

The Vermont Clean Water
State Revolving Fund

Intended Use Plan

for Federal Fiscal Year 2023
and State Fiscal Year 2024 Priority List

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Prepared by The Water Investment Division



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1. Executive Summary

Vermont sends to the U.S. Environmental Protection Agency (EPA), as part of its annual application for Clean Water Capitalization Grants under Title VI of the Water Quality Act of 1987 (the Act), a Clean Water Intended Use Plan (CWIUP) to meet the requirements of Section 606(c) of the Act and the Clean Water Capitalization Grant Agreement. This CWIUP covers the FFY 2023 base CWSRF grant, and the supplemental base and Clean Water Emerging Contaminants grants created by the Bipartisan Infrastructure Law of 2021. The CWIUP serves as the planning document to explain how each fiscal year's appropriation for the Vermont – EPA Clean Water State Revolving Fund (CWSRF) will be used.

Project priority points awarded in accordance with the Department's Municipal Pollution Control Priority System are listed on the SFY 2024 Pollution Control Project Priority List. Whether all construction projects ready to proceed in a particular year will be awarded grant and/or loan funds depends on the amount of funds allocated to the program by the Vermont legislature, the level of federal funding awarded through the federal capitalization grant for the Clean Water State/EPA Revolving Loan Fund (CWSRF), any carry forward from the prior fiscal year, and repayments and fund income received during the fiscal year. Planning projects are not funded in order of their priority, but rather at a rate necessary to bring sufficient projects to the implementation phase to use all the anticipated grant and loan funds each year.

Appearance of projects on the Project Priority List (PPL) indicates eligibility for funding assuming all other requirements are met. The dollar amounts may change from those listed as project cost changes affect the pro-rating of available grant and loan amounts.

1.1. Bipartisan Infrastructure Law (BIL), BABA

The Bipartisan Infrastructure Law (BIL), also known as the Infrastructure Investment and Jobs Act (IIJA), passed November 15, 2021, provides two new SRF grants: the General Supplemental, and the Emerging Contaminants grants, to augment the existing General grant. These BIL grants will continue annually over the next five years. In addition to providing additional funding for Vermont, these grants include significant requirements related to ensuring that communities that meet the State's affordability criteria benefit from the new funds, including a requirement for 49% of General Supplemental funds to be provided in the form of loan forgiveness. Relatedly, BIL creates new CWSRF technical assistance funds (2% of the grants) to enhance or build programs that proactively identify, reach out to, and provide assistance to publicly owned treatment works, particularly in disadvantaged communities.

The BIL expanded domestic sourcing requirements with the inclusion of the Build America, Buy America Act (BABA). For all projects receiving funding based on federal awards made to the State on or after May 14, 2022, all steel, iron, manufactured products, non-ferrous metals, plastic and polymer-based products (including polyvinylchloride, composite building materials, and polymers used in fiber optic cables), glass (including optic glass), lumber, and drywall used in infrastructure projects for federal financial assistance programs must be produced in the United States. EPA has issued a BABA Adjustment Period Waiver for SRF

projects that have initiated design planning. The VT DEC Design and Construction Engineering Section has published an Adjustment Period Waiver Certification form, available at [SRF BABA Waiver Certification Form](#)

1.2 Other State Grants

The Priority List (PPL) under the Municipal Pollution Control Priority System Rule is also used to rank projects for the Vermont Pollution Control Grants. This year and the past year, the CWIUP is also being used to rank projects for the ARPA Village Water and Wastewater Water Initiative. Coordination of these funding sources with the CWSRF is important for setting the CWSRF funding forecast on the PPL.

1.3 Other Federal Grants

The application for the federal fiscal year 2022 Sewer Overflow and Stormwater Reuse Municipal Grant Program (OSG Grant) will not coincide with this IUP. This is a limited EPA allocation and if awarded this year will go towards planning and design for combined sewer overflow (CSO) abatement projects in rural and financially distressed communities.

1.4 Notice of Nondiscrimination

The Vermont Agency of Natural Resources (ANR) operates its programs, services, and activities without discriminating on the basis of race, religion, creed, color, national origin (including limited English proficiency), ancestry, place of birth, disability, age, marital status, sex, sexual orientation, gender identity, or breastfeeding (mother and child). QUESTIONS OR COMPLAINTS/FREE LANGUAGE SERVICES | SERVICES LINGUISTIQUES GRATUITS | भाषासम्बन्धी निःशुल्क सेवाहरू | SERVICIOS GRATUITOS DE IDIOMAS | 免費語言服務 | BESPLATNE JEZIČKE USLUGE | БЕСПЛАТНЫЕ УСЛУГИ ПЕРЕВОДА | DỊCH VỤ NGÔN NGỮ MIỄN PHÍ | 無料通訳サービス | ་ལྷན་ཁུངས་ཀྱི་འགན་ཁུར་བའི་འཕྲུལ་འབྲེལ་ལམ་ལུགས་ | HUDUMA ZA MSAADA WA LUGHA BILA MALIPO | BESPLATNE JEZIČKE USLUGE | အခမဲ့ ဘာသာစကား ဝန်ဆောင်မှုများ | ADEEGYO LUUQADA AH OO BILAASH AH | خدمات لغة مجانية: anr.civilrights@vermont.gov or (802) 636-7827. For more information, visit <https://anr.vermont.gov/special-topics/equity-and-accessibility/notice-nondiscrimination>

If you speak a language not listed or require additional help, we offer free language assistance services. Please reach out to ANR at 802-636-7827 and we can support getting you access to the State of Vermont's free language services. The State of Vermont contracts with several Translation Services organizations, and you can visit this page for more information. <https://anr.vermont.gov/special-topics/equity-and-accessibility/language-services>.

2. CWSRF Mission and Program Goals

2.1. Mission of Vermont CWSRF:

To ensure the fund operates in perpetuity and provides continuing financial assistance to Vermont municipalities and eligible private entities for clean water project need, including traditional, green, and natural infrastructure, and to effectively align the CWSRF with other state and federal funding sources to support clean water projects.

2.2. Long Term Goals:

1. Implement the Bipartisan Infrastructure Law's goal of increasing investment in disadvantaged communities by ensuring subsidy is directed to communities meeting the SRF Program's affordability criteria, and by engaging in a multi-year sustained effort to increase our capacity to target assistance to disadvantaged communities.
2. To provide financial assistance to Vermont municipalities to fund the completion of all known enforceable requirements of the Act.
3. Promote initiatives that will address systemic environmental justice by prioritizing incentives to projects that will ensure equitable access to clean water benefits.
4. Promote sustainable infrastructure by encouraging the development and implementation of fiscal sustainability plans, asset management programs and other strategies that support municipal affordability.
5. Utilization of the additional subsidy provisions and other allowable financial tools to support Vermont's clean water goals by incentivizing high priority projects while continually actively reviewing long term financial implications to ensure fund sustainability.
6. To provide funding assistance to municipalities and eligible private entities seeking to comply with stormwater or wastewater Total Maximum Daily Load (TMDL) or other permit requirements.
7. Promote environmental sustainability, climate change adaptation and resiliency in program incentives and priorities.
8. Continue investment in traditional stormwater and wastewater infrastructure to increase resiliency and reliability, to meet increased demand for collection, treatment, and disposal, and to meet environmental and water quality requirements and goals.
9. Utilize available program eligibilities to invest in natural resource projects to cost-effectively address clean water challenges.
10. Periodically review and create any needed guidance documents or policies to ensure programmatic compliance and assistance to borrowers.

2.3. Short Term Goals

1. Provide incentives that promote municipal affordability including the Lake Champlain Affordability Program which provides special rates and additional subsidy provisions

for TMDL projects that would otherwise result in high user rates. Create additional subsidy opportunities for communities meeting the program’s affordability criteria.

2. Support the Village Wastewater Initiative by providing additional subsidy provisions for small, unsewered communities throughout Vermont.
3. Provide funding opportunities to support Stormwater General Permit 3-9050, also known as the “3-Acre Stormwater Permit”.
4. Create funding mechanisms that support investment in natural resource projects such as WISPr, Natural Infrastructure Bridge Loans, or loan forgiveness for Agency priority water quality projects.
5. Provide low interest and additionally subsidized loans for planning activities to support project development that lead to construction projects.
6. Engage communities and other stakeholders in an evaluation of the Department’s Affordability Criteria and Priority Ranking Criteria, and maximize use of Technical Assistance Funds, to increase investment to disadvantaged communities.

3. State Pollution Control and ARPA Grant Eligibility

3.1. Pollution Control Grants

State Pollution Control (PC) grants may be available for certain projects in addition to CWSRF loans. PC Grants amounts are established through a set of public health, environmental, and affordability-based criteria that are used to determine state grant funding up to a maximum of 35% of eligible cost.

The funding source for these grants is appropriated at the discretion of the legislature and cannot be guaranteed by the program. If sufficient state capital funds cannot be secured to meet full grant eligibility, other funds may be provided to offset the shortfall in grant dollars, such as a CWSRF loan. The PC Grant budget for SFY24 is \$8M.

The Engineering Planning Advance Program will reserve up to 10% of the Pollution Control Grant allocation, which may be used for Engineering Planning Advances. For the first 10 months of the fiscal year, the Engineering Planning Advance allocation will be reserved for planning for Vermont’s unsewered villages. Additionally, up to 5% of the Pollution Control Grant allocation may be used for Regional Engineering Planning Advances also for the first ten months of the fiscal year.

3.2. State ARPA Combined Sewer Overflow (CSO) Elimination and Abatement Program Grant Eligibility

Combined Sewer Overflows (CSOs) are a public health risk and environmental concern. Eliminating discharges will improve the water quality of streams and lakes. Governor Scott worked with the Vermont General Assembly to appropriate an initial \$10 million to support implementation and staffing of these projects in State Fiscal Year 2022. The legislature appropriated an additional \$20M in SFY 23. There were no additional CSO ARPA appropriations in SFY 24. The grant allocations from the SFY 23 IUP remain unchanged.

3.3. State ARPA Village Wastewater and Drinking Water Grant Eligibility

Villages form the heart of Vermont’s rural communities, yet more than 200 villages lack community wastewater disposal systems, hampering revitalization. More than 100 Vermont villages do not have a public municipal water system. While many communities have explored municipal water and wastewater solutions in the past, most could not proceed with the projects because users could not afford the new rates needed to cover the cost of the project.

However, \$36.2 million in ARPA funding was appropriated to help municipalities develop new public drinking water systems and community wastewater disposal systems where this critical infrastructure is lacking. This grant funding is intended to help bridge the affordability gap, protect public health, increase affordable housing, support economic development, and incentivize compact growth in Vermont’s designated villages and neighborhoods.

These ARPA funds are used in a “co-funding” model with the State Revolving Loan Funds, USDA -Rural Development support, other grants and/or locally available funding. Co-funding means that ARPA funds are used to complement other funding sources to achieve affordability. The assistance is primarily in the form of grants for design, land purchase, and/or construction of active as-of-yet completed projects.

The original funding goal was to support up to 10 decentralized community wastewater solutions and/or public municipal water systems. Wastewater projects in designated villages centers and designated neighborhoods, as ranked by the Priority System of the relevant Clean Water Intended Use Plan (IUP) and which propose projects consistent with the funding bill appropriation language are eligible for funding per a March 28, 2023 SRF Guidance Document (Guidance Document #38). Drinking water projects are ranked by their DWSRF IUP points divided by the total possible DWSRF points and then listed with the wastewater projects.

Funds were awarded to Villages based on the previous CWIUP, and Village ARPA grants are pending. Village ARPA grants require certain deliverable milestones and eligibility requirements. If a town is not able to meet the grant milestone or deliverable, or if there are not enough eligible costs demonstrated by the town in their Village ARPA agreement Project Cost Summary, then differential award funds will be rescinded and reallocated to Towns according to this CWIUP in what is being called “trickle down” funds.

If trickle down funds become available, projects on the PPL in the fundable range will be contacted for a Project Cost Summary for a formal line by line eligibility determination of project elements. Projects are encouraged to seek co-funding from CWSRF, DWSRF, and other funders where applicable. Where a project’s eligible costs under this grant are less than the amount of funds reserved on the PPL, any excess funds shall pass to the next ranked community. See the Village ARPA PPL at the end of this section. Attention is called to Guidance Document #38.

A project being shown on the waiting list is not guaranteed any funds.

No Village ARPA grant will be for 100% of the capital cost of the project as suggested by the funding list. Notably, the users of each new utility will be anticipated to be paying a utility

bill with a rate that is in the affordable range of 1%-2% of Median Household Income for the Service Area. Village ARPA Grants are also limited to 90% of the capital costs, though for projects in service areas with an MHI below the statewide average MHI, the 10% cost share may be prorated by the percentage of local MHI to the statewide average MHI. No SFY 24 ARPA grant may exceed: \$3.5M and no VWW ARPA project shall receive more than \$4,009,331.45.

3.3.1. State ARPA Village Wastewater and Drinking Water Grant Allocation

Municipalities should note that trickle down Village ARPA grant values are subject to approval by the Vermont Agency of Administration pursuant to the Vermont’s State Fiscal Recovery Process and Guidance. The intent of the Water Investment Division is to confirm these award values with Agency of Administration.

Village Drinking Water and Wastewater ARPA Initiative					
Combined SFY 22 & SFY 23 ARPA Award List					
Town Name	Project Name	Points	Award		
Montgomery, Town of	Montgomery Center Community Wastewater Project	90	\$ 2,724,107.00		
Montgomery, Town of	Montgomery Village Community Wastewater Project	88			
Londonderry, Town of	South Londonderry Village Wastewater Project	84	\$ 4,009,331.45		
Westford, Town of	Community Wastewater Project	79	\$ 2,377,136.00		
Greensboro, Town of	Community Wastewater Project	78	\$ 3,968,331.45		
Londonderry, Town of	North Londonderry Village Wastewater Project	72	\$ 4,009,331.45		
Wolcott, Village of	Village Wastewater Project	72	\$ 2,565,000.00		
Grafton, Town of	Grafton Village Community Wastewater Project	68	\$ 3,968,331.45		
Burke, Town of	West Burke Village Wastewater Project	67	\$ 3,968,331.45		
Highgate, Town of	Highgate Center Community Wastewater Project	62	\$ 1,457,718.75		
South Hero, Town of	Community Wastewater Project	60	\$ 1,464,881.00		
Moretown, Town of	Village Wastewater Project	56	\$ 3,325,000.00		
Killington, Town of	Killington DW System (Contract 4)	53.8%	\$ 2,300,000.00		
SFY 24 ARPA Waiting Town List (Final Design and Construction)					
Town Name	Project Name	Points	SFY 24 Request	SFY 25 Request	SFY 26 Request
Huntington, Town of	Lower Village Wastewater Project	74	\$ 250,000	\$ 7,499,800	\$ -
Jamaica, Town of	Jamaica Village Wastewater Project	68	\$ 475,000	\$ 6,680,000	\$ -
Berlin, Town of	Riverton Village Wastewater Project	67	\$ 2,100,000	\$ -	\$ -
Saint Albans, Town of	Bay Area Community Wastewater Project	67	\$ -	\$ 1,500,000	\$ 13,000,000
Killington, Town of	Killington DW System	66.2%	\$ 4,000,000	\$ -	\$ -
Waitsfield, Town of	Village Wastewater Project	66	\$ 13,229,900	\$ -	\$ -
Shaftsbury, Town of	Village Wastewater System	51	\$ -	\$ 420,000	\$ 7,455,000
Jericho, Town of	Village Wastewater Project	45	\$ 250,000	\$ -	\$ -

4. CWSRF Administration

Municipal CWSRF construction loans are currently issued at a 0% interest rate with an administrative fee of 2%. Private entity CWSRF construction loans are currently issued at 0% interest rate with an administrative fee of 2.75%, except when specific initiatives have an alternative rate as outlined in this IUP. Additionally, Brownfield Economic Revitalization Alliance (BERA) construction projects will be issued at a 0% interest rate with an administrative fee of 2.25%.

Fee proceeds are deposited into a dedicated account separate from the CWSRF account, referred to as the administrative account. Historically, the program has described the fees as

program income, but has tracked this fee income as either program or non-program income. The SRF program has detailed funds separately, to allow non-program income to be used for a broader array of CWA eligible activities than is allowed with program income. All fee income is accounted for in a separate fund outside the SRF fund.

These funds are primarily used for administrative support of the CWSRF program including staff salaries for financial, project development and engineering staff. Additionally, they have been used to fund costs associated with underwriting of loans and software support. The program reserves the right to use these funds for any eligible use of the fees as fund needs develop over the year.

