

TRANSMITTAL MEMO

TO: LAMOILLE BASIN WATER QUALITY COUNCIL (BWQC)
FR: LAMOILLE BASIN CLEAN WATER SERVICE PROVIDER (CWSP) STAFF
RE: MATERIALS FOR MEETING ON 11/17/23
DA: 11/10/23

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Greetings, Lamoille BWQC members and others. The next meeting will take place on November 17. This is a special date chosen to avoid meeting conflicts with Thanksgiving. Please let me know if you have any questions regarding the agenda or the meeting.

1. Conflict of interest disclosures, if any

This is a new recurring agenda item that provides BWQC members and others opportunity to note possible conflicts of interest regarding agenda items. For example, members representing organizations with applications or requests before the BWQC must recuse themselves from votes on those applications/requests.

2. Seating of any new representatives or alternates

This is a standard agenda item that allows BWQC members to acknowledge new representatives or alternates.

3. Requests for Budget Adjustments

Two projects previously approved for funding are requesting adjustments to the budgets. The adjustments would cover costs not previously included in the budgets (e.g., administrative costs and cost of cultural resource assessment). The requests appear reasonable. However, the requests can only be approved through board action. See memo and materials attached for details.

4. Policy on Budget Adjustments

Under Act 76, BWQCs are responsible for approving funds for projects and CWSP staff are responsible for overseeing subgrant and procurement processes once funds have been approved. Complications can arise when budgets approved by a BWQC require amendment. At least one Basin Water Quality Council has enacted guidelines that attempt to simplify the process of amending already-approved project budgets. Another BWQC is considering adoption of a policy. Your CWSP staff feel such an approach deserves some discussion here. A draft proposal has been prepared for your consideration. Some alternative approaches are also summarized.

5. Training regarding Cultural Resource Assessment

Organizations that receive Clean Water funds agree to do many things in exchange for that financial assistance, including promise to perform due diligence to minimize any project impacts on cultural resources. Some organizations may find the requirements challenging. On November 1, CWSP staff will provide a brief introduction to the topic by highlighting the cultural resource section of the Funding Policy and reviewing the Vermont Division of Historic Preservation assessment form.

6. Updates and conclusion

This time will be available for discussion of future meeting topics and updates on: Finances, Conflict of Interest, and Adoption of existing projects . Additional details may be provided before the meeting. If you would like to mention any of your own please let us know.

Thanks to all who participate.

AGENDA

Lamoille Basin Water Quality Council (BWQC)

Friday, November 17, 2023

9:00 -11:00 AM

(date adjusted because of Thanksgiving holiday)

Remote /Zoom meeting

(Zoom details below

Note: NEW ZOOM LINK)

1. Welcome and Introductions
2. Meeting protocols
3. Conflict of interest declarations, if any
4. Review/adjust and approve agenda
5. Approval of Minutes
6. Public comment not related to items on agenda
7. Seating of any new reps or alternate(s)
8. Budget adjustment requests (two projects)
9. Policy on Budget Adjustments
10. Training regarding Cultural Resource Assessment
11. Updates and Conclusion

Join Zoom Meeting

<https://us02web.zoom.us/j/87059615025?pwd=dndhenk4YlZKSTZnZ3p1VXZpUVhnUT09>

Meeting ID: 870 5961 5025

Passcode: 313146

One tap mobile

+13052241968,,86562460349# US

+13092053325,,86562460349# US

Dial by your location

+1 309 205 3325 US

+1 312 626 6799 US (Chicago)

+1 646 558 8656 US (New York)

Staffing provided by Northwest Regional Planning Commission (NRPC), the Basin 6 Clean Water Service Provider. NRPC's physical / mailing address is 75 Fairfield Street, St. Albans, Vermont 05482.

NRPC will ensure public meeting sites are accessible to all people or provide an opportunity to request accommodations. Requests for free interpretive or translation services, assistive devices, or other requested accommodations, should be made to Amy Adams, NRPC Title VI Coordinator, at 802-524-5958 or aadams@nrpcvt.com. NRPC will accommodate requests made no later than 3 business days prior to the meeting for which services are requested, and will strive to accommodate all other requests. This support is provided in accordance with provisions of the Americans with Disabilities Act (ADA) of 1990.

Lamoille Basin Water Quality Council (BWQC) Meeting

DRAFT MINUTES

Thursday September 28, 2023 9:00 to 11:00 a.m.

Virtual Meeting/Held Via Zoom* (computer/smartphone/tablet etc.)

<https://youtu.be/3EhvAdZHohs?si=Suwb0v671HOfj7k->

Attendance: Peter Danforth (Q), JoAnn Hanowski (Q), Richard Goff (Q), Bruce Wheeler (Q), Brad Holden (Q), Lauren Weston (Q), Katherine Sonnick (Q), Erin De Vries (Q), Meghan Rodier (Q). (Q=toward quorum)

Staff: Dean Pierce, Maddie Yandow, Sara Gratz

Guests: Karen Bates, Ron Rodjenski, Sai Sarepalli

1. Welcome and Introductions

Peter Danforth opened the meeting at 9:02 and everyone introduced themselves.

2. Meeting protocols

Peter Danforth briefly reviewed meeting protocols.

3. Conflict of interest declarations, if any

Dean Pierce explained the addition of conflicts of interest to the agenda. No conflicts of interest were declared.

4. Review/adjust and approve agenda

Lauren Weston moved to approve the agenda. Katherine Sonnick seconded the motion. Motion adopted.

5. Approval of Minutes

Richard Goff moved to approve the minutes of the last meeting. Lauren Weston seconded the motion. Motion adopted.

6.Public comment not related to items on agenda

No public comment was offered.

7.Seating of any new reps or alternate(s)

Dean Pierce shared that no new reps or alternates were needed.

8.Hyde Park Project sponsorship

Dean Pierce discussed the process for project approval and shared that because the town of Hyde Park had not been pre-qualified, either the Northwest Regional Planning Commission could manage the project, or a transfer of sponsorship could be made. Ron Rodjenski shared that they would like to transfer sponsorship to the Lamoille County Planning Commission.

9.Solicitation Schedule /November Meeting date

Dean Pierce provided a slide with suggested dates for the next meeting. Richard Goff moved to approve November 17, 2023 as the next meeting date. Brad Holden seconded that motion. Motion adopted.

