The Vermont Clean Water State Revolving Fund Amended 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

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Contents

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. Details of the Amended Intended Use Plan

<u>This version of the Intended Use Plan amends the version adopted on September 17, 2025, as summarized below. Additions to the Intended Use Plan are indicated through underlining of text.</u>

<u>Section 5.2: The Sources Table was corrected to indicate there is no state match, repayments or interest associated with the Emerging Contaminants Grant. The Sources Table was also revised to indicate that "Interest" is "Investment Interest."</u>

Section 5.2: Was updated to demonstrate the Program’s strategy for full use of the Emerging Contaminants Grant.

1.2. Infrastructure Investment and Jobs 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.

1.3. 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.

1.4. 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.

1.5. Notice of Nondiscrimination

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1.6. Language Access Services

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

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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 prioritize 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, 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

5.1. Capitalization Grants

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 reallotted 2023 Emerging Contaminants Grant is $54,000 (604(b) does not apply to reallotments)
- The reallotted 2022 Emerging Contaminants Grant is $3,000 (604(b) does not apply to reallotments)

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

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

The full match for the General Supplemental Grant will be available beginning July 2025 (source: 2023 VT State Legislature, Act 78, Section (b)(1)). For the General Grant, $814,781 will be available beginning July 2025 (source: 2025 VT State Legislature, Act 33, Section 10(e)). 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 Department is requesting pre-approval by EPA for fixed-cost contracts and sub-awards. This request is made pursuant to 2 CFR 200.333, where the EPA may allow pass-through entities to award subawards up to $500,000 on a fixed amount or “lump sum” basis such that the subrecipient does not account for actual costs.

5.2. Sources and Uses

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*
FFY 25 CWSRF Capitalization Grant (after 604b),	$7,788,000	$12,094,000	$1,100,000
State Match Needed FFY25 Grant	$1,557,600	$2,418,800	$0
FFY 24 Cap Grant Payments (7/1/25-6/30/26)	$1,002,000	$2,791,000	$260,750
Repayments (anticipated 7/1/25-6/30/26)	$10,438,233	Included in General	N/A
Investment Interest (anticipated 7/1/25-6/30/26)	$4,800,000	Included in General	N/A
Available Funds (Unobligated funds as of 7/1/2025)	$88,125,492	Included in General	$1,114,524
Total	$113,711,325	$17,303,800	$2,475,274

*Including 2022 and 2023 EC Reallotments ($3,000 and $54,000, respectively). See also updated explanation of sources and uses for the EC Grant, below.

Uses	General	General Supplemental	Emerging Contaminants (Incl. 2023 Reallotment)
Pending Applications Obligations	$18,587,157	Included in General	$1,728,824
Anticipated Commitments for 2025 IUP	$137,429,935	Included in General	$456,869
Administrative (Max 4%) 2025 Grant Only	$311,520	$483,760	$41,720
Technical Assistance (Max 2%)	$0	$0	$0
Total	$156,328,612	$483,760	$2,227,413

The Sources and Uses tables identify the funding available for projects under this Intended Use Plan. At the time of adoption of the Intended Use Plan (9/17/2025), for the Emerging Contaminants Grant, sources exceeded uses. Additional demand for funding has been realized since adoption of the Intended Use Plan. As of 1/13/2026 all pre-2025 Emerging Contaminant Grants have been fully obligated, and $956,869 of the 2025 Grant has been obligated. The remaining $146,438 is anticipated to be used for a planning loan for the Town of Pownall's landfill remediation project. Additionally, we will amend the Priority List as needed if additional construction demand comes forward. We expect full use of the Emerging Contaminant funds during the year.

For the General and General Supplemental Grants, uses exceed sources. Anticipated Commitments include those projects expected to go forward during the year. Due to a range of factors including the need to procure voter approval, some projects will be delayed, thus actual uses are likely to be less than anticipated based on current information. Additionally, due to the lag in loan disbursements for loans funded this year, the Clean Water SRF Program may rely on future income from loan repayments and interest as necessary to fund projects receiving loans under this Intended Use Plan.

5.2.1 Program and Non-Program Fees Sources and Uses

Sources

	Program Fees	Non-Program Fees
Existing Balance (6/30/25)	$477,797	$8,636,369
Anticipated Fees (7/1/25-6/30/26)	$34,372	$625,687
Total	$512,169	$9,262,056

Anticipated Uses (7/1/25-6/30/26)

Program Fees	$512,169
Non-Program Fees	$2,935,888

The Clean Water SRF Program uses program and non-program fees to support the administration of the program including staffing and loan underwriting expenses. Anticipated additional future uses of fees include offsetting reductions in Administrative income (4% of capitalization grants) with the sunsetting of the Supplemental IIJA Grants and potential reductions to the base 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	$3,894,000	$778,800
4	2026-4	7/1/2026-9/30/2026	$7,788,000	$1,557,600
Total				

