

The Vermont Clean Water  
State Revolving Fund

## Intended Use Plan

for Federal Fiscal Year 2019  
and State Fiscal Year 2020

June 1, 2019; updated July 2, 2019

Prepared by Facilities Engineering Division  
Department of Environmental Conservation



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## Executive Summary

Vermont sends to the U.S. Environmental Protection Agency (EPA), as part of its annual application for a Clean Water Capitalization Grant 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. 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 2020 Pollution Control Project Priority List.

Whether all construction projects ready to proceed in a particular year will be funded depends on the amount of funds allocated to the program by the Vermont legislature and through the federal capitalization grant for the Clean Water State/EPA Revolving Loan Fund (CWSRF). 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 of the anticipated grant and loan funds each year.

Appearance of projects on the Project Priority List 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 amounts.

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Attachment 1: SFY 2020 Project Priority List

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## CWSRF Program Goals

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### Short Term Goals

- (1) To provide local government with low cost financial assistance.
- (2) To coordinate National Pollutant Discharge Elimination System (NPDES) permit schedules with anticipated award of CWSRF loans such that projects are brought into preliminary engineering and final design planning in a timely manner to assure their readiness to proceed to construction when capitalization grant funds become available.
- (3) To provide funding assistance to municipalities seeking to comply with stormwater or wastewater Total Maximum Daily Load (TMDL) permit requirements.
- (4) To develop any rules, guidance or procedures necessary to implement the Vermont - EPA pollution control revolving fund, specifically State-issued guidance for the implementation of Water Resources Reform & Development Act (WRRDA) requirements.
- (5) To coordinate state funded pollution control grant activities for clean water projects with activities of the CWSRF.
- (6) To provide effective program management to ensure fiscal integrity of the CWSRF.
- (7) To incentivize preliminary engineering and final design activities to develop a queue of high priority, ready-to-proceed projects.
- (8) To expedite project development, funding and cash draws.
- (9) To address issues raised by US EPA Region 1 concerning the administration of the CWSRF.

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### Long Term Goals

- (1) To ensure the fund operates in perpetuity and provides continuing financial assistance to Vermont municipalities for clean water project needs.

- (2) To allocate available State grants, in combination with CWSRF loans to assure the most beneficial use of all available funding for water pollution control projects.

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## State Pollution Control Grant Eligibility

State Pollution Control (PC) grants may be available for certain projects in addition to CWSRF loans. Vermont legislation (Act 103, signed May 12, 2016) authorized substantive changes to Vermont’s water pollution control grants program. The legislation replaces three grant categories consisting of CSO abatement (grant of up to 25%), dry weather sewage flow abatement, which may include nutrient upgrade work (grant of up to 35%), and sludge & septage improvements (grant of up to 50%) with a single, broader one referred to as water pollution abatement and control. This term is statutorily defined to include treatment of stormwater and sewage, groundwater protection, and flood resiliency work.

Act 103 established 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 Municipal Pollution Control Priority System Rule contained in Chapter 2 of the Environmental Protection Rules was amended and took effect December 1, 2017. Those changes to PC grant eligibilities takes effect July 1, 2019. Other than for previously completed grant-eligible projects or increases to existing categorical grants, no new categorical grants will be considered under this IUP.

These grants are 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.

**\$3.3M**



**Anticipated amount to be appropriated for pollution control grants in SFY20**



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## CWSRF Administration

Municipal CWSRF loans are currently issued at 0% interest with an administrative fee of 2% on construction loans. Private entity CWSRF loans will be set at 2% interest with an administrative fee of 2%, except when specific initiatives have an alternative rate as outlined in this IUP. Additionally, Brownfield Economic Revitalization Alliance (BERA) projects will be charged a 1% interest rate with an administrative fee of 2%.

Fee proceeds are deposited into a dedicated account separate from the CWSRF account, referred to as the administrative account. Administrative fee income for State FY2020 is projected to be approximately \$1.88 million. 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.

## 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.

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.

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## CWSRF Capitalization Grants FFY 2019

The federal fiscal year 2019 capitalization grant allotment available to Vermont is \$7,779,000 after allocating \$100,000 for the federal 604b program.

The required match is \$1,555,800 which will consist of state FY20 & FY21 capital funds, with \$1,538,103 to be available beginning July 2019 and the balance of \$17,697 anticipated to be available July 2020. The Sources and Uses table below assumes the total needed match will be available. Sources of funds and uses are listed below.

Sources	
<b>CWSRF Capitalization Grant</b>	\$7,779,000
<b>State Match Needed</b>	1,555,800
<b>Repayments</b>	9,502,137
<b>Carry-Forward</b>	<u>70,345,062</u>
<b>TOTAL</b>	<b><u>\$89,181,999</u></b>



Uses	
<b>Anticipated Commitments</b>	\$88,701,980
<b>Administrative</b>	480,019
<b>TOTAL</b>	<b>\$89,181,999</b>

The State matching funds will be deposited into the CWSRF prior to the quarter when federal funds are requested. 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.

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## 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 2020. Although we anticipate a large volume of projects and requests for funds in state fiscal years 2020 to 2024, the fund will likely support the need, thus, a per project cap on the CWSRF loan funds will not be needed, as has been applied in past years.

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 would only provide such funding if the balance remains underutilized and there is compelling justification of a public benefit to be secured.