4.1. Reallocated Funds between CWSRF and DWSRF

The Safe Drinking Water Act Amendments of 1996 (Section 302) allow a state to transfer up to 33% of the Drinking Water State Revolving Fund (DWSRF) capitalization grant from the DWSRF to the CWSRF or an equivalent amount from the CWSRF to the DWSRF for each open grant. This transfer is at the Governor's discretion. The program reserves the right to reserve this amount for future need.

In the event funds are reallocated from the DWSRF to the CWSRF, or vice versa, or additional federal funds are made available beyond the anticipated amount, Vermont will advance these funds to the appropriate projects in accordance with this Intended Use Plan, and the Municipal Pollution Control Priority System.

5. CWSRF Capitalization Grants FFY 2023

Vermont will receive three Federal fiscal year 2023 capitalization grants as a result of the Bipartisan Infrastructure Law (BIL).

- The CWSRF General grant is anticipated to be \$3,683,000 after allocating \$37,000 for the federal 604b program (the 604b program directs 1% of CWSRF allocations to support water quality planning in the form of “604b Water Quality Management Planning Grants”).
- The CWSRF General Supplemental grant is \$10,233,000 after allocating \$103,000 for 604b.
- The CWSRF Emerging Contaminants Supplemental grant is \$1,043,000 after allocating \$11,000 for 604b.

The required match for the FFY23 grants is as follows:

- \$736,600 for the CWSRF General (20% of grant)
- \$1,023,300 for the CWSRF General Supplemental (10% of grant)
- \$0 for the CWSRF Emerging Contaminants (no match requirement)

The full match will be available beginning July 2023. The match to the base grant is comprised of \$412,019 from previously appropriated capital funds with the balance needed from the SFY24 appropriation in H.493 signed by the Governor on June 14, 2023. The full match to

the supplemental grant is available as of July 2023 and consists of state general fund dollars appropriated in H.494, referred to as the Big Bill.

The Sources and Uses tables below assume the total needed match will be available. Sources of funds and uses are listed below.

Sources	General	General Supplemental	Emerging Contaminants
CWSRF Capitalization Grant (after 604b)	\$3,683,000	\$10,233,000	\$1,043,000
State Match Needed FFY23 Grant	\$736,600	\$1,023,300	\$0
Repayments (anticipated 7/1/23-6/30/24)	\$8,785,100	\$0	\$0
Interest (anticipated 7/1/23-6/30/24)	\$1,900,000	\$0	\$0
Carry-Forward (anticipated)	\$65,981,590	\$3,605,000	\$431,460
TOTAL	\$81,086,290	\$14,861,300	\$1,474,460

Repayments and interest values for all three grants are accounted for in the General Grant.

Uses	General	General Supplemental	Emerging Contaminants
Anticipated Commitments	\$80,821,114	\$14,185,923	\$1,411,880
Administrative (Max 4%)	\$176,784	\$450,252	\$41,720
Technical Assistance (Max 2%)	\$88,392	\$225,126	\$20,860
TOTAL	\$81,086,290	\$14,861,300	\$1,474,460

The State matching funds will be deposited into the CWSRF prior to the quarter when federal funds are requested. Within one year after the receipt of each quarterly grant payment, the

CWSRF Program will make binding commitments in an amount equal to the 120 percent of the General Grant, 110 percent of the General Supplemental Grant, and 100 percent of the Emerging Contaminant Grant quarterly payments. All funds shall be expended in a timely and expeditious manner.

The schedule for entering into binding commitments and timing of cash draws is contained in the grant application submitted to EPA. The CWSRF program will continue to comply with the Operating Agreement for Implementing and Managing the State Revolving Fund Program between the State of Vermont and U.S. Environmental Protection Agency, Region I.

5.1. EPA Federal Fiscal Year Payment Schedule

SRF General

Payment No.	Quarter	Date	Federal Amount	State Amount
1	2024-1	10/1/2023-12/31/2023	\$920,750	\$184,150
2	2024-2	1/1/2024-3/31/2024	\$920,750	\$184,150
3	2024-3	4/1/2024-6/30/2024	\$920,750	\$184,150
4	2024-4	7/1/2024-9/30/2024	\$920,750	\$184,150
Total			\$3,683,000	\$736,600

SRF General Supplemental

Payment No.	Quarter	Date	Federal Amount	State Amount
1	2024-1	10/1/2023-12/31/2023	\$2,558,250	\$255,825
2	2024-2	1/1/2024-3/31/2024	\$2,558,250	\$255,825
3	2024-3	4/1/2024-6/30/2024	\$2,558,250	\$255,825
4	2024-4	7/1/2024-9/30/2024	\$2,558,250	\$255,825
Total			\$10,233,000	\$1,023,300

SRF Emerging Contaminants

Payment No.	Quarter	Date	Federal Amount	State Amount
1	2024-1	10/1/2023-12/31/2023	\$260,750	\$0
2	2024-2	1/1/2024-3/31/2024	\$260,750	\$0
3	2024-3	4/1/2024-6/30/2024	\$260,750	\$0
4	2024-4	7/1/2024-9/30/2024	\$260,750	\$0
Total			\$1,043,000	\$0

5.2. EPA Estimated Disbursement Schedule

Disbursement Quarter/\$	CWSRF General	CWSRF Gen. Supplemental	CWSRF Emerg. Contam.
1QFFY24	\$920,750	\$2,558,250	\$260,750
2QFFY2024	\$920,750	\$2,558,250	\$260,750
3QFFY2024	\$920,750	\$2,558,250	\$260,750
4QFFY2024	\$920,750	\$2,558,250	\$260,750
1QFFY2025			
2QFFY2025			
3QFFY2025			
4QFFY2025			
Total	\$3,683,000	\$10,233,000	\$1,043,000

6. Project Funding and Use of Technical Assistance Funds

**Projects Anticipated to Receive FFY 202 CWSRF available Funds
(Award of FFY 2023 Funds are anticipated to be made during SFY 2024)**

6.1. CWSRF General

Project /Activity	Total Project Cost	SRF State Match	Federal Share FFY 2023 Funds
See SFY 2024 Priority List Attached	\$4,154,424	\$692,404	\$3,462,020
Vermont Administrative Expense	\$176,784	\$29,464	\$147,320
Technical Assistance	\$88,392	\$14,732	\$73,660
<i>Total</i>	<i>\$4,419,600</i>	<i>\$736,600</i>	<i>\$3,683,000</i>

6.2.CWSRF General Supplemental

Project /Activity	Total Project Cost	SRF State Match	Federal Share FFY 2023 Funds
See SFY 2024 Priority List Attached	\$10,580,992	\$961,902	\$9,619,020
Vermont Administrative Expense	\$450,252	\$40,932	\$409,320
Technical Assistance	\$225,126	\$20,466	\$204,660
<i>Total</i>	<i>\$11,256,300</i>	<i>\$1,023,300</i>	<i>\$10,233,000</i>

6.3. CWSRF Emerging Contaminants

Project /Activity	Total Project Cost	SRF State Match	Federal Share FFY 2023 Funds
See SFY 2024 Priority List Attached	\$980,420	-	\$980,420
Vermont Administrative Expense	\$41,720	-	\$41,720
Technical Assistance	\$20,860	-	\$20,860
<i>Total</i>	<i>\$1,043,000</i>	<i>\$-</i>	<i>\$1,043,000</i>

Detailed project information is included in the attached Municipal Pollution Control Projects Priority Lists for state fiscal year 2024. The state anticipates disbursement of its state match prior to federal disbursements. For this reason, Vermont will not be required to disburse with a cash draw ratio.

6.4. Use of Technical Assistance Funds (2%)

The Department intends to use the 2% technical assistance funds to contract with entities with the relevant expertise to identify and conduct proactive outreach to, and facilitate applications from, disadvantaged communities previously unable to begin or complete SRF funding requirements.

6.5. Future Program Impact

The proposed method and financial terms for distributing project funds presented in this IUP should have a positive impact on the long-term financial status of the CWSRF while accounting for loan subsidy. Principal payments on loans plus the interest earnings on the fund balance are deposited into the CWSRF and made available for future clean water projects. Lending procedures used by the Vermont Bond Bank (VBB) for municipal loans and the Vermont Economic Development Authority (VEDA) for loans to private entities include safeguards structured to minimize unforeseen losses to the fund. Additionally, the placement of the CWSRF within the financial structure of the VBB guarantees that the Program will benefit in the long-term from the management and financial planning expertise of this organization.

7. Criteria and Method for Distribution of Funds

The Vermont General Assembly enacted Act 75 creating 24 V.S.A. Chapter 120 in the 1987 legislative session, which established Vermont's CWSRF and set out certain priority criteria for the purpose of ranking prospective projects. The Municipal Pollution Control Priority System rule incorporates those criteria in addition to criteria required in federal construction grant regulations 40 CFR Section 35.915.

The Vermont CWSRF initiated operations in fiscal year 1989 and all initial financial assistance activities of the CWSRF have been in the form of loans. Loans will continue to be made in accordance with a project's priority list ranking as noted on the Priority List that is established annually through the Municipal Pollution Control Priority System.

The Pollution Control Project Planning List is intended to show anticipated construction and planning projects for the immediate five-year period, inclusive of state fiscal year 2024. Although we anticipate a large volume of projects and requests for funds in state fiscal years 2024 to 2028, the fund will likely support the need.

Although the CWSRF may be used for the refinancing of local debt obligations incurred after March 7, 1985, Vermont has not used the fund in this way, and may provide such funding if the balance remains underutilized and there is compelling justification of a public benefit to be secured.

Environmental benefits will be reported at least quarterly for every loan transaction using the EPA Office of Water SRF reporting system (OWSRF). This information is now being automatically reported via a data push from an internal database to the OWSRF reporting website. The OWSRF replaced the Clean Water Benefits Reporting (CBR) federal on-line reporting system in 2022. Reporting to FFATA and NIMS will also be completed.

Equivalency will be applied to qualifying wastewater treatment works projects. Except for specifically designated projects, all projects receiving federal funds will be required to comply with the requirements of the federal Single Audit Act, Fiscal Sustainability Plans (FSP), and Qualifications Based Selection (QBS). Except for specifically designated non-treatment works projects, all projects must comply with a National Environmental Protection Act-like review, Telecommunications Prohibition, DBE reporting, Davis-Bacon, American Iron and Steel, Build America Buy America, and other required federal crosscutters, as applicable.

Vermont's CWSRF continues to maintain its, [Repayment Start Date](#), [Emergency Bypass Policy](#), and [Green SW Definition Policy](#).

8. Additional Subsidy

The term "subsidy" refers to forgiveness of loan principal. All subsidy is offered only for municipal or municipally-sponsored projects and is offered on a first come, first-served basis. Eligibility requirements are discussed in "[Requirements to Secure Additional Subsidy](#)", below.

The following sections describe the amount of available subsidy and a description of the eligible categories.

8.1. Prior Year Subsidy

This IUP amends the 2022 IUP to make available the following unused subsidy amounts. This subsidy is made available under the terms of the 2023 IUP as described in Section 8.3. This IUP also amends the 2022 IUP to increase the amount of planning subsidy available under the 2022 General Supplemental Grant by \$250,000.

Emerging Contaminants Grant: \$431,460, no restrictions.

General Grant: \$568,100 in Affordability Criteria Subsidy.

General Supplemental Grant: \$178,742 in Affordability Criteria Subsidy.

8.2. 2023 Subsidy Amounts

Subsidy amounts are stipulated per federal law and the Capitalization Grant agreements with EPA. The specific amounts of proposed subsidy are described below.

8.2.1. General Grant

General Grant: an amount equal to 10% of the grant must be provided as subsidy to eligible recipients. Additionally, the State must use at least 10% but no more than 30% of the grant to provide additional subsidy to recipients that meet the state’s affordability criteria or project types as described in section 603(i) of the CWA. The program intends to utilize up to the maximum allowed additional subsidy (i.e., 40%) in this current IUP.

8.2.2. General Supplemental Grant

Per the Bipartisan Infrastructure Law, an amount equal to 49% of the grant shall be provided as subsidy to recipients that meet the state’s affordability criteria or project types as described in section 603(i) of the CWA.

8.2.3. Emerging Contaminants Grant

Per the Bipartisan Infrastructure Law, an amount equal to 100% of the grant, net administrative and technical assistance deductions, shall be provided as subsidy, with no additional eligibility restrictions.

8.2.4. Summary Table: Available Subsidy by FFY 2023 Grant

2023 Grant	Additional Subsidy Proposed	Eligibility Requirements Per EPA Grant Agreement
General	\$368,300	No Restrictions
	\$1,104,900	AC/603(i)*
General Supplemental	\$5,014,170	AC/603(i)
Emerging Contaminants	\$980,420	No Restrictions

*AC/603(i) = Recipients must meet the State’s Affordability Criteria or projects must qualify under Section 603(i) of the Federal Clean Water Act.

8.3 Subsidy Categories

This IUP proposes to use subsidy to provide principal loan forgiveness for the following categories of activities. Available subsidy includes unused subsidy from the 2022 IUP.

1. Planning: \$2,536,400.
2. Lake Champlain TMDL Affordability Program: \$500,000.
3. Construction: \$4,197,812
4. Emerging Contaminant Grant eligible activities up to \$1,411,880

8.3.1. Summary Table: Available Subsidy by Initiative Category (FFY 2023 Grant and 2022 Carry Forward Combined).

Grant	Initiative	Amount	Subsidy Type
General and General Supplemental			
	Planning	\$2,536,400	\$368,300 No restrictions; \$2,168,100 AC/603(i)*
	Lake Champlain TMDL Affordability	\$500,000	AC/603(i)
	Construction	\$4,197,812	AC/603(i)
Emerging Contaminants			
	All eligible activities	\$1,411,880	No restrictions

*AC/603(i) = Recipients must meet the State’s Affordability Criteria or projects must qualify under Section 603(i) of the Federal Clean Water Act.

8.3.2. Planning Subsidy

Supports Short Term Goal #6: Financing of Planning Activities

This avenue to receive principal loan forgiveness for planning includes feasibility studies, asset management planning, preliminary engineering reports, and final design. Vermont CWSRF has determined this application of additional subsidy is eligible under the Federal Water Pollution Control Act (FWPCA), section 603(i) which states: *In any case in which a State provides assistance to a municipality or intermunicipal, interstate, or State agency under subsection (d), the State may provide additional subsidization, including forgiveness of principal and negative interest loans— (B) to implement a process, material, technique, or technology— (iv) to encourage sustainable project planning, design, and construction.*

There are three Planning Subsidy Categories, described below. Projects may not receive planning loan forgiveness under both Category 1 and Category 2. The CWSRF program will determine which category of loan forgiveness is most financially advantageous for borrowers.

8.3.2.1. Planning Subsidy Category 1

Eligible planning projects may receive loan forgiveness as follows:

- 50% forgiveness of planning costs, up to \$100,000 per project, per IUP year.
- Maximum subsidy of \$250,000 per borrower, per IUP year, which may consist of multiple eligible projects.

8.3.2.2. Planning Subsidy Category 2

Eligible planning projects as described below may receive loan forgiveness as follows:

- 100% forgiveness of planning costs, up to \$125,000 per borrower, per project, inclusive of subsidy received under this Category in prior IUP years.
- Loan forgiveness under Planning Subsidy Category 2 does not count towards the \$250,000 cap in Planning Subsidy Category 1.

Eligible Planning Category 2 projects are limited to:

- Combined sewer overflow (CSO) Long-Term Control Plans (LTCPs) and resulting project designs and additional planning if required.
- Hydrologic & Hydraulic (H&H) Modeling necessary for LTCPs as defined in the CSO Rule (Chapter 34 of the EPRs) or for projects to reduce wet weather storm sewer overflows (SSOs).
- Planning for facilities significantly damaged by flooding in 2023, for activities related to relocation, or reconstruction on-site with augmented flood resilience.
- Municipally sponsored 3-Acre Stormwater private-entity design and permit obtainment.
- Village Wastewater Initiative Planning/Design.
- Planning and design of septage receiving facilities for new, existing, or consolidating facilities.
- Cybersecurity Assessments for WWTFs.
- Automatic sampler purchase for WWTFs required to add automatic sampling and that do not already have automatic sampling equipment.

8.3.2.3. Planning Subsidy Category 3: Emerging Contaminants

Eligible planning projects whose primary purpose is to address emerging contaminants may receive loan forgiveness as follows:

- 100% forgiveness of planning costs, up to \$150,000 per project.

Projects receiving funding under Planning Subsidy Category 3 may apply for subsidy under Planning Category 1 for costs not covered under Category 3, where eligible. The

forgiveness caps under the respective categories are only applicable to forgiveness secured under a given category.