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	$2,418,800

SRF Emerging Contaminants incl. 2022 and 2023 Reallotments

Payment No.	Quarter	Date	Federal Amount	State Amount
1	2026-1	10/1/2025-12/31/2025	$1,100,000	$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			$1,100,000	$0

5.2. EPA Estimated Disbursement Schedule

Disbursement Quarter/$	CWSRF General	CWSRF General Supplemental	CWSRF Emerg. Cont. incl. 2022 a 2023 Reallotments
1QFFY2026	$1,947,000	$3,023,500	$460,000
2QFFY2026	$1,947,000	$3,023,500	
3QFFY2026		$3,023,500	
4QFFY2026	$3,894,000	$3,023,500	$640,000
1QFFY2027			
2QFFY2027			
3QFFY2027			
4QFFY2027			
Total	$7,788,000	$12,094,000	$1,100,000

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, including 2022 and 2023 Reallotted Emerging Contaminants

Project /Activity	Total Project Cost	SRF State Match	Federal Share FFY 2025 Funds
See SFY 2026 Priority List (Attached)	$1,058,280	NA	$1,058,280
Vermont Administrative Expense	$41,720	NA	$41,720
Technical Assistance	$0	NA	$0
Total	$1,100,000	NA	$1,100,000

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.

6.4. 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	$96,192
General Supplemental	$174,760	$225,126	$267,936
Emerging Contam.	$9,180	$20,860	$20,860

6.5. 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
2022 Emerging Contaminants	$3,000	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 Planning and Construction activities: $1,100,000

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			
	Planning and Construction	$1,100,000	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 three Planning Subsidy Categories described below.

8.3.2.1. Planning Subsidy: General

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.

8.3.2.2. Planning Subsidy: Emerging Contaminants Grant

Eligible planning projects may receive loan forgiveness as follows:

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

8.3.2.3. Planning Subsidy: Flood Resilience

Planning for facilities significantly damaged by flooding in 2023 or later, for activities related to relocation, or reconstruction on-site with augmented flood resilience.

- 100% forgiveness of planning costs, up to $125,000 per borrower, per project, inclusive of subsidy received under this category in prior Intended Use Plans.

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% principial 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 2024. 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. The Program Evaluation Review identifies Action Items requiring follow up by the Clean Water SRF Program. The following is a summary of open Action Items:

2023 Program Evaluation Review Action Items

Item: Ensure that progress is being made to meet the binding commitment requirements for the Emerging Contaminant Grants.

- Response: As of 7/28/2025, the Program has fully obligated all available Emerging Contaminant grants based on the most recent loan approval for the Town of Franklin in the amount of $1,728,824.

Item: Ensure that project checklists are formatted in a way that the correct information can be entered. Please complete this update and notify the project officer of the completion by November 1, 2025.

- Response: The Program is on track have the update completed by November 1, 2025.

Item: Include a list of the projects that are used to meet equivalency requirements in the Annual Report.

- Response: The list will be included in the 2025 Annual Report

Item: The Annual Report must contain an explanation of the reasons for the delay in the additional subsidy commitments into loan executions and provide a plan that identifies the project(s) that will use the remaining subsidy funds, along with milestones for each project showing the path to an executed agreement. The Annual Report should indicate the amount of additional subsidy from the previous years that must still be committed to projects.

- Response: Subsidy commitments are tied to loan executions which have been negatively impacted by additional federal funding. Loan activity has increased significantly this past year which is increasing the allocation of subsidy.

2024 Program Evaluation Review Action Items

Item: VT DEC will submit a Corrective Action Plan to EPA by August 29th, 2025. The plan should provide a detailed plan on how VT DEC plans to improve upon their Ratio of Undisbursed Project Funds, Executed Loans as a Percent of Funds Available, and Uncommitted Funds Ratio indicators. This plan should encompass the loans, disbursements, ULO Strategy Improvements, and commitments improvements that have been put in place along with the added staffing that has occurred recently.

- Response: The corrective action plan was provided by August 29, 2025.

Item: If, by 6/30/2025, the minimum GPR amount is not committed for the 2024 capitalization grants, milestones and goals to meet the minimum must be included in the 2025 annual report.

- Response: The item will be included in the 2025 Annual Report.

Item: Include a list of the projects and amounts committed for GPR in the Annual Report for the prior year's capitalization grants.

- Response: The item will be included in the 2025 Annual Report.

Item: If, by 9/30/2025, the additional subsidy for the 2022, 2023, or 2024 capitalization grants are not met, milestones and a plan for committing the remaining subsidy for all grants must be included in the 2025 Annual Report.

- Response: The item will be included in the 2025 Annual Report.

Item: Per 40 CFR 35.3570(a)(3)(ix), VT should include a statement about the fees collected and used during the fiscal year of the Annual Report.

- Response: The item will be included in the 2025 Annual Report.

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, EPA SRFY Signage Guidelines 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
2023 Reallotted Emerging Contaminants	$5,400
2022 Reallotted Emerging Contaminants	$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 was 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 the draft IUP were accepted at the public hearing and in writing until August 8, 2025.

