

The Vermont Clean Water
State Revolving Fund
Draft Intended Use Plan
for Federal Fiscal Year 2025

Prepared by:

The Water Investment Division

Vermont Agency of Natural Resources

Department of Environmental Conservation

1 National Life Drive, Davis 3 | Montpelier, VT 05620-3510

July 2, 2025

Contents

1. Executive Summary	5
1.1. Infrastructure Investment and Jobs Act and the Build America, Buy America Act	5
1.2 Other State Grants	6
1.3 Other Federal Grants	6
1.4 Notice of Nondiscrimination	6
1.5 Language Access Services	7
2. Clean Water State Revolving Loan Fund Program Mission and Goals	7
2.1. Program Mission	7
2.2. Long Term Goals	8
2.3. Short Term Goals	8
3. State Grants under this Intended Use Plan	9
3.1. Pollution Control Grants	9
3.2. State ARPA Combined Sewer Overflow (CSO) Elimination and Abatement Program Grant Eligibility	9
3.3. State ARPA Village Wastewater and Drinking Water Grant Eligibility	9
3.4. Municipal Separate Storm Sewer System (MS4) Grant Program	10
4. CWSRF Administration	11
4.1. Reallocated Funds between Clean Water and Drinking Water SRFs	11
5. Clean Water SRF Capitalization Grants Federal Fiscal Year 2025	11
5.1. EPA Federal Fiscal Year Payment Schedule	13
5.2. EPA Estimated Disbursement Schedule	15
6. Project Funding and Use of Technical Assistance Funds	15
6.1. CWSRF General	15
6.2. CWSRF General Supplemental	16
6.3. CWSRF Emerging Contaminants	16
6.4. CWSRF 2023 Reallotted Emerging Contaminants	16

6.5. Use of Technical Assistance Funds (2%).....	17
6.6. Future Program Impact	17
7. Criteria and Method for Distribution of Funds	17
8. Additional Subsidy	18
8.1. Prior Year Subsidy	18
8.2. 2025 Subsidy Amounts	19
8.2.1. General Grant.....	19
8.2.2. General Supplemental Grant	19
8.2.3. Emerging Contaminants Grant	19
8.2.4. Summary Table: Available Subsidy by FFY 2025 Grant.....	19
8.3. Subsidy Categories	20
8.3.1. Summary Table: Available Subsidy by Initiative Category (FFY 2025 Grant and Prior Year Subsidy Combined).	20
8.3.2. Planning Subsidy	20
8.3.3. Floodplain Restoration Subsidy	21
8.3.4. Construction Subsidy	22
8.4. Requirements to Secure Additional Subsidy	22
9. Affordability Criteria	23
9.1. Affordability Criteria.....	23
10. Non-Point Source Funding	25
10.1. Natural Resources Categorical Eligibility	25
10.2. Water Infrastructure Sponsorship Program (WISPr)	27
10.2.1. How to Qualify for WISPr Funding.....	27
10.3. Interim Financing for Natural Resources Projects.....	27
11. Program Updates and Guidance	28
11.1. Annual Cap on Loans.....	28
11.1.1. Planning Loans Evaluation and Funding Cap.....	28
11.2. Priority List Bypass Procedure	29
11.3. Guidance on Planning Versus Construction Activities	29
11.4. ANR Online Funding Application.....	30

11.5. State Environmental Review Procedure Update	30
11.6. CW SRF Fund Transfer to Onsite Loan Fund	31
11.7. Stormwater Financing Linked Deposit.....	31
11.8. US Environmental Protection Agency (EPA) Performance Evaluation Review	31
12. Equivalency and Federal Reporting	32
13. Green Project Reserve	32
14. Public Participation.....	33
15. Responsiveness Summary.....	34
16. Revisions to the Final Intended Use Plan.....	34
17. Project Priority Lists.....	34

1. Executive Summary

The Vermont Agency of Natural Resources sends to the U.S. Environmental Protection Agency (EPA), as part of its annual application for Clean Water Capitalization Grants under Title VI of the Water Quality Act of 1987, a Clean Water Intended Use Plan to meet the requirements of Section 606(c) of the Clean Water Act and the Clean Water Capitalization Grant Agreements. This Intended Use Plan covers the Federal Fiscal year 2025 General/Base Grant, and the General Supplemental and Emerging Contaminants Grants created by the Infrastructure Investment and Jobs Act, also known as the Bipartisan Infrastructure Law of 2021. The Intended Use Plan serves as the planning document to explain how each fiscal year's appropriation for the Vermont Clean Water State Revolving Fund (CWSRF) will be used.

The Intended Use Plan includes the State Fiscal Year 2026 Pollution Control Project Priority List. Projects seeking construction funding must be shown on the Project Priority List and rank high enough to receive funds. Project priority points are awarded in accordance with the Department's Municipal Pollution Control Priority System. All construction projects on the Project Priority List that are ready to proceed in a particular year will be awarded grant and/or loan funds depending on the amount of funds allocated to the program by the Vermont legislature, the level of federal funding awarded through the federal capitalization grants for the Clean Revolving Loan Fund, any carry-forward funds from the prior fiscal year, and repayments and fund income received during the fiscal year. Projects seeking funding for planning and design do not need to be on the Project Priority List. Funding for planning and design projects is set at an amount necessary to bring sufficient projects to the implementation phase and to use all the anticipated grant and loan funds each year.

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

1.1. Infrastructure Investment and Jobs Act and the Build America, Buy America Act

The Infrastructure Investment and Jobs Act, passed November 15, 2021, provides two additional SRF grants: the General Supplemental, and the Emerging Contaminants Grants, to augment the existing General Grant, also known as the Base Grant. The Infrastructure Investment and Jobs Act grants will continue annually for a total of five years, ending with next year's (Federal Fiscal Year 2026) grants. The Infrastructure Investment and Jobs Act is also known as the Bipartisan Infrastructure Law.

The Infrastructure Investment and Jobs Act expanded domestic sourcing requirements with the inclusion of the Build America, Buy America Act requirements. For all projects receiving funding based on federal awards made to the State on or after May 14, 2022, all steel, iron, manufactured products, non-ferrous metals, plastic and polymer-based products (including polyvinylchloride, composite building materials, and polymers used in fiber optic cables), glass (including optic glass), lumber, and drywall used in infrastructure projects for federal financial assistance programs must be produced in the United States. The Environmental Protection Agency has issued a Build America, Buy America Act Adjustment Period Waiver for SRF projects that have initiated design planning. The Department of Environmental Conservation's Design and Construction Engineering Section has published an Adjustment Period Waiver Certification form, available at [SRF BABA Waiver Certification Form](#). Projects must meet a range of eligibility requirements under the Waiver and should seek an explicit eligibility determination from the SRF Program.

1.2 Other State Grants

The Project Priority List under the Municipal Pollution Control Priority System Rule is also used to rank projects for the Vermont Pollution Control Grants. Pollution Control Grants are covered under Section 3.1.

This Intended Use Plan includes a new funding opportunity for Municipal Separate Storm Sewer System (MS4) regulated communities in the next (FFY2025) Intended Use Plan. An expanded description of this program is included in Section 3.4.

1.3 Other Federal Grants

The application for the federal fiscal year 2025 Sewer Overflow and Stormwater Reuse Municipal Grant Program (OSG Grant) will not coincide with this IUP. This is a limited EPA allocation and if awarded this year will go towards planning design or construction of combined sewer overflow (CSO) abatement projects in rural and financially distressed communities. The project selection process may use the Project Priority List score; however, it may take place outside of this Intended Use Plan.