8.3.3. Lake Champlain TMDL Affordability Subsidy Program

Supports Short Term Goal #1: Municipal affordability support

This subsidy program is intended to address the affordability of projects that are required to meet multiple effluent limits under the Lake Champlain TMDL. To be eligible for the terms outlined in this section, a project must:

- Be a municipal facility with an implementation schedule to meet multiple effluent limits set forth in their first NPDES permit under the 2016 Lake Champlain TMDL.
- Result in post-project annual user rates for wastewater services exceeding 4% of median household income.
- Have applied for construction funding under the FFY 2021 IUP. This forgiveness can include all eligible planning costs.

Systems that fit this description will be eligible for:

- Additional subsidy of 100% forgiveness, up to \$500,000 per year in future IUP years. Qualifying projects will be treated as continuing to ensure access to available additional subsidy.
- Loans can be amended until project completion, up to four consecutive years, with a maximum loan forgiveness of \$2,000,000 per borrower per project.
- This additional subsidy can be additive to other additional subsidy opportunities.
- If any combination of loan forgiveness and pollution control grant result in post-project annual user rate of less than 2%, this affordability eligibility will be ceased.
- The administrative fee rate will be 0% for projects meeting this definition.

8.3.4. Construction Subsidy

Loan forgiveness for eligible construction activities supports multiple long-term and short-term goals. There are two construction subsidy categories: Category 1: subsidy for communities meeting affordability criteria; Category 2: subsidy for projects eligible for Emerging Contaminants Grant funding. Projects may receive up to the maximum amount of loan forgiveness under each category.

8.3.4.1. Construction Subsidy Category 1: Affordability Criteria Subsidy

Eligible construction projects meeting Affordability Criteria (Section 9) may receive loan forgiveness as follows:

- 50% loan forgiveness, up to \$750,000 per project.

8.3.4.2. Construction Subsidy Category 2: Emerging Contaminants Subsidy

Construction projects eligible for Emerging Contaminants Grant funding may receive loan forgiveness as follows:

- 100% loan forgiveness, up to \$500,000 per project.

8.4. Requirements to Secure Additional Subsidy,

The Department establishes the amount of available additional subsidy on an annual basis in the Intended Use Plan, consistent with the requirements of the State's capitalization grants.

To secure additional subsidy, the following applies: All additional subsidy is awarded to recipients and project types that are eligible for subsidy on a first-come, first-served basis.

- Only municipal applicants qualify for additional subsidy under this IUP.
- Applicants may qualify for multiple types of additional subsidy under this plan, subject to the limitations noted above.
- Additional subsidy is considered reserved for a project upon receipt of the following:
 - Complete funding application
 - Qualifications Based Selection certification, if applicable
 - Draft Engineering Services Agreement
 - Relevant readiness to proceed criteria prior to securing additional subsidy for a final design loan and bond documentation and final design approval prior to securing additional subsidy for construction.

For clarification purposes, the program will notify borrowers when they have secured additional subsidy. The table below lists what is needed for each step to lock in additional subsidy, unless it is inapplicable to the project.

Step 1 (Preliminary engineering, feasibility)

- Complete funding application
- Qualifications Based Selection certification, if applicable
- Draft Engineering Services Agreement

Step 2 (Final design engineering)

- Complete funding application
- Qualifications Based Selection certification, if applicable
- Draft Engineering Services Agreement
- Preliminary Engineering Report Concurrence or Facility Plan Approval from WID engineer

Step 3 (Construction)

- Complete funding application
- Qualifications Based Selection certification, if applicable
- Draft Engineering Services Agreement
- Bond Vote Certification and Counsel Opinion letter
- All permits in place, including Act 250, if required
- All necessary prior step WID Engineering approvals, including preliminary

engineering, facility plan, and final design approval.

9. Affordability Criteria

9.1. Affordability Criteria

This IUP identifies the Affordability Criteria applicable to projects funded off this FFY 23 Intended Use Plan. The Department will engage in an ongoing process to evaluate and revise, as necessary, these affordability criteria to ensure disadvantaged communities are equitably served by SRF fund investments.

The Department is required to establish affordability criteria that help in identifying municipalities that would experience a significant hardship in raising the necessary project revenues. These Affordability Criteria have been adopted in conformance with section 603(i)(2) of the Federal Clean Water Act, which requires the criteria be based on income and unemployment data, population trends, and other data determined relevant by the State, including whether the project or activity is to be carried out in an economically distressed area as described in Section 301 of the Public Works and Economic Development Act of 1965.

In addition to the foregoing criteria, all non-profit or cooperatively-owned manufactured home communities (MHCs) will automatically be considered to meet the state’s affordability criteria, as first established in the 2021 Intended Use Plan.

There are five key criteria applied to determine project affordability: median household income (MHI), user costs, unemployment rates, population trends or other demonstrated financial hardships. To be considered a municipality that would experience a significant hardship in raising the necessary project revenues (hereafter referred to as “hardship communities”), an applicant must qualify under at least two of the key criteria.

- **MHI:** The project is located in a municipality with a MHI at or less than the statewide average MHI.
- **User costs:** The project that will result in an annual household user cost for sewer and stormwater that exceeds two percent of the MHI.
- **Unemployment:** The project is located in a municipality with an unemployment rate that is unknown, or at or higher than the statewide median unemployment rate.
- **Population trends:** The project is located in a municipality with a 10-year population trend that shows a population loss of greater than one percent.
- **Other demonstrated hardship:** This criterion recognizes there may be unforeseen hardships that do not meet the requirements of the other key criteria. The applicant would have the responsibility of demonstration to the program, in writing, is a financial hardship. The program would have the discretion of accepting this request.

Income measurements are determined using Median Household Income. This information will be obtained from the American Community Survey’s most recent 5-year rolling average

MHI using the most current data available on the date the corresponding IUP year was finalized, or based on an approved income survey or other method as approved by the Secretary. The procedures for conducting and approving income surveys and the requisite record keeping will be in accordance with the Vermont State Revolving Fund's established Guidance Document #11: Median Household Income Determination or as determined by an equivalent method including HUD's survey method. Annual user cost will be calculated by the annual system debt service, operations and maintenance costs, and short-lived asset set asides, divided by the total Equivalent Residential Units (ERU).

Unemployment data will be based on the most recent statewide unemployment figures as provided by the Vermont Department of Labor and will be compared to the municipality's current unemployment figure.

Population decline will be determined by analyzing the most recent two US Census population numbers.

10. Non-Point Source Funding

Vermont's CWSRF provides funding for eligible non-point sources. Non-point source projects may be funded through loans using standard rates and terms. Generally speaking, non-point source-funded projects are intended to remediate or to promote the remediation of a documented impact to designated uses of Vermont's surface waters, following an approach of documented effectiveness. For projects to be eligible for support under this eligibility, they must be shown to implement the Vermont Nonpoint Source Management Program Plan. Certain nonpoint source project types are described in the CWSRF Eligibilities Handbook referenced below in this section of the IUP, though that document does not provide an exhaustive listing. Many lake or watershed restoration project types may be eligible for support under this category presuming they are documented to be effective in addressing the water quality concern and have a project life equal to or greater than the loan value.

Applicants specifically interested in aquatic invasive species (AIS) control should be aware that CWSRF limits the eligibility of AIS projects only to capital expenses associated with the project. As noted by the Nonpoint Source Management Program Plan, nonpoint source projects proposed for CWSRF support must be identified either by a tactical basin plan or in Vermont's Watershed Projects Database. Loan applicants interested in pursuing non-point source projects should consult with a one of DEC's Watershed Planners as noted below, to evaluate the specific eligibility of the project under consideration, and ensure the project is documented in the Watershed Projects Database.

The two evolving mechanisms to increase this type of utilization of the fund are through the Water Infrastructure Sponsorship Program (WISPr) and the Interim Financing for Natural Resources Projects Program.

10.1. Natural Resources Categorical Eligibility

Eligible CWSRF natural resources projects are defined as a project to protect, conserve, or restore natural resources, including the acquisition of easements and land for the purposes of providing water quality benefits (24 VSA Chapter 120 §4752). Eligible project categories include the following hydromodification, habitat, and thermal restoration project types which are categorically considered eligible for CWSRF funding:

- Wetland restoration projects
- Floodplain/stream restoration
- Thermal restoration
- River corridor easements
- Woody buffer plantings
- Dam removal, where there's a water quality benefit
- Lake shoreland retrofit using LakeWise principles
- Water resource protection through land acquisition or easements for the purposes of providing water quality benefits
- Gully stabilization where there is a downstream water quality benefit
- Forestland conservation

DEC's Watershed Planners will confirm that proposed natural resources projects are eligible and provide a demonstrated water quality benefit. As projects are proposed to be funded through CWSRF, the Watershed Planners will coordinate within DEC's applicable natural resources programs to ensure the projects not only meet these definitions but do not present an unintended environmental impact. Once the Planners have completed their eligibility determination, they will work with SRF Project Developers to assist with the funding process.

Section 603(c) of the Clean Water Act (CWA) states that the CWSRF can provide assistance to these project types under the Habitat Protection and Restoration and Surface Water Protection and Restoration eligibility as described in the [EPA's 2016 Overview of CWSRF Eligibilities document](#). As it pertains to sponsorship (described below), this is further described in [EPA's Sponsorship Lending and the CWSRF](#). These projects are not considered treatment works projects and, therefore, are not required to comply with the NEPA-like under State Environmental Review Policy (SERP). However, these projects may undergo environmental review as part of the permitting review process, as applicable, by this and other funding sources and are proposed to undergo environmental review under the proposed SERP.

Vermont CWSRF reserves the right to require additional review on a case-by-case basis. Additional environmental review determinations will be made by the Watershed Planners.

Many other federal crosscutters are not required for these projects including American Iron and Steel (AIS), Davis Bacon, and Fiscal Sustainability Plans (FSP) as they are not treatment works projects. Additionally, the program intends to use repayment funds (Tier II) to fund all natural resources projects. Due to the use of repayment funds, Qualifications Based Selection (QBS), Signage, and Single Audit Act do not apply. Other traditional CWSRF

programmatic requirements such as standard contract documents and CWSRF construction oversight do not apply to these projects and will not be overseen by CWSRF construction engineers. The relevant DEC regulatory or natural resource program section (dam safety, rivers, wetlands, stormwater, etc.) will oversee these projects and will develop deliverable requirements. Grant conditions required by the capitalization grant will be incorporated into the loan agreement language.

Inclusion of treatment works elements in a Natural Resource Project will trigger federal crosscutter requirements. Treatment works elements may be included in the same project provided that they are co-funded by CWSRF loans or other sources and meet all federal crosscutters. Inclusion of treatment works elements shall not disqualify the eligibility of the Natural Resource Project elements under WISPr.

10.2. Water Infrastructure Sponsorship Program (WISPr)

Supports Short Term Goal #5: Support of Natural Resource Infrastructure

WISPr was established in 2018 upon the passage of Act 185 which established a mechanism for a municipality to “sponsor” a natural resources project, the cost of which is then forgiven.

WISPr has operated on a limited basis due to limited staffing. However, the Department has recently hired a new staff person to work on WISPr projects and expects to increase WISPr-related loan activity.

To ease accessing WISPr funds, the program will use Tier 2, or repayment funds, to support WISPr projects. These projects will not be reported in FFATA for equivalency purposes. As such, QBS procurement process will not be required.

WISPr funding will be capped at \$2,000,000 under this IUP.

10.2.1. How to Qualify for WISPr Funding

In order to receive WISPr funding, the following must be completed:

- A signed letter of commitment and resolution by the governing body
- Passed bond vote for the sponsoring project, if applicable
- Submitted [WISPr Funding Application](#).

10.3 Interim Financing for Natural Resources Projects

Supports Short Term Goal #5: Support of Natural Resource Infrastructure

Upon the passage of Act 185 in 2018, Vermont’s CWSRF program can fund all federally eligible clean water projects and lend to all federally eligible entities, as outlined in EPA’s [Overview of Clean Water State Revolving Fund Eligibilities](#) paper. The CWSRF continues to utilize this expanded eligibility to promote investment in natural resource projects.

To aid in this investment, this IUP is proposing the continuation of an interim financing program. The interim financing is shown on the priority list as a “put aside” to ensure funds are available as needed, though any private entity project that applies to this program would only be funded after all municipal projects that meet readiness criteria are funded. To ensure

funding is flexible and available for the interim financing projects, the put aside does not require discrete projects be ranked on the priority list, but rather categorically ranked within this put aside. The following is proposed:

- \$2M “put-aside” on the priority list for interim financing of all eligible natural resource restoration, agricultural water quality, and forestry conservation projects. This financing is at 0% interest for municipal applicants and 0.6% for all other applicants, for a term not to exceed 5 years.
- In accordance with the SRF Repayment Start Date policy, the initial loan repayment would begin one year after execution of the loan agreement.
- The repayment schedule would be depressed for a lower principal and interest payment for the first four years, with a larger and final balloon payment in the fifth year.
- These loans would be subject to other statutory restrictions for private entity borrowing, including the restriction of utilization of no more than 20% of the available funds unless there is not sufficient municipal need and the requirement to offer funding to all eligible municipal projects prior to making this funding available.
- This funding is available on a first-come, first-served basis.
- To secure this funding, applicants must be able to pass underwriting criteria of either VEDA or VBB.

10.4. Farmland Futures Fund

Supports Short Term Goal #5: Support of Natural Resource Infrastructure

This IUP proposes utilization of the interim financing put-aside to provide assistance to Vermont Land Trust (VLT) for the Farmland Futures Fund (FFF). The FFF will function as a low-cost revolving fund “pass through” of \$10M, to be used over ten years commencing with the FFY 2020 IUP. The goals of the FFF include:

- Facilitate 200 farm transfers between 2020 and 2030.
- Purchase farm properties to facilitate transfers to help strengthen and diversify Vermont’s agricultural economy, support the generational transfer of land, and ensure continued farmer ownership and agricultural use of conserved farms.
- Implement water quality improvements and ecological restoration on the farm properties purchased by VLT and ensure appropriate easement protections.
- Support rural communities that rely on agriculture as part of their economic and cultural landscape.

VLT proposes to deploy several strategies to improve water quality by reducing phosphorous, nutrient, or sediment loss on agricultural land. This approach will involve protecting whole properties with conservation easements, including special water quality restrictions as applicable; updating existing conservation easements with similar special water quality

restrictions; and facilitating land management and restoration activities that complement and enhance these legal protections.

Over the past ten years, VLT farmland access projects have protected 65 miles of streams and rivers and two miles of pond and lake frontage, including 20 miles with special easement protections. Those projects have also protected 475 acres of wetlands, 105 acres of which have special easement protection. The FFF anticipates doubling these outcomes over the next ten years.

This put-aside will follow the same underwriting requirements as Interim Financing. This IUP will reserve up to \$2M to be used in this IUP year and at the end of the IUP year, the amount used will be closed out into one loan and repayment will begin for that year. In following IUP years, this put aside will offer the net remaining from the initial \$10M and the amount spent in that year will be closed out and made a separate loan. Loans made to date are as follows:

- 2020 IUP Year: \$3,000,000
- 2021 IUP Year: \$2,000,000
- 2022 IUP Year: \$2,000,000

This project will be treated as a continuing project for up to 10 years or until the full \$10M is disbursed. Annually, the program will coordinate anticipated need with VLT to reserve for this initiative.

These funds will be made available at a rate of 0.6% and payment will begin one year after execution of the loan.

11. Program Updates and Guidance

11.1. Annual Cap on Loans

This year's priority list does not place an annual cap on loan amount, with the exception of the subsidy limitations for projects eligible for Emerging Contaminants funds. Because these funds are necessarily 100% forgiven the subsidy limitations limit the amount of funding a project may receive under the Emerging Contaminant grant. Projects may receive funding under both the Emerging Contaminant grant and either the General or General Supplemental grants, without a cap on overall loan amount.

11.1.1. Planning Loans Evaluation and Funding Cap

For this IUP funding cycle, "Planning Loans" (Step 1 and/or 2) for General projects (those other than Emerging Contaminants) will be funded using the \$5,000,000 put-aside shown in the Priority List. DEC is accepting applications for Planning Loans on a rolling basis while funding is available. If funding is available following the bypass of projects on the Priority List, DEC may increase funding for Planning Loans beyond \$5,000,000.

11.2. Priority List Bypass Procedure

In order to further prioritize the management of the priority list, the program implements [Readiness to Proceed Criteria](#) that require submission of an administratively complete preliminary engineering report (PER) in order to be ranked for construction loan and PC grant funding. Projects that are in the planning stages may submit priority list applications but will be shown as future projects for planning purposes. Additionally, projects must meet these readiness-to-proceed deadlines:

- November 1, 2023: Submit complete Step II/ Final Design Loan Application;
- January 31, 2024: Schedule a bond vote and submit a copy of the warning to WID;
- May 1, 2024: Receive voter authorization via the bond vote and submit a project schedule that demonstrates the project will be ready to go to bid by June 30, 2024; and,
- June 30, 2024: Submit complete Step III/Construction loan application (all required items have been completed and submitted).