This amended IUP was placed on public comment from 2/10/2026 through 2/25/2026. No comments were received.

15. Responsiveness Summary

The following responsiveness summary addresses comments received during the public comment period ending August 8, 2025, and during the public meeting held on August 1, 2025. Where comments have potential applicability to both the draft Clean Water IUP and draft Drinking Water IUP the comments are addressed in the response summaries for both IUPs.

Comment #1: FEMA has provided comments on the flood studies for each of these communities (Town of Hardwick, Village of Johnson and Village of Ludlow). In order for FEMA to complete their process and provide funding offers for these communities, additional work is required. This effort could take up to 3 months or so and thinking each level of effort may be in the $10k to $15k range, however, we don't have a good handle on costs yet as we are just starting this process with FEMA. Currently, there is not a readily available funding mechanism for the additional effort required and therefore we are looking to amend the existing loans currently approved through the CWSRF program approved in January/February 2024. We are requesting that the 100% flood resiliency subsidy be extended for these communities to complete this effort. (Aldrich + Elliot)
Response: The final Intended Use Plan has been revised to allow 100% forgiveness for planning work related to addressing information required as part of a FEMA-related flood study.

Comment #2: We noticed on the Draft Intended Use Plan for FFY25 that Woodstock Main WWTF is not listed. Our records indicate the attached Priority List was submitted in February. The submission reflects the project in the Construction Loan Need for SFY2027-29 so it shouldn't be too big of an impact. But there is an active Step II loan and we are advancing the design with the intent to be ready for construction in SFY27, so I believe the project should be shown on the Intended Use Plan list. Could you let me know if you your records show this Priority List application as received (around February 13th, 2025). I want to make sure it wasn't a glitch on our end and that we prevent it from happening in the future. (Hoyle Tanner and Associates)
Response: There is no record of this priority list application submittal. We have added this project to the Forecasted Priority list for construction funding in SFY2027.

Comment #3: This project (South Burlington Airport Parkway Biosolids Project) is currently out to bid, and it looks like it is at the bottom of the Priority List and not

fundable this upcoming fiscal year which will affect whether we continue forward currently. (Aldrich + Elliot)
Response: This project’s construction loan has been approved for funding under the FFY2024 Intended Use Plan. The final Priority List has been updated to reflect that this is a continuing project.

Comment #4: This project (Village of Morrisville Jersey Heights Pump Station Project) is currently out to bid, and it looks like it is at the bottom of the Priority List and not fundable this upcoming fiscal year. Should this be a continuing project? (Aldrich + Elliot)
Response: This project’s construction loan is being funded under the FFY2024 Intended Use Plan. The Priority List has been updated to reflect that this is a continuing project.

Comment #5: For the Springfield VT Main Street Sewer Replacement project the “CWSRF and PC Grant Priority List Application SFY 2026” listed the Project Priority Rating
Summary with 59 Total Priority Points. I noticed in the draft Intended Use Plan the project is listed with 49 points. Can you explain the difference. Also, I wanted to formally note this project is designed to address the Notice of Alleged Violation dated 5/30/24. (Dufresne Group Consulting Engineers)
Response: The score was corrected based on the review by our engineering team. Question #3 under Category #2 (Public Health) was changed from “yes” to “no”, resulting in the scoring change. The review comment for the revision is as follows: “This question is about Primary Contact exposure risk. Boating and Fishing are Secondary Contact activities”.

Comment #6: For the Town of Proctor (WWTF Upgrade priority list application) please double check the revised application. There appears to be 5 points missing under section 3 water quality, where the review noted that a box should be checked yes, that section should be an additional 5 points, which would tip this project to 13% PC grant. (Aldrich + Elliot)
Response: The revision has been completed. The update resulted in a change in score for the project from 53 to 58. The project has been updated on the priority list. However, this change did not affect PC Grant eligibility.

Comment #7: For the St. Albans Houghton CSO Project I would like to request an opportunity to review the affordability criteria for this project. The existing debt service and O&M costs were excluded from the application calculation. (Aldrich + Elliot)
Response: No additional information was provided. This project was funded under the FFY2024 IUP so is shown as a continuing project on the Plist. Affordability criteria are also reviewed during the final design approval process.

Comment #8: For the Town of St. Johnsbury, you weren't able to accept the St. Johnsbury WWTF Sludge Processing improvement project priority list application for FFY2025 for this project when I requested it be accepted about a week after the deadline due to the confusion on the status of this project funding, which admittedly was on our end due to the project management change. On behalf of the Town of St. Johnsbury, we request the addition of the St. Johnsbury Wastewater Treatment Plant Sludge Processing Improvements project to the clean water priority list. (Dufresne Group Consulting Engineers)
Response: The Town of St. Johnsbury's WWTF Sludge Management Project has been added to this priority list using the points that were determined from last year's priority list, 47 points.

