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*Agency of Natural Resources*

May 4, 2018

**Municipal Pollution Control Projects Priority List for State FY 2019 and  
Clean Water Intended Use Plan (IUP) for Federal FY 2018**

**Municipal Officials and Interested Parties:**

On December 15, 2017, the Department notified municipalities and other interested parties to submit applications to be included on the CWSRF Project Priority List for State Fiscal Year 2019, and to attend an initial public hearing to be held on April 5, 2018. On March 2, 2018, a draft priority list and IUP was sent to the same parties with a reminder about the public hearing. The public hearing was well attended, and a Public Responsiveness Summary has been prepared to address oral and written comments received by the Department at the public hearing and through the comment period that ended on April 20, 2018. The Public Responsiveness Summary is included as part of the IUP.

The Department of Environmental Conservation has adopted the CWSRF Project Priority List as it appears in the attached IUP. The priority list indicates those projects the Department anticipates will be receiving state and/or federal funding through the end of state Fiscal Year 2019 and until the FY 2020 list is adopted. The 2018 Clean Water IUP, which sets forth how the Federal Fiscal Year 2018 Clean Water Capitalization Grant for the Clean Water State Revolving Fund (CWSRF) will be used, is attached and includes the Priority List. The Department's list of projects anticipated to be funded during State Fiscal Years 2019 through 2023 is also included in the attached IUP.

If you have any questions or desire clarification of the content of these documents, please contact Terisa Thomas at (802) 249-2413 or by email at [terisa.thomas@vermont.gov](mailto:terisa.thomas@vermont.gov) or Eric Blatt at (802) 585-4901 or by email at [eric.blatt@vermont.gov](mailto:eric.blatt@vermont.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Emily Boedecker".

Emily Boedecker, Commissioner

Department of Environmental Conservation

**VERMONT AGENCY OF NATURAL RESOURCES  
DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

State FY 2019 Municipal Pollution Control Project Priority List  
and Federal FY 2018 Clean Water Intended Use Plan

**General Information**

1. Project priority points awarded in accordance with the Department's Municipal Pollution Control Priority System are listed on the SFY 2019 Pollution Control Project Priority List.
2. Priority points on the Project Priority List or 'P-List' for future years do indicate the priority in which construction projects will be funded. 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.
3. 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.
4. The Discharge Permits for all municipal wastewater facilities will be reviewed for requirements which might result in infrastructure projects over the next five years and may be included on the appropriate year Project List.

## PRELIMINARY AND FINAL DESIGN ENGINEERING PLANNING LIST ABBREVIATIONS AND NOTATIONS

The Project Priority List uses abbreviations to identify project types. These abbreviations are listed, defined and described below.

**“REF”** stands for **refurbishment**. A refurbishment is a remodel or reconstruction that does not include a hydraulic or biological loading increase.

**“CSO”** stands for **combined sewer overflow** abatement projects at locations determined by the Secretary. Combined sewers carry both wastewater and stormwater and become hydraulically overloaded during rainfall events. This results in overflows to surface waters that are in violation of state and federal standards.

**“DWF”** represents **dry weather flow** projects. These are projects which abate pollution that occurs during dry weather periods, when systems are not stressed by rainfall events (see CSO discussion). Examples include the construction of a collection system and new treatment facility to eliminate direct discharges to surface waters, or the extension of a sewerage system to collect the flows from failing septic tank or leach field systems and convey them to an existing treatment facility, or a nutrient treatment upgrade at existing wastewater treatment facilities.

**“UPG”** stands for **upgrade** of current facilities to handle increased wastewater flows resulting from municipal growth or biological capacity. These projects receive relatively low priority.

**“OTH”** stands for **other** and represents projects that do not neatly fit into the primary categories.

**“NPS”** stands for **nonpoint source**.

**“SEWEX”** stands for **sewer extension**.

**“SW”** stands for **stormwater**. This includes treatment, conveyance, or storage projects.

**VERMONT**  
**CLEAN WATER INTENDED USE PLAN**  
**FEDERAL FISCAL YEAR 2018 FUNDS**

**May 4, 2018**

**A.     Introduction**

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.

**B.     Short Term Goals and Objectives**

- (1) To provide local government with low cost financial assistance.
- (2) To coordinate NPDES permit schedules with anticipated award of CWSRF loans such that projects are brought into preliminary and final planning in time 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 wastewater treatment facilities with activities of the CWSRF.
- (6) To provide effective program management to ensure fiscal integrity of the CWSRF.
- (7) To incentivize planning 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.

#### C. Long Term Goals and Objectives

(1) To provide financial assistance to Vermont municipalities to fund the completion of all known enforceable requirements of the Act.

(2) To ensure the fund operates in perpetuity and provides continuing financial assistance to Vermont municipalities for future pollution control and stormwater needs.