For projects that qualify under the Village Wastewater Initiative, completion of a feasibility study together with issuance of a DEC preliminary approval from the Indirect Discharge Program constitutes an administratively complete Preliminary Engineering Report (PER) for purposes of inclusion in the project priority list.

Any projects that confirm to the CWSRF program that they have secured funding through another source will receive notification of bypass.

Projects not meeting this and other readiness to proceed dates will be bypassed in favor of lower ranking projects. For purposes of bypass, a project will be defined by a single priority list application. If there are multiple subprojects or sub-components within a priority list application, a PER submittal will be required for all subprojects and all subprojects must meet readiness to proceed guidelines or the entire project will be subject to bypass.

11.3. Guidance on Planning Versus Construction Activities

Activities that are regarded as construction are subject to additional construction procurement provisions that do not apply to planning activities.

Planning activities are those activities that take place during the feasibility, preliminary engineering, and design phases of a project and where there is no significant alteration of existing ambient conditions. In general, if an activity involves excavation or moving soil or rock, it is not a planning activity¹. If a final design approval letter is issued for a project, the planning activities associated with the project must take place prior to issuance of the letter.

¹ This excludes ACCD required archeological test pits, DEC required soil test pits, soil auguring, borings, and other geotechnical investigative work required for Section 106 review, feasibility level site review, and design of wastewater disposal systems and stormwater infiltration practices.

Examples of planning activities:

- Feasibility studies;
- Preliminary engineering reports and engineering studies;
- Development of compliance assistance tools
- Installation of equipment including sensors, meters, gauges, hardware and software used to store and interpret data;
- Sampling, lab work, and data analysis;
- Flow and Level monitoring of CSO discharges including the capability to transfer data electronically in real time for the equipment being installed.

This is not an exhaustive list and other activities will be reviewed by WID on a case-by-case basis.

11.4. ANR Online Funding Application

Loan applications and associated documentation must be submitted through ANR Online (<https://anronline.vermont.gov/>). A loan application will be considered complete when the form and all required documentation are uploaded to ANR Online and the applicant clicks the Submit button. The documentation required for loan applications varies by project step. Applicants with questions about required documentation are encouraged to reach out to CWSRF Project Developer with questions.

Applicants should begin the review process for their draft Engineering Services Agreement (ESA) prior to obtaining other documentation required to submit a complete loan application. Applicants may work directly with the relevant DEC engineering staff to secure review of their ESA; however, no formal loan action will be taken prior to submittal of a complete loan application.

It should be noted that submittal of a completed application is not sufficient to lock in additional subsidy as the project needs relevant approvals as detailed in the additional subsidy portion of this IUP.

11.5. State Environmental Review Procedure Update

Vermont is in the process of revising the State Environmental Review Process (SERP) to evaluate the identifiable environmental effects of a project, funded through the CW and DW state revolving loan funds. This will continue to ensure the necessary mitigation measures are implemented, with public participation and comment period, prior to project implementation actions. This process is applied both to Municipal and Private loan (MPL) recipient projects, whether through the Clean Water or Drinking Water SRFs. The purpose of the SERP is to parallel the intentions of the National Environmental Policy Act (NEPA), as enacted in 1969 with subsequent amendments. The revised SERP is currently in internal review and will go out for 30-day public comment. The revised SERP is subject to US EPA approval. The Vermont SERP procedure applies to all CWSRF and DWSRF funded projects, to ensure that state and federal environmental laws and impacts are considered.

12. Green Project Reserve

The Vermont requirement for Green Project Reserve (GPR) for FFY 2023 is 10% of the General, General Supplemental, and Emerging Contaminants grants. Potential GPR projects are identified on the attached priority list. Many of these projects are early in the development phase. Engineering and project development staff will work directly with municipalities and their consultants to incorporate green project elements into the project design.

While the goal for GPR is 10% of the federal grant, it is the position of the program to solicit and prioritize more than the minimum goal. This will ensure that if certain project elements have changed during the development and construction of a project that may reduce or eliminate GPR elements, there are sufficient GPR projects to meet or exceed this goal.

Grant	Green Project Reserve Requirement
General	\$368,300
General Supplemental	\$1,023,300
Emerging Contaminants	\$104,404

While Vermont intends to prioritize GPR projects addressing emerging contamination concerns, the existing applications may not identify sufficient project elements to meet the minimum goal. If the number of projects identified is short of the goal, the balance of the GPR allocation for emerging contaminants will return to the general emerging contaminant initiative.

13. Public Participation

Vermont follows public participation procedures in the development of the annual Project Priority List (PPL), the CWIUP and in the environmental review process. The CWIUP is typically developed and adopted annually along with the PPL using the same public participation procedure employed for adoption of the PPL. That procedure is outlined in the Municipal Pollution Control Priority System rule. Vermont implements public participation for specific projects through the environmental review for CWSRF funded projects in accordance with the SERP for projects funded through the Vermont/EPA Revolving Loan Program. This procedure was approved by the EPA Regional Administrator in accordance with the August 2, 1989 CWSRF Operating Agreement between the State of Vermont and the U.S. Environmental Protection Agency, Region I. A summary of the public comments that were received for this IUP are included in the following Section.

On January 20, 2023, the Department notified municipalities and other interested parties to apply to be included on the Municipal Pollution Control Projects Priority List for State Fiscal

Year 2024 with a due date of March 1, 2023 for inclusion in the draft Pollution Control Priority List.

The draft IUP was released on June 28, 2023. A public hearing invitation to participate was sent via email to all entities in the contact list and directions to participate via Microsoft Teams, telephone, or in person were posted on the SRF website and on the state library public hearing calendar. A hybrid virtual/in-person public hearing was held on July 31, 2023. The presentation slides and a recording of the public hearing are posted on the WID SRF IUP website. <https://dec.vermont.gov/water-investment/water-financing/srf/intended-use-plans>

14. Responsiveness Summary

The following responsiveness summary addresses comments received during the public comment period ending August 7, 2023, and during the public meeting held July 31, 2023. Some comments have been edited for clarity.

Comment 1: (Hardwick) As you are aware we have been actively pursuing additional funding for the Hardwick WWTF Upgrade project to cover the most recent funding deficit for sludge removal. As the project stands currently there is a need for an additional ~\$400,000 in funding to properly address the sludge removal for the project to proceed. This project is listed on the draft IUP as a continuing project and is expected to be completed in the fall of 2023. I'd like to request that this project be considered as part of the draft IUP comments for consideration in additional funding.

Response: Because the project is shown as a Continuing Project on the Priority List it is eligible to apply for additional funding. Additionally, the Priority List was updated to increase the requested loan amount to \$400,000.

Comment 2: (Hoyle Tanner) In years when the Legislature does not fully fund the identified funding for Pollution Control (PC) Grants, how is the money allocated? First come first serve? If there is not available funding for a project's PC grant, will that be carried into the next fiscal year's distribution of PC grant funds?

Response: PC Grant funds are distributed based on the priority ranking system, it is not first come, first served. Projects must reapply to remain on future Priority Lists to be funded.

Comment 3: (Hoyle Tanner) Consider providing grant funding for septage receiving improvements to help support regional alternatives for septage disposal.

Response: The PC Grant process takes into consideration these project types. Additionally, planning and design of these may be eligible for loan forgiveness (subsidy) under Planning Subsidy Category 2 as described in section 8.3.2.2. of the IUP.

Comment 4: (Hoyle Tanner) The Town of Brighton WWTF upgrade is partially funded by USDA RD and is anticipated to need CWSRF funding as documented in the PPL for this project. This project is required to meet the Lake Memphremagog TMDL for phosphorus, has been submitted at 100% final design, meets eligibility for the affordability criteria and has been identified by VTDEC as a critical need. Consider how priority points are calculated to support funding for projects with this need where scoring would be more competitive with CSO and Village Wastewater Projects as this project currently falls below the fundable range.

Response: The Department acknowledges the importance of this and similar projects. Any change to the priority point system would require an amendment to the Chapter 2 Environmental Protection Rule and may not be modified by the Intended Use Plan.

Comment 5: (Hoyle Tanner) The South Woodstock WWTF Upgrade is ongoing and potentially should be shown as a continuing project.

Response: The Priority List has been revised to include the project as a continuing project.

Comment 6: (Hoyle Tanner) Note the * (asterisk) on the Priority List for certain borrowers that are expected to meet affordability criteria is not reflected in the Planning List table (i.e. no * are shown on the table).

Response: This item has been corrected, asterisks have been added to the affected applicants.

Comment 7: (Hoyle Tanner) Section 3.1 of the Draft IUP, paragraph 3 states that, “For the first 10 months of the fiscal year, the Engineering Planning Advance allocation will be reserved for planning for Vermont’s unsewered villages.” After the first 10 months of the fiscal year, in addition to unsewered villages, what can the Engineering Planning Advance (EPA) allocation be used for?

Response: After the ten-month period, DEC may distribute remaining funds as Pollution Control Grant funds to the next ranked community for PC Grant.

Comment 8: (Hoyle Tanner) Section 3.3 of the Draft IUP, paragraph 5 states that, “If a town is not able to meet the grant milestone or deliverable... then differential award funds will be rescinded and reallocated to Towns according to this CWIUP in what is being called “trickle down” funds.” On July 14, 2023, President Biden declared a major disaster in Chittenden, Lamoille, Rutland, Washington, Windham and Windsor Counties in VT. Federal, State and Local resources are strained to both recover from the federally declared disaster and meet the Village ARPA grant milestones and deliverables. Will consideration be given to extending Village ARPA grant milestones and deliverables to allow Federal, State and Local resources to recover from disaster while also continuing to make Village ARPA grant milestones and deliverables progress?

Response: Grant agreements are currently in progress. Individual communities should raise this question during the grant deliverables negotiation process with their Technical Project Manager. Regrettably, there are firm federal deadlines on the overall spending.

Comment 9: (VAPDA) Section 3 – State Pollution Control and ARPA Grant Eligibility, State ARPA Village Wastewater and Drinking Water Grant. VAPDA would like to confirm that the maximum award to a municipal project receiving funding via the State ARPA Village Wastewater and Drinking Water Grant has been increased from \$2.3 million to approximately \$4 million. If yes, VAPDA supports this change. VAPDA also requests that DEC clarify if the \$4 million limit is a cumulative limit across all three project steps (PER, final engineering, construction).

Response: The SFY 24 VWWW Funding cap for any specific project is \$3.5M. A village project receiving awards over multiple SFYs has a \$4M cumulative limit. For example: Village X received an SFY 23 grant of \$1M and applied to the waiting list with a need of \$5M. If trickle down funding becomes available, then they could be considered for \$3M of additional grant funds for SFY 24 due to the \$4M cumulative limit.

Comment 10: (VAPDA) Section 9 - Affordability Criteria. VAPDA has reviewed the proposed Affordability Criteria in Section 9 of the draft CWSRF IUP and compared the list of criteria to a similar list used by the Environmental Protection Agency (EPA) to determine cost share waivers for projects subject to congressional directed spending via the EPA Community Grants Program.

The list of criteria used by the EPA Community Grants Program is more comprehensive than the draft CWSRF IUP (see pages 5-7). The EPA list includes the following additional criteria:

- two criteria related to poverty rates;
- a criterion related to percentage of SNAP benefits; and
- a criterion about the combined sewer and drinking water costs greater than 2% of the 20th percentile household income.

VAPDA recommends using the criteria from the EPA Community Grants Program because it will provide greater flexibility for municipalities to demonstrate that they are economically disadvantaged and are therefore increase eligibility to obtain additional subsidy through the CWSRF.

Expanding the criteria will provide some relief for municipalities that are currently competing to hire contractors to conduct median household income surveys within proposed wastewater service areas. These income surveys have recently become a popular way to meet the affordability criteria and there are not enough contractors in Vermont to do the work.

VAPDA also recommends editing the existing criterion about user costs to the following language in order to expand the number of municipalities that meet the affordability criteria: User costs: The project that will result in an annual household user cost for sewer, water, and stormwater that exceeds two percent of the MHI.

Response: The Department appreciates the proposed modifications to the Affordability Criteria. The Department anticipates engaging stakeholders in a review of Affordability Criteria in the coming year for potential inclusion in next year's IUP.

Comment 11: (VAPDA) VAPDA also recommends that DEC staff assess if there should be a disaster-specific affordability criterion. This may make sense in light of the significant flood damage that many wastewater systems in the State experienced in July 2023.

Response: The Department appreciates the extreme financial impact flooding has had on many Vermont communities. These costs and associated impacts on user rates can be accounted for under the existing Affordability Criteria. Additionally, the Department has revised Planning Subsidy Category 2 of the IUP, Section 8.3.2.2., to add planning related to facilities damaged by recent flooding as an eligible project category.

Comment 12: (VAPDA) Section 11 - Program Updates and Guidance. VAPDA supports the proposed change in Section 11.2 – Priority Bypass Procedure to allow feasibility studies for Village Wastewater Initiative Projects to be considered administratively complete PERs (Preliminary Engineering Report) provided there is a preliminary approval from the Indirect Discharge Program. This specific exception is very important in order to ensure that projects in the Village Wastewater Initiative are able to use ARPA funds within the Federally designated time frame.

Response: Comment noted, the feedback on this change is appreciated.

Comment 13: (Waitsfield) Section 8.3.2. Planning Subsidy. This section does not incorporate an affordability criterion. We are clarifying that this is the case, as we've heard from DEC staff that an affordability criterion might exist for this subsidy even though it isn't included in the IUP draft. Waitsfield submitted its SFY23 Step 2 Loan Application for Final Design (Planning Subsidy Category 2) on 6/30/23, and we appreciate clarification on whether such an affordability criterion would apply to this Final Design subsidy request.

Response: Subsidy under this section is available to projects meeting the Affordability Criteria and projects eligible under Section 603(i) of the Clean Water Act which includes projects designed to implement a process, material, technique, or technology to encourage sustainable project planning, design, and construction. The majority of planning projects are eligible under this category.

Comment 14: (Waitsfield) Section 9.1. Affordability Criteria. Per the IUP: Income measurements are determined using Median Household Income. This information will be obtained from the American Community Survey’s most recent 5-year rolling average MHI using the most current data available on the date the corresponding IUP year was finalized or based on an approved income survey. Given the large degree of alignment between the Census-derived Waitsfield CDP and the project’s proposed service area, we are clarifying that the Waitsfield CDP MHI is the appropriate source for determining Waitsfield’s MHI for this project. The 2021 Census American Community Survey data table, linked on ANR’s SRF Guidance Document web page, indicates the Waitsfield CDP MHI to be \$32,604.

Response: The Department examined the limits of the CDP with respect to the service area limits and determined that the CDP limits do not match sufficiently to accept the CDP MHI. The Department appreciates the need to improve options for determining MHI data and is reviewing options for a consistent and more accessible protocol for future use.

Comment 15: (Waitsfield) DRAFT SFY2024 Pollution Control Priority and Planning List (pg. 33) & Village Drinking Water and Wastewater ARPA Initiative’s SFY 24 ARPA Waiting Town List (Final Design and Construction) (pg. 35). DEC’s review of the Town of Waitsfield Village Wastewater Project Priority List (PPL) Application indicates a total priority point score of 66/100. We are surprised at this number, as it is substantially lower than what was calculated during DEC review (Lynette Claudon & Hugo Martínez Cazón) of the final draft application with Waitsfield staff on 1/31/23. We are wondering how we dropped from the 81 points estimated via our meeting with DEC staff to the 66 on the PPL Review sheet. Based on our recent review, there appears to be two areas that we’d like to bring to DEC’s attention:

- i. Public Health
 - 1. During our 1/31/23 review with DEC staff, we calculated up to 27 points for this category. 10 points for “Swimming or other contact recreation” for Lareau’s Swimming Hole on the Mad River. 17 additional points for “Does the project address one or more failed systems” due to a total of 13 failed systems.
- ii. Environmental Resiliency & Sustainability
 - 1. Solar is proposed as part of this project, which came into focus during the project PER (90% PER submitted to DEC on 6/1/23)
- iii. Project Readiness
 - 1. During our 1/31/23 review with DEC staff, we calculated 6 points for this category. The majority of these points were attributed to the project’s facility plan approval of 8/31/2004.