Comment #9: Please see the updated priority list application for the Middlebury WWTF and Main Pump Station (MPS) Upgrade – Contract 1. This application was updated to:
correct that the Main Pump Station Priority List application that was submitted but not included in ranking in the Draft CWSRF Intended Use Plan for this funding cycle due to (a review) comment incorrectly stating that there was no PER for the Main Pump Station. Per WID feedback, consolidate the projects identified in the Wastewater Treatment Facility Preliminary Engineering Report Peer Review and Amendment RF1-361-1.0 – Note this PER covers both the WWTF and Main Pump Station. VTDEC comment indicated that the Main Pump Station did not have a PER, which is incorrect, and resulted in the MPS not being ranked in the draft Intended Use Plan. This PER identified work for 2 contracts:
Contract 1 – Main Pump Station and SBR Controls (see attached Priority List Application for this funding cycle)
Contract 2 – WWTF Upgrade (not looking for funding in this cycle)
Update to include the positive bond vote for Contract 1 and Contract 2 work on March 4, 2025.
Additionally, incident reports related to the SBR Controls are provided in the attached.
This replaces the previous Middlebury SBR Controls Application that did get ranked. (Wright-Pierce Engineering)
Response: Due to extenuating circumstances, we are accepting the replacement priority list application for Contract I. Both previously submitted applications that were replaced by this one have been removed from the Plist and the replacement has been ranked.

Comment #10: Per input from WID, the sewer rehabilitation projects identified in the Vergennes Long Term Control Plan and included in the current 1272 Order are consolidated under loan RF1-294 Sewer Rehab Projects. Note, Contract 1, is the Macdonough Drive Sewer Rehab that is intended to be 100% ARPA funded. Contract 2 – North Main is intended to use the remainder of the ARPA funds not used in Contract 1 that need to be expended by the end of 2026. Based on the estimated construction cost developed at 30% final design, CWSRF funding is

requested in the current Intended Use Plan as shown in the attached updated Priority List Application. This application was updated to reflect 1) increased estimated total project cost and 2) Otter Creek below the dam is listed on the 303(d) list for e. coli attributed to the Vergennes wastewater system. Also noting that this project addresses a failed system in a residence where the control panel for a municipal pump station is currently located inside a private residence that has prohibited readily available access for City staff when issues have arisen. (Wright-Pierce Engineering)
Response: Because MacDonough Drive Sewer Rehab (Contract 1) is fully funded by ARPA Grant we have removed this project application from the priority list. Due to extenuating circumstances, the replacement application for Contract 2 – North Main Rehabilitation has been ranked and the applications that it has replaced have been removed from the Plist.

Comment: #11: The City of Vergennes WWTF Hydraulic Upgrade and WWTF Age Related Improvements projects are to be bid as one contract and therefore should be consolidated in one priority list application, please see the consolidated RF1-255 Vergennes WWTF Priority List Application that combines the following as listed in the draft Intended Use Plan:

Vergennes, City of **	M	WWTF Hydraulic Upgrade	63	TW-ST
Vergennes, City of **	M	Vergennes WWTF Age Related Improvements	50	TW-ST

The final design is at 60% for this project. It is co-funded with a combined loan and grant offer of $17,588,600 from USDA RD as noted in the other committed funds. The balance of funding, approximately $12.6M, is anticipated to be PC Grant, ARPA Grant and CWSRF funding. This project is required per the 1272 Order for the City of Vergennes. The priority list application was also updated to reflect that Otter Creek in on the 303(d) list for E. Coli from Vergennes' wastewater system. (Wright-Pierce Engineering)
Response: Vergennes Age Related and Hydraulic applications can be combined because they are 1) the same PER, design, and construction contract, 2) WID had formerly asked for the PPL Applications to be separated for the purposes of the CSO ARPA grants. Those are now closed and this project intends to go to construction. Due to extenuating circumstances, a marked up combined PPL Application has been scored and incorporated into the Plist, while the 2 original submittals were removed.

Comment #12: The Town of Chester's 1st St. Pump Station and Force Main project was funded under the FFY2024 Intended Use Plan so should be shown as a continuing project. (Dufresne Group Consulting Engineers)
Response: This project has been moved from the funding portion of the priority list to the continuing project portion of the priority list.

Comment #13: The City of Vergennes Macdonough Drive Sewer Rehab Project listed in the draft Intended Use Plan should be considered a continuing project. It

has received bids and will be awarded in the next month or two. It is intended to be fully funded by an ARPA grant. (Wright-Pierce Engineering)
Response: Vergennes MacDonough Drive Sewer Improvement (AKA Contract 1) is bid out and fully funded by ARPA and has been removed from the priority list.

Comment #14: The Town of Franklin Lake Carmi Alum project is shown as a continuing project with no costs associated but it should reflect additional Emerging Contaminants FFY2025 funds of $456,869. (Internal Correction/Comment)
Response: The dollar amount for this continuing project was updated to correctly reflect the funding for $456,869 from the FFY2025 Emerging Contaminants Grant.