(3) 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.

#### D. State Pollution Control Grant Eligibilities

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 category 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. The legislation establishes a set of environmental, affordability, and health-based criteria that will be used to determine eligibility and state grant funding up to a maximum of 35%. The legislative changes also broaden eligibility of land acquisition costs.

The Municipal Pollution Control Priority System Rule contained in Chapter 2 of the Environmental Protection Rules was amended and took effect as of December 1, 2017. These changes to PC grant eligibilities will not take full effect until July 1, 2019. For this current IUP cycle, the previous categorical grants (CSO, dry weather flow, and sludge & septage) will be continued.

When sufficient state capital funds cannot be secured to cover total project costs, full project funding may come from other funding sources, such as the CWSRF.

#### E. CWSRF Administration

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. This is a use that may be used for this purpose if the CWSRF balance remains underutilized and there is compelling justification of a public benefit to be secured.

CWSRF loans are currently issued at 0% interest with an administrative fee of 2% on construction loans. Fee proceeds are deposited into a dedicated account separate from the CWSRF account, referred to as the administrative account. In the future, if funds held in the administrative account are in excess of that necessary to fund the state's administration of the CWSRF program, some of those funds may be transferred to the CWSRF account for project funding. Administrative fee income for State FY2019 is projected to be approximately \$1.78 million. Historically, all fees collected were considered to be program income. Currently, the Vermont CWSRF is still using all collected fees as program income, however, this may change in the future.

#### F. CWSRF Capitalization Grants for Federal Fiscal Year 2018 and Future Years

The federal fiscal year 2017 capitalization grant allotment available to Vermont was \$6,474,000 as authorized by the Act, after allocating \$100,000 for the federal 604b program. The program has been notified of an increase in the national appropriation which would result in an approximate \$1,489,500 increase over the previous year. The estimated FFY 2018 capitalization grant is \$7,963,500. Please note that these amounts are subject to change and final numbers will be posted on the CWSRF [website](#).

The required match is \$1,592,700 which will consist of state capital funds anticipated to be appropriated July 2018 and July 2019. The Sources and Uses table below assumes the total needed match will be available. Sources of funds and uses are listed below.

##### Sources

CWSRF Capitalization Grant	\$7,963,500
State Match Needed	1,592,700
Repayments	11,365,151
Carry-Forward	56,631,583
TOTAL	\$77,552,934

##### Uses

Anticipated Commitments	\$77,152,934
Administrative	400,000
TOTAL	\$77,552,934

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.

G. Criteria and Methods 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 2019. Although we anticipate a large volume of projects and requests for funds in state fiscal years 2019 to 2023 which the fund will likely support, a per project cap on the CWSRF loan funds will not likely be needed at this time.

H. Use of Funds for Nonpoint Source Projects

This year, two nonpoint source projects (NSPs) are scheduled to be funded. The two identified NSPs consist of the Town of Addison's Community Wastewater System and the Town of Rochester's Municipal Site #3 Replacement Project.

I. Reallocated Funds between DWSRF to CWSRF

The Safe Drinking Water Act Amendments of 1996 (Section 303 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.

J. 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 Section R of this document.

On December 15, 2017, 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 2019 with a due date of February 16, 2018 for inclusion in the draft Pollution Priority List. On March 2, 2018, the Department released the draft IUP for public comment and on April 5, 2018 held a public meeting in the Montpelier Room at the National Life Complex in Montpelier, Vermont at 9:30 a.m. This final IUP includes a public responsiveness summary to detail comments made throughout this process.

K. 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)).

L. 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.

M. 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.

*Emergency Bypass Procedure:* The program has established a procedure that outlines scenarios where a project meets the definition of an emergency and can bypass other projects in the priority list queue. A project that must be completed expeditiously to address a situation resulting from equipment or other infrastructure failure or an event outside of human control, such as weather or a natural disaster, affecting or constituting a threat to the environment or the public health, safety, or welfare, *as determined by the Secretary*. It should be noted that situations arising from deferred maintenance will not be considered an emergency project for the purposes of this procedure. These determinations will be completed on a case by case basis by CWSRF staff. This procedure can be found in its entirety in [Attachment A](#).

*Treatment Works:* With the passage of the Water Resources Reform and Development Act (WRRDA) in June 2014, Congress expanded the CWSRF eligibility and applied additional requirements to those projects defined in the 1972 Federal Clean Water Act as a Section 212 Treatment Work Project. These additional requirements include the National Environmental

Policy Act (NEPA), Davis Bacon Act, Fiscal Sustainability Plan (FSP), and American Iron and Steel (AIS).