Response: As noted at the public hearing, Priority List points are routinely revisited, and confirmed or amended, as each project progresses through review milestones. Outside of the Priority List process, the Pollution Control Grant points will be adjusted typically at P90 and D90 and at post construction milestones. Only projects in the fundable range are re-adjusted

in this manner to correct the Pollution Control Grant percentage shown in the IUP for that project. The Waitsfield project is currently not in the fundable range.

Comment 16: (Colchester) I have reviewed the draft IUP for SFY23. I note within the Pollution Control Priority and Planning List that the Malletts Bay Sewer Project has a PC Grant Eligibility of 25%. As provided to you in my e-mail of 4/21/23, I noted that the O&M costs within our past applications had not been changed since we originally began submitting these applications about 5 years ago. The current expected O&M costs are \$118,000 per year. I had also updated the total annual gallons used by non-residential connections to 4,144,200 gallons. This consumption is based upon actual water meter readings provided to us from the water department. These are available if needed.

Response: Thank you for providing the additional information, priority points were revised accordingly. As discussed at the IUP public hearing, all projects will have their project priority points and PC grant points validated and recalculated prior to major milestones.

Comment 17: (Village of Johnson) The Village of Johnson has requested that their wastewater treatment plan be added to the Priority List as a result of the extreme damage caused by recent flooding. Johnson is very in favor of reallocating the CWSRF IUP to help repair/replace heavily flood damaged WWTFs. Same goes for unspent ANR ARPA funds.

Response: The Department acknowledges the devastating flooding impacts suffered by the Village of Johnson. The Village may seek designation by the CWSRF Program as an Emergency Project and be added to the Priority List at any time in conformance with Guidance Document Number 16. The Agency of Natural Resources is assessing all options for directing available funding to flood recovery. In response to this comment the Department has added flood recovery to the types of “Category 2” Planning Projects eligible to receive this form of subsidy. Section 8.3.2.2. of the IUP has been modified accordingly.

Comment 18: (Vermont Affordable Housing Coalition) I am writing on behalf of the Manufactured Housing Subcommittee of the Vermont Affordable Housing Coalition. This subcommittee comprises approximately 50 members and meets monthly to advocate for manufactured housing and manufactured housing communities (MHCs).

These communities often face significant water insecurity and environmental justice issues with health implications for residents. Many communities have little voice and assistance with their water infrastructure, which is often substandard. We want to thank the Department of Environmental Conservation (DEC) for the steps they have already taken to increase access to MHCs, which reinforces our state's reputation for innovation, and we want to highlight that there might still be room to improve.

Back in February 2023, subcommittee members met with DEC staff to discuss possible solutions to some of the issues that MHCs face. It was a great start to the conversation and one that we hope can be continued in the future. During that meeting, future meetings were discussed to go over some additional things that could benefit these communities. The committee would welcome a meeting before the end of September to make progress on that, including but not limited to these topics:

- How DEC can reduce barriers to accessing State Revolving Fund (SRF) resources for MHCs
- Categorically thinking about MHCs as priority projects
- Use of 2nd & 3rd generation SRF funds for MHCs to reduce regulatory and administrative barriers, thereby creating a more cost-effective program for the customer
- Additional changes to the IUP that could help MHCs.

The subcommittee also supports the written comments submitted by MHC consultant Liz Curry on July 31st, 2023, and urges DEC to consider them as they look for solutions that will make applying for and receiving funding for these communities simpler and faster. Thank you for the opportunity to comment, and we look forward to seeing how DEC can help to better serve these communities.

Response: Reducing barriers to participating in the SRF program faced by MHCs and other disadvantaged communities (aka projects meeting “Affordability Criteria”) is a goal of the Department as well as a requirement of the Bipartisan Infrastructure Law. The Department values the input received from the Vermont Affordable Housing Coalition and many other partners in the MHC community. We would welcome the opportunity to continue this engagement and are hoping to convene stakeholders to explore the issues identified by this comment, as well as related issues including potential revisions to our Affordability Criteria. The SRF Program’s current workload and existing obligations, including US EPA reporting deadlines, will prevent us from meeting as early as September but we intend to re-engage in this dialogue as soon as possible. Please see also responses to comments from Liz Curry, below.

Comment 19: (Liz Curry, CommonLand Solutions, LLC) The IUP I understand for ANR might be a regulatory document that indicates to the EPA how the agency intends to spend the funding, but it also signals a policy document for constituents. And since it's really the only document we're constituents can find the agencies intentions for the year, it would be beneficial for everyone if it were looked at as a policy document for constituents to really understand and more detail what the department is signaling. And so also that the public can measure the outcomes at the end of the year to see what was achieved and what wasn't, so that

incentives and priorities language, if it had more detail, then the public could follow up on that.

Response: The Department does use the IUP to communicate a broad range of information, including policy goals. Some of those policies are necessarily developed over time and do not readily lend themselves to measurement at the time of IUP adoption. The actual use of funds, including subsidy, is thoroughly tracked and reported on to EPA and the Vermont State Legislature.

The Department agrees that the incentive language pertaining to manufactured housing communities, as described in short-term goal #3 is not sufficiently detailed. This goal was previously tied to a flood-plain buyout program in last-year's IUP. This program was not continued in the FFY 2023 IUP because of other funding available for this effort from the Flood Resilient Communities Fund, and the absence of use of the SRF subsidy incentives under the 2022 IUP. This short-term goal has been removed from the final IUP. The Department has prioritized funding of manufactured housing communities in the SRF Program through categorically including non-profit or cooperatively-owned manufactured housing communities as meeting the Department's Affordability Criteria. Additionally, Department-led funding efforts in addition to the SRF include ARPA funding for infrastructure improvements under the Healthy Homes Initiative, ARPA funding to assist these communities with stormwater permitting requirements for the so-called "three-acre sites." The IUP retains several long-term goals related to increasing investment in disadvantaged communities and promoting initiatives to address systemic environmental justice. These goals will necessarily be informed through input from the affected communities.

Comment 20: (Liz Curry, CommonLand Solutions, LLC) It's also problematic from a technical standpoint for mobile home parks communities not to have a better, more clarity on what incentives and priorities are just because coming from the real estate sector, using grants and loans from the Community development sector, our planning process looks different than municipal planning processes for IUP projects, our planning process has to account for, we have to answered in many more masters we have to answer to funds that map up to HUD. We have to answer to funds that map up to community development, financial institutions, low income tax credits. So our planning process has to incorporate a lot more data and information and if there's incentives or priorities that ANR hasn't really indicated clearly when we're in the planning process, then it's impossible to integrate those into a project early on until we get to a step one Engineering Services Agreement review. And then suddenly there's information from ANR that you know, it's failed to have been incorporated by a housing sector project.

Response: The Department acknowledges that many potential SRF borrowers are not fully aware of the program and its requirements. Public outreach on this front has been sub-optimal

due to staffing constraints. All incentives, in the form of available funding, loan forgiveness, interest rates and administrative fees are included in the Intended Use Plan.

Comment 21: (Liz Curry, CommonLand Solutions, LLC) The long term goal #10 is a great addition, but it would again require knowing when, how and which ones the and our intent to review and deliver to the community. And so some kind of annual plan would be helpful.

Response: Long-term goal # 10 relates to the updating of guidance documents and policies to assist borrowers. The purpose of the goal is to demonstrate the Department's commitment to providing this guidance. These updates are done on an as-needed basis, including in response to public feedback and changes in state or federal requirements.

Comment 22: (Liz Curry, CommonLand Solutions, LLC) I would definitely underscore the endorsement of the short term goal #7 and would be interested in the details of that plan as well.

Response: The Department appreciates the support for this goal. Short-term goal # 7 relates to engaging communities in an evaluation of Affordability Criteria, Priority Ranking Criteria, and the use of Technical Assistance Funds. The Department looks forward to working with affected stakeholders to achieve this goal in furtherance of Long Term Goal #1, increasing investment in disadvantaged communities.

Comment 23: (Liz Curry, CommonLand Solutions, LLC) Re section 6.51 a key piece of feedback is that the Department currently uses VEDA to underwrite procedures and loan servicing for underwriting loans, those systems used by VEDA are failing the mobile home sector. VEDA doesn't understand the mobile home sector. VEDA is a commercial underwriter. The mobile home sector is a real estate and real estate finance transaction. The recommendation is to shift underwriting of the mobile home sector to be VHFA or the Vermont Community Loan Fund. They are underwriting these projects all the time. They are deeply familiar with the risk analysis associated with mobile home sector and they have very efficient and predictable loan systems and procedures that don't confuse their borrowers.

Response: The Department has successfully worked with VEDA in the underwriting of many projects, all of them being private borrowers (the Vermont Bond Bank underwrites municipal SRF loans). We also note VEDA's successful implementation of a range of finance programs including energy, agricultural, and browns fields programs. A change as suggested in the comment would require a change in State statute (24 VSA §4781). Such a change in underwriters should be supported by an analysis demonstrating the benefits. The Department is open to receiving further input this topic.

Comment 24: (Liz Curry, CommonLand Solutions, LLC) Is additional subsidy available only to municipalities because of the funding source? If yes, the Department should use some of the SRF repayments to offer same additional subsidy amounts to MHCs as an equity issue.

Response: Subsidy has been made available only to municipalities as a matter of longstanding Department policy. Additionally, State statute and Federal regulations affect the ability of private entities to receive subsidy. The Department is receptive to receiving input on the advisability of allowing private entities to receive subsidy, for potential inclusion in next year's IUP (the 2024 IUP).

In the event the Department were to revise a future IUP to allow for private entities to receive subsidy it is important to note that federal regulations affect the types of projects and subsidy that may be eligible. First, private borrower eligibility is limited to projects implementing Nonpoint Source management programs established under Section 319 of the Clean Water Act and addressing certain types of nonpoint pollution on private sites through treatment at publicly owned treatment works (POTWs). Additionally, under State statute private projects may not be prioritized over municipal clean water projects (24 VSA §4784).

Notwithstanding the limitations as discussed above, eligibility under federal requirements for subsidy for borrowers under the 2023 Clean Water SRF Grants is as follows:

General Grant:

10% of grant to any eligible borrower, including private entities.

30% of grant to municipal borrowers meeting affordability criteria; or any eligible borrower, including private entities, implementing certain project categories including water and energy efficiency, stormwater, and resiliency projects.

General Supplemental Grant:

49% of the grant to municipal borrowers meeting affordability criteria; or any eligible borrower, including private entities, implementing certain project categories including water and energy efficiency, stormwater, and resiliency projects.

Finally, use of repayment monies, versus EPA SRF grant funds, does not alter the underlying requirements concerning to the extent to which private entities may receive subsidy.

Comment 25: (Liz Curry, CommonLand Solutions, LLC) The construction subsidy increase section that is currently offered to municipalities that should be available to the mobile home sector which has a much harder held climb when repaying these loans, municipalities can spread repayments over a tiered rate structure over 1000 or more users and so for them to get a deeper subsidy and not to provide that for mobile home parks is problematic and the agency could you use repayment funds, second and third generation funds for that subsidy.

Response: The Department acknowledges the significant challenges faced by the manufactured housing communities. As noted in response to the previous comment, use of repayment funds does not alter the underlying requirements concerning the extent to which private entities may receive subsidy. Additionally, if future IUPs allow for private borrowers to receive subsidy, federal requirements limit the eligible project types such that it may be of limited value in addressing the infrastructure issues faced by these communities. We note that private borrowers do also partner with municipal sponsors on CWSRF loans which increases the likelihood of the project receiving funding and the potential for receiving subsidy.

Comment 26: (Liz Curry, CommonLand Solutions, LLC) Using the SRF program is new for VT's manufactured home communities (MHCs) and that working with the MHC sector is relatively new for the Dept. (clarification: maybe working with the nonprofit and co-op MHC sector is new for the Dept).

Response: The Department acknowledges that use of the CWSRF may be new for many MHCs as it is for many smaller communities. Although manufactured home communities are not common SRF Program customers we have worked with them since 1997. Increasing the understanding of our programs by disadvantaged communities and other small borrowers, as well making them more accessible, are important goals for the Department. We look forward to continued engagement with stakeholders on how best to achieve these goals.

Comment 27: (Liz Curry, CommonLand Solutions, LLC) Since there is no environmental justice language embedded in CWA that governs SRF, the State must be vigilant about using an equity lens when interpreting and applying federal regulations, rules, and policy. Disparities are not only the health burdens that failed water/wastewater creates for MHC residents but also the cost burdens associated with redeveloping the infrastructure and bringing it up to code.

Response: The Department agrees with the comment. The Agency of Natural Resources is actively engaged in the implementation of Vermont's Environmental Justice Law, Act 154 (2022), and welcomes public input on this topic. More information is available online: <https://anr.vermont.gov/about-us/civil-rights-and-environmental-justice/vermont-ej-law#:~:text=Also%20known%20as%20Act%20154,Vermont's%20Environmental%20Justice%20State%20Policy>.

Comment 28: (Liz Curry, CommonLand Solutions, LLC) Thanks go to the Department for incorporating, perhaps for the first time, the IUP Long Term Goals that Promote initiatives that address systemic environmental justice through the prioritization of incentives to projects that ensure equitable access to clean water. This sounds like a promising goal that is moving the program in the right direction. Unfortunately, it is not really defined or clarified in the

document. There is a lack of specificity about what constitutes “incentives”, and the documents lacks clarity on what the Department understands environmental justice to be, and what kinds of projects are being referred to. A suggestion for a strategy that aligns with this long-term goal would be:

Invest in the MHC sector to reverse the discriminatory impacts that the lack of regulation prior to the Clean Water Act had on low-income households who must contend with the costs and health consequences of legacy infrastructure.

A suggestion for another long-term goal would be:

Reduce the cost burden that the SRF program’s administrative rules and processes have on MHCs when infrastructure projects are co-funded and underwritten by the State’s housing grant-making agencies and/or USDA.

Some strategies for this proposed long-term goal are:

- Use 2nd/3rd generation SRF repayments to provide the same additional subsidy of construction loans up to \$750k on a \$1.5M minimum sized project for MHC’s that municipalities will receive in FFY2023-2024.
- Develop an Inter-Agency Agreement with the State’s housing funding agencies that minimizes conflicting and/or duplicative administrative rules and practices, and aligns regulatory frameworks. This will reduce project management costs for MHCs.

Response: The Long Terms Goals referenced in the comment were first included in the FFY 22 IUP. The Department includes the Long Term Goals to signal the intended direction of the program. The goal to which the comment refers is informed by EPA guidance, including the 2022 Bipartisan Infrastructure Law Implementation Memo, which acknowledges that achieving the goal will be a multiple year process. The Department looks forward to engagement with the public and partners on how best to accomplish this goal and appreciates the suggested strategies.

Comment 29: (Liz Curry, CommonLand Solutions, LLC) Short Term Goals Proposed by DEC in the IUP: Great to see #3, to Create funding opportunities for economically disadvantaged MHCs with water infrastructure needs. The document does not contain a strategy to implement this goal. A proposed strategy would be:

Work collaboratively with the State’s housing-grant makers to explore the feasibility of a pilot program that sets-aside a portion of the SRF repayments for MHCs as a subsector. The justification would be that this subsector bears a disproportionate cost burden of failed, legacy infrastructure and enforcement citations. Because this subsector is under-resourced, MHCs cannot afford the lengthy time it takes to work through all phases of the SRF loan process (Step 1, Step 2, Step 3). This process could be accelerated by using defederalized funds for MHC infrastructure projects.

Response: The Department appreciates the specificity of the suggested strategy. Removing barriers to SRF Program participation is a substantial endeavor to which we are committed. Progress towards this goal is achieved in part through continuing to treat all non-profit and cooperatively-owned manufactured housing communities (MHCs) as automatically meeting Affordability Criteria. This approach reduces application requirements for MHCs and maximizes potential use of subsidy or loan forgiveness. The suggested approach of using repayment funds can reduce some of the federal requirements related to use of SRF funds. However, the Department is still bound to allocate funds using a priority ranking system. Additionally, the steps of our loan program, 1 through 3, align with planning, design and construction in order to ensure only SRF-eligible projects are funded, and to ensure more that projects are well-designed and executed.

Comment 30: (Liz Curry, CommonLand Solutions, LLC) For every goal, the document should identify a strategy and outcomes, otherwise the goal has no identifiable strategy that has a funding allocation or commitment. As such, the goal should not be included if it's not going to be funded.

Response: The majority of the goals are funded or incentivized through program prioritization of the use of subsidization and other funding. As previously acknowledged, goals related to increased use of the SRF Program by disadvantaged communities are a multi-year endeavor in which the Department looks forward to continued input from the public and partners.

Comment 31: (Liz Curry, CommonLand Solutions, LLC) There is a high need to engage communities and other stakeholders in an evaluation of the Dept's evaluation and priority ranking criteria. The outcome we need is for the Dept to ensure that evaluation criteria align with the MHC sector's needs. To achieve this, the Department should increase funding for the technical assistance program.

