

The Vermont Clean Water  
State Revolving Fund

## Intended Use Plan

for Federal Fiscal Year 2019  
and State Fiscal Year 2020

Draft April 1, 2019

Prepared by Facilities Engineering Division  
Department of Environmental Conservation



 **VERMONT**  
**AGENCY OF NATURAL RESOURCES**  
Department of Environmental Conservation

---

## 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.

## Contents

Executive Summary .....	2
CWSRF Program Goals .....	4
State Pollution Control Grant Eligibility .....	5
CWSRF Administration .....	6
Reallocated Funds between CWSRF and DWSRF .....	6
CWSRF Capitalization Grants FFY 2019.....	6
Public Participation.....	15
Criteria and Method for Distribution of Funds .....	7
Project Funding .....	8
Non-Point Source Funding.....	8
Annual Report .....	10
Environmental Benefits Reporting & Other Federal Databases .....	11
Program Changes.....	11
Green Project Reserve.....	12
Additional Subsidy .....	12
Affordability Criteria.....	15
Responsiveness Summary .....	15

Attachment 1: SFY 2020 Project Priority List

---

## CWSRF Program Goals

---

### 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.

---

### 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.

---

## 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**



---

## 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 program 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 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.

---

## CWSRF Capitalization Grants FFY 2019

The federal fiscal year 2018 capitalization grant allotment available to Vermont was \$7,859,000 as authorized by the Act, after allocating \$100,000 for the federal 604b program. For purposes of this IUP, level funding will be assumed for the FFY19 grant.

The required match is \$1,571,800 which will consist of state FY20 & FY21 capital funds anticipated to be available beginning July 2020. At the time of this draft, the proposed FY20 appropriation is approximately \$1.54M, with the balance expected to be appropriated in FY21. 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>	\$7,859,000
<b>State Match Needed</b>	1,571,800
<b>Repayments</b>	9,502,137



<b>Carry-Forward</b>	<u>70,345,062</u>
<b><i>TOTAL</i></b>	<b><i>\$89,277,999</i></b>

Uses	
<b>Anticipated Commitments</b>	\$89,797,980
<b>Administrative</b>	<u>480,019</u>
<b><i>TOTAL</i></b>	<b><i>\$89,277,999</i></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.

---

## 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. We anticipate a large volume of projects and requests for funds in state fiscal years 2020 to 2024, which the fund will likely support, thus, a per project cap on the CWSRF loan funds will not likely be needed at this time.

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.

---

## Project Funding

**Projects Anticipated to Receive FFY 2019 CWSRF available Funds\***  
(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>	\$8,950,781	\$1,491,781	\$7,459,000
<b>Vermont Administrative Expense</b>	\$480,019	\$80,019	\$400,000
<b>Total</b>	<b>\$9,430,800</b>	<b>\$1,571,800</b>	<b>7,859,000</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>250,000</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

---

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

\*\* Costs will change as projects are refined



the Water Infrastructure Sponsorship Program (WISPr) fund and the introduction of an Interim Financing for Natural Resources Projects Program.

---

### Water Infrastructure Sponsorship Program (WISPr)

---

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.

---

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

---

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.
- 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.

---

## 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)).

---

## 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.

---

## 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](#).

---

### Loan Repayment Start Date

---

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.

---

### Priority List Bypass Procedure

---

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 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.

---

### Green Project Reserve

The Vermont requirement for Green Project Reserve (GPR) for federal fiscal year 2019 is 10% of the federal grant, or \$785,900. 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.

---

### 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 \$785,900. An additional amount equal to 30% of the grant, or \$2,357,700, 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 \$3,143,600 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.

---

### Additional Subsidy 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 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
- Hydrologic & Hydraulic (H&H) Modeling

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.

---

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

---

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.

---

### Additional Subsidy for CSO and Stormwater Technology Based Solutions

---

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.

---

### Requirements to Secure 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.
- 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, unless 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.