1.4 Notice of Nondiscrimination

The Vermont Agency of Natural Resources (ANR) operates its programs, services, and activities without discriminating on the basis of race, religion, creed, color, national origin (including limited English proficiency), ancestry, place of birth, disability, age, marital status, sex, sexual orientation, gender identity, or breastfeeding (mother and child). We will not tolerate discrimination, intimidation, threats, coercion, or retaliation against any individual or group because they have exercised their rights protected by federal or state law. To file a discrimination

complaint, for questions, free language services, or requests for reasonable accommodation, please contact ANR's Nondiscrimination Coordinator at ANR.CivilRights@vermont.gov or visit ANR's online Notice of Nondiscrimination at <https://anr.vermont.gov/special-topics/equity-and-accessibility/notice-nondiscrimination>.



1.5 Language Access Services

Questions or Complaints/FREE LANGUAGE SERVICES | SERVICES LINGUISTIQUES GRATUITS | भाषासम्बन्धी निःशुल्क सेवाहरू | SERVICIOS GRATUITOS DE IDIOMAS | 免費語言服務 | BESPLATNE JEZIČKE USLUGE | БЕСПЛАТНЫЕ УСЛУГИ ПЕРЕВОДА | DỊCH VỤ NGÔN NGỮ MIỄN PHÍ | 無料通訳サービス | ከጻ የቋንቋ አገልግሎቶች | HUDUMA ZA MSAADA WA LUGHA BILA MALIPO | BESPLATNE JEZIČKE USLUGE | အခမဲ့ ဘာသာစကား ဝန်ဆောင်မှုများ | ADEEGYO LUUQADA AH OO BILAASH AH | خدمات لغة مجانية : anr.civilrights@vermont.gov or 802-636-7827.”

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

2. Clean Water State Revolving Loan Fund Program Mission and Goals

2.1. Program Mission

To ensure the fund operates in perpetuity and provides continuing financial assistance to Vermont municipalities and eligible private entities for clean water project need, including traditional, green, and natural infrastructure, and to

effectively align the Clean Water State Revolving Loan Fund (CWSRF) with other state and federal funding sources to support clean water projects.

2.2. Long Term Goals

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

2.3. Short Term Goals

1. Provide incentives that promote municipal affordability and provide additional subsidy opportunities for communities meeting the program's affordability criteria.
2. Create funding opportunities for economically disadvantaged manufactured home communities with water infrastructure needs.
3. Provide funding opportunities to support Stormwater General Permit 3-9050, also known as the "3-Acre Stormwater Permit".
4. Create funding mechanisms that support investment in natural resource projects such as WISPr, Natural Infrastructure Bridge Loans, or loan forgiveness for Agency priority water quality projects.
5. Provide low interest and additionally subsidized loans for planning activities to support project development that leads to construction projects.

6. Engage communities and other stakeholders in an evaluation of the Department's Affordability Criteria and Priority Ranking Criteria.
-

3. State Grants under this Intended Use Plan

3.1. Pollution Control Grants

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

The funding source for these grants is appropriated at the discretion of the legislature and cannot be guaranteed by the program. Due to limited funding most projects will not receive a PC Grant. If sufficient state capital funds cannot be secured to meet full grant eligibility, other funds may be provided to offset the shortfall in grant dollars, such as a CWSRF loan. The Pollution Control Grant budget for SFY26 is \$4,000,000.

No portion (\$0) of the State Fiscal Year 2026 PC Grant is proposed for the Engineering Planning Advance Program. \$200,000 is reserved for the Regional Planning Advance Program. The CWSRF Program will reallocate the REPA funds to PC Grant-eligible projects after February 1, 2026 depending on the extent of REPA-eligible projects.

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

Combined Sewer Overflows (CSOs) are a public health risk and environmental concern. Eliminating discharges will improve the water quality of streams and lakes. Governor Scott worked with the Vermont General Assembly to appropriate an initial \$10 Million to support implementation and staffing of these projects in State Fiscal Year 2022. The legislature appropriated an additional \$20 Million in State Fiscal Year 2023. There have been no additional appropriations. The grant allocations from the 2023 Intended Use Plan remain unchanged.

3.3. State ARPA Village Wastewater and Drinking Water Grant Eligibility

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

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

The original funding goal was to support up to ten decentralized community wastewater solutions and/or public municipal water systems. Wastewater projects are eligible for funding per limitations set by SRF Guidance Document #38, dated March 28, 2024.

All funds have been awarded to qualifying Villages, and Village ARPA grants have been executed. Some villages have chosen to voluntarily rescind grants, allowing for DEC to reallocate those funds to the readiest projects, with the greatest need, and with the greatest potential to accommodate new housing. DEC reserves the right to rescind funding from grantees that are not making progress and where the funding may be at risk of recission from the Federal Treasury Department.

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

3.4. Municipal Separate Storm Sewer System (MS4) Grant Program

The Clean Water SRF Program is administering a Municipal Separate Storm Sewer System (MS4) Stormwater Grant program sourced with Lake Champlain Basin Program funds via this Intended Use Plan. A total of up to \$4,000,000 will be made available to municipalities regulated under the MS4 General Permit to assist with designing and implementing stormwater treatment practices to comply with MS4 General Permit requirements to implement Flow Restoration Plans and Phosphorus Control Plans. Grant funds will be made available to projects securing CWSRF loans.

Grant funds will be used to forgive up to 80% of SRF loan principal, per loan step, per project. Projects seeking construction funds must be ranked as fundable on the SFY 2026 Project Priority List.

Eligible Applicants are limited to regulated MS4 communities and their related eligible Stormwater Management Program Plans including Flow Restoration and Phosphorus Control Plans. Regulated MS4 communities are identified at [MS4 Link](#) .

4. CWSRF Administration

Municipal CWSRF construction loans are currently issued at a 0% interest rate with an annual administrative fee of 2%. Private entity CWSRF construction loans are currently issued at 0% interest rate with an administrative fee of 2.75%, except when specific initiatives have an alternative rate as outlined in this IUP including certain manufactured housing communities as described in Section 9.1 which shall have an administrative fee of 1.5%. Additionally, Brownfield Economic Revitalization Alliance (BERA) construction projects will be issued at a 0% interest rate with an administrative fee of 2.25%.

Administrative fee proceeds are deposited into a dedicated account separate from the CWSRF account, referred to as the administrative account. Fees are tracked as either program or non-program income to allow non-program income to be used for a broader array of Clean Water Act eligible activities than is allowed with program income. All fee income is accounted for in a separate fund outside the SRF fund.

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

4.1. Reallocated Funds between Clean Water and Drinking Water SRFs

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

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

5. Clean Water SRF Capitalization Grants Federal Fiscal Year 2025

Vermont will receive three Federal Fiscal Year 2025 capitalization grants as a result of the Bipartisan Infrastructure Law (BIL).

- The General Grant is \$7,788,000 after allocating \$79,000 for the federal 604b program (the 604b program directs 1% of CWSRF allocations to

support water quality planning in the form of “604b Water Quality Management Planning Grants”).

- The General Supplemental Grant is \$12,094,000 after allocating \$122,000 for 604b
- The Emerging Contaminants Grant is \$1,043,000 after allocating \$11,000 for 604b
- The reallocated 2023 Emerging Contaminants Grant is \$54,000 (604(b) does not apply to reallocations)

The required match for the Federal Fiscal Year grants is as follows:

- \$1,557,600 for the General Grant (20% of grant)
- \$2,418,800 for the General Supplemental Grant (20% of grant)
- \$0 for the Emerging Contaminants Grants (no match requirement)

The full match for the General Supplemental Grant will be available beginning July 2025. For the General Grant, \$814,781 will be available beginning July 2025. The remaining required match of \$742,819 will be available beginning July 2026. The Payment Schedule accounts for the schedule of match funds availability.