In the 2015 Interpretive Guidance for WRRDA, EPA allowed states to determine which projects meet the definition of a “treatment works” project. In 2017, Vermont CWSRF drafted and approved a policy paper outlining the state’s definition. This policy paper states that the Section 212 treatment works definition will be limited to centralized wastewater collection and treatment and gray infrastructure components of stormwater projects. All other CWSRF eligible project types, including soils-based decentralized wastewater disposal projects, will not be considered treatment works. Please see the entire policy paper in [Attachment B](#).

*Loan Repayment Start Date:* As part of a review of projects in need of closeout and continuous process improvement principles, it was noted that there was an inconsistent definition of when a project should begin repayment upon final completion of a project. Consequently, the program created the Repayment Start Date Procedure (see [Attachment C](#)). This states that projects will enter into repayment no later than one year after final completion and provides a consistent definition of final completion. This document also defined situations when a loan should be segmented into multiple loan numbers to avoid long delays between loan initiation and repayment, should a project have multiple contracts spanning multiple years.

*Priority List Bypass Procedure:* The revision of the Chapter 2 Priority Rule in December 2017 allowed for the implementation of a bypass procedure. The CWSRF has adopted a similar procedure to the DWSRF program and this is outlined in Guidance Document #4 (see [Attachment D](#)). The purpose of this procedure is to ensure that only projects which have demonstrated readiness to proceed are prioritized. While there is flexibility on a case by case basis, the procedure generally requires a completed preliminary engineering report (PER) by December 31<sup>st</sup> and successful bond vote by April 30<sup>th</sup> of the following year. Projects not meeting these dates may be bypassed in favor of lower ranking projects.

N. Project Funding

**Projects Anticipated to Receive Federal Fiscal Year (FFY) 2018 CWSRF available Funds\***  
**(Award of federal fiscal year 2018 Funds are anticipated to be made**  
**during state fiscal year 2019)**

<b>Project /Activity</b>	<b>Total Project Cost**</b>	<b>SRF State Match</b>	<b>Federal Share FFY 2018 Funds</b>
See 2019 Priority List Attached	\$9,156,200	\$1,526,020	\$7,630,180
Vermont Administrative Expense	\$400,000	66,680	\$333,320
<b>Total</b>	<b>\$9,556,200</b>	<b>\$1,592,700</b>	<b>7,963,500</b>

Detailed project information is included in the attached Municipal Pollution Control Projects Priority List for state fiscal year 2019. The cash draw ratio of state to federal is 1:5, or an 83.33% federal share of the total.

Vermont CWSRF Payment Schedule FFY 2018EPA Capitalization Grant			
<b>Payment No.</b>	<b>Quarter</b>	<b>Date</b>	<b>Amount</b>
<b>1</b>	<b>2018-4</b>	<b>7/1/2018-9/30/2018</b>	<b>1,500,000</b>
<b>2</b>	<b>2019-1</b>	<b>10/1/2018-12/31/2018</b>	<b>1,500,000</b>
<b>3</b>	<b>2019-4</b>	<b>7/1/2019-9/30/2019</b>	<b>2,500,000</b>
<b>4</b>	<b>2020-1</b>	<b>10/01/2019-12/31/2019</b>	<b>2,463,500</b>
<b>Total</b>			<b>\$7,963,500</b>

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

\*\* Costs will change as projects are refined

O. Green Project Reserve

The Vermont requirement for Green Project Reserve (GPR) for federal fiscal year 2018 is 10% of the federal grant, or \$796,350. This year, seventeen projects indicated likely green project elements at an estimated amount of \$8,670,301. 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. This IUP will propose a sponsorship pilot project utilizing additional subsidy as principal loan forgiveness. These sponsored projects will meet the definition of a GPR project and will, by definition, receive priority for funding.

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.

P. Additional Subsidy

Pursuant to the applicable 2018 federal appropriations act provisions, an amount equal to 10% of the grant must be provided as subsidy, or at least \$796,350. An additional amount equal to 30% of the grant, or \$2,389,050, 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 \$3,185,400 for additional subsidization.

For the Federal FY2018 IUP, the Clean Water State Revolving Fund (CWSRF) loan program is proposing to allow additional subsidy by way of two avenues:

1. Principal loan forgiveness for planning costs
2. Principal loan forgiveness for the Green SW Sponsorship Pilot Program.

**Principal Loan Forgiveness for Planning:**

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 \$2.18 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.

### **Green Stormwater Sponsorship Pilot Program:**

This avenue to receive principal loan forgiveness proposes a pilot program to incentivize green stormwater projects. Under this pilot program, an applicant will pair a traditional treatment works project (i.e.: grey stormwater, wastewater treatment facility upgrade, pipe replacement) with a green stormwater project. The applicant will bond and take out a loan for each project. Upon final completion of the projects, the green stormwater project loan will be forgiven. This IUP proposes the utilization of up to \$1 million to be reserved for this pilot program. The ratio of treatment works project to sponsored project should be approximately 10:1. Frequently Asked Questions (FAQs) document can be found in [Attachment E](#).