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## Project Funding

### **Projects Anticipated to Receive FFY 2019 CWSRF available Funds\***

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\* See attached Extended Portion of Intended Use Plan Project Funding List

(Award of FFY 2019 Funds are anticipated to be made during SFY 2020)

<b>Project /Activity</b>	<b>Total Project Cost**</b>	<b>SRF State Match</b>	<b>Federal Share FFY 2018 Funds</b>
<b>See 2020 Priority List Attached</b>	\$8,854,781	\$1,475,781	\$7,379,000
<b>Vermont Administrative Expense</b>	\$480,019	\$80,019	\$400,000
<b>Total</b>	<b>\$9,334,800</b>	<b>\$1,555,800</b>	<b>7,779,000</b>

Detailed project information is included in the attached Municipal Pollution Control Projects Priority List for state fiscal year 2020. The cash draw ratio of state to federal is 1:5, or an 83.33% federal share of the total.

<b>Vermont CWSRF Payment Schedule FFY 2019EPA Capitalization Grant</b>			
<b>Payment No.</b>	<b>Quarter</b>	<b>Date</b>	<b>Amount</b>
<b>1</b>	<b>2020-1</b>	<b>10/1/2019-12/31/2019</b>	<b>2,000,000</b>
<b>2</b>	<b>2020-2</b>	<b>1/1/2020-3/31/2020</b>	<b>2,000,000</b>
<b>3</b>	<b>2020-3</b>	<b>4/1/2020-6/30/2020</b>	<b>2,000,000</b>
<b>4</b>	<b>2020-4</b>	<b>7/1/2020-9/30/2020</b>	<b>1,609,000</b>
<b>5</b>	<b>2021-4</b>	<b>7/1/2021-9/30/2021</b>	<b>170,000</b>

## Non-Point Source Funding

Vermont’s CWSRF has an increasing focus on non-point source funding. The two new mechanisms to increase this type of utilization of the fund are through the establishment of the Water Infrastructure Sponsorship Program (WISPr) and the introduction of an Interim Financing for Natural Resources Projects Program.

\*\* Costs will change as projects are refined



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## Water Infrastructure Sponsorship Program (WISPr)

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The WISPr program was established in 2018 after the passage of Act 185 which established a mechanism for a municipality to “sponsor” a natural resources project, which would be forgiven over the life of the loan via a reduction in the administrative fee.

WISPr will be coordinating with the Clean Water Initiative Program’s (CWIP) Ecosystem Restoration Grant Program (ERP) to evaluate the technical merits of projects. Together the programs have the ability to provide significantly more funding to natural resources projects (NRP) than ever before. All NRPs seeking funding for planning, design, and implementation will apply to ERP on their funding cycle. Those projects will be provided with funding either through WISPr or ERP for planning and design. Once a project has completed design and is ready for implementation, it will be paired with a municipality that is willing to participate in WISPr.

To support planning efforts, the CWSRF will utilize up to \$250,000 to assist with the funding of projects that apply to ERP. These loans will become part of the project budget once the project goes to construction or implementation. If the natural resources project fails to construct or implement after five years, the loan will be forgiven.

The [WISPr policy](#) has been updated to reflect the alignment with ERP. Additionally, the policy has made the following updates:

- In accordance with the CWSRF Treatment Works Policy, WISPr will not require an environmental review as NR projects are categorically non-treatment works projects. The State Environmental Review Policy (SERP) may need to be revised to reflect this change.
- 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.
- The policy now addresses the situation when a sponsoring project comes in significantly under the executed sponsoring loan agreement amount.
- The Program proposes to change the policy that sponsoring projects will receive additional priority list points for participation in WISPr. A sponsoring project will only receive points for their project and the financial benefit of the 0.1% administrative fee reduction. Effectively, a municipality will not receive additional priority ranking or PC grant eligibility for WISPr for participation.

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## Interim Financing for Natural Resources, Agriculture Water Quality & Forestry Conservation

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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 proposes to utilize this expanded eligibility to promote investment in natural resource restoration, agricultural water quality, and forestry conservation projects with a clean water benefit.

To aid in this investment, this IUP is proposing the development of an interim financing program. The interim financing would be shown on the priority list as a "put aside" to ensure funds are available as needed, though private entity interim financing requests would need to ensure all known municipal projects are bypassed prior to funding. To ensure funding is flexible and available for the interim financing projects, the put aside would not require discrete projects be ranked on the priority list, but rather categorically ranked on this put aside. This would propose the following:

- \$20M "put aside" on the priority list for interim financing of all eligible natural resource restoration, agricultural water quality, and forestry conservation project. This financing would be at 0% for municipal applicants or 1% for all other applicants, for a term not to exceed 5 years. This interim financing allocates \$10M for municipal applicants and \$10M for private entities.
- If insufficient municipal or private entity projects are developed, the program may fund more in a specific category. For example, if insufficient municipal projects are identified, a portion of the \$10M Interim Financing funds can be directed to eligible private entity-sponsored applicants.
- 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 restriction for private entity borrowing, including the restriction of utilization of no more than 20% of the available fund 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 meet readiness to proceed requirements as outlined in this IUP and be able to pass underwriting criteria of either VEDA or VMBB.

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## Annual Report

In accordance with the requirements of Section 606(d) of the Act, Vermont will provide EPA with an Annual Report within 90 days of the end of the state fiscal year. The Annual Report

contains information on how the state has met the goals and objectives of the previous fiscal year, as stated in the IUP and grant agreement. The Annual Report also reviews how well the existing SRF financial operating policies, alone or in combination with other state financial assistance programs, provides for the long-term fiscal health of the fund, assists communities to increase local responsibility for compliance, and carries out other provisions specified in the State Clean Water Strategy. The Annual Report also provides information on loan recipients, loan awards/disbursements, and environmental assessment determinations.