10.Overview of contracting requirements

Dean Pierce shared a slide presentation discussing contract requirements for projects, including performance reporting, procurement procedures, cost agreements, payments, publications, insurance, and certifications.

11.Karen Bates Presentation on Clean Water Project Identification

Karen Bates presented a slideshow explaining how the Department of Environmental Conservation supports the identification of projects. She shared the criteria for assessing priority projects, along with a list of various types of plans and assessments, including the Stormwater Master Plan, Stream Geomorphic Assessments, Lake Watershed Action Plan, Lake Wise, Private Road assessments, Wetland Restoration, and Agricultural Non-RAP Farms.

A discussion followed concerning funding for specific projects.

Erin De Vries asked if similar presentations were being given to other Basin Water Quality Councils, stating that it would be helpful to other project implementors. Karen Bates asked for a show of hands indicating who found the presentation to be useful. At least 5 raised their hand.

Erin De Vries expressed a desire for there to be more technical experts working with the state to help develop river corridor easements for reducing phosphorous loads.

Maddie Yandow asked about a potential part 2 presentation regarding project development to get projects developed quicker.

Meghan Rodier asked about a future presentation regarding a tool for calculating phosphorous in forests.

Peter Danforth referred to Dean Pierce to ask about updates to the P-efficiency table that appeared in Karen's presentation. Dean confirmed that there is a need for the figures to be updated periodically to account for inflation.

Lauren Weston shared that the Watershed Project Database is difficult to navigate for finding and advancing projects. Maddie Yandow agreed.

12. Updates and Conclusion

Dean Pierce asked that anyone who would like more information about the Year 1 annual report, DEC Guidance Chapters, or Project Status Grid, to contact him. He also proposed three topics for future meetings: Project Status Reports, Use of CWSP Maintenance Funds to Adopt Existing Projects, and Procedures for Budget Adjustments.

Lauren Weston moved to adjourn at 10:58 a.m. Erin De Vries seconded that motion. Motion adopted.

Budget adjustment requests (two projects)

MEMORANDUM

TO: LAMOILLE BASIN WATER QUALITY COUNCIL
FR: CWSP STAFF
RE: REQUESTS FOR BUDGET ADJUSTMENTS
DA: NOVEMBER 10, 2023

As noted in the transmittal memo, two projects previously approved for funding are requesting adjustments to the budgets. The adjustments would cover costs not previously included in the budgets (e.g., administrative costs and cost of cultural resource assessment). The requests appear reasonable. However, the requests can only be approved through board action. See memo and materials attached for details.

The table below summarizes the scale of the requests and the nature of the changes reflected in the revised budgets. Copies of the detailed budgets are attached. A representative of the project sponsor, Lamoille County Planning Commission, will attend the meeting, deliver a presentation, and be available for questions.

Project	Original	Revised	Abs Difference	% Difference	Original	Revised
Centerville	45000	52000	7000	16%	Orig included consultant fees but no funds for management	Revised includes 4500 management and 2500 for ARA
Gulf Road	44000	46500	2500	6%	Orig included consultant and management fees but did not include cultural assessment (ARA)	Revised include 2500 for ARA

Preliminary analysis by CWSP staff indicates that the requested changes do not have a material impact on the cost-effectiveness of the projects. CWSP staff recommend approval of the proposed changes.

30% Design Budget

rev 9-8-2021

Lamoille County Planning Commission
Centerville Brook Dam Removal Budget

Gray cells auto-calculate, do not edit. Enter white cells only.

SUB-GRANT ADMINISTRATION AND PROJECT MANAGEMENT EXPENSES

Personnel (Name, Title)	Tasks/Responsibilities	Hours	Hourly Rate (including Fringe)	Total Salary Expense	Match*	Amount requested
Meghan Rodier, Regional Planner	Meghan will serve as grant/project manager.	70	\$29.96	\$2,097.20	Do not write in this space.	
		0	\$0.00	\$0.00		
		0	\$0.00	\$0.00		
		0	\$0.00	\$0.00		
Personnel Subtotal				\$2,097.20		

Indirect Costs	Indirect Rate	Cost related to Indirect rate	Total Indirect cost	Match*	Amount Requested
	111%	\$2,097.20	\$2,325.17	Do not write in this space	
Indirect Subtotal			\$2,325.17		

Anticipated Travel	Purpose	Miles	Mileage Rate	Total Travel Expense	Match*	Amount Requested
Site Visits/Community Meetings	Travel to site visits (2), and meetings (2) with the community/project partners. Mileage budgeted for 2 LCPC staff.	119	\$0.66	\$77.95	Do not write in this space.	
		0	\$0.00	\$0.00		
Travel Subtotal				\$77.95		

NA						
Supplies/Other	Description/Use	# of Units	Unit Cost	Total Supplies Expense	Match*	Amount Requested
		0	\$0.00	\$0.00	Do not write in this space.	
		0	\$0.00	\$0.00		
		0	\$0.00	\$0.00		
Supplies & Other Subtotal				\$0.00		

TOTAL GRANTEE ADMINISTRATION AND PROJECT MANAGEMENT EXPENSES	\$4,500.31	\$4,500.31
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* Enter match amount for Total Grantee Expenses in F26 above. Must be 50% for MS4 projects.

PROJECT IMPLEMENTATION

Contractual/Construction	Description/Use (attach any quotes from consultants/contractors)	# of Units	Unit Cost	Total Contract. Expense	Match*	Amount Requested
Preliminary (30%) Design Planning	Preliminary Design plans and cost estimates for the Centerville Brook Dam Removal Project. This will include a flood analysis and alternatives analysis to evaluate different restoration/dam removal options.	1	\$45,000.00	\$45,000.00	Do not write in this space.	
ARA	Archaeological Resources Assessment as deemed appropriate by the VDHP. This includes hiring an archaeologist and contractor to dig test pits as needed.	1	\$2,500.00	\$2,500.00		
		0	\$0.00	\$0.00		
Contractual Subtotal				\$47,500.00		

Equipment Rental	Description/Use	# of Units	Unit Cost	Total Contract. Expense	Match*	Amount Requested
		0	\$0.00	\$0.00	Do not write in this space.	
		0	\$0.00	\$0.00		
		0	\$0.00	\$0.00		
Rental Subtotal				\$0.00		

Supplies/Other	Description/Use	# of Units	Unit Cost	Total Supplies Expense	Match*	Amount Requested
		0	\$0.00	\$0.00	Do not write in this space.	
		0	\$0.00	\$0.00		
		0	\$0.00	\$0.00		
		0	\$0.00	\$0.00		
Supplies & Other Subtotal				\$0.00		

TOTAL PROJECT IMPLEMENTATION	\$47,500.00	\$47,500.00
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* Enter match amount for Total Project Implementation in F47 above. Must be 50% for MS4 projects.

