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# VIRGINIA FLOOD RESILIENCE FUNDING OUTREACH ASSESSMENT



WETLANDS  
WATCH

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*Virginia Flood Resilience Funding Outreach Assessment*

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## DETAILED SUMMARY

Wetlands Watch received a grant from The Pew Charitable Trusts to support the implementation of, and build a statewide constituency, for the Virginia Community Flood Preparedness Fund (CFPF). The CFPF flood mitigation grant (and recently loans) program is intended to provide Virginia’s flood-risked localities, coastal and inland, with community-scale planning, capacity building, study, and project implementation funds that prioritize flood resilience planning and nature-based flood mitigation. Since the program’s inception, the state’s Department of Conservation and Recreation (DCR) has administered four rounds of the CFPF and has distributed \$97.7M in awards for rounds 1-3 (round 4 awards have yet to be announced in 2023).

The basis for this work stems from the observation that resilience efforts in the Commonwealth have largely focused on coastal regions because these local governments often have greater capacity, exposure, and resources to apply for and implement resilience-based projects. The Virginia Coastal Zone Management (CZM) Program, housed in the Virginia Department of Environmental Quality (DEQ), is one such program, providing direct funding support to coastal planning district and regional commissions. Virginia CZM has received more than \$177 million in federal and state funding since its inception in 1986, establishing a robust foundation for coastal resilience planning in the 29 Coastal Zone counties. Additionally, the coastal region benefits from the [Virginia Coastal Resilience Master Plan](#), a robust written and web based resource. Phase II of this Master Plan is currently underway to incorporate pluvial trends into adaptation planning for coastal flooding.

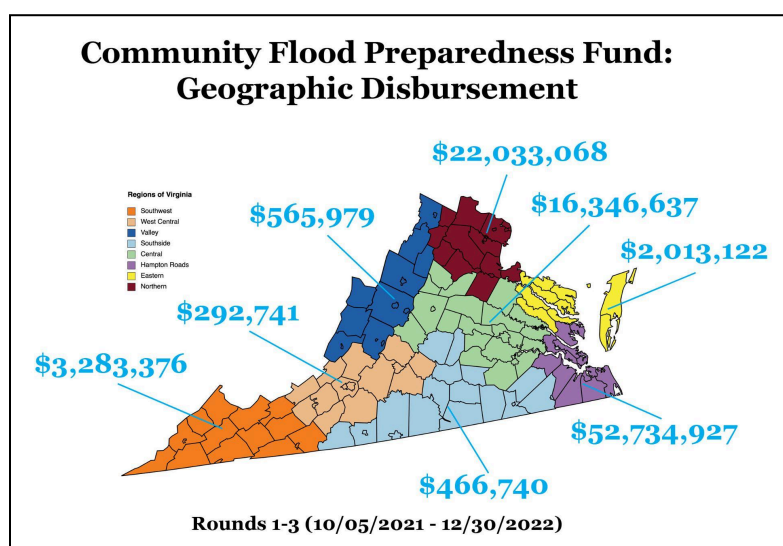


Image credit: Wetlands Watch

The coastal area has also reaped the benefits of NGOs working on the coast, popular media attention to sea level rise, and the research support provided by statewide universities. The Virginia Institute of Marine Science (VIMS) is an academic leader in this space and one of the largest marine research centers in the United States. In 2013, VIMS published a [recurrent flooding report](#) and in the decade since, its findings have driven partnerships among many universities, NGOs, and the private sector to inform local approaches to resilience investments in the coastal zone.

While immense efforts to address coastal flooding issues are underway, Virginia’s western and southwestern communities have experienced *significantly more* flood events that caused or

threatened damage, yet receive substantially fewer resources to address them. The state-administered CFPF offers an accessible resource for pre-disaster flood mitigation, however capacity issues and limited outreach to Virginia's non-coastal communities have compromised the intended equitable distribution of the CFPF's critical resources. Because of the unpredictable and highly localized nature of intense rainfall and riverine flooding that impacts inland VA communities, and because many rural localities are built in or near floodplains for convenient proximity to valuable riverine resources, it is imperative that these areas receive funding as soon as possible to incorporate flood mitigation strategies in anticipation of the next major flood event. It has been Wetlands Watch's goal to facilitate statewide accessibility of CFPF funds through direct local government assistance.

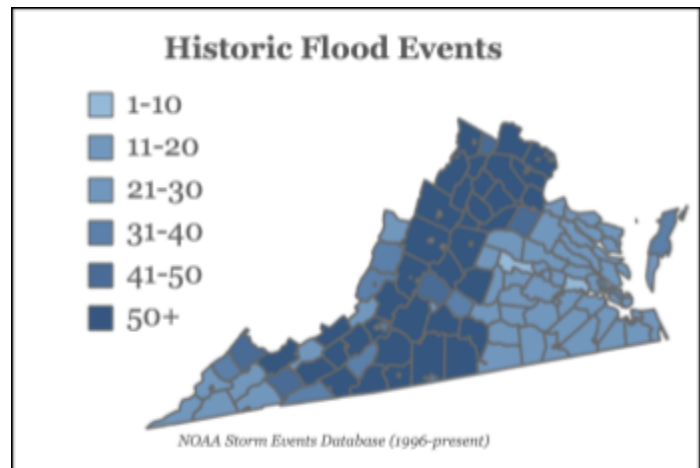


Image Credit: NOAA

**Our Work:** With funding from Pew, Wetlands Watch has:

- **Conducted statewide outreach** for rounds 2, 3, and 4 (2022-2023) of the CFPF to better support non-coastal localities in accessing these funds. This includes social media outreach, hosting virtual Lunch and Learn webinars, sending out newsletters, and sharing program updates through our participation in various multi-stakeholder cohorts focused on statewide adaptation planning.
- **Developed and updated a series of fact sheets and graphics** that help bridge understanding gaps with the CFPF's requirements and procedures, which we have shared with several decision makers (state and local) and our network of conservation partners. These resources are also available on Wetlands Watch's [CFPF website](#).
- **Provided technical assistance** with project identification, plan scoping, and applications by meeting in-person and virtually with local and regional government staff and facilitating needs-based discussions about where the CFPF funding could be best utilized.

Through our outreach, we developed meaningful relationships with inland locality staff and we learned about the unique barriers these communities face as they pursue flood resilience planning. It is imperative that these lessons learned be taken into account as future rounds of the CFPF are administered, and as DCR begins work in developing a statewide [Flood Protection Master Plan](#). We must also consider these barriers in the context of DCR's new funding program, the Resilient Virginia Revolving Fund (RVERF), which provides loans (and some grants) to local governments and planning district/regional commissions for property-scale flood mitigation. The RVERF's inaugural application period opened concurrently with the CFPF's fourth round of funding. Additionally, the looming concern of Virginia rescinding its participation in the



Regional Greenhouse Gas Initiative (RGGI), and thereby losing quarterly proceed allocations to the CFPPF, must be considered as Virginia needs consistent and reliable funding sources to holistically safeguard Virginia from flooding.

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## **COMMUNITY FLOOD PREPAREDNESS FUND (CFPF)**

**Overview:** The Community Flood Preparedness Fund (CFPF) is a statewide grant and loan program administered by Virginia’s Department of Conservation and Recreation (DCR), offering community-scale funding to VA localities and planning district/regional commissions for plans, studies, and projects that mitigate tidal and pluvial flooding. The CFPF:

1. **Prioritizes community-scale, nature-based designs and planning**, and supports DCR’s ongoing work to address statewide flood protection and resilience principles shared by its new state-wide flood protection master plan and the Coastal Resilience Master Plan.
2. **Is required by statute to distribute 25% of awarded funds to low-income geographic areas.** Applicants can use this census viewer to determine if the project area income is less than 80% of the local median household income. This requirement assures more equitable distribution of state resources and helps communities that have been historically left behind begin, or advance, resilience work.
3. Is guided by DCR’s state planning principle to **acknowledge the consequences of climate change and base decision making on the best available science.**
4. **Funds three categories of award related to flood resilience and mitigation:**
  - a. Planning and Capacity Building
  - b. Studies
  - c. Projects
5. **Intends for localities to work their way through each category**, starting with resilience planning and studies, to build upon their progress and familiarity with flood resilience planning and to ensure a strategic approach to project implementation.
6. **Allows localities to access Study funding to scope out and inform resilience planning** (studies can include, but are not limited to, hydrologic/hydraulic analyses, floodplain map and ordinance updates, and floodplain data collection).
7. **Requires that localities must first have a DCR approved local resilience plan on file before applying to the Project category**, funding for which is provided by the Planning and Capacity Building category.

As flooding becomes a more prevalent topic in statewide planning, the staged structure of the CFPPF is a great resource to help guide localities into resilience work and provide uninterrupted, successional funding towards safeguarding communities from flooding. To reap the full benefits

of the CFPP, localities must think intently about the flood issues their community faces and, through thoughtful community engagement and studies, create a well-informed framework that guides the implementation of and justifies reasoning for Project funding later on.