Response: The Department agrees that an evaluation of the project ranking criteria used for development of the Priority List would be beneficial. The Priority List criteria are covered by the Ch. 2 Environmental Protection Rule and are beyond the scope of the Intended Use Plan, except to note that the Department concurs regarding the importance of engaging with the public on the current criteria. Regarding technical assistance, the Department has taken the maximum allowable amount of 2% of FFY 2023 Clean Water SRF grants.

Comment 32: (Liz Curry, CommonLand Solutions, LLC) The Department intends to use the 2% technical assistance (TA) funds to contract with entities with the relevant expertise to identify and conduct proactive outreach to, and facilitate applications from, disadvantaged communities previously unable to begin or complete SRF funding requirements. "Relevant

expertise” is not defined in the document, but should include those who have experience working with low-income households and MHC’s.

Formal delivery of TA is an opportunity to make the program more accessible to Low- Income households in MHC’s by assisting this sector with navigating each loan stage. The TA program should employ a designated Department representative who is in charge of a regular two-way communication forum that low-income communities can participate in to both understand the program and provide feedback to the Department on environmental justice needs.

Response: The Department agrees that experience working with disadvantaged communities is an essential consideration in developing the proposed approach to providing technical assistance (TA). When the Department solicits proposals to provide technical assistance the Request for Proposals will include a description of the types of services requested as well as the necessary experience and expertise. We also value the recommendations provided concerning the structure of a TA program.

Comment 33: (Liz Curry, CommonLand Solutions, LLC) As written, the Affordability Criteria do not serve the MHC sector well. On page 23, in the first paragraph, the affordability criteria apply only to municipalities. It is unclear whether this is intended to cover all SRF recipients or actually applies to only municipalities.

There is an EPA 2015 Memo providing guidance on affordability criteria in the IUP. There should be heavy reliance on the 2015 Memo language that says “the statute does not prescribe the weight that must be given to each type of criteria. States have the flexibility to determine which of the required criteria are most relevant to their CWSRF programs and may structure their program’s criteria accordingly.”

First, the IUP should indicate the weight that each criterion is given in terms of the Departments determination of priority projects. The scoring methodology should be transparent in the document.

Second, there are criteria that would prevent MHC’s from scoring high. For MHC’s, the unemployment and population trends criterion do not affect affordability of a MHC, but rather the resident incomes within the Community, the lot rent, and the age and condition of the infrastructure all have higher impacts on affordability of the MHC.

Third, economically distressed area is not defined in the IUP (but may be in regulations) but many MHC’s are economically distressed communities themselves, due to legacy and nonconforming infrastructure failures, even though they may not be located in an economically distressed municipality.

Fourth, using the community's census AMI does not always align with resident incomes in MHCs. USDA allocates grant resources based on the municipality's census AMI, and as a result many MHC's can't qualify for USDA grant resources. If ANR approaches this the same way, then MHC's have less access to water infrastructure resources overall, and this represents a disparity for households with low incomes living in MHC's.

Federal guidance allows for other data determined relevant by the State, The Department should expand the affordability criteria per the guidance allowed by the EPA in their January 2015 memo. For example, enforcement citations should be a factor that increases points on priority list and the Dept. should form a working group that includes the MHC sector to develop additional criteria.

In general, all non-profit or cooperatively-owned manufactured home communities (MHCs) with failing, legacy infrastructure and a resident-income survey should automatically be considered to meet the state's affordability criteria, as first established in the 2021 Intended Use Plan.

Response: As previously noted, all non-profit or cooperatively-owned MHCs are automatically considered to meet the Affordability Criteria in recognition of the legacy impacts of under-investment in infrastructure and affordability issues. As for the "weight" of the criteria in terms of scoring, the Affordability Criteria are not weighted, rather a community must meet two of the listed criteria. The Department agrees that use of community MHI can be problematic when a specific segment of the community seeking funding has a lower MHI than that of the overall community. To date this has been addressed by having applicants engage in an income survey, however this may add time and expense to a project. Recent GIS-based income data from the US Census Bureau may allow the Department and borrowers to better refine the income estimates for a given applicant.

Comment 34: (Liz Curry, CommonLand Solutions, LLC) Increasing investment in disadvantaged communities – define and include criteria/metrics/benchmarks. The language currently indicates that ANR will invest in its own capacity to target disadvantaged and "ensure subsidy is directed" to eligible communities, but doesn't say how. Also, on page 23, "disadvantaged communities" refers to municipalities that meet the criteria and doesn't indicate if this term applies to MHC's or not, and how.

Response: Consistent with EPA Guidance on achieving Bipartisan Infrastructure Law goals related to increasing investment in disadvantaged communities, the Department expects it will take several years to fully develop metrics to guide and assess this effort. In the short term the Department has sought to maximize disbursement of loan forgiveness under EPA Grants to Disadvantaged Communities. This has been a significant undertaking given the increased

amount of this type of subsidy under the Bipartisan Infrastructure Law (BIL) as well as the additional tracking and reporting requirements of BIL, as well as an overall increase in loan applications. The Department has increased staffing in the SRF Program to be able to more readily process applications in a timely manner and also have sufficient staff resources to engage would-be applicants to assist them in the application process. Additionally, the SRF Program is currently working with a contractor to build a new loan processing database that will help facilitate a transition to a more streamlined and accessible loan application process.

Comment 35: (Liz Curry, CommonLand Solutions, LLC) The Engineering Planning Advance Program has the acronym EPA in the document – this creates confusion for laypeople/the public reading the document, who are not familiar with technical terms like “Engineering Planning Advance.”

Response: The Department acknowledges that use of the acronym “EPA” in the context of Engineering Planning Advances could create confusion given “EPA” is also used for the Environmental Protection Agency. The final IUP has been revised to discontinue use of “EPA” in the context of Engineering Planning Advances. Similarly, use of “REPAs” has been removed.

Comment 36: (Liz Curry, CommonLand Solutions, LLC) CWSRF Administration: “Private entity CWSRF construction loans are currently issued at 0% interest rate with an administrative fee of 2.75%, except when specific initiatives have an alternative rate as outlined in this IUP.” Contrast this to the 2% admin fee for municipalities. MHC’s are considered private entities, so the loans for MHC’s carry a “rate” of 2.75 whereas loans for municipalities carry a rate of 2% (this is not an interest rate per se, but functions like one since it is for the life of the loan). This practice is the exact opposite of an environmental justice lens. Municipal water and wastewater fees are paid by residential and commercial users of all incomes, some of which are very high. Municipalities have the option of creating equitable rate structures that shift a higher cost burden onto higher volume and higher income users. MHC’s do not have that option.

Response: The Department appreciates this comment and agrees an assessment of administrative fee rates for certain sectors, based on affordability, is warranted. The Department will seek input from stakeholders on this topic and may propose changes under a future IUP.

Comment 37: (Liz Curry, CommonLand Solutions, LLC) For public meetings, the department should publish an agenda for the public meeting on its website and include scheduled time for public comment that is not at the end of staff presentations, preferably closer to the beginning of the meeting. Recommend scheduling one meeting for staff to give a presentation and a separate meeting for the public to speak and provide comment.

Response: The Department appreciates this comment and agrees to improve opportunities for public engagement and comment on the program and future IUPs.

15. Revisions to the Final IUP

The final IUP includes the following revisions:

Section 3.3.1: The “ARPA Village Wastewater and Drinking Water Grant Allocation Table” was removed because it was inadvertently included in the draft IUP. The “Village Drinking Water and Wastewater ARPA Initiative Table” remains and includes the correct information.

Section 7: Added “Telecommunications Prohibition” as a compliance requirement for equivalency projects.

Section 8.3.2.2: Planning Subsidy Category 2: revised to clarify that the maximum subsidy in this category is per project, not per IUP year.

Section 8.3.2.2: Planning Subsidy Category 2: revised to include planning for facilities significantly damaged by flooding in 2023 as an eligible category.

Section 9.1: Added “other methods approved by the Secretary” to the allowable means for determining median household income.

Priority List: Identified projects meeting Affordability Criteria.

Priority List: Added a table showing projects and associated NPDES Wastewater Permit Number.

Priority List: multiple revisions in response to public comments, no projects moved below the funding line as a result.

16. Project Priority Lists

General Projects (General and General Supplemental)

Emerging Contaminants

SFY2024 Pollution Control Priority and Planning List

Applicant	Applicant Type	Project Name	Priority Points	Project Category	2024 Step I	2024 Step II	2024 Step III	SFY 2024 Total SRF Project Cost	Total Project Cost	Grant Source	Green Project Reserve	PC Grant Eligibility \$	PC Grant Eligibility %
Hinesburg, Town of*	M	WWTF Upgrade Contract No. 1	92	TW-AT	0	0	0	0	0	NA	0	178,490	34%
Hinesburg, Town of*	M	WWTF Upgrade Contract No. 2	92	TW-AT	0	0	6,566,820	9,700,000	21,415,246	GS	0	6,279,045	34%
Whitingham, Town of*	M	WWTF Refurbishment	64	TW-ST	0	0	0	0	3,908,500	GB	0	0	0%
Woodstock, Town of	M	South Woodstock WWTF Upgrade	61	TW-AT	0	0	0	0	0	NA	0	0	0%
Burlington, City of*	M	Manhattan Dr Outfall Repair	51	SW-Gray	0	0	1,037,340	1,037,340	1,094,506	GS	0	109,451	10%
Brandon, Town of*	M	WWTF Upgrade	50	TW-ST	0	0	0	0	6,755,000	GB	0	675,500	10%
Hardwick, Town of*	M	WWTF Upgrade	47	TW-ST	0	0	400,000	0	4,508,904	GS	0	450,890	10%
Castleton, Town of*	M	WWTF Upgrade Contract I	44	TW-ST	0	0	0	0	2,500,000	GS	0	250,000	10%
Milton MHC	PPF	Wastewater System Upgrade	40	TW-NCS	0	0	0	0	0	NA	0	0	0%
Planning Subsidy Put-Aside	M	CWSRF Planning Subsidy Put-Aside	NA	NA	0	0	5,500,000	5,500,000	5,500,000	NA	0	NA	NA
Vermont Land Trust	PNP	Farmland Futures Fund	NA	NPS	0	0	2,000,000	2,000,000	2,000,000	GB	2,000,000	0	0%
Montgomery, Town of* **	M	Montgomery Center Community Wastewater Project	90	NPS-IDS	0	481,000	2,628,375	3,109,375	9,624,948	GS	3,109,375	3,368,732	35%
Montgomery, Town of* **	M	Montgomery Village Community Wastewater Project	87	NPS-IDS	0	350,000	2,790,625	3,140,625	7,719,816	GS	3,140,625	2,701,936	35%
Colchester, Town of	M	Malletts Bay Sewer Project - Phase 1	80	TW-NCS	0	0	2,580,000	8,296,700	8,296,700	GB	0	2,737,911	33%
Westford, Town of	M	Community Wastewater Project	79	NPS-IDS	0	0	2,811,603	2,811,603	3,772,359	GB	3,277,797	1,282,602	34%
South Burlington, City of	M	Bartlett Bay WWTF Refurbishment	78	TW-ST	0	1,236,000	24,421,000	25,657,000	26,169,000	GB	2,200,000	7,327,320	28%
Burlington, City of*	M	WWTF Improvements Stage 0	77	TW-ST	0	0	8,583,000	8,583,000	9,678,000	GS	0	2,322,720	24%
Vergennes, City of*	M	WWTF Hydraulic Upgrade	73	TW-CSOC	0	0	875,000	875,000	6,557,547	GB	0	1,836,113	28%
Fairlee, Town of*	M	Lake Morey Alum Treatment Project	68	NPS-H	0	0	790,000	790,000	790,000	EC	0	0	0%
Berlin, Town of	M	Riverton Village Wastewater Project	67	NPS-IDS	15,000	100,000	2,000,000	2,115,000	2,115,000	GB	0	613,350	29%
Waitsfield, Town of	M	Village Wastewater Project	66	NPS-IDS	0	889,900	12,340,000	13,229,900	13,433,653	GS	13,433,653	3,358,413	25%
Vergennes, City of*	M	North Main St Sewer Improvements	66	TW-CSOC	0	56,000	73,000	129,000	1,007,000	GB	0	211,470	21%
Vergennes, City of*	M	WWTF Age-Related Upgrade	65	TW-ST	0	540,123	566,725	1,106,848	1,274,092	GB	1,000,000	242,077	19%
Rutland, City of*	M	Meadow St Stormwater Separation	64	TW-CSOC	0	0	286,000	286,000	1,195,600	GS	0	239,120	20%
Saint Johnsbury, Town of*	M	Portland St Sewer and Stormwater Improvements	63	TW-CSOC	0	0	1,424,000	1,424,000	1,648,030	GS	0	412,008	25%
Highgate, Town of	M	Highgate Community Wastewater Project	62	NPS-IDS	0	50,000	2,500,000	2,550,000	2,550,000	GB	0	612,000	24%
Vergennes, City of*	M	MacDonough Dr PS FM Improvements	62	TW-CSOC	0	173,000	3,109,000	3,282,000	3,357,400	GB	0	537,184	16%
Vergennes, City of*	M	Maple/Green St Sewer Improvements	60	TW-CSOC	0	70,000	834,000	904,000	1,277,000	GB	0	191,550	15%
Winooski, City of*	M	Main St Revitalization Project	59	TW-SSR	0	0	1,613,361	1,613,361	8,073,361	GS	0	807,336	10%
Montpelier, City of	M	Biosolids, Odor Control, and Nutrient Improvements	53	TW-ST	0	943,152	17,403,000	18,346,152	18,346,152	GB	11,200,000	0	0%
Saint Johnsbury, Town of*	M	Railroad St Sewer and Stormwater Improvements	52	TW-CSOC	0	0	1,146,000	1,146,000	1,213,200	GS	0	169,848	14%
Saint Albans, City of*	M	Stebbins St Utility Improvements Project	52	TW-CSOC	0	25,000	370,000	395,000	395,000	GS	0	47,400	12%
Swanton, Village of*	M	WWTF Upgrade and Phosphorus Improvements	52	TW-AT	21,300	268,000	4,500,000	4,789,300	4,789,300	GS	0	622,609	13%
Brighton, Town of*	M	WWTF Refurbishment	52	TW-ST	0	270,300	1,157,000	1,427,300	5,171,263	GS	100,000	517,126	10%
Berlin, Town of	M	Crosstown Rd Collection System Refurbishment	50	TW-SSR	10,000	25,000	375,000	410,000	410,000	GB	5,000	69,700	17%
Rutland, City of*	M	Moon Brook Pond Modifications Project	50	NPS-H	0	168,000	232,000	400,000	1,570,000	GB	212,500	157,000	10%
Woodstock, Town of	M	Woodstock Main WWTF Upgrade	48	TW-ST	0	1,015,000	19,875,000	20,890,000	21,055,000	GB	300,000	2,105,500	10%
Enosburg Falls, Village of*	M	Church St Sewer Project	47	TW-CSOC	0	20,000	250,000	270,000	288,900	GS	0	28,890	10%
Enosburg Falls, Village of*	M	Elm St Sewer Project	46	TW-CSOC	0	0	387,000	387,000	421,100	GS	0	42,110	10%
Pittsford, Town of*	M	US Rte 7 Segment 2 Sewer Project	46	TW-SSR	0	0	4,500,000	4,500,000	4,500,000	GS	0	450,000	10%
Montpelier, City of	M	Sewer Siphons and 36" Trunk Line Project	45	TW-SSR	0	150,823	2,376,000	2,526,823	2,526,843	GB	0	0	0%
West Rutland, Town of*	M	WWTF and System Improvements	42	TW-ST	0	105,000	1,700,000	1,805,000	1,805,000	GS	0	180,500	10%
Newport, City of*	M	Bluff Rd Pump Station Upgrade	41	TW-CSOC	0	25,000	250,000	275,000	290,800	GS	0	29,080	10%
Saint Albans, City of*	M	Lower Weldon St Stormwater Facility	40	SW-Green	0	70,000	2,720,000	2,790,000	2,790,000	GS	0	279,000	10%
Saint Johnsbury, Town of*	M	Sludge Management Improvements	40	TW-ST	0	148,200	2,612,230	2,760,430	2,805,990	EC	0	280,599	10%
Middlebury, Town of	M	South Street Reconstruction- Phase IV	33	TW-CSOC	0	30,000	498,200	528,200	1,192,200	GB	200,000	0	0%
Berlin, Town of	M	Rte 302 WWPS Hazard Elimination and Upgrade	28	TW-SSR	0	100,000	900,000	1,000,000	1,000,000	GB	0	0	0%
Middlebury, Town of	M	Bakery Ln Wastewater Improvements	22	TW-SSR	0	0	944,771	944,771	990,771	GB	125,000	0	0%
South Burlington, City of	M	Airport Pkwy WWTF Solids Handling Optimization	21	TW-ST	0	129,000	2,050,000	2,179,000	2,248,000	EC	0	0	0%
Natural Resource Put Aside	PNP	Natural Resource Interim Finance	NA	NPS	0	0	2,000,000	2,000,000	2,000,000	GS	2,000,000	0	0%
Bolton Valley CWS, LLC	PPF	BVCWS WWTF Upgrade	27	NPS-IDS	0	399,600	3,530,000	3,929,600	4,027,100	GB	150,000	0	0%
Subtotal SFY2024 Project Requesting Construction Funding					46,300	7,838,098	155,506,050	171,840,328	236,058,281		42,453,950	41,724,580	

Continuing Projects
Municipal Projects Yet To Be Funded
Private Projects Yet To Be Funded
The bold line on line XX is the fundable line

Anticipated SFY24 Planning Need	2,336,080	14,386,691		16,722,770
Total	2,382,380	22,224,788	155,506,050	180,113,219
Total SRF Funding Request		180,113,219		
Total Available Funds		96,418,917		
Annual SRF Surplus/Shortfall		(83,694,302)		

Applicant Type:
M = Municipality
PNP = Private Non-Profit
PPF = Private For Profit

Grant Identifier
GB (General Base)
GS (General Supplemental)
EC (Emerging Contaminants)

Project Type	Code
CWT - CSO Correction	TW-CSOC
CWT - Sewer System Rehabilitation	TW-SSR
CWT - Secondary Treatment	TW-ST
CWT - Advanced Treatment	TW-AT
CWT - New Collector Sewers	TW-NCS
NPS - Individual Decentralized Systems	NPS-IDS
NPS - Hydromodification	NPS-H
NPS - Brownfields	NPS-B
Stormwater - Gray Infrastructure	SW-Gray
Stormwater - Green Infrastructure	SW-Green

*These borrowers are expected to meet affordability criteria.