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

Sources	General	General Supplemental	Emerging Contaminants
CWSRF Capitalization Grant (after 604b), including 2023 Reallotment (\$54,000)	\$7,788,000	\$12,094,000	\$1,097,000
State Match Needed FFY24 Grant	\$1,557,600	\$2,418,800	N/A
Repayments (anticipated 7/1/25-6/30/26)	\$10,438,233	N/A	N/A
Interest (anticipated 7/1/25-6/30/26)	\$4,800,000	N/A	N/A
Carry-Forward (anticipated)	\$90,403,917	N/A	\$521,100
TOTAL	\$114,987,750	\$14,512,800	\$1,618,500

Repayments and interest values for all three grants are accounted for in the General Grant. General Supplemental and Emerging Contaminant carry-forward is accounted for in the respective grant.

Uses	General	General Supplemental	Emerging Contaminants (Incl. 2023 Reallotment)
Anticipated Commitments	\$186,708,237	\$14,029,040	\$1,574,620
Administrative (Max 4%)	\$311,520	\$483,760	\$43,880
Technical Assistance (Max 2%)	\$0	\$0	\$0
TOTAL	\$187,019,757	\$14,512,800	\$1,618,500

The Sources and Uses tables identify the funds used to determine the funding line for the Priority List. The funding line, shown here as “anticipated commitments” is informed by a review of anticipated project schedules, consequently “Uses” are shown as exceeding “Sources” for the General and General Supplemental Grants.

5.1. EPA Federal Fiscal Year Payment Schedule

The State matching funds will be deposited into the Clean Water SRF prior to the quarter when federal funds are requested. Within one year after the receipt of each quarterly grant payment, the CWSRF Program will make binding commitments in an amount equal to 120 percent of the General Grant, 120 percent of the General Supplemental Grant, and 100 percent of the Emerging Contaminant Grant quarterly payments. All funds shall be expended in a timely and expeditious manner.

The schedule for entering into binding commitments and timing of cash draws is contained in the grant application submitted to EPA. The Clean Water SRF 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.

The amount used for administration of the fund will not exceed the statutory (4%) limit, per grant.

SRF General

Payment No.	Quarter	Date	Federal Amount	State Amount
1	2026-1	10/1/2025-12/31/2025	\$1,947,000	\$389,400
2	2026-2	1/1/2026-3/31/2026	\$1,947,000	\$389,400
3	2026-3	4/1/2026-6/30/2026		
4	2026-4	7/1/2026-9/30/2026	\$3,894,000	\$778,800
Total			\$7,788,000	\$1,557,600

SRF General Supplemental

Payment No.	Quarter	Date	Federal Amount	State Amount
1	2026-1	10/1/2025-12/31/2025	\$3,023,500	\$604,700
2	2026-2	1/1/2026-3/31/2026	\$3,023,500	\$604,700
3	2026-3	4/1/2026-6/30/2026	\$3,023,500	\$604,700
4	2026-4	7/1/2026-9/30/2026	\$3,023,500	\$604,700
Total			\$12,094,000	\$2,418,700

SRF Emerging Contaminants

Payment No.	Quarter	Date	Federal Amount	State Amount
1	2026-1	10/1/2025-12/31/2025	\$1,043,000	\$0
2	2026-2	1/1/2026-3/31/2026	--	\$0
3	2026-3	4/1/2026-6/30/2026	--	\$0
4	2026-4	7/1/2026-9/30/2026	--	\$0
Total			\$1,043,000	\$0

SRF Emerging Contaminants -2023 Reallotment

Payment No.	Quarter	Date	Federal Amount	State Amount
1	2026-1	10/1/2025-12/31/2025	\$54,000	\$0
2	2026-2	1/1/2026-3/31/2026	--	\$0
3	2026-3	4/1/2026-6/30/2026	--	\$0
4	2026-4	7/1/2026-9/30/2026	--	\$0
Total			\$54,000	\$0

5.2. EPA Estimated Disbursement Schedule

Disbursement Quarter/\$	CWSRF General	CWSRF General Supplemental	CWSRF Emerg, Contam.	2023 CWSRF Emerg. Contam.
1QFFY2026	\$1,947,000	\$3,023,500	\$260,750	
2QFFY2026	\$1,947,000	\$3,023,500	\$260,750	\$54,000
3QFFY2026		\$3,023,500	\$260,750	
4QFFY2026	\$3,894,000	\$3,023,500	\$260,750	
1QFFY2027				
2QFFY2027				
3QFFY2027				
4QFFY2027				
Total	\$7,788,000	\$12,094,000	\$1,043,000	\$54,000

6. Project Funding and Use of Technical Assistance Funds

Projects Anticipated to Receive FFY 2025 CWSRF available Funds
(Award of FFY 2025 Funds are anticipated to be made during SFY 2026)

6.1. CWSRF General

Project /Activity	Total Project Cost	SRF State Match	Federal Share FFY 2025 Funds
See SFY 2026 Priority List (Attached)	\$8,971,776	\$1,495,296	\$7,476,480
Vermont Administrative Expense	\$373,824	\$62,304	\$311,520
Technical Assistance	\$0	\$0	\$0
Total	\$9,345,600	\$1,557,600	\$7,788,000

6.2. CWSRF General Supplemental

Project /Activity	Total Project Cost	SRF State Match	Federal Share FFY 2025 Funds
See SFY 2026 Priority List (Attached)	\$13,932,288	\$2,322,048	\$11,610,240
Vermont Administrative Expense	\$580,512	\$96,752	\$483,760
Technical Assistance	\$0	\$0	\$0
Total	\$14,512,800	\$2,418,800	\$12,094,000

6.3. CWSRF Emerging Contaminants

Project /Activity	Total Project Cost	SRF State Match	Federal Share FFY 2025 Funds
See SFY 2026 Priority List (Attached)	\$1,001,280	NA	\$1,001,280
Vermont Administrative Expense	\$41,720	NA	\$41,720
Technical Assistance	\$0	NA	\$0
Total	\$1,043,000	NA	\$1,043,000

6.4. CWSRF 2023 Reallotted Emerging Contaminants

Project /Activity	Total Project Cost	SRF State Match	Federal Share FFY 2025 Funds
See SFY 2026 Priority List (Attached)	\$51,840	NA	\$51,480
Vermont Administrative Expense	\$2,160	NA	\$2,160
Technical Assistance	\$0	NA	\$0
Total	\$54,000	NA	\$54,000

Detailed project information is included in the attached Municipal Pollution Control Projects Priority Lists for state fiscal year 2026. The state anticipates disbursement of its state match prior to federal disbursements.

6.5. Use of Technical Assistance Funds (2%)

The Clean Water SRF Program does not intend to use the 2% technical assistance funds and will instead fund projects. Additionally, this Intended Use Plan amends the 2022, 2023 and 2024 Intended Use Plans to direct unused Technical Assistance funds to fund projects. The Clean Water SRF Program preserves the ability to use prior year Technical Assistance funds under future Intended Use Plans. Prior year Technical Assistance funds are as follows:

Technical Assistance Funds Directed to Projects			
Grant	2022	2023	2024
General	\$113,620	\$88,392	\$80,160
General Supplemental	\$174,620	\$225,126	\$223,280
Emerging Contam.	\$88,392	\$20,860	\$20,860

6.6. Future Program Impact

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

7. Criteria and Method for Distribution of Funds

The Vermont General Assembly enacted Act 75 creating 24 V.S.A. Chapter 120 in the 1987 legislative session, which established Vermont's CWSRF and set out certain priority criteria for the purpose of ranking prospective projects. The Municipal Pollution Control Priority System Rule (Agency of Natural Resources Environmental Protections Rules, Chapter 2) 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 shows anticipated construction and planning projects for the immediate five-year period, inclusive of state fiscal year 2026. We

anticipate a large volume of projects and requests for funds in state fiscal years 2026 to 2030 with demand for funding potentially exceeding availability. The funds will be managed to maximize project funding.