**Locality Responses:** Beginning October 2021, Virginia’s Department of Conservation and Recreation (DCR) has made \$190 million available across four rounds of the CFPP. Since the first application period, applicant demand has increased significantly per round from \$14.5 million and 32 applicants in 2021 to \$93 million and 64 applicants in 2022, and \$76 million and 36 applicants in 2023. The amount awarded to localities has also increased exponentially since 2021, confirming that there is both a strong and continuous demand for these funds and that more localities are becoming familiar with the program overtime.

VA Community Flood Preparedness Fund: Award Cycles					
Grant Round	Announcement Date	Amount Released	Amount Requested	Amount Awarded	% Designated Low-Income
4	07/07/2023	\$85M	\$76M	TBD	TBD
3	09/28/2022	Phase One: \$40M Phase Two: \$56.4M <i>Total for Round 3: \$70M</i>	\$93M <i>64 applications</i>	Phase One: \$13.6M <i>27 applications</i> Phase Two: \$51.8M <i>22 applications</i>	72%
2	12/22/2021	\$17M	\$29.7M <i>37 applications</i>	\$24.5M* <i>30 applications</i>	86%
1	10/05/2021	\$18M	\$14.5M <i>32 applications</i>	\$7.8M <i>19 applications</i>	49%
Total		\$190M**	\$213M	\$97.7M	74%

\*DCR released funds that were left over from Grant Round One to fund additional applications in Grant Round Two.  
\*\*The total amount released represents only a portion of the money available in the CFPP, which receives a 45% allocation from the quarterly Regional Greenhouse Gas Initiative auctions.

Image credit: Wetlands Watch

**Accessibility of Funding:** As mentioned earlier, coastal localities are often more prepared to approach resilience planning work than inland and rural communities due to a number of factors including:

- **Greater exposure to chronic climate and sea level rise impacts.**
- **Greater opportunities and eligibility for state and federal climate and flood mitigation funding** and, as a result, more pre-existing plans in place that incorporate resilience principles (such as comprehensive, hazard mitigation, green infrastructure, and transportation plans).
- **Greater concentration of agencies, NGOs, academic research institutions, and consulting firms** with priorities in coastal community management and resilience planning.

## CFPF Funding Map for FY2022 (VRA)

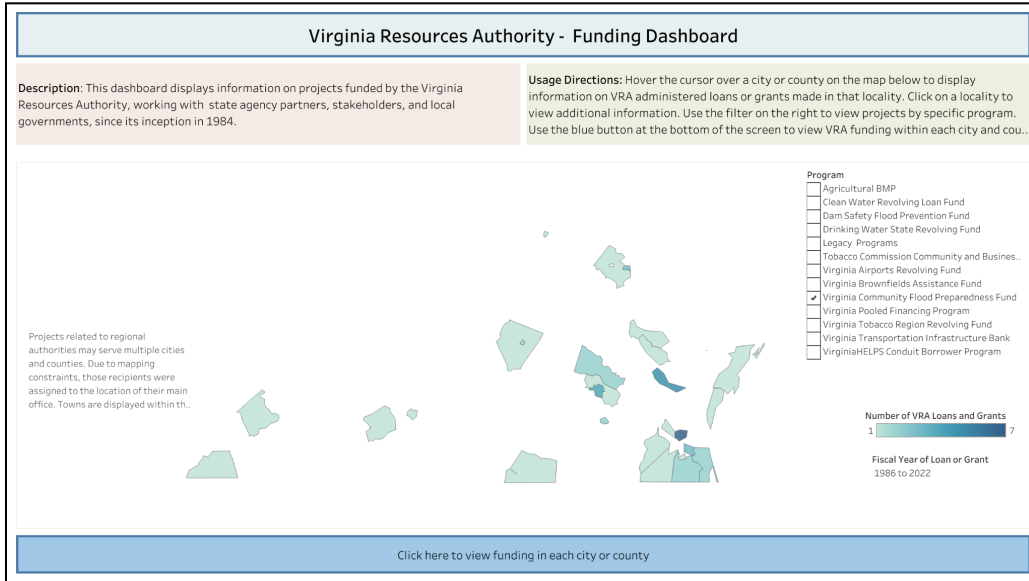


Image credit: Wetlands Watch

## CFPF Funding Map for FY2023 (VRA)

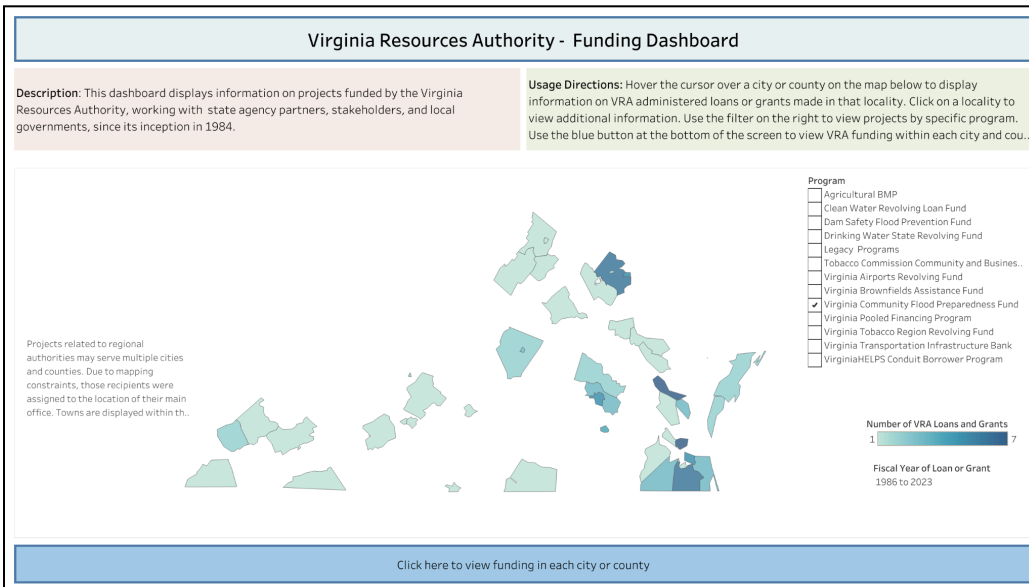


Image credit: Virginia Resources Authority

While the CFPF is technically a statewide fund, we have heard anecdotal evidence of significant barriers that challenge the accessibility of the program to rural and non-coastal communities including:

- At a baseline, **many rural localities do not know the CFPF exists** because there is little to no meaningful outreach from the state.
- **Limited staff capacity and staff turnover are common in many small, rural communities that need these funds.** This can cause barriers to applying to the CFPF, and interruptions or pauses to resilience work that can leave many projects unfulfilled until another staff person is onboarded and able to complete the work.

**Example:** Early in Wetlands Watch’s outreach to inland Virginia, we spoke with one local town planner in a small town who wore many “hats.” He served as the zoning administrator, floodplain manager, and among other administrative positions, he also checked the bear traps in town each morning.

- **Once the CFPF becomes known to a locality, it is then a challenge to hire new staff and/or fund training for local expertise** to begin needs assessments that inform the development of a resilience plan. In some cases, particularly for rural, non-coastal VA communities, even finding the local staff capacity to *apply* to the program can be a great challenge, as grant writing can be an intense time and resource commitment for already-limited staff in local government. Anecdotally, many communities expect, or hope for, the regional planning entity to complete this work on their behalf, or seek the assistance of a consultant or NGO with grant writing experience to help.

**Example:** During our outreach to southwestern Virginia, we met with a town planner for a small town who is one of very few staff and the only individual with expertise in flood risk management and with extensive knowledge of resident attitudes about flooding from her previous position in local law enforcement. While our conversations were robust and we identified several opportunities for the locality through the CFPF, this individual had just returned from maternity leave when Round 4 of the CFPF opened. This compromised her ability to apply for the CFPF on behalf of the town as other catch-up work took priority with little to no staff to take over CFPF interest.

- **Inaccessibility of funding for rural, inland localities does not end at the state level.** Small mountain valley and riverine communities have been subject to devastating flood events, leading to the greatest number of federal Emergency and Major Disaster declarations in the state. Despite the costly and often life-threatening nature of these floods, requests for federal assistance to these areas have been repeatedly denied by the Federal Emergency Management Association (FEMA) due to a number of factors:

**(1) Rural homeownership often spans generations., resulting in fewer flood insurance policies.** When mortgages are fully paid and a federally backed bank is no longer tied to the property, homeowners are not required to



have flood insurance. Without flood insurance, FEMA support post-disaster is not guaranteed and extremely limited.