The Annual Report will show that the State has completed the following:

- (1) Reviewed all CWSRF funded section 212 projects in accordance with the approved environmental review procedures (section 602(a));
- (2) Deposited its match on or before the date which each quarterly grant payment was made (section 602(b)(2));
- (3) Made binding commitments to provide assistance equal to 120% of the amount of each grant payment within one year after receiving the grant payment (section 602(b)(3)); and
- (4) Expended all funds in an expeditious and timely manner (section 206(b)(4)).

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## Environmental Benefits Reporting & Other Federal Databases

Environmental benefits will be reported using the Clean Water Benefits Reporting (CBR) federal on-line reporting system each time a loan is transacted during the fiscal year. This information is now being automatically reported via a data push from an internal database to the CBR website. Reporting to FFATA and NIMS will also be completed.

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## Program Changes

All projects receiving federal funds will be required to comply with the requirements of the federal Single Audit Act. All treatment works projects must comply with a NEPA like review, DBE reporting, Davis-Bacon, American Iron and Steel, and other federal crosscutters required by WRRDA, as applicable. Projects will be reported in FFATA until an amount equivalent to the federal grant has been met. However, the program does not use equivalency to apply federal crosscutters and they are applied to all projects, regardless of funding source.

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

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## Loan Repayment Start Date

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In the FFY2018 IUP, the program adopted a policy regarding when loans initiate repayment. This stated that projects will enter into repayment no later than one year after final completion and provided a consistent definition of final completion. Once implemented, it was noted that this requirement does not allow for loan recipients to submit for disbursements throughout the warranty period. As such, this IUP proposes a revised policy that states that all loans will go into repayment in year one at their full loan value and in year two, those loan values will be reduced to reflect the disbursed amount.

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## Priority List Bypass Procedure

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The revision of the Chapter 2 Priority Rule in December 2017 allowed for the implementation of a bypass procedure. In order to further prioritize the management of the priority list, the program proposes a [revised procedure](#) that requires, among other things, a preliminary engineering report (PER) by August 31 of each year for PC Grant and CWSRF Loan applicants. Projects not meeting this and other readiness to proceed dates may 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.

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## Green Project Reserve

The Vermont requirement for Green Project Reserve (GPR) for federal fiscal year 2019 is 10% of the federal grant, or \$777,900. This year, projects indicated likely green project elements at an estimated amount of \$2,662,970. These projects are identified on the attached priority list. Many of these projects are early in the development phase and engineering and project development staff will work directly with municipalities and their consultants to incorporate green project elements into the project design.

In addition, the revisions to the Chapter 2 Priority Ranking criteria provide a framework for how projects should be prioritized for funding. This framework provides flexibility for the prioritization of federally mandated project types, including GPR projects.

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.

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## Additional Subsidy

Pursuant to the applicable 2019 federal appropriations act provisions, an amount equal to 10% of the grant must be provided as subsidy, or at least \$777,900. An additional amount equal to 30% of the grant, or \$2,333,700, may also be provided in the form of subsidy in accordance with the 2014 federal WRRDA provisions. In total, the fund may use up to 40% of the federal grant, or \$3,111,600 for additional subsidization. The program intends to utilize no more than \$3M in additional subsidy in this current IUP. Only municipal applications are eligible for additional subsidy.

For the Federal FY2019 IUP, the Clean Water State Revolving Fund (CWSRF) loan program is proposing to allow additional subsidy by way of the following avenues:

1. Principal loan forgiveness for planning costs up to \$2 million.
2. Principal loan forgiveness for Total Maximum Daily Load (TMDL)-related expenses of natural resources projects up to \$500,000.
3. Principal loan forgiveness for technology-based solutions to optimize and prioritize Combined Sewer Overflows (CSOs) and stormwater control systems, up to \$500,000.

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### Additional Subsidy for Planning

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This avenue to receive principal loan forgiveness for planning includes feasibility studies, asset management planning, preliminary engineering reports, and final design projects. This IUP proposes to reserve up to \$2 million for these activities. Eligible projects may receive forgiveness for 50% of planning costs, up to \$100,000 per project, with a limit of no more than \$250,000 for each borrower. A single borrower may combine multiple projects for preliminary engineering or final design to reach the cap.

Additionally, all municipalities seeking funding for the following plan types will receive 100% forgiveness on their loans, up to \$100,000 per borrower:

- Long-Term Control Plans (LTCPs)
- 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 SSOs.

The forgiveness for these plans can be additive to the 50% forgiveness above and would not count toward the proposed cap. In other words, an applicant may receive the 100% planning loan eligibility for one project and may apply for planning additional subsidy for other projects. The \$100,000 would not apply to the \$250,000 cap on the 50% planning loan additional subsidy.

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## Additional Subsidy for TMDL-related reductions in Natural Resources Projects

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This avenue to receive additional subsidy through principal loan forgiveness is directed to municipalities that have natural resource restoration or protection components of a funded project that support implementation of a nutrient or sediment TMDL, which include:

- Eligible Natural Resource Projects
- Wetland restoration projects
- Floodplain/stream restoration
- River corridor easements
- Woody buffer plantings
- Lake shoreland retrofit, erosion repair using LakeWise principles
- Dam Removal
- Portions of agriculture and forest conservation easements based on acres of special water quality protections (percent of acres of special water quality protection zones out of total acres conserved). A special water quality protection zone is a no-touch riparian buffer or wetland protection zone.

Of the total project costs, the amount that is directly attributable to nutrient reductions will be 100% forgiven, up to \$500,000. There is no cap per borrower and all determinations of nutrient reduction related costs will be determined by DEC. This may be done in conjunction with the Interim Financing for NR Projects Program or a traditional CWSRF loan.