Comment #15: Westons MHC in Berlin does not have a PER and should not have been listed in the Priority List. (Internal Correction/Comment)
Response: The project has been moved from the Priority List to the Forecasted List for final design funds only.

Comment #16: Jericho Village Wastewater only has a 60% level PER and should not have been listed in the Priority List. (Internal Correction/Comment)
Response: The project has been moved from the Plist to forecasted list for construction in SFY2027.

Comment#17: I'm a consultant with a number of manufactured home communities that are organized as limited equity co-ops and receive technical assistance from the Cooperative Development Institute. They have also started a water infrastructure support program through USDA-TA grant and along with other colleagues like Addison Housing Works and HFI. We form a group of TA providers that are part of this, the manufactured home Community Subcommittee of the Housing and Homeless Alliance of Vermont. So I'm here as a consultant with a number of clients that are manufactured home communities that are using or have used the SRF program and wanted to provide some perspective on this subcategory of borrowers. There's over 20,000 manufactured homeowners in Vermont, and 30% of those folks live in parks. So about 6,000 manufactured homeowners live in parks. There's about 16 or 17 co-op parks. It is very typical for these parks when the nonprofits or residents buy them to inherit very old legacy, wastewater infrastructure that has not been either originally designed and permitted according to any regulations or overseen within a regulatory framework, unless there's a health and safety emergency. And so purchasing those systems puts a real financial burden on the folks who live there. Generally, most of whom have very low incomes and then they have to take on the financial investment to fix them. A number of you are familiar with some of these projects, so I wanted to just express appreciation and support for some of the work you've done to create some environmental justice provisions in the IUP after reading it for the past three years. Because it's great to see some of the points we've raised as a subcommittee included in the IUP. Specifically, section 2.2, goals 1, 3 and 5, and section 2.3, short term goals 1 and 2, as well as 6. And we do appreciate the recent engagement by you all to talk with us in terms of how the program can be more user friendly and adapted to manufactured home communities. And I will say that manufactured home community needs are circumspect. You can quantify them and they are going to be time limited over the next 10 years. But still, unlike your primary customer, municipalities, which have ongoing new and renewed issues, which we understand the program isn't. It was originally designed for primarily municipalities, but the MHC sector is quantifiable. It has a group of needs that will be met by investments that are large capital investments. But once that's done, then you're done. They don't really need to come back if done right the first time. So I think that's one of the advantages of looking at this sector as a subsector, as a customer. That is really worth your time engaging with, especially due to Vermont's environmental justice law.

I just wanted to call out a couple things because I also read the Maine 2025 IUP which I think can be a model for Vermont in many ways. Not saying their program is necessarily fully a model, but just in terms of the ability for non-municipal customers to see some benefits in that IUP specifically, they did clearly call out that the Bipartisan Infrastructure Law supplemental grant mandates 49% of the supplemental cap grant to be delivered as subsidy. They clearly called that out in their IUP and that was helpful because it just provides the reader with a little bit of a road map about this new, albeit time limited opportunity. But it just is helpful to have that. And the EPA website indicates states can use 31% of that as a set aside, and the reason I bring that up is because I think we've had these conversations before, that Vermont statute needs, authorizes municipalities to be eligible for disadvantaged community status and that's it. And that's my understanding is that it's just municipalities that are allowed to be eligible for that status. So in your Section 8 under additional subsidy, it's only municipalities that are eligible for that. If I'm understanding correctly, and I may not be understanding correctly at all, but it's my understanding that only municipalities or municipally sponsored projects can be eligible for the entire kind of like, subsidy, opportunity and you know disadvantaged community status, so. This seems to be where we get hung up with the MHC sector in terms of many of these parks facing severe constraints financially because they have a kind of a captive population, very low income people, many times at least 50 or 60% of the folks who live in these parks earn you know between $20-24,000 to $38,000 because many are seniors fixed incomes or just working in wage jobs, like being able to work in the summer for a road paving crew but taking unemployment in the winter, there's just our Vermont's working class, working poor workforce lives in these parks. And that's a kind of categorically different financial proposition than municipalities where you can spread, even in disadvantaged municipalities, the cost of a rate structure over a broader income population. They have a wider range of incomes, and so there's a way you can create equitable rate structures. Not so in manufactured home communities. And I think you're aware of some parks, particularly Addison Housing Works, that can't even afford the debt without lot rents going into a tier that's unaffordable, exceeding the state median, Mobile Home Park lot rent, so financially, the constraints that these parks face warrant, I think, your time and investment in looking at the state Statute, if that's