**(2) FEMA does not always offer financial relief for damages caused by mudslides and landslides in mountainous regions.** For policyholders to qualify for flood damage coverage and individual financial relief, FEMA must determine that the flooding that damaged the structures contained enough water in comparison to soil and mud. This nuanced definition of a “flood” has caused confusion for many policyholders and leaves little option for individual assistance.

**(3) FEMA determines whether the impact to individuals and households is of enough severity and magnitude to warrant individual assistance** based on its assessment of damages.

**Example:** In the recent case of Buchanan and Tazewell Counties, which were devastated by a flash flood event in July 2022 (while Buchanan and Hurley were still recovering from a [similar event in 2021](#)), the state of Virginia [allocated \\$18 million](#) in post-disaster funding from Regional Greenhouse Gas Initiative (RGGI) auction proceeds. This decision came after FEMA denied individual assistance because the event “was not of such severity and magnitude” to warrant it. In FEMA’s [damage assessment](#) of the area, 134 homes were impacted.

#### Other Challenges/Barriers:

- Across the Commonwealth, **localities are in very different stages of flood resilience planning and climate adaptation work.** For some, climate change is not as pressing nor as relevant an issue as its impacts, which requires organizations like Wetlands Watch to approach conversations on this subject through a lens of the community’s values. In other words, wherever climate change is not the greatest or most familiar concern of local government staff and residents, adaptation work can still be successful by addressing specific concerns such as the safety of transportation routes, the nuisance of “sunny day” tidal flooding, or the impact of flooding on crop production.
- **The CFPF is the only state-administered fund that offers community-scale flood mitigation funding, therefore the grants are competitive.** Federal programs are not a reliable alternative as some have denied post-disaster funding to small localities in Virginia’s valley regions despite costly, life-threatening, and sometimes deadly flood events. Having a state-dedicated fund to fill this gap is critical, yet awards are limited to localities that have enough resources and dedicated personnel to manage the grant, a deeper understanding of resilience principles, and access to data that verifies their need.

- Accurate FEMA Flood Insurance Rate Maps (FIRMs) are critical for localities to assess their flood risk in land use decisions, however **updates to FIRMs are handled by FEMA and there is a lengthy backlog of communities in need of initial or updated flood maps**. FIRM updates can be especially few and far between for rural localities because FEMA does not prioritize these areas for data collection.
- **The most common challenges for Virginia’s inland and rural communities is limited resources and staff capacity to apply for, manage, and implement grants**. The socioeconomic vitality of these small developed areas is often dominated by agriculture, making local government positions (and salaries) less desirable to residents of the community, particularly those with field-based skills. With little to no external support, small towns and cities must prioritize immediate projects that are attainable by existing staff.
- **DCR considers the social vulnerability score of localities applying to the CFPF in their review of applications**, citing [AdaptVA's equity viewer](#) as the appropriate tool to use. While this is one of the most comprehensive tools available, it is not fully accurate at the parcel level because it relies on census data. Localities and DCR must be mindful of its shortcomings as the sole determining factor of social vulnerability. Nevertheless, statutory designation of funding will ensure a more equitable distribution of state resources – helping historically left behind communities.
- **DCR removed accessibility of CFPF funds from federal or state-recognized Tribes**. Tribes were included in program manual language as eligible applicants for rounds 1-3 of the CFPF, but were removed from the final manual text for round 4. Only local governments are listed as eligible applicants. While no Tribe has independently applied for or been awarded CFPF funding, this could be attributed to a lack of outreach and engagement with these communities, and more specifically a lack of understanding of the financial mechanisms required to provide Tribes with state funding. While it may not be the case for all, we are also aware that Tribes may be more project-focused, prioritizing the implementation of restoration and conservation practices above long-term resilience planning.

***Our Work:*** To our knowledge, Wetlands Watch is the only NGO meeting with localities in-person to share information about the CFPF and offer direct technical assistance with applications. When a meeting is confirmed, we conduct a significant review of existing strategic planning documents (such as hazard mitigation or comprehensive plans) to understand the locality’s existing strategies to address flooding. We provide tailored plan and project identification based on the information available and research the unique flood risk of each locality ahead of time, paying particular attention to the number, cost, and recovery progress of federal and state declared disasters, vulnerable community infrastructure, and the locality’s relationship with neighboring communities and regional planning entities. **We believe this level of research is a necessary component of meeting communities where they are, and approaching vulnerable situations with as little assumptions as possible.**

### Opportunities/Solutions:

- **More thoughtful and accessible outreach on the CFPF and related funding programs is needed** from state agencies and other entities interested in working with flood-risk localities. Meeting with local government staff in-person should be mandatory in this work to build meaningful relationships, understanding, and trust in the assistance provided. The goal of this engagement should be to build long-term relationships with stakeholders, meeting multiple times to address concerns and share program updates applicable to the locality.
- **The CFPF offers critical resources to non-coastal communities for acquiring data and information that will help level the playing field between coastal and non-coastal communities.** Localities unfamiliar with the cost of this work may risk asking for too little resources from the CFPF to complete a comprehensive, community-wide data assessment. It may be beneficial for an organization or agency to compile a regional and/or statewide inventory of available contractors for this work, and their consulting fees, to provide localities with a reference to accurately scope out costs.
- **Fostering relationship-building between localities and regional planning entities may be an advantageous solution in providing resilience-based work for localities needing to bridge staff capacity and resource challenges.** Regional planning entities can help smaller communities access and manage grant funding, however not all planning entities have strong relationships with each of the local governments in their jurisdictions. Providing meeting space and administrative help with this process could be immensely beneficial to progress in these areas. However, because regional planning must collect input from a diverse and geographically wide range of stakeholders, these entities (and particularly those in rural non-coastal regions) are sometimes hesitant to take on resilience or climate-related work because of the facilitation required to approach synergy across the region. This opens a potential opportunity for external organizations to provide support in facilitating conversations about sensitive bipartisan topics, such as climate change, and find common ground among stakeholders.

## **PRIORITIZING NATURE-BASED PROJECTS**

**Overview:** One of the strongest benefits of the CFPF is its statutory requirement to **prioritize nature-based practices for flood mitigation**. Installing “living” infrastructure acknowledges that native landscapes, species, and natural phenomena (such as tide cycles and weather patterns) evolve and change, often unpredictably, as a response to climate change, and that humans must account for those changes when considering disturbance to and development of their communities. Nature-based flood storage can often reduce downstream flood damages and incur fewer lifetime maintenance costs compared to gray infrastructure, making this approach critical for communities who experience riverine flooding. Working with adaptive, natural systems for flood mitigation is an approach that ensures future generations are provided

with the right framework to build upon resilience progress, and to ensure nature is an integral component of conservation efforts.

To incentivize localities to plan with this in mind, **applicants to the CFPF benefit from lower match requirements if their project results in nature-based or hybrid solutions.** Calculating the match percentage depends on “the degree to which a completed project is comprised of a nature-based solution”, suggesting that the more a project incorporates nature-based elements, the smaller the match percentage will be. Some nature-based practices that help mitigate the impacts of flooding include living shorelines, open space preservation, and wetland and floodplain restoration, all of which are funded through the CFPF.

DCR offers the following definition of “nature-based solution” in the CFPF manual:

*“Nature-based solution’ means an approach that reduces the impacts of flood and storm events through the use of environmental processes and natural systems. A nature-based solution may provide additional benefits beyond flood control, including recreational opportunities and improved water quality. This includes a project that reduces these impacts by protecting, restoring or emulating natural features.”*

Common nature-based and hybrid approach projects funded by the CFPF include:

- “Green streets” and stormwater best management practice (BMP) installations
- Property acquisition and open space restoration/preservation
- Living shoreline construction and stewardship

**Note:** When weighing the success of applications for nature-based projects, it should be noted that, while DCR scores applications for their alignment with program priorities, **there does not appear to be a strong correlation between how many points an application receives and its eligibility for award.** The maximum number of points available for the Project category depends on the scope of the Project and whether it combines property acquisition, nature-based practices, and hybrid approaches or if it applies to just one of these categories. A minimum points threshold is not included in the CFPF manual. *This process has changed in Round 4 with the recent addition of a CFPF grant review committee and the release of state agency staff application scores - see [round 4 example](#).*

In rounds 1-3 of the CFPF, Project category applicants were asked to include a scoring assessment of their application that evaluates its alignment with eligible projects using a score table provided in the program manual. DCR publicized score sheets completed by evaluators at the agency in rounds 3 and 4, allowing for the general public to see how DCR scored applicants compared to the applicant’s self-evaluation. The score sheet asks applicants to identify whether their project implements specific nature-based solutions (weighted 45 points), a broad “other nature-based approach” (weighted 40 points), and/or “hybrid approaches whose end result is a nature-based solution” (weighted 35 points). It is unclear whether the applicant-submitted score sheets were considered in the application review process, however the program manual for

round 4 removed the score sheet as a required component of the application. In round 4 DCR internally scored each application and publicized the score sheets for the CFPF review committee to analyze in advance of their application review meeting.