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## Additional Subsidy for CSO and Stormwater Technology Based Solutions

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This avenue for additional subsidy is for the installation of technology-based solutions to optimize existing control systems. Eligible project types include:

- Rain gauges for CSO communities that need to comply with the CSO Rule
- Flow metering of CSO discharges for volumetric monitoring and telemetric reporting
- Smart controls for stormwater projects to optimize stormwater storage where flow Volumes are the pollution problem
- Other technology-based solution that is approved by the Secretary.

Please note that SCADA system upgrades, energy efficiency, and telemetry projects are not eligible for this subsidy opportunity. Applicants would be eligible for 100% additional subsidy in the form of principal forgiveness, up to \$100,000 per borrower, with a \$500,000 total cap.



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## What Constitutes Planning Versus Construction Activities?

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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, planning, 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 activity. 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.

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 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 FED on a case by case basis

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## Requirements to Secure Additional Subsidy

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To secure additional subsidy for either criteria, applicants must comply with and submit the following:

- All additional subsidy is awarded on a first come, first serve basis.
- Only municipal applicants are eligible for additional subsidy
- Applicants may qualify for multiple types of additional subsidy under this plan. All eligibility can be additive, except as outlined under the 50% planning provisions 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 such as facility plan approval including environmental prior to securing additional subsidy for a final design loan and bond documentation and final design approval prior to securing additional

subsidy for construction.

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## Affordability Criteria

The Water Resources Reform and Development Act of 2014 (WRRDA) amended sections of the Federal Water Pollution Control Act (FWPCA) that impact the Clean Water State Revolving Fund (CWSRF) loan program administered by Vermont's Department of Environmental Conservation. Section 603(i) was added requiring States to establish affordability criteria to assist in identifying municipalities that would experience a significant hardship raising the revenue necessary to finance a project or activity eligible under the CWSRF program, if additional subsidization is not provided. The amendment required States to establish the affordability criteria no later than September 30, 2015 after providing notice and an opportunity for public comment. It also requires that 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.

The Department amended this criteria in 2018 to create consistency with the Chapter 2 Rule. There are no proposed changes under this IUP.

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## 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 department's Environmental Review Procedures 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 15, 2019, 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 2020 with a due date of February 15, 2019 for inclusion in the draft Pollution Priority List. On April 1, 2019, the Department released the draft IUP for public comment and on May 1, 2019 held a public meeting at the Annex in Berlin, Vermont at 10:00 a.m. This final IUP includes a public responsiveness summary to detail comments made throughout this process.

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## Responsiveness Summary

The following responsiveness summary is a list of questions and comments received at the May 1, 2019 public hearing through the public comment period ending May 15, 2019. Some comments have been edited for brevity and clarity:

Q. (Regarding a project on the priority list being bypassed by the CWSRF Program). If a project on the priority list gets bypassed should work on the project continue?

A. The project is being bypassed for construction funding only. If there is planning and design work that still needs to be completed for the project, then funding is still available for the that work, and that work should be completed so the project is ready for construction the following year.

Q. (Regarding future PC Grant incentivization). A comment was made that the PC Grant program should consider additional weighting for projects that specifically address age related infrastructure replacement.

A. This concern will be considered the next time that Chapter 2, the governing document for PC Grants, is modified. In the meantime, our program will consider incentivizing age-related infrastructure projects using additional subsidy in next year's IUP.

Q. (Regarding Interim Financing). Has a maximum loan amount for this benefit been established?

A. A cap per borrower has not been established at this time.

Q. (Regarding Additional Subsidy for LTCP and Hydraulic and Hydrologic (H&H)). Is it possible to get this 100% additional subsidy applied to a project retroactively?

A. Once the IUP is finalized, we will consider loan amendments.

Q. (Regarding Additional Subsidy). Does the project have to go through the Qualifications Based Selection (QBS) process?

A. Yes, all projects must go through the QBS process to qualify for funding and additional subsidy in the CWSRF program.

Q. (Regarding H&H Subsidy). Does this apply to H&H modeling combining through the overflow system or does it apply to the H&H specific to flooding?

A. It wouldn't apply to a project that isn't a CSO.

Q. (Regarding QBS for H&H). Comment was made that it doesn't feel like there is any flexibility with the QBS and the H&H is a lot of effort. Is there any kind of consideration for that?

A. QBS is a Federal CWSRF program requirement for all projects, regardless of type of project.

Q. (Regarding CSO Control Add Sub). What is a special water quality zone?

A. The special water quality zones are identified by the technical staff of the Watershed Management Division. If a new water quality zone is proposed, the technical experts in that Division will evaluate the proposal. It also has to be shown to be within the project area.

Q. (Regarding the CSO Control add sub). This add sub is only available for projects that are coming in after the IUP is adopted?

A. Yes. The loan approval for the project would have to be prepared and executed after the IUP is formally adopted.

Q. (Regarding the CSO Control add sub). Does this forgiveness apply to the engineering related work or just the monitoring equipment? A typical project would include the installation of level monitoring at strategic locations within the system and then that data would be monitored, analyzed, etc.

A. The equipment and the engineering are both eligible. Equipment purchase will need to follow procurement policy. The work necessary to install the equipment can also be considered.

Q. Comment: (Regarding WISPr incentives for municipalities to participate). Is the 0.1% interest rate reduction sufficient to get municipalities to participate in WISPr?

A: Since the program has removed most of the administrative barriers and participation requires relatively little effort for the municipality, it is believed by the Department that this incentive is sufficient to encourage participation. If this proves to not be sufficient, this policy can be reconsidered in the future.