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

Environmental benefits are reported at least quarterly for every loan transaction using the EPA Office of Water SRF reporting system (OWSRF). Loans used to meet equivalency requirements are reported in conformance with the Federal Funding Accounting and Transparency Act. The Subaward Reporting System (FSRS) used to report loans for FFATA was retired in 2024 and has been replaced by the System for Award Management (SAM.gov).

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

8. Additional Subsidy

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

The following sections identify the amount of available subsidy and the eligible categories.

8.1. Prior Year Subsidy

This IUP amends the following prior year IUPs to make available unused subsidy amounts. This subsidy is made available under the terms of the 2025 IUP as described in Section 8.3.

2022 Emerging Contaminants General Grant: \$27,540

2023 Emerging Contaminants General Grant: \$62,580

2023 Reallotted Emerging Contaminants: \$54,000

2023 General Supplemental Grant: \$1,183,912 (AC/603*)

2024 Emerging Contaminants Grant: \$62,580

2024 General Grant: \$351,785 (No restrictions)

2024 General Supplemental Grant: \$2,186,450 (AC/603*)

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

8.2. 2025 Subsidy Amounts

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

8.2.1. General Grant

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

8.2.2. General Supplemental Grant

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

8.2.3. Emerging Contaminants Grant

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

8.2.4. Summary Table: Available Subsidy by FFY 2025 Grant

Grant	Additional Subsidy Proposed	Eligibility Requirements Per EPA Grant Agreement
General	\$778,800 \$1,557,600	No Restrictions AC/603(i)*
General Supplemental	\$5,926,060	AC/603(i)
Emerging Contaminants	\$1,043,000	No Restrictions
2023 Emerging Contaminants	\$54,000	No Restrictions

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

8.3. Subsidy Categories

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

1. Planning: \$1,030,585
2. Floodplain Initiative: \$500,000
3. Construction: \$10,353,962
4. Lakes in Crisis: \$100,000
5. Emerging Contaminant Grant Construction activities: \$1,097,000

8.3.1. Summary Table: Available Subsidy by Initiative Category (FFY 2025 Grant and Prior Year Subsidy Combined).

Grant	Initiative	Amount	Subsidy Type
General and General Supplemental			
	Planning	\$1,030,585	No restrictions
	Floodplain	\$500,000	AC/603(i)
	Construction	\$10,353,962	AC/603(i)
	Lakes in Crisis	\$100,000	No restrictions
Emerging Contaminants			
	Construction	\$1,097,000	No restrictions

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

8.3.2. Planning Subsidy

Supports Short Term Goal #6: Financing of Planning Activities

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

There are two Planning Subsidy Categories described below.

8.3.2.1. Planning Subsidy

Eligible planning projects may receive loan forgiveness as follows:

- 50% forgiveness of planning costs, up to \$100,000 per project, inclusive of prior subsidy received.

8.3.3. Floodplain Restoration Subsidy

Supports Short Term Goal #5: Financing incentives for natural infrastructure and #3: Financing support for economically disadvantaged MHCs

This additional subsidy offers principal loan forgiveness as outlined below with a maximum allowable for this entire initiative of \$500,000. This additional subsidy opportunity is for floodplain buyouts and restoration to purchase developed properties located in floodplains or at high risk of flooding or erosion as determined by the DEC Rivers Program. Loan funds for eligible projects are considered under the Interim Finance Put-Aside.

1. Projects eligible for FEMA funding:

- a. In manufactured home community: Subsidy in the form of 100% principal forgiveness, up to 50% of total project costs or \$250,000, whichever is lower. Example with \$200,000 total project cost: \$100,000 loan, \$100,000 forgiven.
- b. Not in manufactured home community: Subsidy in the form of 100% principal forgiveness, up to 25% of total project costs or \$100,000, whichever is less. Example with \$200,000 total project cost: \$50,000 loan, \$50,000 forgiven.

2. Projects not eligible for FEMA funding:

- a. In manufactured home community: Subsidy in the form of 100% principal forgiveness up to \$250,000. Example with \$200,000 total project cost: \$200,000 loan, \$200,000 forgiven.
- b. Not in manufactured home community: Subsidy in the form of 100% principal forgiveness up to \$100,000. Example with \$200,000 total project cost: \$100,000 loan, \$100,000 forgiven.

Eligible costs may include property purchase, closing costs, demolition and site restoration, and floodplain restoration. All eligibility determinations and cost approvals will be made by the DEC Rivers Program. These loans must be municipally sponsored.

Projects that intend to seek funding must submit a letter of intent to apply by the sponsoring municipality no later than February 15, 2026. After this date any

remaining subsidy without identified demand will be made available under Section 8.3.5. (Construction Subsidy). Additionally, projects must meet applicable Priority List Bypass Procedure dates in Section 11.2.

8.3.4. Construction Subsidy

Loan forgiveness for eligible construction activities supports multiple long-term and short-term goals. There are three construction subsidy categories: Category 1: subsidy for communities meeting affordability criteria; Category 2: subsidy for projects eligible for Emerging Contaminants Grant funding; Category 3: subsidy for qualifying “Lakes in Crisis” projects. Projects may receive up to the maximum amount of loan forgiveness under each category.

8.3.4.1. Construction Subsidy Category 1: Affordability Criteria Subsidy

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

- 50% loan forgiveness, up to \$1,000,000 per project, inclusive of prior year construction subsidy.

8.3.4.2. Construction Subsidy Category 2: Emerging Contaminants Subsidy

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

- 100% loan forgiveness.

8.3.4.3. Construction Subsidy Category 3: Lakes in Crisis

This category is intended to allow completion of a previously funded project in the Lake Carmi watershed in Franklin. Eligibility is restricted to projects meeting the statutory definition of Lakes in Crisis. Loan forgiveness is as follows:

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

8.4. Requirements to Secure Additional Subsidy

The Clean Water SRF Program establishes the amount of available additional subsidy on an annual basis in the Intended Use Plan, consistent with the requirements of the State’s capitalization grants.

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

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

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

Step 1 (Preliminary engineering, feasibility)

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

Step 2 (Final design engineering)

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

Step 3 (Construction)

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

9. Affordability Criteria

9.1. Affordability Criteria

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

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

In addition to the following criteria, all non-profit or cooperatively owned manufactured home communities (MHCs) categorically meet the state's affordability criteria, as first established in the 2021 Intended Use Plan. Such projects will receive a reduced admin fee rate of 1.5%.

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

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

Income measurements are determined using Median Household Income. This information will be obtained from the American Community Survey's most recent 5-year rolling average MHI using the most current data available on the date the corresponding IUP year was finalized, or based on an approved income survey, or other method as approved by the Secretary. The procedures for conducting and approving income surveys and the requisite record keeping will be in accordance with the Vermont State Revolving Fund's established Guidance Document #11: Median Household Income Determination or as determined by an equivalent method including HUD's survey method. Annual user cost will be calculated by the annual system debt service, operations and maintenance costs, and short-lived

asset set asides, divided by the total Equivalent Residential Units (ERU).

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

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

10. Non-Point Source Funding

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

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

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

10.1. Natural Resources Categorical Eligibility

Eligible CWSRF natural resources projects are defined as a project to protect, conserve, or restore natural resources, including the acquisition of easements and land for the purposes of providing water quality benefits (24 VSA Chapter 120

§4752). Eligible project categories include the following hydromodification, habitat, and thermal restoration project types which are categorically considered eligible for Clean Water State Revolving Loan funding:

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

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

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

The Water Investment Division reserves the right to request additional review on a case-by-case basis. Additional environmental review determinations will be made by the Watershed Planners.