Project Total	\$52,000.31	\$0.00	\$52,000.31
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Notes:

30% Design Budget

rev 9-8-2021

Lamoille County Planning Commission

Gulf Rd Bridge Replacement/Floodplain Restoration

Gray cells auto-calculate, do not edit. Enter white cells only.

SUB-GRANT ADMINISTRATION AND PROJECT MANAGEMENT EXPENSES

Personnel (Name, Title)	Tasks/Responsibilities	Hours	Hourly Rate (including Fringe)	Total Salary Expense	Match*	Amount requested
Meghan Rodier, Regional Planner	Meghan will serve as grant/project manager.	62	\$29.96	\$1,857.52	Do not write in this space.	
		0	\$0.00	\$0.00		
		0	\$0.00	\$0.00		
		0	\$0.00	\$0.00		
Personnel Subtotal				\$1,857.52		

Indirect Costs	Indirect Rate	Cost related to Indirect rate	Total Indirect cost	Match*	Amount Requested
	111%	\$1,857.52	\$2,059.43	Do not write in this space	
Indirect Subtotal			\$2,059.43		

Anticipated Travel	Purpose	Miles	Mileage Rate	Total Travel Expense	Match*	Amount Requested
Site Visits/Community Meetings	Travel to site visits (2), and meetings (2) with the community/project partners. Mileage budgeted for 2 LCPC staff.	127	\$0.66	\$82.86	Do not write in this space.	
		0	\$0.00	\$0.00		
Travel Subtotal				\$82.86		

NA

Supplies/Other	Description/Use	# of Units	Unit Cost	Total Supplies Expense	Match*	Amount Requested
		0	\$0.00	\$0.00	Do not write in this space.	
		0	\$0.00	\$0.00		
		0	\$0.00	\$0.00		
Supplies & Other Subtotal				\$0.00		

TOTAL GRANTEE ADMINISTRATION AND PROJECT MANAGEMENT EXPENSES				\$3,999.81		\$3,999.81
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* Enter match amount for Total Grantee Expenses in F26 above. Must be 50% for MS4 projects.

PROJECT IMPLEMENTATION

Contractual/Construction	Description/Use (attach any quotes from consultants/contractors)	# of Units	Unit Cost	Total Contract. Expense	Match*	Amount Requested
Preliminary (30%) Design Planning	Preliminary Design plans and cost estimates for the Gulf Rd. Bridge Replacement and floodplain restoration alternatives. This will include a summary of potential permits required.	1	\$40,000.00	\$40,000.00	Do not write in this space.	
ARA	Archaeological Resources Assessment as deemed appropriate by the VDHP. This includes hiring an archaeologist and contractor to dig test pits as needed.	1	\$2,500.00	\$2,500.00		
		0	\$0.00	\$0.00		
Contractual Subtotal				\$42,500.00		

Equipment Rental	Description/Use	# of Units	Unit Cost	Total Contract. Expense	Match*	Amount Requested
		0	\$0.00	\$0.00	Do not write in this space.	
		0	\$0.00	\$0.00		
		0	\$0.00	\$0.00		
Rental Subtotal				\$0.00		

Supplies/Other	Description/Use	# of Units	Unit Cost	Total Supplies Expense	Match*	Amount Requested
		0	\$0.00	\$0.00	Do not write in this space.	
		0	\$0.00	\$0.00		
		0	\$0.00	\$0.00		
		0	\$0.00	\$0.00		
Supplies & Other Subtotal				\$0.00		

TOTAL PROJECT IMPLEMENTATION				\$42,500.00		\$42,500.00
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* Enter match amount for Total Project Implementation in F47 above. Must be 50% for MS4 projects.

Project Total				\$46,499.81	\$0.00	\$46,499.81
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Notes:

Policy on Budget Adjustments

MEMORANDUM

TO: LAMOILLE BASIN WATER QUALITY COUNCIL
FR: CWSP STAFF
RE: POLICY PROPOSAL REGARDING BUDGET ADJUSTMENTS
DA: NOVEMBER 10, 2023

Under Act 76, BWQCs are responsible for approving funds for projects and CWSP staff are responsible for overseeing subgrant and procurement processes once funds have been approved. The approach sounds simple enough. But, complications can arise, particularly when budgets change.

At least one Basin Water Quality Council has enacted guidelines that attempt to simplify the process of amending already-approved project budgets. A second BWQC is currently considering such a policy. Your CWSP staff feel the subject deserves some discussion here.

In Basin 5, BWQC members were recently faced with a request to amend a project budget to provide funds for a review of potential cultural resource impacts. (The request was approved.) Even before action was taken BWQC leaders were wondering if steps could be taken to improve the budget amendment process. Lamoille BWQC members will face two similar requests on November 17.

One concern expressed in Basin 5 is that requests for budget amendments will become more and more common. Without some action, Basin 5 leaders concluded, such administrative requests could either pressure the BWQC to meet more frequently or cause delays for projects it might be possible to avoid. The two requests for funding adjustments to be considered on November 17 were made several weeks ago, and thus they have experienced some delay as a result.

The response in Basin 5 was to adopt guidelines “granting the CWSP some leeway to adjust project budgets so that the Council is not called into meet for such minor administrative tasks.”

The draft policy proposal is meant to serve as a starting off point for discussion in Basin 7.

DRAFT Lamoille Basin CWSP/BWQC Project Budget Adjustment Policy DRAFT

Adopted by BWQC:

Adopted by CWSP:

Policy

It shall be the policy of the Lamoille basin CWSP and BWQC to allow for modest adjustments to previously approved project budgets using a simplified process as described below.