**Project Priority List (PPL) Applications that were received after the February 15, 2019 deadline and were processed are as follows:**

<b>Applicant</b>	<b>Project Name</b>	<b>Project Cost</b>	<b>PList Points</b>
453 Pine St, LLC	Brownfield Project (BERA)	\$5,000000	31

Addison, Town of	Addison Community Wastewater	\$680,272	39
Arlington School District	WWTF Disinfection System Improvements	\$70,000	27
Brattleboro, Town of	WWTF Upgrade <b>PC Grant Only</b> (Continuing)	\$6,000,000	49
Burlington, City of	2 previously submitted applications revised into 3 applications	NA	NA
Colchester, Town of	Malletts Bay Sewer Project	\$14,280,000	75
Pittsford, Town of	Depot Hill Rd Pump Station and WWTF Controls	\$970,000	38
Pownal, Town of	Pownal Landfill Project (Revised)	\$750,000	45
St. Albans, City of	Kingman St Reconstruction Project	\$200,000	55
St. Albans, City of	Stebbins St Utility Upgrades	\$275,000	48
South Burlington, City of	Airport Parkway WWTF Upgrade <b>PC Grant Only</b> (Continuing)	\$25,831,500	65
Swanton, Town of	WWTF and Collection System Evaluation	\$5,000,000	68
White River Partnership	Hyde Dam Removal Project	\$220,000	43
Whitingham, Town of	WWTFs Improvements Projects	\$3,690,000	54
Winooski, City of	Hickok St and West	\$1,000,000	27