Many other federal crosscutters are not required for these projects including American Iron and Steel (AIS), Davis Bacon, and Fiscal Sustainability Plans (FSP) as they are not treatment works projects. Additionally, the program intends to use repayment funds (Tier II) to fund all natural resources projects. Due to the use of

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

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

10.2. Water Infrastructure Sponsorship Program (WISPr)

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

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

To ease accessing WISPr funds, the program will use Tier 2, or repayment funds, to support WISPr projects. These projects will not be reported under Federal Funding Accountability and Transparency Act for equivalency purposes.

The CWSRF Program reserves the ability to limit WISPr funding on a project-by-project and programmatic level as necessary in consideration of available funding.

10.2.1. How to Qualify for WISPr Funding

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

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

10.3. Interim Financing for Natural Resources Projects

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

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

To aid in this investment, this Intended Use Plan is proposing the continuation of an interim financing program. The interim financing is shown on the priority list as a “put aside” to ensure funds are available as needed, though any private entity project that applies to this program would only be funded after all municipal projects that meet readiness criteria are funded. To ensure funding is flexible and available for the interim financing projects, the put-aside does not require discrete projects to be ranked on the priority list, but rather categorically ranked within this put aside. The following is proposed:

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

11. Program Updates and Guidance

11.1. Annual Cap on Loans

This year’s priority list does not place an annual cap on loan amount. Where projects are eligible for Emerging Contaminants grant funds and loan value exceed Emerging Contaminants Grant funds, they may receive funding under both the Emerging Contaminants grant and either the General or General Supplemental grants, without a cap on overall loan amount.

11.1.1. Planning Loans Evaluation and Funding Cap

For this Intended Use Plan, “Planning Loans” (Step 1 and/or 2) for General projects (those other than Emerging Contaminants) will be funded using the \$5,000,000 put-

aside shown in the Priority List. The Clean Water SRF Program is accepting applications for Planning Loans on a rolling basis while funding is available. If additional funding is available following the bypass of projects on the Priority List, the Water Investment Division may increase funding for Planning Loans beyond \$5,000,000.

11.2. Priority List Bypass Procedure

In order to further prioritize the management of the priority list, the program implements Readiness to Proceed Criteria that require submission of an administratively complete preliminary engineering report (PER) in order to be ranked for construction loan and PC grant funding. Projects that are in the planning stages may submit priority list applications but will be shown as future projects for planning purposes. Additionally, projects must meet these readiness-to-proceed deadlines, by no later than:

- November 1, 2025: Submit complete Step II/ Final Design Loan Application;
- January 31, 2026: Schedule a bond vote and submit a copy of the warning to the Clean Water SRF Program;
- May 1, 2026: Receive voter authorization via the bond vote and submit a project schedule that demonstrates the project will be ready to go to bid by June 30, 2026; and,
- June 30, 2026: Submit complete Step III/Construction loan application (all required items have been completed and submitted).

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

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

11.3. Guidance on Planning Versus Construction Activities

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

Planning activities are those activities that take place during the feasibility, preliminary engineering, and design phases of a project and where there is no significant alteration of existing ambient conditions. In general, if an activity involves excavation or moving soil or rock, it is not a planning activity. This excludes Agency of Commerce and Community Development-required

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

If a final design approval letter is issued for a project, the planning activities associated with the project must take place prior to issuance of the letter.

Examples of planning activities:

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

This is not an exhaustive list and other activities will be reviewed by the Clean Water SRF Program on a case-by-case basis.

11.4. ANR Online Funding Application

Loan applications and associated documentation must be submitted through ANR Online [ANR Online Link](#). A loan application will be considered complete when the form and all required documentation are uploaded to ANR Online and the applicant clicks the Submit button. The documentation required for loan applications varies by project step. Applicants with questions about required documentation are encouraged to reach out to a Clean Water Project Developer with questions.

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

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

11.5. State Environmental Review Procedure Update

Vermont is in the process of revising the State Environmental Review Process (SERP) to evaluate the identifiable environmental effects of a project, funded through the Clean Water and Drinking Water Revolving Loan Funds. This will continue to ensure the necessary mitigation measures are implemented, with public

participation and comment period, prior to project implementation actions. This process is applied both to municipal and private loan recipient projects, whether through the Clean Water and Drinking Water State Revolving Loan Funds. The purpose of the procedure is to parallel the intentions of the National Environmental Policy Act (NEPA), as enacted in 1969 with subsequent amendments. The revised procedure is currently in internal review and once that review is completed it will go out for 30-day public comment. The revised procedure is subject to US EPA approval. The procedure applies to all Clean Water and Drinking Water State Revolving Loan funded projects, to ensure that state and federal environmental laws and impacts are considered.

11.6. CW SRF Fund Transfer to Onsite Loan Fund

The CWSRF Program will reserve up to \$275,000 annually for transfer to the Onsite Loan Fund.

11.7. Stormwater Financing Linked Deposit

Due to demand for funding related to Stormwater General Permit 3-9050, otherwise known as the “3-Acre Stormwater Permit”, this Intended Use Plan proposes the creation of a linked deposit mechanism to fund these project types. The bulk of the need to comply with this permit requirement will be with business entities and residential associations in the Lake Champlain and Lake Memphremagog Basins. This Intended Use Plan reserves the authority to invest up to \$1,000,000 for this funding mechanism. This investment will be made only after satisfying the statutory requirement to offer funding to all eligible municipal projects.

Funds used for the linked deposit program are considered an investment and, as such, are considered in the fund uses portion of the IUP but are not a discrete put-aside or ranked project.

11.8. US Environmental Protection Agency (EPA) Performance Evaluation Review

EPA undertakes an annual Performance Evaluation review for the Clean Water SRF Program. The most recently completed Program Evaluation Review conducted by EPA Region 1 covered State Fiscal Year 2023. The Program Evaluation Review for 2024 is pending at the time of this Intended Use Plan. The Clean Water SRF Program issues an Annual Report to EPA that covers program operations and addresses action items identified by EPA in their Review.

12. Equivalency and Federal Reporting

The term “equivalency” refers to projects funded in the amount equal to an EPA Capitalization Grant. All equivalency projects are reported to the Environmental Protection Agency in conformance with the Federal Funding Transparency Act.

Equivalency projects are required to comply with several requirements collectively referred to as “cross-cutters.” Additionally, certain cross-cutters apply to individual projects regardless if the project is reported per the Federal Funding Transparency Act.

All projects receiving federal funds are required to comply with the requirements of the federal Single Audit Act, Fiscal Sustainability Plans, and Qualifications Based Selection, except for specifically designated projects.

All projects must comply with a National Environmental Protection Act-like review, Telecommunications Prohibition (Telecom Equipment & Services 2 CFR 200.21), Federal Flood Risk Management Standard (FFRMS), Disadvantaged Business Enterprise reporting, Davis-Bacon, American Iron and Steel, and other required federal crosscutters, as applicable, except for specifically designated non-treatment works projects.

All treatment works projects are required to meet all cross-cutters, except Build America Buy America requirements, as noted below.

Build America Buy America requirements apply to all projects reported for purposes of the Federal Funding Transparency Act. The Program will identify such projects as necessary to comply with equivalency reporting requirements.

13. Green Project Reserve

The Vermont requirement for Green Project Reserve (GPR) for FFY 2025 is 10% of the General, General Supplemental, and Emerging Contaminants grants. Potential GPR projects are identified on the attached priority list. Many of these projects are early in the development phase. Engineering and project development staff will work directly with municipalities and their consultants to incorporate green project elements into the project design.