There is a maximum cap of \$300,000 per borrower for the Green Stormwater Sponsorship Program. Additionally, an applicant may receive the maximum amount of subsidy for planning and it will not affect their ability to receive additional subsidy under the green stormwater pilot program.

For example, if a municipality had a pipe replacement project costing \$1M, they would identify a green stormwater project(s) for approximately \$100,000. They would conduct a bond vote for \$1.1M and then take out two loans, one for \$1M and one for \$100,000. Upon project closeout, the \$100,000 loan would be forgiven, leaving the municipality to only repay the original \$1M costs in the other loan.

Vermont has defined green stormwater projects as projects that involve a wide range of multi-functional, natural and semi-natural landscape elements that are located within, around, and between developed areas, that are applicable at all spatial scales, and that are designed to control, collect, or treat stormwater runoff. Components of a green infrastructure project that are essential but considered gray infrastructure (e.g. a pipe to convey water to a green practice) may be included in the sponsored project. Additionally, Green Stormwater Infrastructure Projects:

1. Have a direct and quantifiable water quality benefit that includes a reduction in sediment or nutrient pollution; and
2. Involve Tier 1 stormwater treatment practices; or
3. Have undergone an alternatives analysis and are the most effective treatment alternative while still meeting the above definition of “Green Stormwater Infrastructure.”

The complete rationale for Vermont’s green stormwater infrastructure can be seen in [Attachment E](#). The CWSRF program will make the ultimate determination as to whether or not a project meets this definition.

All sponsoring and sponsored projects must be on the priority list. It is likely that this IUP will need to be amended in future quarters to include additional projects. Sponsored projects will be required to complete an addendum to the funding application. A sample of this addendum can be found in [Attachment G](#). Due to current statutory restrictions, only municipally owned, operated, and maintained green stormwater projects may be considered for sponsorship.

### **Requirements for Additional Subsidy:**

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.
- Additional subsidy is considered reserved for a project upon receipt of the following:
  - Complete funding application
  - QBS certification
  - Draft Engineering Services Agreement
  - Relevant readiness to proceed criteria: for example, 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.

### **Q. State 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 requires States to establish the affordability criteria not later than September 30, 2015, and 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.

Revisions to the Chapter 2 Priority Ranking rule also made changes to the affordability criteria used to determine priority ranking as well as pollution control grant amounts. This IUP proposes to amend the previous year's affordability criteria with one that is consistent with the rule update.

The new affordability applies five key criteria 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. The complete affordability criteria can be found in [Attachment H](#).

#### R. Responsiveness Summary

The following responsiveness summary is a list of questions and comments received at the April 5, 2018 public hearing through the public comment period ending April 20, 2018. Some comments have been edited for brevity and clarity:

Q. (Regarding Repayment Start Date) Is it the final completion document or the balancing change order that is used when determining the repayment start date?

A. The final completion date that is used for determining the repayment start date is listed on balancing change order. The project completion certificate is not used for this determination, just the date listed on the balancing change order.

Q. (Regarding Repayment Start Date) What about projects where punch list items are dated after the balancing change order?

A. They are included as part of the warranty period.

Q. (Regarding Segmented Projects) What happens if you have a project you can't get done in a year?

A. Segmented projects are addressed in our Repayment Start Date Guidance SOP. Contracts need to be completed within 1 year of each other, otherwise the project will be segmented and separate loans will be required with different repayment start dates. Segmented projects will be awarded separate loans but will have the same rate and term.

Q. (Regarding Segmented Projects) What about when you have a project and it doesn't make sense to break it up into multiple contracts? For example, with winter shutdown, it may take a year and half to two years to complete.

A. That timeline is fine. The only problem is when you get a bunch of contracts that want to extend it.

Q. (Regarding Sponsorship Pilot Program) Is 10 to 1 ratio for all costs?

A. Yes, which includes preliminary and final design costs. The 10:1 ratio is the target, but is adjustable.

Q. (Regarding Sponsorship Pilot Program regarding the definition of Green SWI) "What's green"?

A. We have developed a Green v Grey Infrastructure Paper that is part of the proposed IUP.

Q. (Regarding Sponsorship Pilot Program regarding the definition of Green SWI) Is this part of H.777?

A. This is a pilot that can be done without the proposed legislation (H.777 of 2018) but will serve to inform implementation of H.777.

Q. (Regarding Sponsorship Pilot) What is the intent of commitment for this program? The big challenge is rolling this out. We've got projects through bond vote, in final design, they're in different locations, to simplify the project they need to be identified in PER. There are a few applicants that are trying to squeeze it in that are in construction. We have to think about it for tying it in to PER; make sure that it's already part of comprehensive plan, but timing is a concern.