**SFY2020 Clean Water Loans and Pollution Control Grants Priority List**

Applicant	Applicant Type	Project Name	Priority Points	Project Category	2020 Step I	2020 Step II	2020 Step III	2020 Total Project Loan	Green Project Reserve Amount	Grant Eligibility \$	Grant %
Saint Albans, City of	Municipality	WWTF Refurbishment and TP Upgrade	81	CWT - Advanced Treatment	0	0	0	0	77,000	0	DWF
South Burlington, City of	Municipality	Hadley Road Area Infrastructure Improvements	65	CWT - CSO Correction	0	0	0	0	60,000	0	CSO
South Burlington, City of	Municipality	Airport Parkway WWTF Upgrade PC Grant Retroactive	65	CWT - Advanced Treatment	0	0	0	0	0	4,395,000	S/S
Bennington, Town of	Municipality	Bennington WWTF Upgrade	49	CWT - Advanced Treatment	0	0	0	0	0	0	0%
Brattleboro, Town of	Municipality	Brattleboro WWTF Upgrade	47	CWT - Advanced Treatment	0	0	0	0	0	2,682,747	S/S
Winooski, City of	Municipality	WWTF New Headworks	38	CWT - Secondary Treatment	0	0	0	0	0	0	0%
Proctor, Town of	Municipality	Ormsbee Avenue Sewer and Stormwater Improvements	37	CWT - New Collector Sewers	0	0	0	0	0	0	0%
Castleton, Town of	Municipality	Route 30 Sewers	32	CWT - New Collector Sewers	0	0	0	0	0	0	0%
Derby Line, Village of	Municipality	Rock Island Quebec Wastewater Treatment Facility Upgrade	31	CWT - Advanced Treatment	0	0	0	0	0	0	0%
Shelburne, Town of	Municipality	Sewer Collection System Improvements	23	CWT - Sewer System Rehabilitation	0	0	0	0	0	0	0%
Rutland, City of	Municipality	City of Rutland CWSRF Projects SFY20	90	CWT - CSO Correction	94,000	376,175	7,577,000	8,047,175	0	2,816,511	35%
Burlington, City of	Municipality	FY 20 CW Infrastructure Upgrades and SW and WW	79	CWT - Secondary Treatment	120,000	310,000	8,750,000	9,180,000	810,000	4,501,600	34%
Bridgewater, Town of	Municipality	Wastewater Facility Improvement Project	77	CWT - Sewer System Rehabilitation	0	0	760,000	760,000	0	220,400	29%
Saint Johnsbury, Town of	Municipality	Pleasant St. and Gilman Ave. area Combined Sewer Separation	77	CWT - CSO Correction	0	196,700	5,845,700	6,042,400	161,200	1,541,500	25%
Colchester, Town of	Municipality	Malletts Bay Sewer Project	75	CWT - New Collector Sewers	511,000	1,127,000	12,642,000	14,280,000	0	4,426,800	31%
Vergennes, City of	Municipality	WWTF & Pump station Evaluation	70	CWT - Advanced Treatment	143,000	0	0	143,000	0	50,050	35%
Barre, City of	Municipality	Biosolids Improvements	63	CWT - Advanced Treatment	27,600	55,200	900,000	982,800	200,000	167,076	17%
Montpelier, City of	Municipality	Aging Infrastructures & Organics to Energy Improvements	62	CWT - Advanced Treatment	0	0	0	0	0	2,316,074	14%
Northfield, Town of	Municipality	Main Street Stormwater Separation and CSO Abatement	61	CWT - CSO Correction	0	70,000	1,874,520	1,944,520	205,000	435,820	22%
Middlebury, Town of	Municipality	East Middlebury Flood Resiliency	60	Floodplain/Stream Restoration	0	0	476,000	476,000	200,000	0	0%
Saint Albans, City of	Municipality	Kingman St Reconstruction	55	CWT - CSO Correction	10,000	15,000	175,000	200,000	0	34,000	17%
Whitingham, Town of	Municipality	Wastewater Facilities Improvements	54	CWT - Secondary Treatment	69,500	241,000	3,379,500	3,690,000	50,000	442,800	12%
Wilmington, Town of	Municipality	Infrastructure Extension Route 9 East	54	CWT - New Collector Sewers	13,400	30,000	700,000	743,400	0	111,510	15%
Ludlow, Village of	Municipality	WWTF Upgrade	51	CWT - Secondary Treatment	0	0	3,000,000	3,000,000	0	300,000	10%
Waitsfield, Town of	Municipality	Maclay System	51	NPS - Individual/Decentralized Systems	3,000	7,000	50,000	60,000	60,000	0	19%
Bristol, Town of	Municipality	Wastewater Treatment Upgrade Project	50	CWT - Advanced Treatment	16,000	33,000	579,000	628,000	450,000	75,360	12%
Hartford, Town of	Municipality	White River Junction South Main Street Improvements	50	CWT - Sewer System Rehabilitation	0	100,000	1,750,000	1,850,000	0	185,000	10%
Saint Albans, City of	Municipality	Stebbins St Utility Upgrades	48	CWT - CSO Correction	10,000	15,000	250,000	275,000	0	27,500	10%
Hyde Park, Village of	Municipality	Hyde Park Village Wastewater Improvements	42	NPS - Individual/Decentralized Systems	0	232,000	590,000	822,000	0	0	0%
Hartford, Town of	Municipality	White River Junction Downtown No. Main Street Stormwater	42	Stormwater - Gray Infrastructure	0	0	750,000	750,000	0	75,000	10%
Fair Haven, Town of	Municipality	River Street Sewers and Storm	40	CWT - Infiltration/Inflow	0	50,000	600,000	650,000	0	67,500	10%
Chester, Town of	Municipality	Chester Stormwater System Evaluation	39	Stormwater - Gray Infrastructure	20,000	70,000	920,000	1,010,000	200,000	101,000	10%
Addison, Town of	Municipality	Addison Community Wastewater System	39	NPS - Individual/Decentralized Systems	0	0	562,000	562,000	154,770	68,027	10%
Pittsford, Town of	Municipality	Depot Hill Rd Sewer and PS Improvements and WWTF Control Im	38	CWT - Sewer System Rehabilitation	10,000	40,000	920,000	970,000	85,000	0	0%
Fair Haven, Town of	Municipality	Wastewater Treatment Facility Refurbishment	35	CWT - Secondary Treatment	0	100,000	2,000,000	2,100,000	0	215,000	10%
West Windsor, Town of	Municipality	West Windsor Sewer Rehabilitation Project	29	CWT - Infiltration/Inflow	0	37,000	645,000	682,000	0	0	0%
Fairfax, Town of	Municipality	Fairfax Wastewater Treatment Facility Upgrade	28	CWT - Sewer System Rehabilitation	63,000	117,000	1,895,200	2,075,200	0	0	0%
Winooski, City of	Municipality	Hickok St and West lane SS and SW Improvements	27	CWT - Sewer System Rehabilitation	16,000	84,000	900,000	1,000,000	0	0	0%
Arlington School District	Municipality	Disinfection System Improvements	27	CWT - Secondary Treatment	0	10,000	60,000	70,000	25,000	7,000	10%
Lyndon, Town of	Municipality	Pinehurst Street Sewer Replacement	26	CWT - Sewer System Rehabilitation	10,000	60,000	430,000	500,000	0	50,000	10%
Proctor, Town of	Municipality	Willow Street Pump Station	24	CWT - Infiltration/Inflow	35,000	50,000	350,000	435,000	0	0	0%
Johnson, Village of	Municipality	Johnson Powerhouse Building Emergency Demolition	21	NPS - Brownfields	0	0	250,000	250,000	0	25,000	10%
Brattleboro, Town of	Municipality	Retreat and Wilson Woods Pump Station Upgrades	16	CWT - Sewer System Rehabilitation	12,000	45,000	750,000	807,000	0	0	0%
Mountain Wastewater Treatment, Inc.	Private Non-Profit	Tertiary Sandfilter Replacement	38	NPS - Individual/Decentralized Systems	15,000	70,000	1,000,000	1,085,000	0	0	0%
453 Pine St, LLC	Private For-Profit	453 & 501 Pine Street Redevelopment	31	NPS - Brownfields	100,000	150,000	4,750,000	5,000,000	0	0	0%
Milton Mobile Home Park	Private Non-Profit	MMHC Water and Sewer Upgrade	17	NPS - Individual/Decentralized Systems	20,000	150,000	2,000,000	2,170,000	0	0	0%
<b>Subtotal SFY2020 Projects Requesting Construction Funding</b>					<b>1,318,500</b>	<b>3,841,075</b>	<b>68,080,920</b>	<b>73,240,495</b>			
Natural Resource Interim Financing Put A	Municipal	Natural Resources, Ag Water Quality and Forestry Conservation		NPS				10,000,000			
Natural Resource Interim Financing Put A	Private	Natural Resources, Ag Water Quality and Forestry Conservation		NPS				10,000,000			
<b>TOTAL</b>					<b>1,318,500</b>	<b>3,841,075</b>	<b>68,080,920</b>	<b>93,240,495</b>	<b>2,737,970</b>	<b>25,338,275</b>	
Additional Anticipated SFY20 Planning Need*					3,593,883	3,632,010		7,225,893			
<b>Total</b>					<b>4,912,383</b>	<b>7,473,085</b>		<b>100,466,388</b>			
<b>Total Anticipated Commitments</b>								<b>(100,466,388)</b>			
<b>Administrative Expenses</b>								<b>(480,019)</b>			
<b>Federal Funds</b>								<b>7,779,000</b>			
<b>State Matching Funds</b>								<b>1,555,800</b>			
<b>Repayment Funds</b>								<b>9,502,137</b>			
<b>Carry Forward</b>								<b>70,345,062</b>			
<b>Total Available Funds</b>								<b>89,181,999</b>			
<b>Annual Suprus/Shortfall</b>								<b>(11,764,408)</b>			

CSO= 25%; DWF=35%; and S/S=50%

\* Denotes a planning need only in FY20 (these projects are not ranked)

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

Note: Total estimated grant need of \$24,207,716, but it has not been determined what the grant appropriation will be.