Previously approved project budgets (eg., those approved as part previous funding rounds) shall be eligible for adjustment retroactively. Project budgets approved as part of future funding rounds will be approved with the understanding they are modifiable according this policy.

When a project sponsor proposes an amendment to a project budget for a good and valid reasons, the budget amendment may be authorized on an expedited basis as follows:

- Changes of up to 10% of the project budget may be approved at the descretion of CWSP staff;
- Changes of more than 10% but less than 20% of the project budget may be approved at the descretion of CWSP staff with concurrence of the BWQC Chair and Vice Chair (or in the event the Chair and/or Vice Chair have a conflict, with the concurrence at least two BWQC members without conflicts of interest);
- Changes of more than 20% of the project budget may be approved only by a vote of the BWQC and will be scheduled as expeditiously as schedules allow.

Any budget changes approved by CWSP staff and/or the Chair and Vice Chair shall be listed as information items on the meeting agenda subsequent to any approval.

Amendment

This policy may be amended by vote of the BWQC as deemed appropriate by the CWSP and BWQC.

Adoption

Adopted at _____ meeting of Lamoille Basin Water Quality Council

Base approach		Alternative 1		Alternative 2		Alternative 3	
Percentage based		Percentage with caps		Percentages with caps and types*		Graduated percentages*	
Three levels		Three levels		Three levels and two types		Three levels three types	
Illustration				Assessment /ID/ Project Development Projects		Assessment /ID/ Project Development Projects	
<=10%	CWSP staff may approve	<=10%, but capped at \$10,000	CWSP staff may approve	<=10%, but capped at \$5,000	CWSP staff may approve	<=10%, but capped at \$5,000	CWSP staff may approve
>10% and <20%	CWSP staff with concurrence of Chair and Vice Chair (or 2 BWQC members) may approve	>10% and <20%, but capped at \$20,000	CWSP staff with concurrence of Chair and Vice Chair (or 2 BWQC members) may approve	>10% and <20%, but capped at \$10,000	CWSP staff with concurrence of Chair and Vice Chair (or 2 BWQC members) may approve	>10% and <20%, but capped at \$10,000	CWSP staff with concurrence of Chair and Vice Chair (or 2 BWQC members) may approve
20% and up	Requires action by full BWQC	20% and up, or any request >\$20,000	Requires action by full BWQC	20% and up, or any request >\$20,000	Requires action by full BWQC	20% and up, or any request >\$20,000	Requires action by full BWQC
				Design / implementation Projects		Design Project / implementation Project costing less than \$150k	
				<=10%, but capped at \$10,000	CWSP staff may approve	<=10%, but capped at \$10,000	CWSP staff may approve
				>10% and <20%, but capped at \$20,000	CWSP staff with concurrence of Chair and Vice Chair (or 2 BWQC members) may approve	>10% and <20%, but capped at \$20,000	CWSP staff with concurrence of Chair and Vice Chair (or 2 BWQC members) may approve
				20% and up, or any request >\$20,000	Requires action by full BWQC	20% and up, or any request >\$20,000	Requires action by full BWQC
						implementation project costing more than \$150k	
						<=10%, but capped at \$15,000	CWSP staff may approve
						>10% and <20%, but capped at \$30,000	CWSP staff with concurrence of Chair and Vice Chair (or 2 BWQC members) may approve
						20% and up, or any request >\$30,000	Requires action by full BWQC

Training regarding Cultural Resource Assessment

MEMORANDUM

TO: LAMOILLE BASIN WATER QUALITY COUNCIL
FR: CWSP STAFF
RE: CULTURAL RESOURCE REVIEW
DA: NOVEMBER 10, 2023

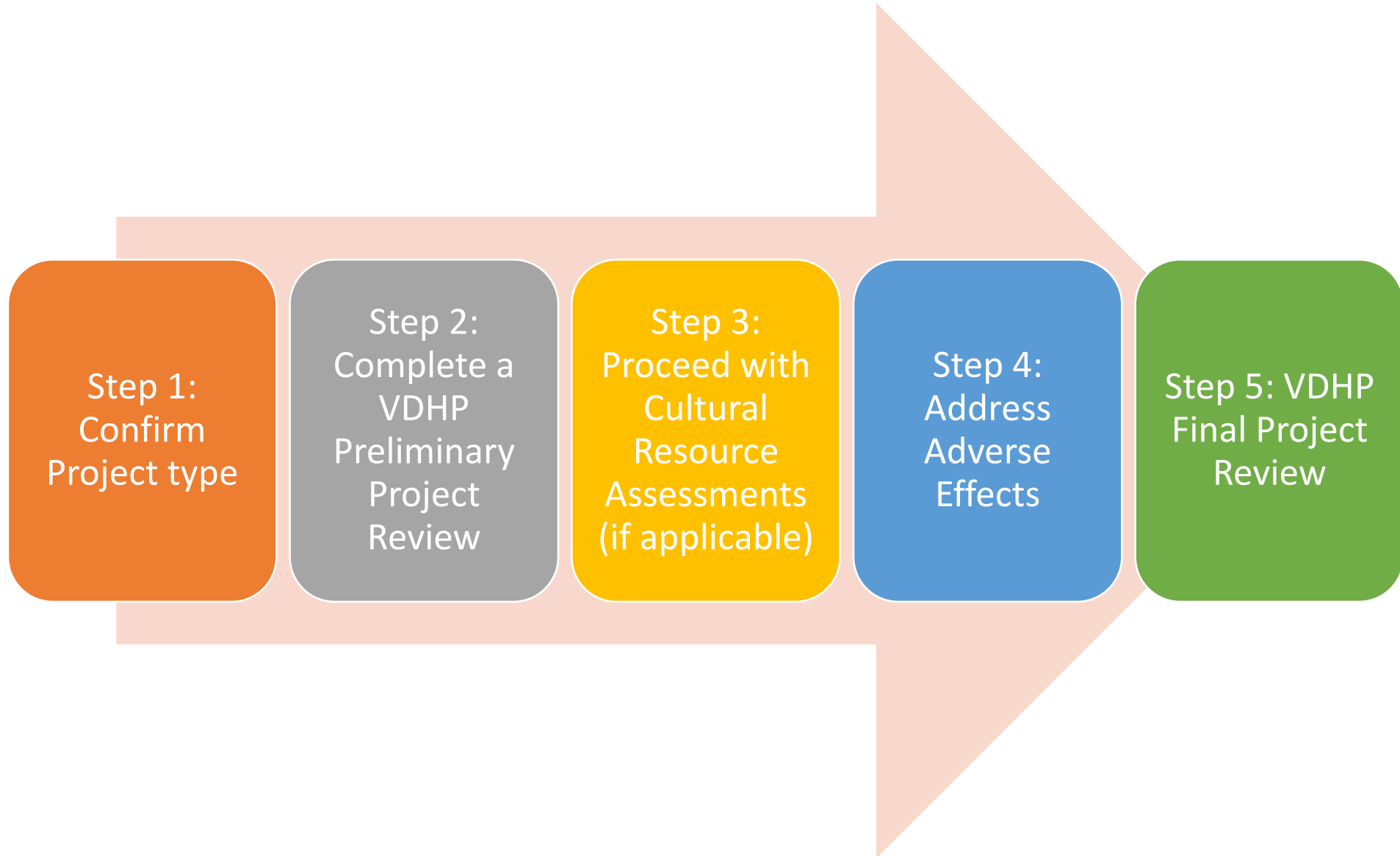
Organizations that receive Clean Water funds agree to do many things in exchange for that financial assistance. The purpose of this memo is to draw attention to the importance of “perform[ing] due diligence to avoid or minimize natural and cultural resource impacts” a project might otherwise cause.