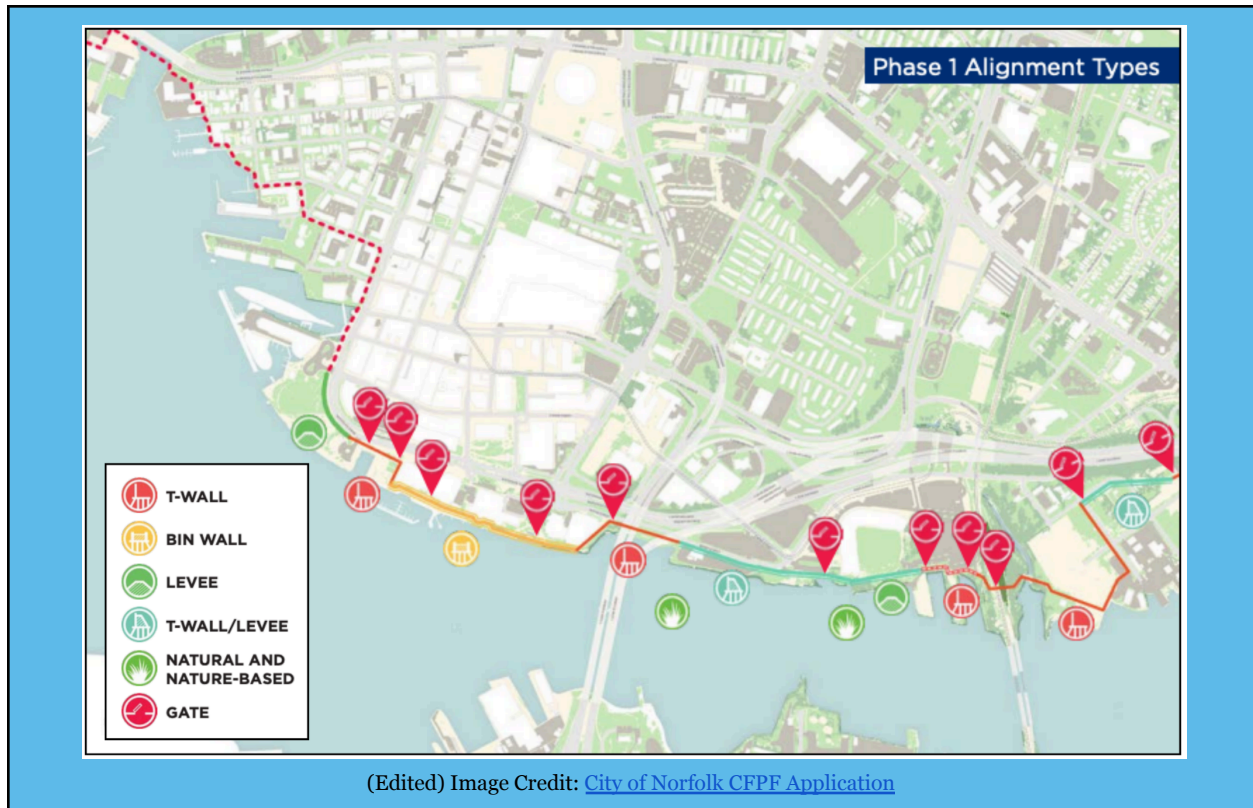
It is worth noting that the CFPF program manual states that supporting documents to the Study category should also include the relationship of the study to the local government's needs for identifying nature-based solutions to implement in the community.

**Locality Responses:** Based on DCR's publicized score sheets for Project category awards and other narrative information available for **rounds 3** of the CFPF:

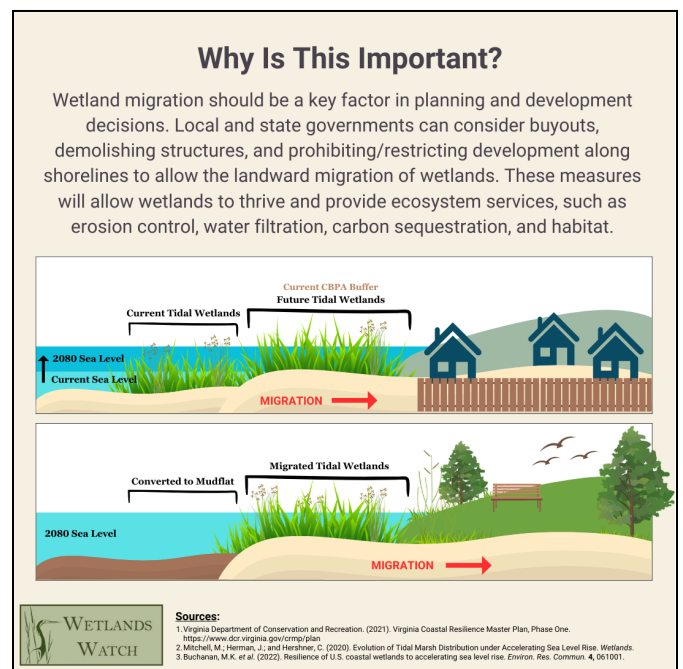
- **Of all Project awards granted by DCR in round 3, 13/20 include nature-based practices or hybrid approaches.**
  - *Note: DCR did not publish score sheets for 2/20 Project applications, however the applicant self-scored the inclusion of nature-based practices in both (these two projects are not included in the 13 nature-based application total because DCR's evaluation is unknown). One of the 13 awards includes several projects, combinations of which were individually scored by the locality, but all were lumped together by DCR as one application with one score of 58 points. Some of the projects within were not primarily nature-based, and the applicant scored the projects with a range of 88-123.*
- **Of the 13 funded nature-based and hybrid projects in round 3, scores ranged from 58 points to 113 points with variable means of execution and delivery.**
- **Resilience planning applications often score higher than nature-based Project applications.** It appears that scores are siloed per category, rather than compared across all categories. *Example: Resilience plan development for the Rappahannock-Rapidan Regional Commission scored 295 points because it included several components of Capacity Building and Planning Activities, such as resource assessments, stakeholder engagement, and goal planning. The Project category is not broken out into as many sub-categories as the Capacity Building and Planning category and therefore not awarded as many points.*

**Example:** In round 3 of the CFPF, the City of Norfolk received significant funding (\$24.6 million) to begin construction of a flood wall that protects a segment of the city from storm surge. While the CFPF application was scored with full points as a hybrid approach whose end result is a nature-based solution, the city's plans for the flood wall includes only minimal installment of nature-based features compared to the full scope of the project installation. This would not meet DCR's definition of a hybrid solution "to achieve an outcome that is primarily nature-based" (emphasis added).





Locality responses to the nature-based component of the CFPF shows that there is clear interest and decent understanding of the benefits of doing resilience work with a nature-based approach. **This focus is also extremely important for Virginia's tidal and non-tidal ecosystems** as sea level rise and increased rainfall pose great risk to the wetlands that border these water bodies. Without suitable natural habitat that would allow wetlands plants to migrate away from rising inundation, these natural ecosystems could equivocally drown in place. The communities residing near them could lose wetlands' many benefits, such as water filtration, wave action buffering, biodiversity, erosion control, and carbon sequestration. Property acquisition and open space preservation can be a successful tool to help facilitate the migration of water-based ecosystems inland as their aquatic environments are impacted by climate change.



### Challenges:

- **DCR’s CFPF application scoring process and weighted priority of nature-based projects is not a clear nor substantive component of whether applications are awarded funding.** Per category, a rubric should be created that considers elements like the physical scale at which nature-based projects are implemented, the value of nature-based concepts and resilience planning, and decisions based on the best available science. These values should mimic the Commonwealth Resilience Plan Priorities integrated in DCR’s planning efforts.
- **There is a lack of state-level guidance on best practices in green infrastructure and nature-based solutions,** making this priority of the CFPF a relatively ambiguous and unguided approach for many localities. Up-front maintenance of “living” infrastructure can be a surprising commitment to localities who are new to these practices. Once successfully established, many nature-based best management practices (BMPs) function well with little long-term maintenance. Long-term monitoring of the site’s success is often a hidden cost that may be surprising or new to localities pursuing Project applications.

Our Work: In the most recent drafting process of the CFPF manual, Wetlands Watch and our partners offered comments that requested DCR allow a portion of CFPF awards be used for stewardship/maintenance of projects. Maintenance of nature-based projects, in particular, is often a ubiquitous gap in resilience funding as these practices are often composed of natural living plants that undergo succession and changes in response to weather and climate. These systems need fairly intense on-set maintenance to ensure the practice is established, and then future maintenance to ensure the site is healthy, free of invasives and pests, and serving its proper flood mitigation function(s).

Working with our conservation partners, Wetlands Watch is also helping introduce legislation that would require the property-scale focused RVRP to incentivize nature-based components through the scoring process as its community-focused counterpart, the CFPF, already does.