C denotes continuing project. Additional funds may be needed.

Note: While all projects requesting construction funding are shown, it is not expected that all will proceed in SFY20. Additionally, the allocation for interim financing is not expected to be fully utilized; therefore, no shortfall is expected. At the time that this list is finalized a fundable line will be provided as needed.



**CWSRF Construction Loan Need SFY2021-2024, and Planning Loan Need for SFY2020**

Applicant	Applicant Type	Project Name	Project Category	2020 Step I	2020 Step II	2021 Step III	2022 Step III	2023 Step III	2024 Step III
Burlington, City of	Municipality	Remaining Placeholder Clean Water Resiliency Plan Infrastructure Upgrades and SW/CSS Retro	CWT - Advanced Treatment	1,500,000	375,000	15,500,000	0	0	0
Rutland, City of	Municipality	City of Rutland CWSRF Projects SFY 2021	CWT - CSO Correction	80,000	187,000	3,943,000	0	0	0
Middlebury, Town of	Municipality	Combined Sewer Overflow Abatement for Pump Stations #3 and #9	CWT - CSO Correction	50,000	100,000	850,000	0	0	0
Swanton, Town of	Municipality	WWTF and Collection System	CWT - Advanced Treatment	50,000	250,000	4,700,000	0	0	0
Barre, City of	Municipality	WWTF 20-Year Evaluation	CWT - Advanced Treatment	200,000	400,000	6,500,000	0	0	0
Saint Albans, City of	Municipality	Federal Street Sewer Separation	CWT - CSO Correction	25,000	50,000	500,000	0	0	0
Winooski, City of	Municipality	Main Street Revitalization Project (RF1-212)	CWT - Infiltration/Inflow	190,383	670,000	5,640,000	0	0	0
Hinesburg, Town of	Municipality	Wastewater treatment facility upgrade and expansion	CWT - Advanced Treatment	300,000	700,000	8,000,000	0	0	0
Castleton, Town of	Municipality	Crystal Heights Sewer	CWT - New Collector Sewers	15,000	35,000	400,000	0	0	0
Westford, Town of	Municipality	Town Center Community Wastewater System	CWT - New Collector Sewers	38,500	115,010	1,550,460	0	0	0
Middlebury, Town of	Municipality	WWTF Evaluation and Facilities Planning Study	CWT - Advanced Treatment	140,000	600,000	0	8,000,000	0	0
Saint Albans, City of	Municipality	Lower Weldon CSO	CWT - CSO Correction	50,000	0	100,000	900,000	0	0
Milton, Town of	Municipality	Flanders Development	CWT - New Collector Sewers	35,000	0	75,000	900,000	0	0
Castleton, Town of	Municipality	Castleton WWTF Upgrade	CWT - Secondary Treatment	50,000	0	150,000	2,500,000	0	0
Burlington, City of	Municipality	Integrated Planning and Implementation	CWT - Sewer System Rehab	540,000	0	0	2,500,000	25,000,000	0
Montpelier, City of	Municipality	Montpelier Long Term Control Plan	CWT - CSO Correction	30,000	0	0	0	0	0
Pownal, Town of	Municipality	Landfill West Mitigation	NPS - Brownfields	300,000	150,000	300,000	0	0	0
<b>TOTAL</b>				<b>3,593,883</b>	<b>3,632,010</b>	<b>48,208,460</b>	<b>14,800,000</b>	<b>25,000,000</b>	<b>0</b>
<b>Total Anticipated Commitments</b>						<b>(48,208,460)</b>	<b>(14,800,000)</b>	<b>(25,000,000)</b>	<b>0</b>
<b>Administrative Expenses</b>						<b>(480,019)</b>	<b>(480,019)</b>	<b>(480,019)</b>	<b>(480,019)</b>
<b>Federal Funds</b>						<b>7,779,000</b>	<b>7,779,000</b>	<b>7,779,000</b>	<b>7,779,000</b>
<b>State Matching Funds</b>						<b>1,555,800</b>	<b>1,555,800</b>	<b>1,555,800</b>	<b>1,555,800</b>
<b>Repayment Funds</b>						<b>9,502,137</b>	<b>9,502,137</b>	<b>9,502,137</b>	<b>9,502,137</b>
<b>Carry Forward</b>						<b>(11,764,408)</b>	<b>(41,615,950)</b>	<b>(38,059,032)</b>	<b>(44,702,114)</b>
<b>Total Available Funds</b>						<b>7,072,529</b>	<b>(22,779,013)</b>	<b>(19,222,095)</b>	<b>(25,865,177)</b>
<b>Annual Suprus/Shortfall</b>						<b>(41,615,950)</b>	<b>(38,059,032)</b>	<b>(44,702,114)</b>	<b>(26,345,196)</b>

Note: Step III represents construction costs only.