As acknowledged in DEC’s FY 23 Clean Water Initiative Funding Policy, the Vermont Division of Historic Preservation (VDHP) is an important participant in these efforts. Indeed, **“VDHP must be engaged in the successful implementation of clean water projects to ensure they have a minimal impact on the state’s rich cultural, historical, and architectural legacy.”**

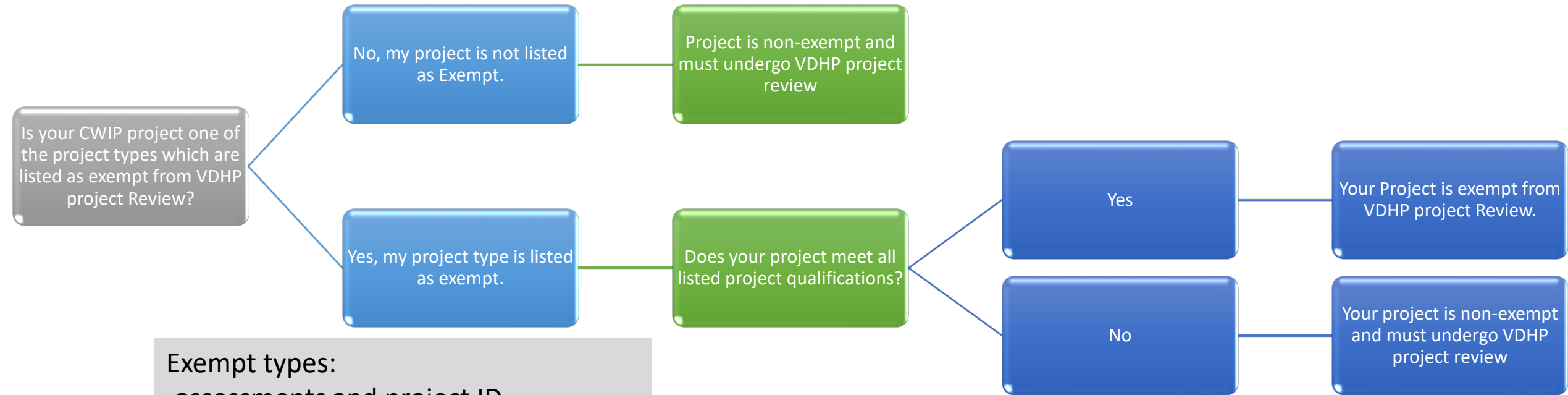
On November 17, CWSP staff will provide a brief introduction to the topic by highlighting different sections of the Funding Policy addressing “which CWIP project types should pursue VDHP Project Review, when, how, and what the project proponents should expect from this process.” CWSP Staff will also direct BWQC members to other information resources, including VDHP forms, a [recorded training session](#), and offers by DEC staff to make a presentation to the BWQC at a future date.*

(*DEC staffer Gianna Petito has noted ... **“I’d recommend you share the training video with them first and gather the outstanding questions that remain” to help future presenters address the topic.**)

VDHP Project Review Process



Exempt Project Types



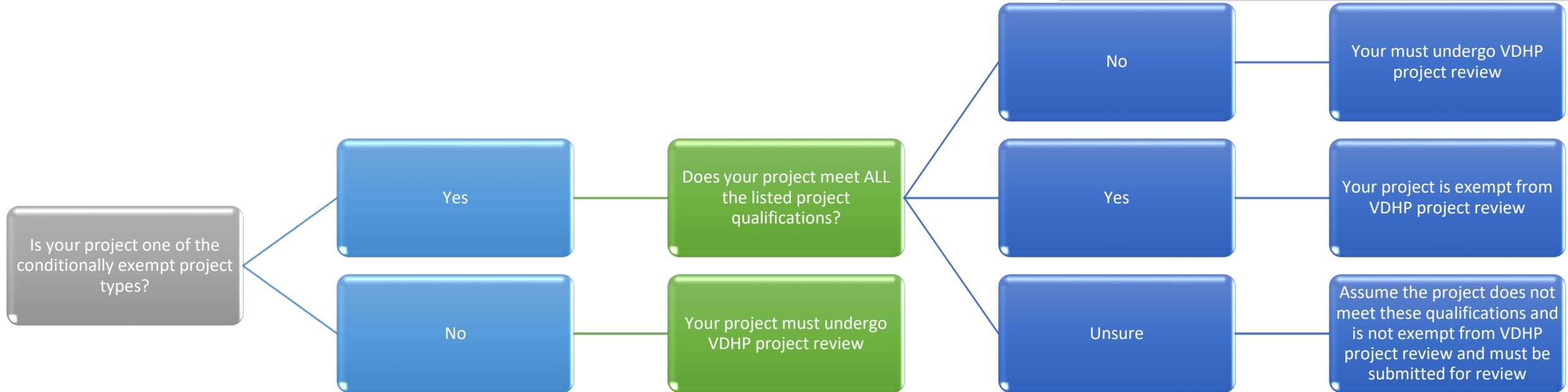
Exempt types:

- assessments and project ID
- project development
- equipment
- IDDE
- River corridor and wetland easements
- Riparian buffer planting
- O&M

Conditionally Exempt Project Types

Qualifications:

- no new ground disturb beyond footprint
- no impact on structure > 50 years
- no impact on federally listed structure
- Area Potential Effect outside designated Areas (state and federal)



Conditionally Exempt types:

- Ag pollution prevention
- Roads project
- Stormwater project
- Roads/SW Gullies
- Forestry

Clean Water Service Providers should refer to Water Quality Restoration Formula Grant Guidance document on a different and separate definition for and allowed use of “leftover funds.”

STATE HISTORIC PRESERVATION REVIEW

With evidence of Native American occupations extending as far back as 13,000 years ago, Vermont has a rich cultural, historical, and architectural legacy. This significant heritage manifests itself in the state’s ancient Native encampments, agricultural farmsteads with timber-framed barns and rising silos, villages with white-spired churches and town halls marking the valley bottoms and maple-strewn hillsides, downtowns centered on railroad depots and sites of early industrial centers, summer retreats surrounding lakes and ponds, and ski resorts nested on the slopes of the green mountains. The strata of history is a component of the built and natural environment, recounting the stories of Vermont’s buildings, economy, and communities.

Preservation of Vermont’s historic resources is the primary initiative of the Vermont Division for Historic Preservation (VDHP). Serving as the State Historic Preservation Office (SHPO), VDHP plays an essential role in guiding the state’s historic preservation agenda, keeping hundreds of years of history alive and vital, engaging people of all walks in Vermont’s past through collecting, preserving, and discovering a shared priority and value for the human spirit that preceded us.

The Vermont Division for Historic Preservation (VDHP) is authorized by 22 V.S.A. § 723(10) to adopt rules and carry out the purposes of the Vermont Historic Preservation Act. VDHP is charged to fulfill responsibilities under the Vermont State Historic Preservation Act and the National Historic Preservation Act to identify, preserve, and interpret historic resources on behalf of the citizens of the state and promoting them as significant components of our communities. This is achieved, in part, by the regulatory review and comment process for projects involving federal or state funding, licenses or permits.

Since Clean Water Initiative Program funding programs can involve both state and federal funding, VDHP must be engaged in the successful implementation of clean water projects to ensure they have a minimal impact on the state’s rich cultural, historical, and architectural legacy. The following sections of guidance provide information on which CWIP project types should pursue VDHP Project Review, when, how, and what the project proponents should expect from this process.

Project Types Subject to VDHP Project Review

Exempt Project Types

The following are CWIP project types categorically exempt from any VDHP Project Review:

- Sector based or multi-sector assessments and project identification

- Project development
- Stormwater/Road Equipment
- Forestry Equipment
- Illicit Discharge Detection and Elimination (IDDE)
- River Corridor and Wetland Easements
- Riparian Buffer Plantings
- Operation and Maintenance activities

These project types have no VDHP milestones or deliverables listed in the [Appendix B. Project Types Table](#).

Conditionally Exempt Project Types

The following project types are exempt from VDHP Project Review if they meet all the listed project qualifications:

Project Types

- Agricultural Pollution Prevention
- Roads
- Stormwater
- Roads/SW Gullies
- Forestry

Project Qualifications

- a. Project involves no new ground disturbance beyond the previously disturbed³¹ horizontal (surface area) and vertical (depth) footprint.
- b. Project causes no direct or indirect³² impact or disturbance to any man-made building or structure (including dams, culverts, and bridges) more than 50 years old.³³
- c. Project causes no direct or indirect impact or disturbance to any federally listed historic

³¹ Previous disturbance means any man-made change to improved or unimproved real estate, including but not limited to buildings or other structures, mining, dredging, filling, grading, paving, excavation or drilling operations or storage of equipment or materials.

³² Indirect impacts might include instances where natural systems readjust to a project's impacts in a manner that newly undermines or affects nearby Historic Sites.

³³ If the age of nearby structures is unknown, tax accessor records are a good resource. Connect with the applicable town clerk to access this information. You can also contact the State Architectural Historian (Devin Colman devin.colman@vermont.gov 802-585-8246) for guidance on age of building or structure that cannot be determined. If the age of an impacted building or structure cannot be determined, assume this qualification is NOT met and the project is NOT exempt from VDHP Project Review.

building or structure.³⁴

- d. Project Area of Potential Effect (APE)³⁵ is not located within, does not intersect with, and is not adjacent to a state-listed historic district,³⁶ Designated Downtown, or Village Center.³⁷
- e. Project APE is not located within, does not intersect with, and is not adjacent to a federally listed historic district or site.³⁸

It is the responsibility of project proponents to confirm their projects meet these conditional qualifications and continue to do so as the project advances through to implementation. If the project proponent is in any way unsure, they should assume their project does not meet these qualifications and is not exempt from VDHP Project Review.

Non-exempt Project Types

Non-exempt project types are all project types listed in [Appendix B. Project Types Table](#) not otherwise listed above as exempt or conditionally exempt. All non-exempt project types, or

³⁴ Federally listed historic buildings and structures are not mapped digitally. A full listing of federally listed historic buildings and structures in Vermont can be found in the Historic Sites Spreadsheet on the CWIP Applicant & Recipient Resources Page here: <https://dec.vermont.gov/water-investment/cwi/grants/resources>. Filter the "BUILDINGS & STRUCTURES" tab by Column E ("City") for the town and neighboring towns of your project's APE. If no historic buildings or structures are listed, your project meets this qualification. If historic buildings or structures are listed, use the links in Column G ("External Link") to determine the geographic location and extent of the listed historic buildings or structures. Contact the State Architectural Historian (Devin Colman devin.colman@vermont.gov 802-585-8246) for guidance as necessary. If these available resources are insufficient to confidently determine whether the project causes direct indirect impact or disturbance to any federally listed historic building or structure, proceed assuming this qualification is NOT met, and the project is NOT exempt from VDHP Project Review.