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

Grant	Green Project Reserve Requirement
General	\$778,800
General Supplemental	\$1,209,400
Emerging Contaminants	\$104,300

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

14. Public Participation

Vermont follows public participation procedures in the development of the annual Project Priority List, the Intended Use Plan and in the environmental review process. The Intended Use Plan is typically developed and adopted annually along with the Priority List using the same public participation procedure 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 State Environmental Review Procedure. This procedure was approved by the EPA Regional Administrator in accordance with the August 2, 1989, Clean Water SRF Operating Agreement between the State of Vermont and the U.S. Environmental Protection Agency, Region I.

On December 16, 2024, the Clean Water SRF Program notified municipalities and other interested parties to apply to be included on the Municipal Pollution Control Projects Priority List for State Fiscal Year 2026 with a due date of February 14, 2025, for inclusion in the draft Pollution Control Priority List.

The draft Intended Use Plan was released on July 2, 2025. A public hearing invitation to participate was sent via email to all entities in the contact list and directions to participate via Microsoft Teams, telephone, or in person were posted on the SRF website and on the state library public hearing calendar. A hybrid virtual/in-person public hearing will be held on Friday, August 1, 2025, at 10 AM, at the Catamount Room of the National Life Building, 1 National Life Drive, Montpelier. Public comments on this draft IUP will be accepted at the public hearing and in writing until 5:00 PM on August 8, 2025.

15. Responsiveness Summary

The final Intended Use Plan will include a response to all public comments submitted regarding this draft Intended Use Plan.

16. Revisions to the Final Intended Use Plan

The final Intended Use Plan will identify all revisions made relative to the draft Intended Use Plan.

17. Project Priority Lists

General Projects (General, General Supplemental and Emerging Contaminants combined)