where the barrier lies for allowing disadvantaged community status to be given to a group of parks or meeting some criteria, that's just not necessarily municipally sponsored. It is not tenable or feasible for any of us to organize a bond vote with the municipality. This is beyond reason, I think, in terms of the capacity expectation. So another suggestion there is that if there's a way to use the EPA set aside category as either a work around to the state statute and, or if you could ask the legislature for authority to create set asides outside of the municipal eligibility criteria. You would have the flexibility to work with us to say, OK, we got this BIL (Bipartisan Infrastructure Law, aka Infrastructure Investment and Jobs Act, one-time, great grant for Vermont that has this new flexibility that allows subsidy. Why don't we use our authority to create a set aside of like $5,000,000 you know, or $3,000,000 whatever. Because it's not like you see 10 parks a year come through your program. You see, like what? One or two that can get to the point of construction, so if you could get authority to create, set aside for not municipalities, that might be a way that we all could move forward together on trying to address some of the acute financial needs that some of these parks have. Not all of them have acute financial need. Some can support the debt and so if you had to set aside, you could create a mini loan pool to look and spread that across the pool. We're all collegial. We don't compete with each other. We all look at the state as nonprofit, limit equity co-ops as one portfolio. We all are serving the same folks that live in those parks. It's not like any anybody's going to begrudge Addison Housing Works for getting a straight out grant when St. George can afford some debt. That's fine. I mean if you could create a set aside of a pool that blends the funds and gives the grants to those who need it and, you know, put the interest rate on those who don't. And by the way, thank you. For changing the interest rate, if that is intended for mobile home parks to the 1.5%, that would become a standard request of all of us anyway. So appreciate that gesture. (CommonLand Solutions)
Response: The SRF Program greatly appreciates the ongoing constructive engagement with CommonLand Solutions and the Housing and Homeless Alliance of Vermont that has highlighted the needs of the MHC sector.

Both the Clean Water and Drinking Water Intended Use Plans identify all available subsidy, including subsidy from the Infrastructure Investment and Jobs Act, also known as the Bipartisan Infrastructure Law, in Sections 8 and 9, respectively. There are differences between Clean Water and Drinking Water as to whom may receive subsidy.

In the Drinking Water State Revolving Loan Program, MHCs and other non-municipal borrowers are eligible to receive subsidy. The 2025 Drinking Water Intended Use Plan provides 25% subsidy for planning loans, and up to 50% subsidy for construction loans where the borrower is a Disadvantaged Community. In the Clean Water State Revolving Loan Program, both federal regulation and state statute limit the award of subsidy to municipal borrowers. Consequently, an MHC seeking subsidy as part of a Clean Water loan would require municipal sponsorship (i.e. the municipality would be the borrower). We acknowledge that this is a substantial barrier to MHCs receiving this type of assistance.

The comment also references “set-asides”. Technically speaking, set-asides are applicable to the Drinking Water State Revolving Loan Program and refer to the ability of state programs to allocate up to 31% of the annual capitalization grant (e.g. the General or Base Grant) to fund non-infrastructure activities that support compliance with the Safe Drinking Water Act. Section 6 of the Drinking Water Intended Use Plan identifies the range of programs and activities supported by set-aside use.

Under the Drinking Water Intended Use Plan, MHCs are treated the same as municipal borrowers in terms of prioritization and eligibility for additional subsidy in the form of principal forgiveness. Additionally, in terms of the 2025 Drinking Water Project Priority List, no MHCs requested construction funding. Projects may still seek planning and design funding and may receive principal forgiveness.

Comment #18: From a public reading the IUP perspective and the sources and uses table, it was confusing how your commitments exceed your available funding. So if there's any way to clarify that, I'm sure there's an explanation. It was on page 13. (CommonLand Solutions)
Response: The final Intended Use Plans provide an expanded explanation for the basis of establishing our funding line. In short, in developing the Sources and Uses table, we reviewed the projects on the Priority List and identified projects that are likely to procure other funding, or are unlikely to meet readiness criteria in order to qualify for a loan under this years Intended Use Plans, and adjusted the funding line to account for these projects based on their low likelihood of actually using SRF funds. We note that the projects on the Priority List are not commitments, but rather anticipated commitments.

Comment #19: I notice that you're not using the Technical Assistance set aside, so I don't know. Or the carve out 2%. Whatever. I don't know what the implications are of that in terms of providing Technical Assistance, but it just seems like we've all, those of us who use the ARPA healthy homes for manufactured communities program have benefited very much, especially from Rosalie Sharp's assistance and support. And she's, you know, done things like helped us navigate the SRF. She's done things like get ahead of the curve by sending PER's to the appropriate people in your program. We're going into the Step 2 process and losing that little bit of Technical Assistance. I mean it's a lot for us, but hopefully it's a little for you would be a shame. So I hope you're making provision for sustaining that role. It's been very helpful. The other thing is just listening to Don and having been through construction engineering one project. It would be great to see your construction engineers have more support and the Technical Assistance pool might be an opportunity to subcontract. Some construction engineering just for specific types of projects like mobile home parks or other projects to subcontract that out so that you can supplement your Construction Engineering folks. (CommonLand Solutions)
Response: Under the Clean Water State Revolving Loan Program we are able to use 2% of the capitalization grants to provide technical assistance. Our program identified that we intended to use these funds for this purpose under the past three