**These projects are expected to obtain funding other than SRF but are included until alternate funding is confirmed.

Note 1: There are no Emergency Projects identified on this priority list

Note 2: Up to 10% of the FY23 Pollution Control Grant appropriation shall be reserved for planning advances through December 31, 2023, and up to another 10% for REPAs (for engineering research) through May 31, 2024.

Note 3: Where a project includes multiple categories, the category that accounts for the highest dollar need is shown.

Note 4: There are projects on this list that have been added as continuing projects that did not provide priority list applications.

Note 5: \$3.3 million in SFY 23 is available for PC Grants, EPAs, and REPAs, pending legislation, and therefore the full need is not likely to be funded at this time.

Note 6: The PC Grant eligibilities shown are estimates based on the submitted priority list application. The PC grant amounts will be finalized upon issuance of the project's final design approval.

Note 7: Some of the estimated PC Grant amounts above have been bolded to denote other sources of funds (such as NBRC, USDA, CDS, etc.), may be available to the project, and therefore, may effect the estimated PC Grant amount.

Note 8: The "Total Available Funds" amount and the Planning Loan Put-Aside combined = 103% of the total available funds. Past program performance indicates not all projects above the funding line will go forward, hence exceeding 100% is intentional.

CWSRF Construction Loan Need SFY 2025-2028, Additional Planning Loan Need, and ARPA Grants for CSO and VWW for SFY 2024

Applicant	Applicant Type	Project Name	Project Category	2024 Step I	2024 Step II	2025 Step III	2026 Step III	2027 Step III
Londonderry, Town of*	M	South Londonderry Village Wastewater Project	NPS - Individual/Decentralized Systems	0	270,000	4,605,000	0	0
Berlin, Town of	M	Hospital Hill Collection System Upgrade	CWT - Sewer System Rehabilitation	100,000	601,200	9,298,800	0	0
Greensboro, Town of*	M	Community Wastewater Project	NPS - Individual/Decentralized Systems	0	600,000	8,000,000	0	0
South Burlington, City of	M	4 Pump Stations Refurbishment	CWT - Sewer System Rehabilitation	190,000	660,000	4,440,000	0	0
Londonderry, Town of*	M	North Londonderry Village Wastewater Project	NPS - Individual/Decentralized Systems	0	275,000	4,600,000	0	0
Jamaica, Town of*	M	Jamaica Village Wastewater Project	NPS - Individual/Decentralized Systems	0	475,000	6,680,000	0	0
Burke, Town of*	M	West Burke Village Wastewater Project	NPS - Individual/Decentralized Systems	0	1,033,200	9,349,200	0	0
South Hero, Town of	M	Community Wastewater Project	NPS - Individual/Decentralized Systems	0	150,000	2,250,000	0	0
Pittsford, Town of*	M	Plains Road Sewer Project	CWT - Sewer System Rehabilitation	0	0	600,000	0	0
West Windsor, Town of	M	Sewer System Expansion Project	CWT - New Collector Sewers	0	0	3,682,550	0	0
Saint Albans, Town of	M	Tanglewood Stormwater Project	Stormwater - Green Infrastructure	0	0	750,000	0	0
Montpelier, City of	M	Pump Stations Upgrade Project	CWT - Sewer System Rehabilitation	149,591	299,182	5,000,000	0	0
Bennington, Town of*	M	Sewer Interceptor Upgrades	CWT - Sewer System Rehabilitation	0	0	3,600,000	0	0
Middlebury, Town of	M	Rogers Rd Pump Station Upgrade	CWT - Sewer System Rehabilitation	0	0	750,000	0	0
Orleans, Village of*	M	WWTF Upgrade	CWT - Advanced Treatment	0	250,000	2,500,000	0	0
Burlington, City of*	M	505 Riverside Separate Stormwater Outfall Repair	Stormwater - Gray Infrastructure	336,400	225,000	1,000,000	0	0
Burlington, City of*	M	Pine St CSO storage tank	CWT - CSO Correction	247,670	350,000	1,705,560	0	0
Hartford, Town of*	M	CSO Abatement - Catch Basin and GSI	CWT - CSO Correction	0	35,000	500,000	0	0
Hartford, Town of*	M	North Main St Stormwater Project	Stormwater - Gray Infrastructure	0	25,000	900,000	0	0
Ludlow, Village of*	M	Lower High St Infrastructure Improvements	CWT - Sewer System Rehabilitation	0	12,000	168,000	0	0
Fairfax, Town of	M	WWTF Upgrade	CWT - Secondary Treatment	0	65,000	1,150,000	0	0
Morrisville, Village of*	M	Jersey Heights Pump Station Upgrade	CWT - Sewer System Rehabilitation	0	70,000	1,000,000	0	0
Burlington, City of*	M	WWTFs Improvements Stage 1	CWT - Secondary Treatment	0	3,747,916	80,000,000	0	0
Newport, City of*	M	Gardner Park Interceptor Sewer	CWT - CSO Correction	0	50,000	750,000	0	0
Rutland, City of*	M	Vernon St Storm Sewer Separation	CWT - CSO Correction	0	10,000	3,200,000	0	0
Rutland, City of*	M	Connor Park Storage Phase 1	CWT - CSO Correction	0	250,000	7,000,000	0	0
Rutland, City of*	M	CSO Check Valves	CWT - CSO Correction	0	55,000	497,000	0	0
Bennington, Town of*	M	WWTF Filter Upgrades	CWT - Advanced Treatment	15,000	100,000	2,035,000	0	0
Cavendish, Town of*	M	Wastewater Pump Station Upgrades	CWT - Sewer System Rehabilitation	10,000	60,000	920,000	0	0
Bellows Falls Village Corp.	M	WWTF Refurbishment	CWT - Advanced Treatment	15,000	125,000	2,100,000	0	0
Burlington, City of*	M	Pump Station Refurbishment Phase II (Next 3)	CWT - Sewer System Rehabilitation	0	650,000	3,625,000	0	0
Burlington, City of*	M	WWTF Improvements - Tertiary Treatment	CWT - Advanced Treatment	0	435,000	10,000,000	0	0
Burlington, City of*	M	High Priority Separate Stormwater Outfall Repairs	Stormwater - Gray Infrastructure	155,000	250,000	2,000,000	0	0
Rutland, City of*	M	WWTF Improvements	CWT - CSO Correction	0	68,000	1,572,000	0	0
Vergennes, City of*	M	MacDonough Dr Sewer Improvements	CWT - CSO Correction	0	49,000	773,000	0	0
Vergennes, City of*	M	Downtown Sewer Improvements	CWT - CSO Correction	0	0	929,000	0	0
Proctor, Town of	M	WWTF Upgrade	CWT - Secondary Treatment	19,800	75,000	2,000,000	0	0
Essex Junction, Village of	M	Ejector Station Improvements	CWT - Sewer System Rehabilitation	0	69,000	1,351,250	0	0
Essex Junction, Village of	M	West St PS Upgrade	CWT - Sewer System Rehabilitation	0	60,000	1,170,000	0	0
Colchester, Town of	M	Malletts Bay Sewer Project - Phase 2	CWT - New Collector Sewers	0	425,000	8,275,000	0	0
Saint Albans, Town of	M	Grice Brook Project	Stormwater - Green Infrastructure	0	35,000	1,000,000	0	0
Essex, Town of	M	Center Rd Sewer Forcemain	CWT - Sewer System Rehabilitation	20,000	60,000	700,000	0	0
South Burlington, City of	M	Commerce Ave and Airport Pkwy FM Replacement	CWT - Sewer System Rehabilitation	0	0	1,100,000	0	0
Huntington, Town of	M	Lower Village Wastewater Project	NPS - Individual/Decentralized Systems	127,619	0	250,000	7,499,800	0
Wolcott, Village of*	M	Village Wastewater Project	NPS - Individual/Decentralized Systems	125,000	0	300,000	7,710,000	0
Saint Albans, Town of	M	Bay Area Community Wastewater Project	NPS - Individual/Decentralized Systems	500,000	0	1,500,000	13,000,000	0
Moretown, Town of	M	Village Wastewater Project	NPS - Individual/Decentralized Systems	0	250,000	0	4,000,000	0
Shaftsbury, Town of	M	Village Wastewater System	NPS - Individual/Decentralized Systems	125,000	0	420,000	7,455,000	0
Shelburne, Town of	M	WWTFs Consolidation Project	CWT - Advanced Treatment	0	0	1,996,000	30,040,700	0
Saint Albans, City of*	M	CSO Off-Line Storage	CWT - CSO Correction	0	0	200,000	3,000,000	0
Burlington, City of*	M	WWTF Facility Improvements Stage 2	CWT - Secondary Treatment	0	1,720,193	0	30,000,000	0
Windsor, Town of*	M	WWTF Upgrade	CWT - Secondary Treatment	150,000	0	275,000	4,000,000	0
Rutland, City of*	M	Calvary CSO Storage Project	CWT - CSO Correction	0	0	142,000	3,558,000	0
Rutland, City of*	M	River St Pump Station Improvements	CWT - CSO Correction	0	0	29,000	611,000	0
South Burlington, City of	M	Commerce Ave and Airport Pkwy FM Replacement	CWT - Sewer System Rehabilitation	0	0	0	1,100,000	0
Milton, Town of	M	Flanders Development Sewer Project	CWT - New Collector Sewers	0	0	350,000	7,000,000	0
Rutland, City of*	M	South Main St CSO Separation Project	CWT - CSO Correction	0	47,000	0	1,043,000	0
Rutland, City of	M	Otter Creek Interceptor Upgrade	CWT - CSO Correction	0	0	0	368,000	10,032,000
Chelsea, Town of*	M	WWTF and PS Upgrades	CWT - Secondary Treatment	50,000	150,000	0	0	0
Jericho, Town of	M	Village Wastewater Project	NPS - Individual/Decentralized Systems	0	250,000	0	0	0
North Avenue Cooperative	Rate Non-P	Wastewater Distribution and Stormwater Infrastructure	CWT - New Collector Sewers	0	0	800,000	0	0
Windy Hollow MHC	Rate Non-P	Wastewater System Replacement	NPS - Individual/Decentralized Systems	0	0	611,000	0	0
TOTALS				2,336,080	14,386,691	210,399,360	120,385,500	10,032,000

Total Anticipated Commitments						(210,399,360)	(120,385,500)	(10,032,000)
Administrative Expenses						(480,000)	(480,000)	(480,000)
Federal Funds**						14,959,000	14,959,000	14,959,000
State Matching Funds**						1,759,900	1,759,000	1,759,000
Repayment Funds						8,785,100	8,785,100	8,785,100
Carry Forward						0	0	0
Total Available Funds						25,504,000	25,503,100	25,503,100
Total Annual Surplus/Deficit						(185,375,360)	(95,362,400)	14,991,100

*These borrowers are expected to be disadvantaged communities based on our current affordability criteria

**The funds shown are the sum of the capitalization grant, Bipartisan Infrastructure Law Grant, and Emerging Contaminants Grant

Village Drinking Water and Wastewater ARPA Initiative

Combined SFY 22 & SFY 23 ARPA Award List

Town Name	Project Name	Points	Award
Montgomery, Town of	Montgomery Center Community Wastewater Project	90	\$ 2,724,107.00
Montgomery, Town of	Montgomery Village Community Wastewater Project	88	
Londonderry, Town of	South Londonderry Village Wastewater Project	84	\$ 4,009,331.45
Westford, Town of	Community Wastewater Project	79	\$ 2,377,136.00
Greensboro, Town of	Community Wastewater Project	78	\$ 3,968,331.45
Londonderry, Town of	North Londonderry Village Wastewater Project	72	\$ 4,009,331.45
Wolcott, Village of	Village Wastewater Project	72	\$ 2,565,000.00
Grafton, Town of	Grafton Village Community Wastewater Project	68	\$ 3,968,331.45
Burke, Town of	West Burke Village Wastewater Project	67	\$ 3,968,331.45
Highgate, Town of	Highgate Center Community Wastewater Project	62	\$ 1,457,718.75
South Hero, Town of	Community Wastewater Project	60	\$ 1,464,881.00
Moretown, Town of	Village Wastewater Project	56	\$ 3,325,000.00
Killington, Town of	Killington DW System (Contract 4)	53.8%	\$ 2,300,000.00

SFY 24 ARPA Waiting Town List (Final Design and Construction)

Town Name	Project Name	Points	SFY 24 Request	SFY 25 Request	SFY 26 Request
Huntington, Town of	Lower Village Wastewater Project	74	\$ 250,000	\$ 7,499,800	\$ -
Jamaica, Town of	Jamaica Village Wastewater Project	68	\$ 475,000	\$ 6,680,000	\$ -
Berlin, Town of	Riverton Village Wastewater Project	67	\$ 2,100,000	\$ -	\$ -
Saint Albans, Town of	Bay Area Community Wastewater Project	67	\$ -	\$ 1,500,000	\$ 13,000,000
Killington, Town of	Killington DW System (Remainder Contracts 1-4 & 6A)	66.2%	\$ 4,000,000	\$ -	\$ -
Waitsfield, Town of	Village Wastewater Project	66	\$ 13,229,900	\$ -	\$ -
Shaftsbury, Town of	Village Wastewater System	51		\$ 420,000	\$ 7,455,000
Jericho, Town of	Village Wastewater Project	45	\$ 250,000	\$ -	\$ -

Village: ARPA Ineligible Projects

Berlin, Town of	Crosstown Rd Collection System Refurbishment
Winhall, Town of	Bondville Village Sewer Extension
Killington	Contract 6B, 7

Extended Portion Of Intended Use Plan Project Funding List*

ADDISON TOWN
ALBANY TOWN
Albany Village
ALBURG TOWN
Alburgh Fire District #1
Alburgh Village
Algiers Fire District #1
ANDOVER TOWN
ARLINGTON TOWN
ATHENS TOWN
BAKERSFIELD TOWN
Bakersfield Fire District #1
BALTIMORE TOWN
BARNARD TOWN
BARNET TOWN
BARRE CITY
BARRE TOWN
BARTON TOWN
Barton Village
Bellows Falls Village
BELVIDERE TOWN
BENNINGTON TOWN
BENSON TOWN
BERKSHIRE TOWN
BERLIN TOWN
BETHEL TOWN
BLOOMFIELD TOWN
BOLTON TOWN
BRADFORD TOWN
BRAINTREE TOWN
BRANDON TOWN
Brandon Fire District #1
Brandon Fire District #2
BRATTLEBORO TOWN
BRIDGEWATER TOWN
BRIDPORT TOWN
BRIGHTON TOWN
BRISTOL TOWN
Bristol Village
BROOKFIELD TOWN
BROOKLINE TOWN
BROWNINGTON TOWN
BRUNSWICK TOWN
BURKE TOWN
BURLINGTON CITY
CABOT TOWN
Cabot Village
CALAIS TOWN
CAMBRIDGE TOWN
Cambridge Village