The Virginia Community Rating System Workgroup, chaired by Wetlands Watch, serves as a platform where information about funding opportunities and technical assistance is promoted to localities. Projects and studies funded through the CFPF have the potential to score points for CRS-participating localities, leading to increased flood insurance discounts for policyholders. Property acquisition and open space preservation have the greatest scoring potential, accounting for up to one third of the total available discounts in the CRS program. Virginia's local governments consistently demonstrate a commitment to pursuing and safeguarding these credits due to their significant value to their constituents. Of the 30 CRS communities in Virginia, all receive open space preservation credits. The positive impact of open space preservation credits are evident to localities, in part because Virginia's existing shoreline regulations and wetlands protections offer substantial credit resulting in millions of dollars saved annually for policyholders.

### Opportunities/Solutions:

- **Increase transparency and structure of DCR’s CFPPF scoring criteria** so that localities have an assured frame of reference and understanding of best practices in CFPPF applications. Particularly, comparative scoring across categories should be included to build synergy between funding opportunities that prioritize resilience planning that leads to nature-based Project applications. Include a clear threshold for points awarded (if under X, do not fund).
- **Expand education and training for green infrastructure and nature-based solutions**, such as promoting the Chesapeake Bay Landscape Professional (CBLP) training or connecting CBLPros with localities interested in applying for Project funding from the CFPPF.
- **Increase availability of funding opportunities that support project implementation and maintenance of nature-based conservation practices.** Localities need support when approaching projects that require substantial knowledge of climate projections, and the efficacy and evolution of nature-based practices.

**Note:** Wetlands Watch and the Virginia Outdoors Foundation have administered two rounds of the Coastal Resilience and Trees Fund (CRTF), a program designed to help bridge gaps in other resilience-based funding opportunities. This includes funding capacity building opportunities, such as the attendance of training, the planning and design of projects, and development of maintenance plans. Maintenance funding is also available to ensure projects are established successfully. Virginia’s agricultural BMP cost-share program, VACS, is another program through which Soil and Water Conservation Districts provide financial and technical assistance for the installation of conservation practices that treat polluted runoff on farmland.

- **Encourage and support public input on state agency guidance documents**, such as revisions to DEQ’s Virginia Stormwater Management Handbook that outlines best practices in stormwater management. These documents need thorough multi-stakeholder feedback to be effective for the Commonwealth.

## RESILIENCE PLANNING

**Overview:** Localities interested in accessing the Project category of funding through the CFPPF must have an approved local resilience plan on file with DCR.

These plans must showcase intentional, science-based, and comprehensive forethought in addressing flood risk exposure throughout the locality and must detail specific actionable projects that mitigate flooding, with particular emphasis on holistic community-scale benefit and nature-based design. Specific elements of resilience plans can be found in the final pages of the CFPPF program manual (Appendix F).

Before a locality applies to the CFPF, it must assess if it has the resources and existing information to create a resilience plan in one of two formats (both approvable by DCR, but only one available for funding through the CFPF):

- (1) **a compilation** of existing local or regional plans (such as hazard mitigation or comprehensive plans) that references specific pages and sections that meet DCR’s resilience plan criteria, or
- (2) **a stand-alone plan** that addresses all of the requirements in one succinct document.

**Locality Responses: Local and regional approaches to resilience planning vary across the Commonwealth depending on staff capacity, availability of existing plans and data, consultant needs, and accessibility of supporting funds.** Because of these factors, the compilation resilience plan format is common among larger coastal localities (such as Norfolk and Hampton) that have more experience with flood resilience planning and often already incorporate temporal planning phases as they relate to future projections of sea level rise and other climate impacts. The availability of preexisting plans and data can fast-track the accessibility of CFPF funding for coastal localities, furthering the regional divide between progress on the coast and further inland.

A stand-alone plan is the only option available for funding through the CFPF and often requires outsourcing a consultant, conducting extensive public engagement, and filling in data gaps required to inform risk management and project identification. The benefits of creating a stand-alone plan include:

- Facilitating refreshed discussions about community values with the public
- Updating incomplete or outdated databases
- Generating direct alignment with other planning priorities the locality possesses
- Identifying project opportunities to be later funded by the CFPF

**Example:** Despite coastal localities generally having more resources to approach resilience work, Wetlands Watch heard anecdotal evidence from tidewater localities that **creating a standalone plan can be burdensome** for many reasons. One locality in particular expressed reticence to put forth projects in their resilience plans that are not currently prioritized in their planned expenditures for capital improvements. Because the CFPF requires localities to identify potential projects, nodding to the successional categories of funding available, the public may develop unmanageable expectations that the locality will follow through on such plans, for which they do not have the capacity or funding without a grant award.

### Challenges:

- **Some localities are not quite ready to dive into resilience plan work, and are in even earlier stages of plan scoping.** The CFPPF has funded pre-planning work for resilience plans before (often as “resource assessments” in the Planning and Capacity Building category), but it is important to highlight that significant resources need to be invested towards plan scoping in early stages of this work for rural, inland, and small communities.

**Example:** Southside PDC was awarded in Round 2 of the CFPPF for regional scoping studies and data collection, with the support of significant external partnerships, to help the PDC “prepare for the future development and implementation of coordinated resilience plans.” Buchanan County applied similarly for local planning support and studies in Round 1.

- **Resilience planning costs vary by locality, region, and exposure to risk.** Coastal localities have ordinances and regional planning entities with designated tasks to address flood risk, in addition to a great concentration of coastal adaptation-focused NGOs, academic institutions, and research facilities. In many cases, coastal localities already have hazard mitigation, comprehensive, and/or transportation and infrastructure plans in place that consider and provide solutions for sea level rise and pluvial flooding impacts. This makes it easy for a locality such as Norfolk to “compile” their resilience plan, already having many pre-existing plans in place that can support and inform their resilience approach.
- **Resilience plans are currently required to be updated every 3 years.** This is an aggressive timeline for localities with limited resources to conduct the extensive community engagement and data collection required to inform a holistic plan, and it does not align with the existing rhythm of hazard mitigation planning and comprehensive planning on 5-year cycles. Many localities are coming up to their first round of resilience plan renewal and have not received guidance from DCR for what level of detail is needed for these updates. The CFPPF also does not allow for recurrent funding of the same activity or project, meaning that localities cannot re-apply to the CFPPF to complete updates to their resilience plans.
- **Collecting data on pluvial and riverine flooding is costly, time-intensive, and often outside of the expertise of local government staff in these areas.** This requires many localities to contract with outside consultants and can be an outreach barrier for engaging citizens who are unfamiliar with the work being done, or the priorities of the consultant. No formal list of approved contractors to conduct resilience plan work is available from DCR or the state.
- **Regional planning entities such as PDCs and RCs can compile resilience plans for their localities, however, CFPPF Project funding cannot be implemented in localities that do not formally “adopt” the plan as their own.**



This requires significant, and important, outreach and education to all localities within the region to align values and discuss resilience objectives. While critical, this can be a cost-prohibitive element of regional planning.

- **Funding for resilience plans through the CFPF requires that the resilience plan created must be a stand-alone plan**, and not a referenced compilation of existing plans (such as local or regional hazard mitigation and comprehensive plans) that address resilience plan principles. DCR allows for resilience plans developed *without* funding from the CFPF to be submitted and approved as a compiled list of references to existing plans that appropriately address resilience plan principles.

**Our Work:** Wetlands Watch will be undergoing a thorough review of all available DCR-approved resilience plans to compile a list of best practices and recommendations for localities pursuing this work.

**Opportunities/Solutions:**

- When meeting with localities about resilience planning, it is good to **share existing approved resilience plans with a similar scope and project opportunities for the local staff to review**. Providing as much detailed information as possible about how localities are approaching resilience plan efforts can help bridge understanding gaps and make the work more accessible.
  - **Research and compile a list of available consultants with regional alignment to assist localities with resilience plan work**. Wetlands Watch has begun scoping this work, but to date has only listed the consultants named in CFPF applications. More in-depth research into who is available to help, and their associated costs and missions, would be a great resource to localities.
  - **As resilience plans are adopted and put to work, tracking progress on project implementation and keeping in touch with local staff leading implementation of the plan will be critical**. We want to be sure localities are able to achieve the goals and projects outlined in their plan, and offer support along the way. This feedback will be valuable to DCR as they assess criteria for resilience planning resources.
  - **Promote and share lists of accessible funding opportunities that support resilience plan work**. There are numerous resources available at the local, state, and federal level that provide funding for this work although support for smaller localities is necessary to help them apply for these competitive buckets. Wetlands Watch created an Airtable of resilience-based grant opportunities with this in mind.
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## REGIONAL GREENHOUSE GAS INITIATIVE (RGGI)

**Overview:** In 2021, Virginia’s legislature codified the state’s participation in the Regional Greenhouse Gas Initiative (RGGI) through HB981: the Clean Energy and Community Flood Preparedness Act. Virginia is the southernmost state to join the program and has mandated by law that proceeds from the quarterly carbon allowance auctions “be distributed without further appropriation (i) to the Virginia Community Flood Preparedness Fund; (ii) to the Department of Housing and Community Development for low-income energy efficiency programs; (iii) for administrative expenses; and (iv) to the Department of Housing and Community Development in partnership with the Department of Mines, Minerals and Energy to administer and implement low-income energy efficiency programs.” Since the beginning of VA’s contract with RGGI, the state received \$827.7 million in proceeds, of which 45% is allocated to the CFPPF, totaling \$372.4 million.