A. The entire commitment is \$1M total in additional subsidy. We don't envision there being a huge number of applicants. No matter when the pilot is undertaken, there would always be some projects in the queue that would be affected. The CWSRF attempted to give municipalities a heads up in early December for inclusion in broader bond language.

Q. (Regarding Sponsorship H.777 Bill Proposal to lend to Private Entities) Is the proposal to allow co-funded (municipalities with private entities) projects for municipalities doing stormwater treatment on private property?

A. Sponsorship can't be done with a private for-profit entity. The proposal is really restricted to municipal/municipal, or municipal/non-profit scenarios.

Q. (Regarding Sponsorship Pilot) How do you work the green stormwater project into the point rating system?

A. The project priority system allows for the host and sponsored project to be ranked together as one project. We wouldn't have a sponsored and treatment works project separate on list (in the final implementation).

Q. (Regarding the CWSRF Plist) The new point system compiles projects into the database and points are assigned during that process. When looking at the priority list, does it matter that once you get below all of the continuing projects, the first 10/12 projects happen to be big city projects as they scored higher. The CSO projects scored a lot lower. Are the projects landing where you think they should?

A. The list you have in front of you is a rough draft, our first draft. These project applications have not been fully vetted at this time. For example, some applications indicated that they were emergency projects and they really aren't using our draft definition, etc. There has been some minor shuffling of the projects based on the information that we have and there is likely to be some more once all of the applications are thoroughly vetted.

Q. (Regarding CWSRF Plist) Can we only submit comments on this iteration of the list?



A. We've just finished the internal preliminary review of the applications received by the deadline. The process of working with our software consultant to accurately process the applications left little time for vetting the applications on hand. A second draft of this year's Priority List was released to the public on April 6, 2018. We expect that next year the draft list that will be released at the public hearing will be more complete. Also, anybody who won't go to construction this year is on this list, too, but if they weren't going to construction we moved them down list to a lower subsection.

Q. (Regarding the GSWI Definition Attachment) On page 2 of the IUP there are a number of instances where it says "pavement2" or "permeable 2". Are those typos or does the "2" signify something that I'm missing?

A. They are a typo, probably the 2s were a footnote in the previous document where the language originated.

**Project Priority List (PPL) Applications that were received after the February 16, 2018 deadline and were processed are as follows:**

- Town of St. Johnsbury for the Wastewater Treatment Facility (WWTF) Upgrade Project
- City of Barre for the WWTF Refurbishment Project
- Town of Rochester for the Site 3 Replacement WW Disposal and Site 1 Pump Station Improvements Project
- Town of Addison for the Addison Community Wastewater System Project
- Town of Berlin for the Paine Turnpike North Wastewater Improvements Project
- City of South Burlington Kennedy Drive Pond 3 Expansion and Gravel Wetland Retrofit
- Town of Shelburne for the Town Center Campus Stormwater Improvements
- Town of Northfield for the Main St. CSO Elimination and Drainage Separation Project
- Town of Middlebury for the WWTF Evaluation and Facilities Planning Study
- City of Vergennes for the WWTF Evaluation
- Town of Whitingham for the Whitingham WWTF 20 Year Evaluation
- Town of Whitingham for the Village of Jacksonville WWTF 20 Year Evaluation