# 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.**

## NPDES Numbers

Municipality Name	Project Name	NPDES Permit Number
City of Montpelier	One Taylor Street	VT0100196
City of South Burlington	Village at Dorset Park Stormwater Pond Improvements	NA
Town of Springfield	Meadow Drive Stormwater	VT0100382
City of Montpelier	Taylor St Stormwater	VT0100196
Village of Poultney	York Street stormwater improvements	VT0100269
Town of Northfield	Northfield Village Green Stormwater Site	NA
City of Rutland	NW Neighborhood Phase 1A	VT0100871
Town of Springfield	CSO - Collection System Improvements	VT0100382
Town of Williston	Route 2A Gravity Sewer	VT0100439
City of Burlington	Colchester Avenue CSO Abatement/ Elimination	VT0100226
Village of Saxtons River	Wastewater Upgrade	VT0100609
Village of Bellows Falls Corporation	WWTF Biosolids Train and Pump Station Upgrades	VT0100013
City of Burlington	Phosphorus reductions through Stormwater Outfall Assessment, Repair and Watershed Improvements	VT0100153 VT0100307 VT0100226
City of St. Albans	Wastewater treatment facility refurbishment	VT0100323
Town of Addison	Community Wastewater System	NA
Village of Bellows Falls Corporation	Sewer Main Replacement Project	VT0100013
Town of Wilmington	Wastewater treatment facility refurbishment	VT0100706
City of Burlington	Stormwater Pipe Infrastructure Rehabilitation	NA
Town of Waitsfield	NPS Projects	NA
Town of Williamstown	Wastewater treatment facility refurbishment	VT0100722
Town of St. Johnsbury	St. Johnsbury Wastewater Improvements Phase 2	VT0100579
Town of St. Johnsbury	St. Johnsbury Wastewater Improvements Phase 1	VT0100579
Town of Windsor	Sewer Separation/Storm Water Removal	VT0100919
City of Barre, VT	Trunk line and North Main Street Wastewater Improvements	VT0100889
Town of St. Johnsbury	Frost Avenue Sewer Main	VT0100579
Town of Windsor	Pump Stations Upgrade	VT0100919
Town of Richmond	East Main Street Sewer Replacement	VT0100617
Town of Ryegate	Filter Bed #2 Reconstruction	NA
Town of Richmond	West Main Street Sewer Extension	VT0100617
Town of Castleton	Crystal Heights Sewer	VT0100897
City of St. Albans	Lower Weldon CSO Abatement	VT0100323
Colchester Fire District #2	New sewer system	NA

Village of Alburgh	Kirk and Fitts Road Sewer Extension	VT0100005
Town of St. Johnsbury	St. Johnsbury Wastewater Improvements Phase 3	VT0100579
Town of Rochester	Rochester Site No. 3 Rehabilitation	NA
Town of Royalton	Wastewater System Improvements	VT0100854
City of South Burlington	Preliminary Engineering Design Report for the Hadley Road Sanitary Sewer Service Area	VT0100358
City of South Burlington	Airport Parkway Wastewater Treatment Facility Outfall Rehabilitation	VT0100366
City of South Burlington	Gravity Sewer Inflow & Infiltration Reduction	VT0100366 VT0100358
City of Barre, VT	WWTF Headworks Upgrade	VT0100889
Town of Hartford	Downtown Stormwater Improvements	VT0101010
Town of Brandon	Champlain Pump Station	VT0100056
Town of Brandon	Sewer System Evaluation and Rehabilitation	VT0100056
Town of Proctor	Willow Street Pump Station	VT0100528
Town of West Windsor	West Windsor Resort Upper Loop Sewer	VT0100919
		VT0100153 VT0100307 VT0100226
City of Burlington	Enhanced WWTP Phosphorus Removal	VT0100226
Town of Bennington	WWTF Upgrade	VT0100021
City of Montpelier	WWTF Refurbishment	VT0100196
City of South Burlington	Gravity Sewer Sleeves Crossing of Interstate 89	VT0100366
Town of Williston	East Hill Road Stone Line ditching	
		VT0100366 T0100358
City of South Burlington	Sewer Pump Station SCADA Replacement	T0100358
City of South Burlington	Airport Parkway Wastewater Treatment Facility	VT0100366
		VT0100153 VT0100307 VT0100226
City of Burlington	Integrated Stormwater and Wastewater Planning and Early Implementation	VT0100226
City of South Burlington	Lane Press Pump Station & Force Main Upgrade	VT0100366
Town of Williston	Williston Town Fields Stormwater Treatment Facility	NA
Town of Williston	Lamplite Acres Green Streets	NA
Town of Williston	Golf Links	NA
Town of Williston	Taft Farm Village I & II and Taft Farm Commercial Lots	NA
Town of Williston	Meadow Run/Forest Run	NA
Town of Williston	Hill Side East Lot 14	NA
Town of Williston	Hill Side East Lot 16 & 17	NA
Village of Hyde Park	Wastewater System Improvements	NA
City of South Burlington	Hinesburg Road PS & Dorset St. FM	VT0100366
Town of Williston	Taft Farms Condo Commercial: Lot H	NA
Town of Williston	Indian Ridge	NA
Town of Williston	Old Stage Estates	NA

Town of Williston	Hampton Direct	NA
Town of Williston	Hill Side East Lot 5	NA
Town of Williston	Hill Side East Lot 7	NA
Town of Williston	Allen brook Meadows/ Lefebvre Lane	NA
Town of Williston	Heritage Meadows	NA
Town of Williston	Coyote Run	NA
Town of Williston	Pleasant Acres	NA
Town of Williston	Allen Brook School	NA
Town of Williston	Hill Side East Lot 12 -13A	NA
City of South Burlington	Bartlett Bay Wastewater Treatment Facility Upgrade	VT0100358
Town of Williston	The Commons at Williston Village	NA
Town of Williston	Brennan Woods	NA
Town of Williston	Whitney Hill	NA
Town of Williston	Turtle Crossing	NA
Town of Williston	Turtle Pond	NA
Town of Williston	Williston North of I89 Stormwater Treatment Facility	NA
Town of Williston	Meadow Ridge	NA
Town of Williston	Southridge	NA
Town of Williston	Williston Central	NA
City of South Burlington	Wastewater Infrastructure CIP	VT0100366 VT0100358
City of South Burlington	Bartlett Bay WWTF Phosphorous Treatment Limits Study	VT0100358