DRAFT 2026 Pollution Control Priority and Planning List

Applicant	Applicant Type	Project Name	Priority Points	Project Category	2026 Step I	2026 Step II	2026 Step III	SFY 2026 Total SRF Project Cost	Grant Source	Green Project Reserve Amount	Grant Eligibility \$	Grant Eligibility %
Franklin, Town of	M	Lake Carmi Emerging Contaminants Project	NA	NPS-H	0	0	0	0	EC	0	0	0%
Whitingham, Town of	M	WWTF Upgrade Bid Alternates Segment	NA	TW-ST	0	0	0	0	GB	0	0	0%
Hinesburg, Town of	M	Wastewater Treatment Facility Upgrade, Contract No. 2	92	TW-AT	0	0	0	0	GS	0	0	35%
Colchester, Town of	M	Malletts Bay Sewer Project - Phase 2	85	TW-NCS	0	0	10,500,000	10,500,000	GS	0	3,465,000	33%
Colchester, Town of	M	Malletts Bay Sewer Project - Phase 1	80	TW-NCS	0	0	0	0	GS	0	0	0%
Burlington, City of*	M	Wastewater Treatment Facility Improvements "Stage 0"	74	TW-ST	0	0	0	0	GS	0	0	20%
Brighton, Town of* **	M	Brighton Wastewater Treatment Facility Refurbishment	70	TW-AT	0	0	0	0	GS	0	0	0%
Franklin, Town of	M	Rte 236 Culvert - Lake Carmi	51	NPS - H	0	0	0	0	GB	0	0	0%
Saint Albans, City of*	M	Houghton Park CSO Storage Tank	47	TW-CSOC	0	0	0	0	GB	0	0	0%
Essex, Town of	M	Center Road Sewer Force Main Replacement	22	TW-SSR	0	0	0	0	GB	0	0	0%
Swanton, Village of*	M	WWTF Upgrade and Phosphorous Improvements	20	TW-AT	0	0	0	0	GB	0	0	10%
Bolton Valley Community W&S	PFP	BVCWS WWTF Upgrade	22	NPS - IDS	0	0	0	0	GS	0	0	0%
Planning Put-Aside	M	CWSRF Planning Put-Aside	NA	NA	0	0	5,000,000	5,000,000	GS	NA	NA	NA
Hinesburg, Town of	M	Wastewater Treatment Facility Upgrade, Contract No. 4	92	TW-AT	0	0	0	0	GB	0	0	35%
Londonderry, Town of* **	M	South Londonderry Village Community Wastewater System	90	NPS - IDS	0	0	1,796,700	1,796,700	GB	1,796,700	628,845	35%
Waitsfield, Town of **	M	Waitsfield Community Wastewater	89	NPS - IDS	0	0	12,885,406	12,885,406	GB	12,885,406	4,509,892	35%
Montgomery, Town of* **	M	Montgomery Center Wastewater Infrastructure Project	88	NPS - IDS	0	1,451,967	4,339,565	5,791,532	GS	5,791,532	2,027,036	35%
South Burlington, City of	M	Bartlett Bay Wastewater Treatment Facility Refurbishment	84	TW-ST	0	0	31,157,470	31,157,470	GB	4,200,000	10,905,114	35%
Shelburne, Town of	M	WWTF Consolidation C#1	79	TW-ST	0	0	7,373,374	7,373,374	GS	0	2,580,681	35%
Shelburne, Town of	M	WWTF Consolidation C#2	79	TW-ST	0	0	34,202,000	34,202,000	GB	0	11,970,700	35%
Shelburne, Town of	M	WWTF Consolidation C#3	78	TW-AT	0	0	1,727,986	1,727,986	GS	0	604,795	35%
Burlington, City of*	M	Stage 2 East to Main Conveyance - Cherry Street	77	TW-CSOC	0	187,269	2,791,500	2,978,769	GS	0	863,843	29%
Berlin, Town of	M	Riverton Village Community Wastewater	77	NPS - IDS	0	100,000	1,400,000	1,500,000	GS	0	525,000	35%
Saint Johnsbury, Town of*	M	Bay Street Water and Sewer Improvements	77	TW-CSOC	0	0	2,285,800	2,285,800	GS	0	640,024	28%
Barre, City of* **	M	WWTF Headworks	76	TW-ST	0	0	8,847,600	8,847,600	GS	0	2,477,328	28%
Burlington, City of*	M	Pine St CSO Storage Tank and Sewer Separation Project	73	TW-CSOC	0	0	14,000,000	14,000,000	GS	0	3,360,000	24%
Rutland, City of* **	M	Meadow Street Combined Sewer Separation	73	TW-CSOC	0	0	2,341,400	2,341,400	GS	0	468,280	20%
Rutland, City of* **	M	Connor Park CSO Storage	72	TW-CSOC	0	0	7,200,000	7,200,000	GS	0	1,368,000	19%
Burlington, City of*	M	Stormwater Collection Improvements - RF1-278 Phase 2	72	SW - Gray	0	0	2,000,000	2,000,000	GS	0	280,000	14%
Londonderry, Town of* **	M	North Londonderry Village Community Wastewater System	70	NPS - IDS	0	0	489,500	489,500	GS	489,500	112,585	23%
Burlington, City of*	M	Wastewater Collection Improvements - RF1-187 Phase 2	70	TW-SSR	0	0	2,000,000	2,000,000	GS	0	380,000	19%
Jericho, Town of	M	Town of Jericho Wastewater	69	NPS - IDS	0	394,100	9,219,600	9,613,700	GS	0	2,884,110	30%
Burlington, City of*	M	Pump Station Refurbishment Phase II (Next 3 Pump Stations)	67	TW-SSR	0	0	5,730,000	5,730,000	GS	0	1,146,000	20%
Vergennes, City of	M	North Main Street Sewer	67	TW-SSR	0	180,000	935,000	1,115,000	GS	0	245,300	22%
Barton, Village of*	M	Barton WWTF Upgrade	66	TW-ST	0	472,000	9,177,000	9,649,000	GS	0	2,412,250	25%
Burlington, City of*	M	Phosphorus Reduction Retrofits in Burlington MS4 System	63	SW- Green	0	500,000	2,000,000	2,500,000	GS	2,650,000	650,000	26%
Saint Johnsbury, Town of*	M	Portland Street Storm and Sewer Improvements	63	TW-CSOC	0	0	1,550,000	1,550,000	GS	0	310,000	20%
Saint Johnsbury, Town of*	M	Railroad Street Storm and Sewer Improvements	63	TW-CSOC	0	0	473,000	473,000	GS	0	94,600	20%
Vergennes, City of **	M	WWTF Macdonough Dr Pump Station Upgrade	63	TW-SSR	0	500,000	1,500,000	2,000,000	GS	100,000	320,000	16%
Vergennes, City of **	M	WWTF Hydraulic Upgrade	63	TW-ST	0	400,000	4,630,000	5,030,000	GS	100,000	804,800	16%
Vergennes, City of	M	North Main Sewer Improvements	62	TW-SSR	0	81,000	353,000	434,000	GS	0	73,780	17%
Vergennes, City of	M	Macdonough Drive Sewer Improvements	62	TW-SSR	0	38,000	275,000	313,000	GS	0	53,210	17%
Vergennes, City of	M	Macdonough Dr Pump Station Force Main Improvements	62	TW-SSR	0	460,000	5,100,000	5,560,000	GS	0	834,000	15%
Chester, Town of*	M	First Avenue Pump Station, Force Main and Gravity Main	56	TW-SSR	0	0	2,705,900	2,705,900	GS	0	270,590	10%
Rutland, City of* **	M	CSO Check valves	55	TW-CSOC	0	0	907,489	907,489	GS	0	136,123	15%
Rutland, City of*	M	Moon Brook Pond Modifications Project	55	SW - Green	0	0	1,402,000	1,402,000	GS	0	154,220	11%
West Rutland, Town of*	M	WWTF and System Improvements	54	TW-ST	0	0	2,300,000	2,300,000	GS	0	230,000	10%
Burlington, City of*	M	Manhattan Drive Outfalls Project - Phase II	54	SW - Gray	0	0	1,069,576	1,069,576	GS	0	0	0%
Middlebury, Town of	M	South St. Reconstruction Phase V-- Sewer and Stormwater	54	TW-CSOC	0	0	1,368,300	1,368,300	GS	250,000	164,196	12%
Proctor, Town of*	M	Proctor WWTF Upgrade	53	TW-ST	0	0	5,166,000	5,166,000	GS	0	0	0%
Rutland, City of*	M	Stormwater/Wastewater Improvements	52	TW-CSOC	0	0	1,535,000	1,535,000	GS	0	214,900	14%
Richmond, Town of	M	WWTF Refurbishment	51	TW-ST	0	1,008,000	16,776,000	17,784,000	GS	1,662,000	1,778,400	10%
Vergennes, City of **	M	Vergennes WWTF Age Related Improvements	50	TW-ST	0	330,000	6,825,000	7,155,000	GS	200,000	715,500	10%
Montpelier, City of	M	Odor Control, Secondary Clarifier and UV system Upgrades	49	TW-ST	0	1,458,300	11,000,000	12,458,300	GS	0	1,245,830	10%
Springfield, Town of*	M	Main St Sewer Replacement Design	49	TW-SSR	0	0	2,469,000	2,469,000	GS	0	246,900	10%
South Hero, Town of **	M	South Hero Village Community Wastewater System	47	NPS-IDS	0	0	4,000,000	4,000,000	GS	0	751,500	18%
Burlington, City of*	M	SW Outfall Projects: Priority Group 1 - TO-0097	47	SW - Gray	0	150,000	1,000,000	1,150,000	GS	0	0	0%
Berlin, Town of	M	Hospital Hill Sewer Line Replacemmnt	46	TW-SSR	0	0	2,500,000	2,500,000	GS	0	0	0%
Middlebury, Town of	M	Wastewater Treatment Facility SBR Controls Upgrade	44	TW-SSR	0	121,000	2,348,000	2,469,000	GS	0	0	0%
Montpelier, City of	M	Pump Station #1 Replacement	44	TW-SSR	0	74,700	1,525,500	1,600,200	GS	0	160,020	10%
Chester, Town of*	M	Chester WWTF Upgrade	44	TW-ST	0	0	5,815,000	5,815,000	GS	0	581,500	10%
Poultney, Village of*	M	Poultney WWTF and Interceptor Sewer Improvements	43	TW-AT	0	268,000	5,666,900	5,934,900	GS	0	593,490	10%
Hartford, Town of*	M	North Main Street Stormwater	42	SW - Gray	0	48,000	1,360,000	1,408,000	GS	0	0	0%
Middlebury, Town of	M	Adams Acres Stormwater Treatment Practice	42	SW - Green	0	79,100	792,900	872,000	GS	688,000	0	0%
Village of Morrisville W&L*	M	Jersey Heights Pump Station Upgrade	37	TW-SSR	0	0	1,500,000	1,500,000	GS	0	150,000	10%
Chelsea, Town of*	M	Chelsea WWTF Upgrade	36	TW-ST	0	56,000	465,000	521,000	GS	0	0	0%
Sherburne Fire District #1*	M	RBC and Effluent Pump upgrade	34	TW-ST	0	79,500	3,128,000	3,207,500	GS	0	320,750	10%
Hardwick, Town of*	M	Town of Hardwick, Pump Station Reconstruction	31	TW-SSR	0	80,000	1,400,000	1,480,000	GS	0	148,000	10%
Essex Junction, City of	M	Maple and River Street Pump Stations	29	TW-SSR	0	43,200	960,000	1,003,200	GS	0	0	0%
Burlington Airport	M	SRE Building Drainage Improvements	22	SW - Green	0	10,000	200,000	210,000	GS	0	0	0%
Edward Farrar Utility District*	M	Lagoon Walls	21	TW-ST	0	0	258,150	258,150	GS	0	0	0%
South Burlington, City of	M	Solids Handling Upgrades	20	TW-ST	0	0	0	0	GS	0	0	10%
Natural Resources Put Aside	PNP	Natural Resources Interim Financing	NA	NPS	NA	NA	2,000,000	2,000,000	GS	0	0	0%
Sunset Lake MHC	PFP	Replace Sunset Lake Cooperative's Wastewater System	38	NPS - IDS	0	80,448	816,398	896,846	GS	0	0	0%
Triangle MHC	PNP	Triangle Cooperative's Wastewater Infrastructure Upgrades	20	NPS - IDS	0	21,500	0	21,500	GS	0	0	0%
Weston's MHC	PFP	Weston's Cooperative's Wastewater Infrastructure Upgrade	10	TW-NCS	0	200,000	0	200,000	GS	0	0	0%
Subtotal SFY2026 Projects Requesting Construction Funding					0	8,872,084	282,541,014	291,413,098		30,813,138	64,857,092	

Continuing Projects
Municipal Projects Yet To Be Funded
Private Projects Yet To Be Funded
The bold line on line 40 is the fundable line

Applicant Type:	Grant Identifier
M = Municipality	GB (General Base)
PNP = Private Non-Profit	GS (General Supplemental)
PFP = Private For Profit	EC (Emerging Contaminants)

Anticipated SFY26 Planning Need	0	9,416,480	9,416,480
Total	0	18,288,564	282,541,014
Total SRF Funding Request		300,829,578	
Total Available Funds		128,252,220	
Annual SRF Surplus/Shortfall		(172,577,358)	

Project Type	Code
CWT - CSO Correct	TW-CSOC
CWT - Sewer Syste	TW-SSR
CWT - Secondary T	TW-ST
CWT - Advanced Tr	TW-AT
CWT - New Collecto	TW-NCS
CWT - Infiltration/In	CWT I/I
NPS - Individual De	NPS-IDS
NPS - Hydromodific	NPS-H
NPS - Brownfields	NPS-B
Stormwater - Gray I	SW-Gray
Stormwater - Green	SW-Green

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

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

Note 2: Up to 10% of the FY26 Pollution Control Grant appropriation shall be reserved for planning advances through December 31, 2025, and up to another 10% for REPA's (for engineering research) through May 31,2026.