CANAAN TOWN
CASTLETON TOWN
Castleton Fire District #1
Castleton Fire District #3
CAVENDISH TOWN
Cavendish Fire District #1
Cavendish Fire District #2
CHARLESTON TOWN
CHARLOTTE TOWN
CHELSEA TOWN
CHESTER TOWN
CHITTENDEN TOWN
CLARENDON TOWN
COLCHESTER TOWN
Colchester Fire District #1
Colchester Fire District #2
Colchester Fire District #3
Cold Brook Fire District #1
CONCORD TOWN
CORINTH TOWN
CORNWALL TOWN
COVENTRY TOWN
CRAFTSBURY TOWN
DANBY TOWN
Danby-Mt. Tabor Fire District#1
DANVILLE TOWN
Danville Fire District #1
DERBY TOWN
Derby Center Village
Derby Line Village
DORSET TOWN
DOVER TOWN
DUMMERSTON TOWN
DUXBURY TOWN
EAST HAVEN TOWN
EAST MONTPELIER TOWN
EDEN TOWN
ELMORE TOWN
Enosburg Falls Village
ENOSBURG TOWN
ESSEX TOWN
Essex Junction Village
FAIR HAVEN TOWN
FAIRFAX TOWN
FAIRFIELD TOWN
Fairfield Fire District #1
FAIRLEE TOWN
FAYSTON TOWN
FERRISBURGH TOWN
Ferrisburgh Fire District #1
FLETCHER TOWN
FRANKLIN TOWN
GEORGIA TOWN
GLOVER TOWN
GOSHEN TOWN
GRAFTON TOWN
GRANBY TOWN
GRAND ISLE TOWN
Grand Isle Fire District #4
Graniteville Fire District #4
GRANVILLE TOWN
GREENSBORO TOWN

GROTON TOWN
Groton Village
GUILDHALL TOWN
GUILFORD TOWN
H2O F.F.D. #2 (Fairfield 2)
HALIFAX TOWN
HANCOCK TOWN
HARDWICK TOWN
HARTFORD TOWN
HARTLAND TOWN
HIGHGATE TOWN
HINESBURG TOWN
HOLLAND TOWN
HUBBARDTON TOWN
HUNTINGTON TOWN
Huntington Woods Fire District
HYDE PARK TOWN
Hyde Park Village
IRA TOWN
IRASBURG TOWN
ISLE LA MOTTE TOWN
Jacksonville Village
JAMAICA TOWN
JAY TOWN
Jeffersonville Village
JERICHO TOWN
Jericho Fire District #1
Jericho Village
JOHNSON TOWN
Johnson Village
KILLINGTON TOWN
KIRBY TOWN
LANDGROVE TOWN
LEICESTER TOWN
LEMINGTON TOWN
LINCOLN TOWN
LONDONDERRY TOWN
LOWELL TOWN
LUDLOW TOWN
Ludlow Village
LUNENBURG TOWN
Lunenburg Fire District #1
Lunenburg Fire District #2
LYNDON TOWN
Lyndonville Village
MAIDSTONE TOWN
MANCHESTER TOWN
Manchester Village
MARLBORO TOWN
MARSHFIELD TOWN
Marshfield Village
MENDON TOWN
MIDDLEBURY TOWN
MIDDLESEX TOWN
MIDDLETOWN SPRS TOWN
MILTON TOWN
MONKTON TOWN
MONTGOMERY TOWN
MONTPELIER CITY
Montpelier Fire District #1
MORETOWN TOWN
MORGAN TOWN

MORRISTOWN TOWN
Morrisville Village
MOUNT HOLLY TOWN
MOUNT TABOR TOWN
NEW HAVEN TOWN
NEWARK TOWN
NEWBURY TOWN
Newbury Village
NEWFANE TOWN
Newfane Village
NEWPORT CITY
NEWPORT TOWN
North Bennington Village
North Branch Fire District #1
NORTH HERO TOWN
North Troy Village
North Westminster Village
NORTHFIELD TOWN
Northfield Village
NORTON TOWN
NORWICH TOWN
Norwich Fire District #1
Old Bennington Village
ORANGE TOWN
Orleans Village
ORWELL TOWN
PANTON TOWN
PAWLET TOWN
PEACHAM TOWN
Peacham Fire District #1
Perkinsville Village
PERU TOWN
PITTSFIELD TOWN
PITTSFORD TOWN
Pittsford Fire District #1
PLAINFIELD TOWN
PLYMOUTH TOWN
POMFRET TOWN
POULTNEY TOWN
Poultney Village
POWNAL TOWN
Pownal Fire District #2
PROCTOR TOWN
PUTNEY TOWN
RANDOLPH TOWN
Randolph Fire District #1
Randolph Village
READING TOWN
READSBORO TOWN
RICHFORD TOWN
Richford Village
RICHMOND TOWN
RIPTON TOWN
ROCHESTER TOWN
ROCKINGHAM TOWN
ROXBURY TOWN
ROYALTON TOWN
Royalton Fire District #1
RUPERT TOWN
RUTLAND CITY
RUTLAND TOWN
Rutland Town Fire District #1

Rutland Town Fire District #4
Rutland Town Fire District #5
Rutland Town Fire District #8
Rutland Town-Mendon FD#2
RYEGATE TOWN
Ryegate Fire District #2
SALISBURY TOWN
SANDGATE TOWN
Saxtons River Village
SEARSBURG TOWN
SHAFTSBURY TOWN
SHARON TOWN
SHEFFIELD TOWN
SHELBURNE TOWN
SHELDON TOWN
Sherburne Fire District #1
SHOREHAM TOWN
SHREWSBURY TOWN
SOUTH BURLINGTON CITY
South Burlington Fire District #1
South Georgia Fire District #1
SOUTH HERO TOWN
South Hero Fire District #4
South Ryegate Village
SPRINGFIELD TOWN
SAINT ALBANS CITY
SAINT ALBANS TOWN
SAINT GEORGE TOWN
SAINT JOHNSBURY TOWN
STAMFORD TOWN
STANNARD TOWN
STARKSBORO TOWN
STOCKBRIDGE TOWN
STOWE TOWN
STRAFFORD TOWN
STRATTON TOWN
SUDBURY TOWN
SUNDERLAND TOWN
SUTTON TOWN
SWANTON TOWN
Swanton Village
THETFORD TOWN
TINMOUTH TOWN
TOPSHAM TOWN
TOWNSHEND TOWN
Townshend Village
TROY TOWN
TUNBRIDGE TOWN
UNDERHILL TOWN
VERGENNES CITY
VERNON TOWN
VERSHIRE TOWN
VICTORY TOWN
WAITSFIELD TOWN
WALDEN TOWN
WALLINGFORD TOWN
Wallingford Fire District #1
Wallingford Fire District #2
WALTHAM TOWN
WARDSBORO TOWN
WARREN TOWN
WASHINGTON TOWN

Washington Fire District #1
WATERBURY TOWN
Waterbury Village
WATERFORD TOWN
WATERVILLE TOWN
WEATHERSFIELD TOWN
Websterville Fire District #3
WELLS TOWN
Wells River Village
West Burke Village
WEST FAIRLEE TOWN
WEST HAVEN TOWN
WEST RUTLAND TOWN
WEST WINDSOR TOWN
WESTFIELD TOWN
WESTFORD TOWN
WESTMINSTER TOWN
Westminster Village
WESTMORE TOWN
WESTON TOWN
WEYBRIDGE TOWN
WHEELOCK TOWN
WHITING TOWN
WHITINGHAM TOWN
WILLIAMSTOWN TOWN
WILLISTON TOWN
WILMINGTON TOWN
WINDHAM TOWN
WINDSOR TOWN
WINHALL TOWN
Winhall-Stratton Fire District
WINOOSKI CITY
WOLCOTT TOWN
WOODBURY TOWN
WOODFORD TOWN
WOODSTOCK TOWN
Woodstock Village
WORCESTER TOWN
Worcester Fire District #1

***Note: The Towns listed in this table include all political subdivisions therein, whether such subdivisions are specifically included on the listing in their own names or not.**

Facility Name	Permit ID	NPDES Permit Number	Permittee Name	City	County Name
Arlington School	3-1372	VT0022934	Arlington School	Arlington	Bennington
Barre City	3-1272	VT0100889	City of Barre	Barre	Washington
Barton	3-1202	VT0100641	Village of Barton	Barton	Orleans
Bellows Falls	3-1297	VT0100013	Village of Bellows Falls	Bellows Falls	Windham
Bennington	3-1261	VT0100021	Town of Bennington	Bennington	Bennington
Benson	3-1166	VT0100498	Town of Benson	Benson	Rutland
Bethel	3-1280	VT0100048	Town of Bethel	Bethel	Windsor
Bradford	3-1157	VT0100803	Town of Bradford	Bradford	Orange
Brandon	3-1196	VT0100056	Town of Brandon	Brandon	Rutland
Brattleboro	3-1242	VT0100064	Brattleboro	Brattleboro	Windham
Bridgewater	3-1156	VT0100846	Town of Bridgewater	Bridgewater	Windsor
Brighton	3-1213	VT0100072	Town of Brighton	Brighton	Essex
Burlington Main	3-1331	VT0100153	City of Burlington	Burlington	Chittenden
Burlington North	3-1245	VT0100226	City of Burlington	Burlington	Chittenden
Burlington River	3-1247	VT0100307	City of Burlington	Burlington	Chittenden
Cabot	3-1440	VT0101257	Town of Cabot	Cabot	Washington
Canaan	3-0330	VT0100625	Town of Canaan	Canaan	Essex
Castleton	3-1238	VT0100897	Town of Castleton	Castleton	Rutland
Cavendish	3-1205	VT0100862	Town of Cavendish	Cavendish	Windsor
Chelsea	3-1197	VT0100943	Town of Chelsea	Chelsea	Orange
Chester	3-1177	VT0100081	Town of Chester	Chester	Windsor
Cold Brook FD 1 - Direct Discharge	3-1296	VT0101214	Cold Brook Fire District 1	Wilmington	Windham
Danville	3-1235	VT0100633	Town of Danville	Danville	Caledonia
Enosburg Falls	3-1234	VT0100102	Village of Enosburg Falls	Enosburg Falls	Franklin
Essex Junction	3-1254	VT0100111	Village of Essex Junction, Town of Williston, Town of Essex	Essex Junction	Chittenden
Fair Haven	3-1307	VT0100129	Town of Fair Haven	Fair Haven	Rutland
Fairfax	3-1194	VT0101087	Town of Fairfax	Fairfax	Franklin
Hardwick	3-1143	VT0100137	Town of Hardwick	Hardwick	Caledonia
Hartford - Quechee	3-1185	VT0100978	Town of Hartford	Hartford	Windsor
Hartford - WRJ	3-1225	VT0101010	Town of Hartford	White River Jct	Windsor
Hinesburg	3-1172	VT0101028	Town of Hinesburg	Hinesburg	Chittenden
Jeffersonville	3-1323	VT0101150	Village of Jeffersonville	Jeffersonville	Lamoille
Johnson	3-1149	VT0100901	Village of Johnson	Johnson	Lamoille
Ludlow	3-1208	VT0100145	Village of Ludlow	Ludlow	Windsor
Lunenburg FD2	3-1140	VT0101061	Lunenburg Fire District 2	Gilman	Essex
Lyndon	3-1111	VT0100595	Town of Lyndon	Lyndonville	Caledonia
Manchester	3-1153	VT0100170	Town of Manchester	Manchester	Bennington
Marshfield	3-1195	VT0100471	Village of Marshfield	Marshfield	Washington
Middlebury	3-1210	VT0100188	Town of Middlebury	Middlebury	Addison
Milton	3-1203	VT0100684	Town of Milton	Milton	Chittenden
Montpelier	3-1207	VT0100196	City of Montpelier	Montpelier	Washington
Morrisville	3-1155	VT0100480	Village of Morrisville	Morrisville	Lamoille
Newport City	3-1241	VT0100200	City of Newport	Newport	Orleans
North Troy	3-1139	VT0100234	Village of North Troy	North Troy	Orleans
Northfield	3-1158	VT0100242	Village of Northfield	Northfield	Washington
Orleans	3-1201	VT0100251	Village of Orleans Inc	Orleans	Orleans
Orwell	3-1214	VT0100676	Town of Orwell	Orwell	Addison
Otter Valley Union High School	3-0293	VT0020842	Otter Valley Union High School	Brandon	Rutland
Pawlet	3-1220	VT0101192	Town of Pawlet	West Pawlet	Rutland
Pittsford	3-1189	VT0100692	Town of Pittsford	Pittsford	Rutland
Plainfield	3-0381	VT0100781	Town of Plainfield	Plainfield	Washington
Poultney	3-1231	VT0100269	Village of Poultney	Poultney	Rutland
Pownal	3-1493	VT0101281	Town of Pownal	North Pownal	Bennington
Proctor	3-1298	VT0100528	Town of Proctor	Proctor	Rutland
Putney	3-1211	VT0100277	Town of Putney	Putney	Windham
Randolph	3-1198	VT0100285	Town of Randolph	Randolph	Orange
Richford	3-1147	VT0100790	Town of Richford	Richford	Franklin
Richmond	3-1173	VT0100617	Town of Richmond	Richmond	Chittenden
Royalton	3-1165	VT0100854	Town of Royalton	Royalton	Windsor

Rutland	3-1285	VT0100871	City of Rutland	Rutland	Rutland
Ryegate Fire District 2	3-1382	VT0100951	Ryegate Fire District 2	East Ryegate	Caledonia
Ryegate Town - South	3-1218		Town of Ryegate	South Ryegate	Caledonia
Saxtons River	3-1167	VT0100609	Village of Saxtons River	Rockingham	Windham
Shelburne 1 (Crown Rd)	3-1289	VT0100331	Town of Shelburne	Shelburne	Chittenden
Shelburne 2 (Harbor Rd)	3-1304	VT0100820	Town of Shelburne	Shelburne	Chittenden
Sheldon Springs	3-1108	VT0100340	Town of Sheldon	Sheldon Springs	Franklin
Sherburne FD 1	3-1243	VT0101141	Sherburne Fire District 1	Killington	Rutland
Shoreham	3-1459		Town of Shoreham	Shoreham	Addison
South Burlington - Airport Parkway	3-1278	VT0100366	City of South Burlington, Town of Colchester	South Burlington	Chittenden
South Burlington - Bartlett Bay	3-1284	VT0100358	City of South Burlington	South Burlington	Chittenden
Springfield	3-1154	VT0100374	Town of Springfield	Springfield	Windsor
St Albans City	3-1279	VT0100323	City of St Albans	St Albans	Franklin
St Albans Northwest Correctional	3-1260	VT0101117	City of St Albans	St Albans	Franklin
St Johnsbury	3-1290	VT0100579	Town of St Johnsbury	St Johnsbury	Caledonia
Stowe	3-1232	VT0100455	Town of Stowe	Stowe	Lamoille
Swanton	3-1292	VT0100501	Town of Swanton	Swanton	Franklin
Troy & Jay	3-1311	VT0101168	Towns of Troy and Jay	Troy	Orleans
Vergennes	3-0368	VT0100404	City of Vergennes	Vergennes	Addison
Wallingford FD 1	3-0365	VT0100552	Wallingford Fire District 1	Wallingford	Rutland
Waterbury	3-1160	VT0100463	Village of Waterbury	Waterbury	Washington
West Rutland	3-1237	VT0100714	Town of West Rutland	West Rutland	Rutland
Whitingham	3-1229	VT0101109	Town of Whitingham	Whitingham	Windham
Whitingham - Jacksonville	3-1230	VT0101044	Town of Whitingham	Jacksonville	Windham
Williamstown	3-1176	VT0100722	Town of Williamstown	Williamstown	Orange
Wilmington	3-1281	VT0100706	Town of Wilmington	Wilmington	Windham
Windsor Main	3-1253	VT0100919	Town of Windsor	Windsor	Windsor
Windsor Weston Heights	3-1168	VT0100447	Town of Windsor	Windsor	Windsor
Winooski	3-1248	VT0100510	City of Winooski	Winooski	Chittenden
Woodstock	3-1228	VT0100757	Town of Woodstock	Woodstock	Windsor
Woodstock - South	3-1178	VT0100749	Town of Woodstock	South Woodstock	Windsor
Woodstock - Taftsville	3-1179	VT0100765	Town of Woodstock	Taftsville	Windsor