**Challenges:** While Virginia’s participation in RGGI was codified under former Governor Ralph Northam, the current Administration has openly opposed RGGI since before entering office. On January 14th, 2022 Governor Glenn Youngkin published Executive Order 9 (EO9) announcing a plan to remove Virginia from RGGI through regulatory repeal by vote of the State Air Pollution Control Board (Air Board). Wetlands Watch and many of our partners maintain that this is an illegal action as RGGI was written into Virginia state code and can therefore only be repealed through *legislative* action, not regulatory vote.

In August 2022, a Notice of Intended Regulatory Action (NOIRA) under the Air Board’s jurisdiction was filed followed by a NOIRA comment period during which an overwhelming 730 submissions spoke against the repeal. Soon after, the Air Board voted to adopt the proposed

YOUNGKIN'S RGGI REMOVAL PLAN

The Youngkin Administration's plan to repeal RGGI through regulation is unlawful as VA joined RGGI through legislative action. **Only the General Assembly may act to remove VA from RGGI.**

<p style="text-align: center;"><b>AUGUST 2022</b></p> <p style="text-align: center;">Air Pollution Control Board ("Air Board") Meeting: Acting Secretary Voyles announced Administration's plan for RGGI withdraw via Notice of Intended Regulatory Action (NOIRA)</p> <p style="text-align: center;"><b>SEPTEMBER 2022</b></p> <p style="text-align: center;">NOIRA submitted to the <i>Virginia Register</i></p> <p style="text-align: center;"><b>NOV - DEC 2022</b></p> <p style="text-align: center;">Administration reviewed comments (730 against repeal; 51 support) and prepared responses</p> <p style="text-align: center;"><b>JANUARY 2023</b></p> <p style="text-align: center;">Proposed regulation filed for executive branch review &amp; published to the <i>Virginia Register</i> along with an Economic Impact Analysis report</p> <p style="text-align: center;"><b>APRIL - JUNE 2023</b></p> <p style="text-align: center;">Revision period</p> <p style="text-align: center;"><b>JULY 31ST, 2023</b></p> <p style="text-align: center;">Final regulation submitted for executive branch review and published to VA Registrar. <b>SELC, representing several parties, filed a Notice of Appeal challenging the legality of this action.</b></p> <p style="text-align: center;"><b>SEPTEMBER 2023</b></p> <p style="text-align: center;">Replacement regulation is complete (if 6 month extension is not requested)</p> <p style="text-align: center;"><b>DECEMBER 6TH, 2023</b></p> <p style="text-align: center;">VA's final RGGI proceed allocation under existing contract: \$97.6M. This is the most VA has received in one auction since enrolling.</p>	<p style="text-align: center;"><b>SEPT 26 - OCT 26, 2022</b></p> <p style="text-align: center;">NOIRA comment period opened (30 days)</p> <p style="text-align: center;"><b>DECEMBER 2022</b></p> <p style="text-align: center;">Air Board adopted proposed replacement regulation at the Dec. 7th Air Board meeting <b>On December 19th, the Joint Commission on Administrative Rules voted (5:4) to object to the Administration's regulatory repeal.</b></p> <p style="text-align: center;"><b>JAN 30 - MAR 31</b></p> <p style="text-align: center;">Comment period open (60 days)</p> <p style="text-align: center;"><b>JUNE 7 2023</b></p> <p style="text-align: center;"><b>Air Board voted 4:3 in favor of adopting the final replacement regulation that repeals RGGI</b></p> <p style="text-align: center;"><b>AUGUST 2023</b></p> <p style="text-align: center;">30-day final adoption period. Public comments open until August 30th.</p> <p style="text-align: center;"><b>NOVEMBER 2023</b></p> <p style="text-align: center;"><b>SELC Notice of Appeal Update: three of four plaintiffs are denied standing and the court venue is changed to Floyd County</b></p> <p style="text-align: center;"><b>DECEMBER 31ST, 2023</b></p> <p style="text-align: center;"><b>Virginia's contract with RGGI set to expire</b></p>
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replacement regulation and the action carried on. In June 2023 the Air Board again voted to adopt the repeal despite a second comment period confirming public opposition to the action.

In July 2023, representing several parties, the Southern Environmental Law Center (SELC) filed a Notice of Appeal challenging the legality of the Air Board’s actions to repeal state legislation. A court schedule for the proceedings has yet to be released, although it is likely that this process could take a significant amount of time to complete in 2024. With Virginia’s contract with RGGI ending in December 2023, it is unlikely that the state will see another RGGI contract or receive proceeds from an auction for quite some time.

Aside from the legal challenge, two attempts to divert funds from RGGI revenues were successful in 2022:

- **\$25 million** to create and capitalize the Resilient Virginia Revolving Fund
- **\$11.4 million** for immediate flood assistance to Hurley after a devastating flood event in September 2021

While the diverted funds are helpful to the flood-related programs they serve, the “raiding” of RGGI proceeds undermines its purpose to provide the Commonwealth with reliable pre-disaster mitigation funding that can safeguard flood-prone localities from future risk. According to the [National Institute of Building Sciences](#), **\$6 is saved for every \$1 spent on pre-disaster flood mitigation.**

National Institute of BUILDING SCIENCES		ADOPT CODE	ABOVE CODE	BUILDING RETROFIT	LIFELINE RETROFIT	FEDERAL GRANTS
<b>Overall Benefit-Cost Ratio</b>		<b>11:1</b>	<b>4:1</b>	<b>4:1</b>	<b>4:1</b>	<b>6:1</b>
<b>Cost (\$ billion)</b>		<b>\$1/year</b>	<b>\$4/year</b>	<b>\$520</b>	<b>\$0.6</b>	<b>\$27</b>
<b>Benefit (\$ billion)</b>		<b>\$13/year</b>	<b>\$16/year</b>	<b>\$2200</b>	<b>\$2.5</b>	<b>\$160</b>
 <b>Riverine Flood</b>		<b>6:1</b>	<b>5:1</b>	<b>6:1</b>	<b>8:1</b>	<b>7:1</b>
 <b>Hurricane Surge</b>		not applicable	<b>7:1</b>	not applicable	not applicable	not applicable
 <b>Wind</b>		<b>10:1</b>	<b>5:1</b>	<b>6:1</b>	<b>7:1</b>	<b>5:1</b>
 <b>Earthquake</b>		<b>12:1</b>	<b>4:1</b>	<b>13:1</b>	<b>3:1</b>	<b>3:1</b>
 <b>Wildland-Urban Interface Fire</b>		not applicable	<b>4:1</b>	<b>2:1</b>	not applicable	<b>3:1</b>

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**TABLE 1.** Nationwide average benefit-cost ratio by hazard and mitigation measure. BCRs can vary geographically and can be much higher in some places. Find more details in the report.

Image credit: [National Institute of Building Sciences](#)

**Locality response:** Overall, localities that Wetlands Watch has worked with on the CFPF are more interested in discussing available funding opportunities than the nuanced policy history behind the fund’s establishment. While we always come prepared to discuss the impact of the Administration’s attempt to dismantle RGGI, our meetings are often more focused on understanding the capacity of local staff and addressing their questions about suitable projects funded under the CFPF. Some common themes in our discussions about the CFPF with localities include:

- Resilience planning
- Valuable community infrastructure in the flood zone
- Hydrologic/hydraulic studies and data collection
- Creation/restoration of green space for recreation and flood mitigation

When concerns do arise about the impact of leaving RGGI, we typically cite the legislative code that mandates RGGI proceeds remain in the CFPF in perpetuity and without diversion. While diversions have been successful in the past, DCR has maintained full transparency in its commitments to continue administering additional funding rounds of the CFPF as long as money remains in the CFPF.

One of the main arguments against RGGI states that the price of the state’s participation in the program is too costly to ratepayers, and that leaving the program will significantly lower utility bills. Because this can be a major concern for the Commonwealth’s residents, it is important to understand the nuance behind utility rates of Virginia’s largest energy producers. While it is true that the state must “pay” to be a member of the RGGI program, it is a choice, not a requirement, of power producers to pass this cost on to its customers.