³⁵ The project APE or "area of potential effects" means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different from different kinds of effects caused by the undertaking [36 C.F.R. § 800.16(d)]. When determining a project's APE remember to consider/include extent of restoration footprint; new, upgraded or existing access or haul roads; staging, storage, and stockpile areas; disposal sites or waste areas; borrow areas and other source locations for fill material; and areas impacted by drainage diversions or mechanical tree clearing and similar landscape alterations.

³⁶ Find state-listed historic districts through this mapping tool: <https://geodata.vermont.gov/datasets/ee5cdb1b9c094139ad00f7f02785d2b2/explore?location=44.264850%2C-72.514584%2C12.77>.

³⁷ Find a map of Designated Downtowns and Village Centers here: <https://accd.vermont.gov/community-development/designation-programs/downtowns>.

³⁸ Federally listed historic districts and sites are not mapped digitally. A full listing of federally-listed historic districts and sites in Vermont can be found in the Historic Sites Spreadsheet on the CWIP Applicant & Recipient Resources Page here: <https://dec.vermont.gov/water-investment/cwi/grants/resources>. Filter the "DISTRICTS & SITES" tab by Column E ("City") for the town and neighboring towns of your project's APE. If no historic districts or sites are listed, your project meets this qualification. If historic districts or sites are listed, use the links in Column G ("External Link") to determine the geographic location and extent of the listed historic districts/sites. Contact the State Architectural Historian (Devin Colman devin.colman@vermont.gov 802-585-8246) for guidance as necessary. If these available resources are insufficient to confidently determine whether the project APE is located within, intersects with or is adjacent to a listed district or site, proceed assuming this qualification is NOT met, and the project is NOT exempt from VDHP Project Review.

conditionally exempt project types that do not meet the project qualifications, are subject to the VDHP Project Review Processes as outlined below.

VDHP Project Review Process

VDHP Project Review consists of identifying a project's potential effect to historic buildings and structures, historic districts, historic landscapes and settings, and to known or potential archaeological resources. These resources are known, collectively as "Historic Properties" or "Historic Sites." This consultative process, also known as Project Review, occurs between the Vermont State Historic Preservation Office (VDHP) and project proponent. Purpose of review is to assure that Historic Properties/Sites are not affected, or if affected, are not adversely affected.

Step 1: Confirm Project Type

Confirm project type is either non-exempt or conditionally exempt and fails to meet the project qualifications.

Step 2: Complete a VDHP Preliminary Project Review

Complete the VDHP Preliminary Project Review section of the VDHP Project Review Form³⁹ and submit to VDHP. VDHP will conduct a desk review to determine whether the project location is considered sensitive and if a professional consultant is needed by checking the appropriate boxes and returning the form to the project proponent. VDHP findings as a result of this review will clarify next steps for the project proponent. These steps may include:

1. Finding of Historic Properties/Sites Affected:
 - a. Recommendation of further historic assessment performed by a consultant(Architectural Historian or Historian as appropriate) who meets the minimum qualifications under the Secretary of the Interior's Professional Qualification Standards (48 FR 44738-9). Purpose of this work will be to identify potential sites and to seek ways to avoid or minimize an Adverse Effect on the Historic Site.
 - b. Recommendation of further archaeological assessment consultation performed by an archaeologist (the Archaeologist) who meets the minimum qualifications under the Secretary of the Interior's Professional Qualification Standards (48 FR 44738-9). Purpose of this work will be to identify potential sites and to seek ways to avoid or minimize an Adverse Effect on the Historic Site.
2. Finding of No Historic Properties/Sites Affected/No Effect: For projects that have received this determination from VDHP, the project proponent may continue to advance design plans without further historic or archeological resource assessment consultation. These projects still need to complete **Step 5: VDHP Final Project Review**. Additionally, VDHP should be notified and re-engaged if the approved plans change during final design. This includes if the APE is adjusted or the area, depth, or location of ground

³⁹ The VDHP Project Review Form is available on the CWIP Applicant & Recipient Resources Page here: <https://dec.vermont.gov/water-investment/cwi/grants/resources>.

disturbance changes.

Step 3: Proceed with Cultural Resource Assessments (if applicable)

Proceed with any archaeological or historic assessment consultation as requested by VDHP. This may be an iterative process in which the professional consultant may recommend additional consultation and, unless VDHP disagrees, the project proponent should plan to perform that work should they wish to proceed with the project.

For projects that receive a recommendation for further historic assessment consultation, this may include:

1. Historic Resource documentation to evaluate the eligibility of structures in the project area for inclusion on the state and National Registers of Historic Places.

In addition to assessment reports, the professional consultant shall submit a Determination of Eligibility (DOE) Form and Vermont Architectural Resource Inventory (VARI) Form as appropriate to VDHP for review and approval. Upon receipt, VDHP shall have 30 days to respond. Non-response by VDHP within 30 days will constitute concurrence with documents submitted. Project proponents should proceed following VDHP's final determination or, in the absence of this, should proceed assuming VDHP concurrence with final recommendations provided by the professional consultant. For projects involving historic properties or historic sites that are listed in or potentially eligible for inclusion in the State or National Registers of Historic Places, the consultation process may require the Federal Advisory Council on Historic Preservation or Vermont Advisory Council on Historic Preservation participation with extended review time.

For projects that receive a recommendation for further archaeological assessment consultation, this may include:

1. Archaeological Resource Assessment (ARA)⁴⁰
2. Phase I site identification survey (in some cases, the need for a Phase I site identification survey may be readily apparent without an ARA).
3. Phase II Site Evaluation
4. Phase III Data Recovery (generally completed as a mitigation measure)

A report of each study phase shall be submitted to VDHP. Each study should include a determination by the consulting Archaeologist as to whether or not additional archaeological studies are necessary. Vermont Archaeological Inventory (VAI) Forms are also required as appropriate. Upon VDHP's receipt of archaeological resource assessments, other archaeological reports, or end-of-field documents, VDHP shall have 30 days to respond. Non-response by VDHP within 30 days will constitute concurrence with documents submitted. Project proponents should proceed following VDHP's final determination or, in the absence of this, should proceed assuming VDHP concurrence with final recommendations provided by the

⁴⁰ Learn more about these steps here:

https://outside.vermont.gov/agency/ACCD/ACCD_Web_Docs/HP/Archaeology/ARCHEO_GUIDELINES.pdf

consulting Archaeologist. For projects involving historic properties or historic sites that are listed in or potentially eligible for inclusion in the State or National Registers of Historic Places, the consultation process may require the Federal Advisory Council on Historic Preservation or Vermont Advisory Council on Historic Preservation participation with extended review time.