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

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

Note 5: \$4 million in SFY 26 is available for PC Grants, therefore the full need will not be funded at this time.

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

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

Note 8: The fundable line shown above line 41 exceeds the amount of available funds intentionally. This is based on information received regarding alternate funding sources for certain projects, and other factors.

CWSRF Construction Loan Need SFY 2027-2029 And Additional Planning Loan Need									
Applicant	Applicant Type	Project Name	Priority Points	Project Category	2026 Step I	2026 Step II	2027 Step III	2028 Step III	2029 Step III
Middlebury, Town of	M	Wastewater Treatment Facility Upgrade	75	TW-SSR	0	5,485,000	41,806,000	0	0
Highgate, Town of **	M	Highgate Village Wastewater System	72	NPS - IDS	0	100,000	4,000,000	0	0
Middlebury, Town of	M	Main Pump Station Upgrade	69	TW-SSR	0	133,000	2,597,000	0	0
Berlin, Town of	M	rte 302 main pump station replacement	64	TW-SSR	0	0	1,750,000	0	0
Danville, Town of	M	Danville Wastewater Treatment Upgrades	48	TW-AT	0	125,000	1,900,000	0	0
Middlebury, Town of	M	Bakery Lane Infrastructure Improvements	46	TW-SSR	0	0	1,800,000	0	0
Alburgh, Village of	M	Infiltration and Inflow Reduction	46	TW-SSR	0	60,000	500,000	0	0
Stowe, Town of	M	Lower Village Pump Station Replacement	40	TW-SSR	0	285,000	3,000,000	0	0
Essex Junction, City of	M	West Street Pump Station	32	TW-SSR	0	61,980	1,907,000	0	0
Saint Albans, City of*	M	Lower Welden Stormwater Treatment Facility	30	SW - Green	0	0	2,720,000	0	0
Burlington, City of*	M	SW Outfall Improvements Projects: Group 3	26	SW - Gray	0	300,000	1,500,000	0	0
Burlington, City of*	M	SW Outfall Improvements Projects: Group 2	26	SW - Gray	0	150,000	1,500,000	0	0
Pawlet, Town of*	M	Pawlet Wastewater Treatment Facility Sludge Storage Project	20	TW-ST	0	0	0	0	0
Bennington, Town of*	M	Wastewater Treatment Facility Phosphorus Removal Upgrade	20	TW-AT	0	125,000	2,500,000	0	0
Bellows Falls Village Corp*	M	WWTF Sludge Drying Upgrades	20	TW-AT	0	250,000	3,400,000	0	0
South Burlington, City of	M	South Burlington Pump Station and Force Main Replacement	20	TW-SSR	0	0	4,495,000	0	0
Shaftsbury, Town of	M	Shaftsbury Village Wastewater System	20	NPS - IDS	0	250,000	7,455,000	0	0
Johnson, Village of*	M	Wastewater Treatment Facility Relocation	20	TW-AT	0	905,000	9,219,600	0	0
Ludlow, Village of*	M	Lower High Street Infrastructure Improvements	20	TW-SSR	0	20,000	200,000	0	0
Castleton, Town of*	M	Route 30 North Gravity Sewer Replacement	20	TW-SSR	0	130,000	2,300,000	0	0
Ludlow, Village of*	M	Wastewater Treatment Facility Upgrade - Flood Damage	20	TW-AT	0	200,000	8,000,000	0	0
Jamaica, Town of* **	M	Jamaica Village Wastewater System	20	NPS - IDS	0	250,000	9,630,000	0	0
South Burlington, City of	M	Commerce Ave and Airport Parkway Forcemain Replacement	20	TW-SSR	0	0	2,200,000	0	0
Hardwick, Town of*	M	Town of Hardwick, WWTF Relocation	20	TW-ST	0	0	20,950,000	0	0
Northfield, Town of	M	Route 12/1A Sewer Main Extension	20	TW-NCS	0	85,000	1,665,000	0	0
Richmond, Town of	M	Richmond Bridge St Pump Station Upgrade	19	TW-SSR	0	350,000	1,200,000	0	0
Saint Albans, City of*	M	Federal Street Sewerline Upgrades	19	TW-SSR	0	86,500	1,728,500	0	0
Burlington, City of*	M	"Stage 1" Main WWTF Improvements - Part 1 SFY27	10	TW-ST	0	0	57,029,000	0	0
Edward Farrar Utility District*	M	Sludge Management Project	0	TW-ST	0	0	4,000,000	0	0
Fairfax, Town of	M	Wastewater Treatment Facility Upgrade	0	TW-ST	0	65,000	1,150,000	0	0
Middlebury, Town of	M	Rogers Road Pump Station Upgrade	62	TW-SSR	0	0	2,000,000	0	0
Middlebury, Town of	M	Gorham Lane Sewer and Stormwater Improvements	50	CWT - I/I	0	0	750,000	0	0
Richford, Village of*	M	Richford Wastewater Treatment Facility Lagoon Rehabilitation	20	TW-ST	0	0	0	1,000,000	0
Springfield, Town of*	M	Wastewater Treatment Facility and Solids Handling Upgrade	20	TW-ST	0	0	0	5,000,000	0
Stowe, Town of	M	Wastewater Treatment Facility Refurbishment	10	TW-AT	0	0	0	5,000,000	0
Greensboro, Town of **	M	Town of Greensboro Wastewater Infrastructure Project	10	NPS - IDS	0	0	0	10,000,000	0
Burlington, City of*	M	"Stage 1" Main WWTF Improvements - Part 2 SFY28	10	TW-ST	0	0	0	57,029,000	0
Arlington, Town of	M	Wastewater Feasibility Study	0	TW-NCS	0	0	0	4,500,000	0
Saint Albans, Town of	M	Town of St. Albans - St. Albans Bay Sewer Extension	0	TW-NCS	0	0	0	20,950,000	0
Vergennes, City of	M	Vergennes Green St Sewer Improvements	71	TW-SSR	0	0	0	0	0
Vergennes, City of	M	Vergennes Downtown Sewer Improvements	71	TW-SSR	0	0	0	0	0
Burlington, City of*	M	Stage 2 East to Main Conveyance - Overall PCS	10	TW-ST	0	0	0	0	15,581,950
Burlington, City of*	M	Stage 2 East Pump Station & Decommissioning	10	TW-ST	0	0	0	0	2,371,000
Burlington, City of*	M	Stage 2 East Pump Station & Decommissioning - Overall PCS	10	TW-ST	0	0	0	0	4,371,500
Burlington, City of*	M	Stage 1 Dewatering Improvements	10	TW-ST	0	0	0	0	971,500
TOTALS					0	9,416,480	204,852,100	103,479,000	23,295,950
Total Anticipated Commitments							(204,852,100)	(103,479,000)	(23,295,950)
Administrative Expenses							(837,000)	(311,520)	(311,520)
Federal Funds***							20,979,000	7,788,000	7,788,000
State Matching Funds***							3,817,344	1,557,600	1,557,600
Repayment Funds							10,438,233	10,438,233	10,438,233
Carry Forward							0	0	0
Total Available Funds							35,234,577	19,783,833	19,783,833
Total Annual Suprlus/Deficit							(170,454,523)	(84,006,687)	(3,823,637)

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

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

See 2026 priority list for key