**Note:** Dominion Energy included a RGGI “rider” on customer bills for a brief period of time in 2022, averaging less than \$2 per month. The rider has since been removed, while other fuel cost riders on the bill continue to increase. Residents with Appalachian Power, for example, must tolerate an average [\\$16 increase](#) to their power bill due to fuel rate increases. The emissions reduction component of RGGI would help the state reduce its dependence on fossil fuels, *lowering* this rate for residents rather than increasing it.

***The Stakes:*** Removing Virginia from RGGI poses significant risk and challenges resilience progress made with the proceeds received since 2021, and to prospective resilience progress of the future. Without RGGI or a reliable alternative funding source, the state would lose or interrupt many of the following tangible benefits:

- **On average, Virginia receives \$275.9 million from RGGI proceeds per year** (based on numbers from 2021-2023). Programmatically, the CFPF receives an average of \$124.2 million per year and the HIEE receives an average of \$138 million per year.
- **The CFPF has awarded \$97.7 million** of its roughly \$372.4 million allocation from RGGI, not including a 5-percent set-aside for DCR administration of the program. **The HIEE has awarded \$259** of its roughly \$413.9 million allocation from RGGI, not including administrative set-aside for DHCD administration of the program and administrative diversions of RGGI funding.
- **Of the 98 awards provided by the CFPF, at least 30 directly fund resilience plan development** or pre-resilience planning resource assessments. This does not include awards for Staff Capacity (such as hiring or training a Certified Floodplain

Manager) or the numerous Study awards that help update existing plans and data sets to inform future resilience planning.

- **In Virginia’s final auction of its 3-year contract with RGGI in December 2023, the state received \$97.6 million** - the largest single-auction sum since Virginia’s enrollment in the program.
- **The CFPF is Virginia’s only dedicated grant funding source for resilience work with statewide accessibility.** All Virginia communities, but particularly those with riverine flood risks, need CFPF resources to build resilience against more frequent and intensifying rainfall events, which cause devastating and costly floods everywhere. Virginia’s coastal communities need CFPF resources to defend against the impacts of dangerous hurricanes and nor’easters, as well as more frequent nuisance flooding from higher tides and rising sea levels. Without the CFPF, resilience progress statewide would be greatly hindered.
- **RGGI’s function as a carbon emissions reduction program drives Virginia’s power plants to reduce fossil fuel usage over time**, benefitting the state’s and the Chesapeake Bay’s air quality goals. For all states in the RGGI program, emissions reductions have occurred at a more rapid rate than non-participants. To meet the Commonwealth’s carbon emissions goals of the Virginia Clean Economy Act, DEQ states that “an emissions reduction program or combination of programs will be required.” Without RGGI, Virginia’s progress towards meeting climate goals is at risk.

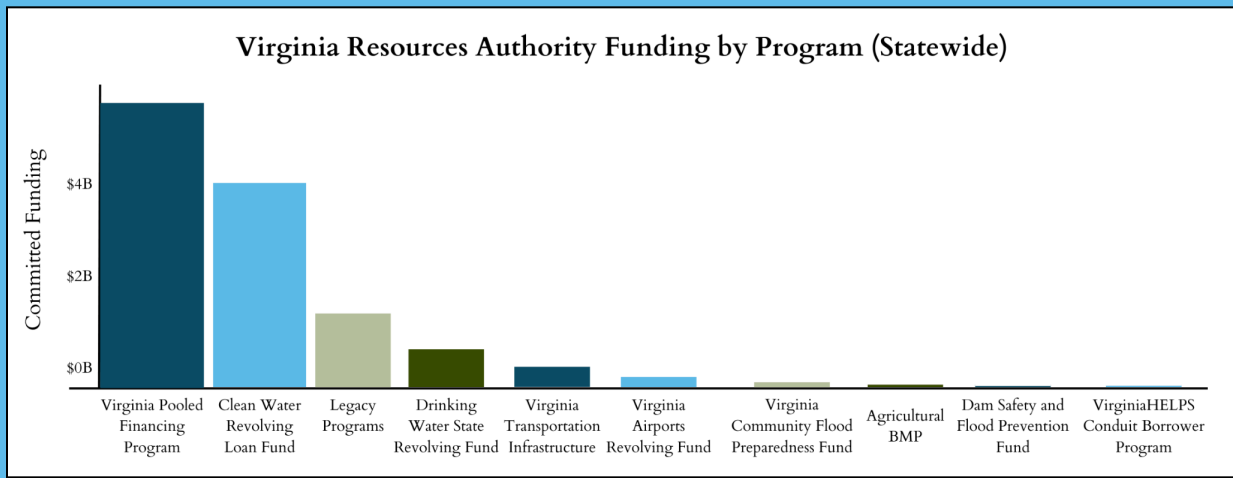
### **Our Work:**

- **Advocacy:** Wetlands Watch works with our partners and the Virginia Conservation Network (VCN) on both public and legislative outreach to interpret the RGGI law, inform decision-makers about its importance, and advocate for the benefits of the Commonwealth having dedicated resilience funds for community-scale efforts. We track each RGGI auction and how the proceeds Virginia receives are distributed among the mandated programs (CFPF and the Department of Housing and Community Development’s Housing and Innovations in Energy Efficiency fund, HIEE) and we consistently check our calculations with DCR when funding totals are shared in their public presentations.
- **Transparency:** Our staff maintain consistent and collaborative working relationships with DCR staff, local government staff, and other stakeholders necessary to inform and promote reliable resilience funding, and we maintain that RGGI is the state’s best opportunity aside from dedicated general funds. We ensure open honesty with localities on the RGGI process, timeline, and expectations where applicable and particularly when requested to help prospective applicants to the CFPF understand that the monies accrued thus far (which is over \$370 million before subtracting grant awards) are held in perpetuity per legislation. This helps grow the confidence of the local government staff we meet with, and assures that the work they begin with CFPF funding will have successional opportunities.



- **Alternative Funding:** Wetlands Watch is working closely with professionals in the VCN network to devise budget amendments and requests that dedicate state dollars to resilience planning, particularly as Virginia’s existing contract with RGGI ended in December 2023 and the state will not receive proceeds for the foreseeable future in 2024.

**Note:** Of programs funded or administered by the Virginia Resources Authority (VRA), the Community Flood Preparedness Fund is the 7th-most subscribed resource across all of Virginia’s localities. Infrastructure, clean water, and transportation are among the leading funding programs.



Information extracted from the [VRA Funding Dashboard](#).

**Opportunities/Solutions:**

- **Advocate for reliable state funding that continues to capitalize the CFPF while Virginia is without RGGI.**
- **Where applicable, approach the topic of flood risk from a values perspective, not a climate angle.** Discussions about flood resilience toe a thin line between climate change acceptance and values-based decision making. Understand that climate change can be an uninviting topic for some and could damage local perceptions of your intention to work with them. Prioritize offering solutions that address the locality’s unique flood risk, the infrastructure that matters most to the community, and the greatest concerns to local residents.
- **Create clear and concise tools/resources that bridge knowledge gaps about state and federal funding opportunities, and their sources.** Localities should know which programs are available and how much is typically awarded, the general timeline of the programs, application requirements, and grant management expectations. One-pagers and fact sheets are a great way to do this.
- **Educate localities on the difference between investing in post-disaster and pre-disaster mitigation.** Both are important and necessary to address climate risks

across the globe, however, comprehensive and data-driven pre-disaster mitigation can safeguard future generations from risk through establishing phased plans, setting timelines, and scoping projects that would benefit both the short and long-term resilience of the community.

## RESILIENT VIRGINIA REVOLVING FUND (RVRF)

**Overview:** The Resilient Virginia Revolving Fund (RVRF) is a new funding program administered by DCR that offers loans and grants for three categories: property-scale hazard mitigation, federal grant matches, and start-up costs and capitalization for local government resilience loan programs. The RVRF is designed to complement the CFPF with an emphasis on property-scale funding and supports localities statewide in setting up revolving loan programs to administer funding for resilience projects at the parcel scale, such as the installation of living shorelines.

The RVRF was originally capitalized with \$25 million, the majority of which was diverted from the CFPF’s allocated proceeds from RGGI. The fund has been additionally supplemented with \$31.1 million in funding from the STORM Act and \$125 million from Virginia state general funds. Its inaugural funding round was open concurrently with the CFPF’s fourth application period in 2023, extending the application deadline one month beyond the CFPF due date to allow localities more time to understand and apply for the new program.

