Their insurance claim was denied and since they rely solely on disability, they are unable to make the necessary repairs.

An elderly New London couple reported that they were unable to leave their home despite having the city sewer system back up through their toilet, into their bathroom and down the hall. The wife explained that her husband is not mobile, and they have nowhere else to go.

F. Voluntary Agency Assistance

Voluntary organizations in Connecticut have been heavily affected by the economic situation of the state, and in particular the high unemployment levels. There has been an increasing demand

for their services, and a significant decline in donations. In addition to the poor economy, the recent disasters in neighboring states such as Rhode Island, Massachusetts (DR 1894 and DR 1895) and New York (DR 1899), not to mention the disasters of national significance which were declared during the period (for example, DR 278 and DR 396) have strained the resources of voluntary organizations that serve other states in the region, such as the Red Cross and the Salvation Army.