2019 Second Draft Pollution Control Priority and Planning List (Last Updated 4-12-18)

Municipality	Project Name	Priority Points	Project Type	2019 Step I	2019 Step II	2019 Step III	2020 Step III	2021 Step III	Green Project Reserve Amount	Potential Subsidy
Saint Albans, City of	Wastewater Treatment Facility Refurbishment	93	CWT - Advanced Treatment	0	0	0*	0	0	77,000	
Rochester, Town of	Site #3 Replacement and Site #1 PS Improvements	72	NPS - Individual/Decentralized Systems	0	0	0*	0	0	0	
North Branch Fire District #1	Upgrade Additions	65	CWT - Advanced Treatment	0	0	0*	0	0	0	
Waitsfield, Town of	Community Wastewater Loan Fund Program	61	CWT - Secondary Treatment	0	0	60,000*	0	0	0	
Bennington, Town of	Bennington WWTF Upgrade	49	CWT - Advanced Treatment	0	0	0*	0	0	0	
Derby Line, Village of	Stanstead (Que) Wastewater Treatment Facility Upgrade	48	CWT - Secondary Treatment	0	0	0*	0	0	0	
Bennington, Town of	Bennington WWTF RBC Replacements	43	CWT - Advanced Treatment	0	0	0*	0	0	0	
Proctor, Town of	Ormsbee Avenue Sewer and Stormwater Improvements	41	CWT - Sewer System Rehabilitation	0	0	0*	0	0	0	
Castleton, Town of	Route 30 Sewer Improvements	31	CWT - Sewer System Rehabilitation	0	0	0*	0	0	0	
Shelburne, Town of	Sewer Collection System Improvements	24	CWT - Sewer System Rehabilitation	0	0	0*	0	0	0	
Rutland, City of	Smart Control Installation @ Calvary Cemetery CSO Structure	78	CWT - CSO Correction	20,000	30,000	325,000	0	0	500,000	25,000
Rutland, City of	Northwest Neighborhood Sewer Separation Project 1A	76	CWT - CSO Correction	0	25,000	1,425,000	0	0	0	1,250
Burlington, City of	Citywide Gravity Pipe Assessment and Rehabilitation	74	CWT - Sewer System Rehabilitation	997,204	200,000	9,900,000	0	0	0	100,000
Rutland, City of	Meadow Street CSO Abatement Project	74	Stormwater - Gray Infrastructure	25,000	50,000	618,750	0	0	100,000	37,500
Saint Johnsbury, Town of	Pleasant Street and Gilman Avenue CSO	73	CWT - CSO Correction	118,000	205,000	2,877,000	0	0	65,000	100,000
Northfield, Village of	Main St. CSO Elimination and Drainage Separation	71	CWT - CSO Correction	29,950	106,000	2,277,000	0	0	452,950	67,975
Rutland, City of	Upper Crescent Street Stormwater System Upgrade & Treatment	71	Stormwater - Gray Infrastructure	5,000	15,000	305,000	0	0	0	10,000
Barre, City of	WWTF 20-Year Evaluation	70	CWT - Advanced Treatment	175,000	350,000	6,500,000	0	0	2,600,000	100,000
South Burlington, City of	Hadley Road Area Infrastructure Improvements Project	68	CWT - CSO Correction	94,700	212,020	2,673,280	0	0	60,000	100,000
Rutland, City of	Stormwater Management System on Easterly Avenue	65	Stormwater - Green Infrastructure	0	40,000	685,000	0	0	360,000	20,000
Rutland, City of	Vernon Street Stormwater Separation & CSO Replacement	65	CWT - CSO Correction	45,000	90,000	1,517,000	0	0	0	67,500
Barre, City of	Biosolids Improvements	61	CWT - Advanced Treatment	27,600	55,200	408,600	0	0	200,000	41,400
Whitingham, Town of	Whitingham Plant 20 Yr Evaluation	59	CWT - Secondary Treatment	25,000	50,000	575,000	0	0	50,000	37,500
Whitingham, Town of	Jacksonville Plant 20 Yr Evaluation	59	CWT - Secondary Treatment	25,000	50,000	575,000	0	0	50,000	37,500
Berlin, Town of	Paine Turnpike North - Wastewater Improvements Project	57	CWT - Sewer System Rehabilitation	50,000	90,000	1,722,210	0	0	200,000	70,000
Colchester, Town of	Malletts Bay Sewer Project	56	CWT - New Collector Sewers	100,000	900,000	15,500,000	0	0	0	100,000
Hartford, Town of	White River Junction Downtown Stormwater Improvements	51	Stormwater - Gray Infrastructure	0	0	700,000	0	0	0	0
Richmond, Town of	Richmond East Main Street Enhancements Project	50	Stormwater - Gray Infrastructure	0	100,000	1,000,000	0	0	0	50,000
South Burlington, City of	Kennedy Drive Pond 3 Expansion & Gravel Wetland Retrofit	49	Stormwater - Green Infrastructure	0	0	310,000	0	0	310,000	0
Fair Haven, Town of	River Street Sewers and Storm	49	Stormwater - Green Infrastructure	25,000	50,000	600,000	0	0	0	37,500
Middlebury, Town of	CSO Abatement for Pump Stations #3 and #9	48	CWT - CSO Correction	50,000	100,000	600,000	0	0	0	75,000
Rutland, City of	Digester Cover Rehab/Replacement & Digester Building Upgrades	44	CWT - Advanced Treatment	73,000	150,000	2,577,000	0	0	1,600,000	100,000
Winooski, City of	Winooski WWTF Headworks Upgrade	44	CWT - Secondary Treatment	26,000	70,000	1,104,000	0	0	0	50,500
Brattleboro, Town of	Retreat and Wilson Woods Pump Station Upgrades	41	CWT - Sewer System Rehabilitation	12,000	38,000	700,000	0	0	0	25,000