Intended Use Plans however due to staffing limitations and the administrative workload of administering the funds we did not develop any such programs. Additionally, we note that using these funds reduces the amount of funding available for projects by a commensurate 2%. Consequently, we clarified that we are not using the 2% from the 2022-2025 grants at this time. The program retains the ability to use these funds in the future. (CommonLand Solutions)

Comment #20: Perhaps another workaround to the municipal requirement in 24 V.S.A. is to give step 1 and 2 the high financial need MHCs as grants and not roll those into permanent loans. (CommonLand Solutions)
Response: Our understanding is that making a portion of the Clean Water capitalization grant available as a grant would be subject to the same restriction as subsidy as described earlier. Where our program refers to “subsidy” in the Intended Use Plans, it is shorthand for “additional subsidy”. Currently, our program provides additional subsidy strictly in the form of loan principal forgiveness. We also have the option of providing this additional subsidy in the form of grants or negative interest loans, however these alternative forms of additional subsidy would be subject to the same recipient limitations described above, i.e. municipal borrowers only.

Comment #21: Why has planning subsidy for septage receiving facilities been eliminated? There are communities that want to support septage receiving facilities at their treatment facilities, but the cost plan, design, and construct is an obstacle. Every little bit helps and without the subsidy it seems as if the state is not supportive of communities providing septage receiving. (Hoyle Tanner and Associates)
Response: On the clean water side we've consolidated our subsidy offerings for planning and design. There essentially being one category of 50% so there is still loan principal forgiveness available for projects that are going that route. It's not 100% but it's still significant at 50%. So not eliminated, but we hear your point and we would love to be able to offer 100% subsidy for all projects. We just need to spread it out based on what we have available and the total universe of need.

Comment #22: We are in the WISPr program. If, at the end of the fiscal year, there's flexibility or opportunity above funding level to increase the amount from 10% of a loan application, is that possible?
Response: WISPr funding is capped at 10% of disbursed loan funds under the host loan.

16. Revisions to the Final Intended Use Plan

The following revisions were made relative to the draft Intended Use Plan.

The Sources and Uses tables, subsidy information and Green Project Reserve amounts were updated to reflect the Departments application for the 2022 reallotted Emerging Contaminants Grant funds.

Long term goals 2 and 6 were revised to be consistent with US EPA guidance.

The Sources and Uses tables were revised to provide additional detail in response to a request by US EPA.

Section 5, language was added to provide the Department pre-approval of fixed-cost contract and sub-awards.

Corrected the Disbursement Schedule for Emerging Contaminants Grant.

Included a list of eligible municipalities and NPDES Permit numbers in response to a request by US EPA (Attachment to final IUP).

Section 11.8. was updated to reference EPA's adoption of the 2024 Performance Evaluation Report.

Revised Planning Subsidy categories to provide 100% forgiveness for flood resilience projects.

Revised Planning Subsidy categories to provide 100% forgiveness for Emerging Contaminant Grant eligible projects.

Multiple revisions were made to the Priority List based on public comment, as described in responses to comments in Section 15.

17. Tables: Municipalities and NPDES Regulated Facilities

Tables Identifying Vermont municipalities and NPDES regulated facilities. Attached.