---

## 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.

---

## 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 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.

---

## Responsiveness Summary

DRAFT 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	C	77,000	0	0%
South Burlington, City of	Municipality	Hadley Road Area Infrastructure Improvements	65	CWT - CSO Correction	0	0	0	0	C	60,000	0	0%
South Burlington, City of	Municipality	Airport Parkway WWTF Upgrade PC Grant Retroactive	65	CWT - Advanced Treatment	0	0	0	0	C	0	4,395,000	0%
Bennington, Town of	Municipality	Bennington WWTF Upgrade	49	CWT - Advanced Treatment	0	0	0	0	C	0	0	0%
Winooski, City of	Municipality	WWTF New Headworks	38	CWT - Secondary Treatment	0	0	0	0	C	0	0	0%
Proctor, Town of	Municipality	Ormsbee Avenue Sewer and Stormwater Improvements	37	CWT - New Collector Sewers	0	0	0	0	C	0	0	0%
Castleton, Town of	Municipality	Route 30 Sewers	32	CWT - New Collector Sewers	0	0	0	0	C	0	0	0%
Derby Line, Village of	Municipality	Rock Island Quebec Wastewater Treatment Facility Upgrade	31	CWT - Advanced Treatment	0	0	0	0	C	0	0	0%
Shelburne, Town of	Municipality	Sewer Collection System Improvements	23	CWT - Sewer System Rehabilitation	0	0	0	0	C	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/CSS Retrofits	83	CWT - Secondary Treatment	2,900,000	1,300,000	9,040,000	13,240,000		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%
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%
Pownal, Town of	Municipality	Landfill West Remediation	51	NPS - Brownfields	100,000	100,000	300,000	500,000		0	50,000	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%
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 Improven	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%
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%
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%
Subtotal SFY2020 Projects Requesting Construction Funding					4,093,000	4,566,075	63,906,420	72,565,495				
Natural Resource Interim Financing Put Aside	Municipal	Natural Resources, Ag Water Quality and Forestry Conservation		NPS				10,000,000				
Natural Resource Interim Financing Put Aside	Private	Natural Resources, Ag Water Quality and Forestry Conservation		NPS				10,000,000				

\* 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 \$16,515,028, but it has not been determined what the grant appropriation will be.  
C denotes continuing project. Additional funds may be needed.

Draft Note: While all projects requesting constrution 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.

TOTAL	4,093,000	4,566,075	63,906,420	92,565,495	2,662,970	22,194,228
Additional Anticipated SFY20 Planning Need*	1,303,883	2,957,010		4,260,893		
Total	5,396,883	7,523,085		96,826,388		
Total Anticipated Committments				(96,826,388)		
Administrative Expenses				(480,019)		
Federal Funds				7,859,000		
State Matching Funds				1,571,800		
Repayment Funds				9,502,137		
Carry Forward				70,345,062		
Total Available Funds				89,277,999		
Annual Suprus/Shortfall				(8,028,408)		

**DRAFT 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 Infrastructure Upgrades and SW/CSS Retrofits	CWT - Advanced Treatment	0	0	41,678,896	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
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
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	100,000	100,000	0	0	0	0
<b>TOTAL</b>				<b>1,303,883</b>	<b>2,957,010</b>	<b>69,387,356</b>	<b>12,300,000</b>	<b>0</b>	<b>0</b>
Total Anticipated Commitments						<b>(69,387,356)</b>	<b>(12,300,000)</b>	<b>0</b>	<b>0</b>
Administrative Expenses						<b>(480,019)</b>	<b>(480,019)</b>	<b>(480,019)</b>	<b>(480,019)</b>
Federal Funds						<b>7,859,000</b>	<b>7,859,000</b>	<b>7,859,000</b>	<b>7,859,000</b>
State Matching Funds						<b>1,571,800</b>	<b>1,571,800</b>	<b>1,571,800</b>	<b>1,571,800</b>
Repayment Funds						<b>9,502,137</b>	<b>9,502,137</b>	<b>9,502,137</b>	<b>9,502,137</b>
Carry Forward						<b>(8,028,408)</b>	<b>(58,962,846)</b>	<b>(52,809,928)</b>	<b>(34,357,010)</b>
Total Available Funds						<b>10,904,529</b>	<b>(40,029,909)</b>	<b>(33,876,991)</b>	<b>(15,424,073)</b>
Annual Suprus/Shortfall						<b>(58,962,846)</b>	<b>(52,809,928)</b>	<b>(34,357,010)</b>	<b>(15,904,092)</b>

Step III represents construction costs only.