Winooski, City of	Main Street Revitalization Project (RF1-212-1.0)	38	CWT - Infiltration/Inflow	213,276	300,000	3,000,000	0	0	1,500,000	100,000
Ludlow, Village of	WWTF Upgrade	37	CWT - Secondary Treatment	50,000	90,000	1,860,000	0	0	0	70,000
Fair Haven, Town of	Wastewater Treatment Facility Refurbishment	34	CWT - Secondary Treatment	50,000	100,000	2,000,000	0	0	0	75,000
Hartford, Town of	South Main Street, Gates Stormwater Improvements	34	Stormwater - Gray Infrastructure	25,000	75,000	900,000	0	0	100,000	50,000
Chester, Town of	Chester Stormwater System Development	33	Stormwater - Gray Infrastructure	20,000	70,000	920,000	0	0	200,000	45,000
Hartford, Town of	South Main Street, Gates, North Main Street wastewater improveme	32	CWT - Sewer System Rehabilitation	0	60,000	900,000	0	0	0	30,000
Hyde Park, Village of	Wastewater System Improvements	31	CWT - Secondary Treatment	42,700	30,000	751,300	0	0	0	0
Shelburne, Town of	Shelburne Town Center Campus Stormwater Improvements	30	Stormwater - Green Infrastructure	0	100,000	400,000	0	0	0	50,000
Addison, Town of	Addison Community Wastewater System	29	NPS - Individual/Decentralized Systems	61,298	56,974	498,000	0	0	160,351	59,136
Fairfax, Town of	Fairfax Wastewater Treatment Facility Upgrade	28	CWT - Secondary Treatment	63,000	117,000	1,840,000	0	0	0	90,000
Pittsford, Town of	Depot Hill Rd Sewer and PS and WWTF Control Improvements	26	CWT - Sewer System Rehabilitation	2,815	33,435	529,050	0	0	85,000	18,125
Lyndon, Town of	Pinchurst Street Sewer Replacement	26	CWT - Sewer System Rehabilitation	10,000	60,000	430,000	0	0	0	35,000
Rutland, City of	Strongs Avenue Stormwater Treatment & Detention System	72	Stormwater - Green Infrastructure	0	0	0	900,000	0	0**	0
Burlington, City of	Integrated Water Quality Management	72	CWT - CSO Correction	0	0	0	6,750,000	0	0**	0
Burlington, City of	WWTP Process and/or Capital Equipment Infrastructure Upgrades	71	CWT - Advanced Treatment	0	0	0	38,000,000	0	0**	0
Burlington, City of	Stormwater Outfall Repair	64	Stormwater - Gray Infrastructure	0	0	0	2,920,000	0	0**	0
Saint Albans, City of	Lower Weldon CSO	63	CWT - CSO Correction	0	0	0	1,100,000	0	0	0
Bristol, Town of	Bristol Wastewater Treatment and Disposal System Upgrade	43	CWT - Advanced Treatment	0	0	0	628,000	0	0**	0
Castleton, Town of	Crystal Heights Sewer	36	CWT - New Collector Sewers	0	0	0	450,000	0	0	0
Montpelier, City of	Montpelier WRRF Upgrade	34	CWT - Advanced Treatment	0	0	0	8,000,000	0	0	0
Proctor, Town of	Willow Street Pump Station	30	CWT - Sewer System Rehabilitation	0	0	0	425,000	0	0	0
Middlebury, Town of	WWTF Evaluation aend Facilities Planning	60	CWT - Advanced Treatment	0	0	0	0	8,740,000	0	0
Westford, Town of	Town Center Community Wastewater System	46	CWT - New Collector Sewers	0	0	0	0	1,841,000	0**	0
Hinesburg, Town of	Wastewater treatment facility upgrade and expansion	39	CWT - Advanced Treatment	0	0	0	0	9,000,000	0	0
South Burlington, City of	Bartlett Bay Wastewater Treatment Facility Refurbishment Project	44	CWT - Advanced Treatment	0	0	0	0	0	0**	0
Vergennes, City of	WWTF Evaluation	63	Other - Planning and Assessments	0	0	0	0	0	0**	0
Bridgewater, Town of	PER and 20 Year Review	62	Other - Planning and Assessments	0	0	0	0	0	0	0
Richmond, Town of	Richmond Bridge Street Infrastructure Improvements Project	47	Stormwater - Gray Infrastructure	0	0	0	0	0	0	0
Brandon, Town of	Park Street Infrastructure Improvements	44	CWT - Sewer System Rehabilitation	0	0	0	0	0	0	0
Williston, Town of	Allen Brook Flow Restoration Plan Projects	41	Stormwater - Gray Infrastructure	0	0	0	0	0	0	0
Barre, City of	Trunkline and North Main Street Wastewater Improvements	27	CWT - Sewer System Rehabilitation	0	0	0	0	0	0	0
Hyde Park, Village of	Wastewater Treatment System Improvements	20	CWT - Secondary Treatment	0	0	0	0	0	0	0
West Windsor, Town of	West Windsor Resort Upper Loop Sewer	7	CWT - Sewer System Rehabilitation	0	0	0	0	0	0**	0
Contingency		0		0	0	1,119,572	0	0	0	0
TOTAL				2,461,543	4,068,629	70,622,762	59,173,000	19,581,000	8,670,301	1,875,886
			Anticipated Commitments			(77,152,934)	(59,173,000)	(19,581,000)		
			Administrative Expenses			(400,000)	(400,000)	(400,000)		
			Federal Funds			7,963,500	6,074,000	6,074,000		
			State Matching Funds			1,592,700	1,294,800	1,294,800		
			Repayment funds			11,365,151	11,365,151	11,365,151		
			Carry Forward			56,631,583	0	0		
			Total Available Funds			77,552,934	18,733,951	18,733,951		
			Annual Surplus/Shortfall			0	(40,839,049)	(1,247,049)		