18. Project Priority Lists

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

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	456,869	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	281,523	20%
Brighton, Town of* **	M	Brighton Wastewater Treatment Facility Refurbishment	70	TW-AT	0	0	0	0	GS	0	0	0%
Chester, Town of*	M	First Avenue Pump Station, Force Main and Gravity Main	56	TW-SSR	0	0	0	0	GS	0	270,590	10%
Franklin, Town of	M	Rte 236 Culvert - Lake Carmi	51	NPS - H	0	0	75,000	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%
Village of Morrisville W&L*	M	Jersey Heights Pump Station Upgrade	37	TW-SSR	0	0	0	0	GS	0	150,000	10%
Swanton, Village of*	M	WWTF Upgrade and Phosphorous Improvements	20	TW-AT	0	0	0	0	GB	0	160,578	10%
Bolton Valley Community W&S	PFP	BVCWS WWTF Upgrade	22	NPS - IDS	0	0	0	0	GS	0	0	0%
South Burlington, City of	M	Solids Handling Upgrades	0	TW-ST	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	600,000	600,000	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	1,000,000	2,451,967	GS	5,791,532	2,027,036	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%
Vergennes, City of	M	Sewer Rehabilitation Contract 2 - North Main St.	78	TW-SSR	0	180,000	16,600	196,600	GS	0	414,912	32%
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	198,800	198,800	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%
Vergennes, City of **	M	WWTF Hydraulic Upgrade	76	TW-ST	0	1,882,000	10,411,400	12,293,400	GS	100,000	3,565,086	29%
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	1,741,400	1,741,400	GS	0	468,280	20%
Rutland, City of* **	M	Connor Park CSO Storage	72	TW-CSOC	0	0	0	0	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	350,000	350,000	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%
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%
Middlebury, Town of	M	WWTF & MPS Upgrade (Contract 1)	67	TW-ST	0	254,000	4,945,000	5,199,000	GB	0	1,247,760	24%
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%
South Burlington, City of	M	Bartlett Bay Wastewater Treatment Facility Refurbishment	64	TW-ST	0	0	31,157,470	31,157,470	GB	4,200,000	10,905,114	25%
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	Macdonough Dr Pump Station Force Main Improvements	62	TW-SSR	0	460,000	2,100,000	2,560,000	GS	0	834,000	15%
Proctor, Town of*	M	Proctor WWTF Upgrade	58	TW-ST	0	0	5,166,000	5,166,000	GS	0	0	0%
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	704,300	704,300	GS	250,000	164,196	12%
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%
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%
St. Johnsbury, Town of*	M	WWTF Sludge Management Improvements	47	TW-ST	0	0	2,943,000	3,145,000	GS	0	314,500	10%
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 Replacememnt	46	TW-SSR	0	0	2,500,000	2,500,000	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%
Chelsea, Town of*	M	Chelsea WWTF Upgrade	36	TW-ST	0	56,000	465,000	521,000	GS	0	0	0%
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%
Sherburne Fire District #1*	M	RBC and Effluent Pump upgrade	24	TW-ST	0	79,500	3,128,000	3,207,500	GS	0	320,750	10%
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%
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%
Subtotal SFY2026 Projects Requesting Construction Funding					**0**	**8,943,984**	**248,370,618**	**256,984,733**		**27,963,138**	**64,663,251**	
				Anticipated SFY26 Planning Need	0	**9,877,580**		**9,877,580**				
				Total	**0**	**18,821,564**	**248,370,618**	**267,192,182**				
				Total SRF Funding Request	**267,192,182**							
				Total Available Funds	**111,632,688**							
				Annual SRF Surplus/Shortfall	**(155,559,494)**							

Continuing Projects
Municipal Projects Yet To Be Funded
Private Projects Yet To Be Funded
The bold line on line 39 is the fundable line

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

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

Project Type	Code
CWT - CSO Correc	TW-CSOC
CWT - Sewer Syste	TW-SSR
CWT - Secondary T	TW-ST
CWT - Advanced T	TW-AT
CWT - New Collect	TW-NCS
CWT - Infiltration/In	CWT I/I
NPS - Individual De	NPS-IDS
NPS - Hydromodific	NPS-H
NPS - Brownfields	NPS-B
Stormwater - Gray	SW-Gray
Stormwater - Greer	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 prioirty 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 REPAs (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: $4 million in SFY 26 is available for PC Grants, therefore the full need will not be funded at this time.

Note 5: There are projects on this list that have been added as continuing projects that did not provide priority list applications.

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: The fundable line shown above line 39 exxceeds 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
Jericho, Town of	M	Town of Jericho Wastewater	64	NPS - IDS	0	394,100	9,219,600	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
Danville, Town of	M	Danville Wastewater Treatment Upgrades	48	TW-AT	0	125,000	1,900,000	0	0
South Hero, Town of **	M	South Hero Village Community Wastewater System	47	NPS-IDS	0	0	4,000,000	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
Bennington, Town of*	M	Wastewater Treatment Facility Phosphorus Removal Upgrad	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
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
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
Pawlet, Town of*	M	Pawlet Wastewater Treatment Facility Sludge Storage Projec	15	TW-ST	0	0	0	0	0
Shaftsbury, Town of	M	Shaftsbury Village Wastewater System	10	NPS - IDS	0	250,000	7,455,000	0	0
Burlington, City of*	M	"Stage 1" Main WWTF Improvements - Part 1 SFY27	10	TW-ST	0	0	57,029,000	0	0
Woodstock, Town of	M	Main Wastewater Treatment Facility Upgrade	5	TW-ST	0	0	19,875,000	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
South Burlington, City of	M	Commerce Ave and Airport Parkway Forcemain Replacment	0	TW-SSR	0	0	2,200,000	0	0
South Burlington, City of	M	South Burlington Pump Station and Force Main Replacemen	0	TW-SSR	0	0	4,495,000	0	0
Weston's MHC	PFP	Weston's Cooperative's Wastewater Infrastructure Upgrade	10	TW-NCS	0	200,000	0		0
Richford, Village of*	M	Richford Wastewater Treatment Facility Lagoon Rehabilitatio	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 WWTFImprovements - 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 & Decomissioning	10	TW-ST	0	0	0	0	2,371,000
Burlington, City of*	M	Stage 2 East Pump Station & Decomissioning - 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**	**9,877,580**	**233,599,700**	**103,479,000**	**23,295,950**

	2027 Step III	2028 Step III	2029 Step III
Total Anticipated Commitments	(233,599,700)	(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	(199,202,123)	(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