**Locality Response:** To our knowledge, only one application to the RVRF was submitted in its 2023 inaugural round. The general response we receive from localities is that the commitments required to service and manage loans makes the RVRF a relatively undesirable program for resilience-based work, particularly for localities in early planning stages. As we have already discovered substantial barriers to accessing grant funds in certain communities due to staff

CFPF vs RVRF	
Community Flood Preparedness Fund	Resilient Virginia Revolving Fund
Primarily grants with some loans	Primarily loans with some grants
<b>Focus:</b> flood protection, planning, and resilience	<b>Focus:</b> hazard mitigation of buildings, homes, and property
Community-scale projects	Property-scale projects
Funds resilience-focused capacity building, planning, and projects	Funds structural improvements and the establishment of local loan programs
Prioritizes nature-based projects	Does not prioritize nature-based projects
25% of funds required to fund low-income geographic areas	No low-income geographic area funding requirement
Funded by Virginia’s participation in the Regional Greenhouse Gas Initiative	Funded by the STORM Act, VA General Funds, and the CFPF*
Projects require a resilience plan	Projects do not require a resilience plan but more points are awarded for consistency with this or similar plan
<i>*In 2022, \$25 million was diverted from the CFPF to capitalize the new RVRF program.</i>	
For more information, visit: (1) <a href="http://wetlandswatch.org/community-flood-preparedness-fund" style="color: white;">wetlandswatch.org/community-flood-preparedness-fund</a> (2) <a href="http://wetlandswatch.org/rvrf" style="color: white;">wetlandswatch.org/rvrf</a> (3) <a href="http://dcr.virginia.gov/dam-safety-and-floodplains/dsfpm-grants" style="color: white;">dcr.virginia.gov/dam-safety-and-floodplains/dsfpm-grants</a>	

capacity and lack of resources, the future of the RVERF depends on its ability to sustain transparency about loan mechanisms and expectations, technical support from DCR staff, and updated resources that clearly define the purposes of this fund.

Some Virginia localities have also already met their debt capacity, making an application to the RVERF an impossibility. Additionally, fiscally secure communities in Virginia may access better loan rates in alternative marketplaces and raise their own bonds to fund resilience projects, which could perhaps reduce interest in the RVERF.

**Examples:** There are a few examples of VA localities with revolving loan and grant programs similar to the parameters outlined by the RVERF:

- The [Middle Peninsula PDC Living Shoreline Incentive Program](#)
- The [Middle Peninsula PDC Onsite Septic Repair Revolving Loan and Grant Program](#)
- The [Northern Neck PDC Flood Hazard Mitigation Program](#)
- The City of Hampton's [Resilient and Innovative Neighbor \(RAIN\) Grant Program](#)

Notably, many of these programs are serviced at the regional level as PDCs and RCs often have more capacity and resources.

### Challenges/Barriers:

- **In some ways, RVERF priorities are dissimilar and not complementary to the priorities of the CFPF.** While it brings a necessary focus to property-scale hazard mitigation, there are no requirements for programs and projects funded under the RVERF to align with resilience plan frameworks nor to incorporate nature-based elements wherever possible. Applications with ties to resilience plans are scored with more points than those without, but it is not a required component of loan programs.
- **DCR and VRA must offer more outreach and technical assistance on servicing and managing loans** for the RVERF to be a more accessible program to localities. This requires significant resources to fund staff, although based on the response of local governments, it would be an almost necessary investment to make the program more desirable.
- **Significant state resources have been dedicated to this program despite having an uncertain demand,** while the CFPF has only recently received its first state budget allocation despite having annual monumental success and consistent, increasing demand.
- **While the general hesitation to apply for and manage loans is not an unreasonable one, there is credibility in DCR creating a program that holds localities accountable for the money they spend on resilience funding.** Loans provided by the RVERF motivates subscribed local governments to use the funds responsibly and ensure that projects are installed properly, reducing the risk for limited resilience money to be spent on unsuitable or unreasonable practices.

***Our Work:*** Wetlands Watch held a technical assistance “Lunch and Learn” on both the CFPPF and RVRF in September 2023 to help our network distinguish between the two programs and work through any questions of suitability. DCR staff joined us for this presentation and provided valuable feedback and support to participants who were present. We created a webpage where we will track RVRF updates similarly to how we track CFPPF rounds.

To better align the RVRF with the CFPPF and other DCR resilience planning efforts, Wetlands Watch is also working with our VCN partners to advocate for the distinct prioritization of nature-based elements in RVRF-funded programs.

### ***Opportunities/Solutions:***

- **Ensure localities are fully aware of and prepared to take on the costs related to servicing and managing loans.** Recipients of the RVRF must maintain good standing with loans from DCR and, for those using loans to capitalize a local revolving loan program, there must be enough staff capacity and resources to help manage loans on a parcel project basis.
- **Explore and promote accessible options for financing natural infrastructure,** such as the EPA Clean Water Revolving Fund and the Drinking Water State Revolving Fund. [This 2022 report](#) from the Environmental Defense Fund (EDF) and Quantified Ventures explores some of these options.

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## **RECOMMENDATIONS**

With state agency-level efforts in planning for resilience, participation in RGGI, and the establishment of the CFPPF and RVRF, Virginia has laid the groundwork for successful and robust advancement of community-based climate adaptation. However, the several threats and uncertainties that surround many of these pillars have complicated the accessibility of progress for localities and particularly for the state’s rural inland regions. Based on our extensive work in this space, Wetlands Watch recommends the following approaches to future work in this space:

- **Advance and support outreach and technical assistance on individual funding programs (CFPPF, RVRF) to rural, under-resourced localities.** Help bridge the knowledge gap for communities most in need of resilience planning work.
- **Meet communities where they are by engaging in values-based discussions about resilience priorities before implementing project work.** Resilience plans are a great approach to help localities engage the public and assess the current state of resources and proximity to risk.
- **Promote nature-based elements and projects wherever possible for adaptation.**

- **Work closely with state agencies and leading NGOs in Virginia to design an engagement approach and avoid duplicating efforts and wasting valuable resources.** As attention to rural riverine flooding grows and targeted funding opportunities emerge, it may be easy to oversaturate localities with offers of support and can make future work in these regions competitive and more difficult to approach. Collaboration is key!
- **When available, review and offer comments to draft manuals of the CFPF, RVRF, and other state-administered resilience funding programs.** DCR consistently releases draft manuals ahead of each round of the CFPF, which will now occur on an annual basis consecutively with the RVRF.
- **Research and connect with local partners that understand and work with the unique risks facing inland and riverine communities.** Even work expanding beyond climate and flooding should prioritize meeting local expectations and learning about community values.

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## AFFILIATE ORGANIZATIONS & POTENTIAL PARTNERS\*

*\*This list is not intended to be exhaustive, but only those entities that appear most actively engaged in CFPF related technical assistance work.*

Organization/ Affiliation	Contact Name	Contact Email	Activities
<i>Environmental Defense Fund (NGO)</i>	Grace Tucker	gtucker@edf.org	Statewide and regional alignment of resilience planning priorities. Member of the VCN community. Grace provides direct technical assistance to localities; EDF provides seed and grant funding to localities to approach hazard mitigation.
<i>Virginia Conservation Network (NGO)</i>	Pat Calvert	pat@vcnva.org	VCN is a leading convening body for statewide NGO coordination of advocacy and defense for resilience progress in Virginia. VCN hosts meetings to discuss the CFPF and RVRF, legislative strategy, and multi-stakeholder involvement in these important topics.
<i>Resilient Virginia (formed to build upon the Virginia Sustainable Building Network)</i>	Annette Osso	rvca@resilientvirginia.org	RV is a new convening body entering the resilience landscape in rural southern/southwestern Virginia. In 2023, RV launched a “Regional Resilience Initiative” with aims to aggregate cross-regional stakeholders and address the hazard mitigation barriers facing VA’s rural non-coastal communities (not necessarily flood-specific).
<i>Alliance for the Shenandoah Valley (ASV, NGO)</i>	Kate Wofford	kwofford@shenandoahalliance.org	ASV engages communities along the Shenandoah Valley to sustain farms, forests, clean streams and rivers, and thriving communities. Strategic goals include conservation-oriented land use and



			transportation policies, land and water conservation, and compatible economic development. Kate (Executive Director) is a great contact for this region.
<i>First Earth (FE)</i>	Tee Clarkson	tee@firstearth.eco	FE helps advance climate change adaptation and mitigation through market-based mechanisms (tax deductions, credits, etc.) and works among many sectors to support completion of conservation grants and projects. Tee (the Principal of FE) and Charlie Westbrook (below) have worked together in the past, and are both good partners to approach this work.
<i>Resource Environmental Solutions (RES)</i>	Charlie Westbrook	cwestbrook@res.us	RES is a restoration-based corporation helping to implement lasting, successful green infrastructure and nature-based practices across the United States. RES has expertise working with mitigation “markets” such as nutrient credit banking. Charlie Westbrook was previously with First Earth, has been involved in VCN resilience work in both positions, and has helped with Buchanan County resilience plan efforts through the CFPF.
<i>UVA Weldon Cooper Center</i>	Bryan David	rbd7g@virginia.edu	The Weldon Cooper Center is working with communities outside of the coastal zone on writing CFPF applications and developing community resilience plans.
<i>ICAR</i>	Jessica Whitehead	jcwhiteh@odu.edu	The ICAR team is working with eastern shore communities to develop and submit CFPF applications.