\* Denotes a project has already received or will be receiving funding from the FFY2017 IUP and is included on this list should additional funding be needed.  
\*\* Denotes the GPR estimate has been removed since the project is proposed to go to construction after FY19.  
\*\*\* Denotes that the project construction is after FY19, and therefore will not qualify for a categorical grant, but will instead be subject to the new grant funding formula to take effect for construction projects beginning in FY20.  
Note 1: One project was identified for funding in FY22, consisting of South Burlington's Bartlett Bay WWTF Upgrade for an estimated \$17.5M  
Note 2: No projects were identified for funding in FY23.  
Note 3: The final 8 applications are at the bottom of the list due to the priority list application that was submitted being absent of a date by which construction funding is required.

**Municipal Pollution Control Grants - Draft FY19 Project Priority List**

(last updated 5-1-18)

Municipality	Project Name	Priority Points	Type	2018 PC Grant	2019 PC Grant	2020 PC Grant
Saint Albans, City of	Wastewater Treatment Facility Refurbishment	93	CWT - Advanced Treatment	1,314,301	0	0
Rutland, City of	Smart Control Installation @ Calvary Cemetery CSO Structure	78	CWT - CSO Correction	0	125,000	0
Rutland, City of	Northwest Neighborhood Sewer Separation Project 1A	76	CWT - CSO Correction	0	475,000	0
Rutland, City of	Meadow Street CSO Abatement Project	74	Stormwater - Gray Infrastructure	0	231,250	0
Saint Johnsbury, Town of	Pleasant Street and Gilman Avenue CSO	73	CWT - CSO Correction	800,000	0	0
South Burlington, City of	Hadley Road Area Infrastructure Improvements Project	68	CWT - CSO Correction	0	716,000	0
Rutland, City of	Vernon Street Stormwater Separation & CSO Replacement	65	CWT - CSO Correction	0	181,750	231,250
Northfield, Village of	Main Street Drainage Separation	63	CWT - CSO Correction	100,000	409,000	0
Saint Albans, City of	Lower Weldon CSO	63	CWT - CSO Correction	0	250,000	0
Barre, City of	Biosolids Improvements	61	CWT - Advanced Treatment	0	491,400	0
Middlebury, Town of	CSO Abatement for Pump Stations #3 and #9	48	CWT - CSO Correction	0	250,000	0
Colchester, Town of*	Malletts Bay Sewer Project	46	CWT - New Collector Sewers	0	500,000	5,275,000
Rutland, City of	Digester Cover Rehab/Replacement & Digester Building Upgrades	44	CWT - Advanced Treatment	0	400,000	1,000,000
Barre, City of	WWTF 20-Year Evaluation	70	CWT - Advanced Treatment	0	0	1,500,000
Middlebury, Town of	WWTF 20-Year Evaluation	60	CWT - Advanced Treatment	0	0	4,000,000
Hyde Park, Village of	Wastewater Treatment System Improvements	20	CWT - Secondary Treatment	0	0	450,000
			<b>Total Grant Need</b>	<b>2,214,301</b>	<b>4,029,400</b>	<b>12,456,250</b>
			<b>Total Grant Available</b>	<b>2,214,301</b>	<b>4,029,400</b>	<b>TBD</b>

\*Denotes only partial grant funding

\*\*In FY18 & FY19, \$110,075 is proposed for planning advances

# 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
City of Burlington	Enhanced WWTP Phosphorus Removal	VT0100153 VT0100307 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	
City of South Burlington	Sewer Pump Station SCADA Replacement	VT0100366 T0100358
City of South Burlington	Airport Parkway Wastewater Treatment Facility	VT0100366
City of Burlington	Integrated Stormwater and Wastewater Planning and Early Implementation	VT0100153 VT0100307 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