Step 4: Address Adverse Effects

To the extent possible, historically and archaeologically sensitive areas should be avoided. It is strongly encouraged to have project designs developed in tandem with archaeological and historic assessment consultation to ensure potential effects to historic properties/sites are avoided or minimized to the maximum extent possible. An open and iterative conversation between engineering and historic/archaeological consultants will ensure an accurate APE is mapped and informs the archaeological and historic assessment consultation. Even with archaeological or historic resources nearby, a project can proceed with a finding of No Historic Properties/Sites Affected /No Effect or No Adverse Effect as long as it can demonstrate avoidance to the archaeological/historic resources.

If the historic/archaeological consultant determines that the proposed final design plans and scope of work will have an Adverse Effect on a Historic Property/Site, the project proponent will need to work with the consultants and VDHP to develop a Treatment Plan or other agreement document. The intent of the Treatment Plan is to help the project arrive at No Adverse Effect (if possible) or to mitigate an Adverse Effect. This Treatment Plan may include such activities as:

1. Redesign of one or more project components;
2. Specific construction conditions;
3. Construction monitoring by a qualified Archaeologist and/or Architectural Historian/Historian;
4. Site documentation and archiving, or public facing informational signage; and
5. Rehabilitation of an affected historic building or structure in accordance with the *Secretary of the Interior's Standards for Rehabilitation*.

Step 5: VDHP Final Project Review

All non-exempt project types, or conditionally exempt project types that do not meet the project qualifications, must complete a VDHP Final Project Review of 100% Final Design plans once completed. To do this, complete the VDHP Final Project Review section of the VDHP Project Review Form⁴¹ and submit to VDHP. The review may be simple if the preliminary review issued a finding of No Historic Properties/Sites Affected/No Effect, and the project has not changed. For projects that required further archaeological or historic assessment consultation, or development of a Treatment Plan this VDHP Final Project Review must signal VDHP concurrence with all findings and proposed Treatment Plan strategies if applicable.

⁴¹ Project proponents should be completing the Final Project Review section on the same form that was completed and signed for Preliminary Project Review such that all the Preliminary Project Review data entry and VDHP signoffs are included in the Final Project Review submission.

VDHP Project Review Timing and Budgeting

For all non-exempt and conditionally exempt project types, CWIP's standard milestones have integrated VDHP Preliminary Project Review as part of the Preliminary (30%) Design Phase but this can happen earlier if appropriate for the project. CWIP's standard milestones also have integrated VDHP Final Project Review as part of the 100% Final Design Phase, and Treatment Plan implementation as part of implementation phases (if applicable).

CWIP recognizes that the exploratory and iterative nature of historic and archaeological assessment consultation, if required by VDHP, can be difficult to predict and budget for within the 100% Final Design Phase.

1. CWIP encourages Funding Program Administrators to be flexible in granting additional cultural resource funds as the iterative process progresses as long as the project remains cost-competitive (in terms of ecological and community benefits gained per dollar spent).
2. Project proponents should do everything in their power to avoid impacts to historic and archaeological resources and should be cautious about advancing any projects that cannot practically avoid these impacts. Failure to adequately demonstrate avoidance leads to mounting costs both in terms of required cultural resource assessment consultation as well as, potentially, the mitigation strategies that must be implemented under a Treatment Plan. Although some clean water projects may be worth this expense in terms of the resulting ecological and community co-benefits, not all projects may continue to demonstrate a cost-competitive advantage over other clean water projects.

Costs associated with VDHP Project Review are eligible and may fall under the Project Completion or another budget category depending on how cultural resource work is contracted. Funding Program Administrators may request case-specific budgeting guidance from CWIP as needed. Eligible expenses include costs for identifying and evaluating historic buildings, structures and archaeological sites; for project reviews and determination of effect; for necessary studies; and for implementation for Treatment Plans. This also includes project manager personnel time needed to oversee these tasks and perform the necessary procurement and contracting of professional cultural consultant services.

Vermont Division for Historic Preservation
Project Review Form
DEC Clean Water Initiative Program

This form is to be used for both the Preliminary and Final Project Review for clean water projects funded by the Department of Environmental Conservation (DEC) Clean Water Initiative Program (CWIP). See applicable sections below.

Preliminary Project Review Section

To start the consultation process for CWIP-funded Clean Water Projects, please complete this form and submit it to the Vermont Division for Historic Preservation (VDHP) at ACCD.projectreview@vermont.gov with the information requested below. This Preliminary Project Review form once completed and signed by VDHP should be submitted as a project deliverable.

This is for non-exempt CWIP project types or conditionally exempt that have failed to meet the project qualifications. Exempt project types should NOT submit this form. Please refer to the CWIP Funding Policy for a listing of exempt and conditionally exempt project types. The CWIP Funding Policy can be found here: <https://dec.vermont.gov/water-investment/cwi/grants>

For questions on architectural resources, archaeology, and below-ground resources, please contact Scott Dillon at (802) 272-7358 or scott.dillon@vermont.gov.

1. Contact information:

- a. Contact name:
- b. Email address:
- c. Phone number:

2. WPD Project Title:

3. WPD – ID:

4. Town Project is Located In:

5. Project site map: Please attach a project site map. An annotated Google map or [ANR Atlas](#) map will suffice but professional design plans indicating location are also welcome. An example image is provided below. Site map should outline:

- a. Project Area of Potential Effects (APE)¹ with clearly marked GPS coordinates for project boundaries.

¹ The project APE or “area of potential effects” means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The

§106 Project Review Form

For Clean Water Projects funded by the DEC Clean Water Initiative Program

- b. Proposed ground disturbance locations. Note that stream bank regrading is considered ground disturbance.



6. Project information:

- a. Select CWIP project type from drop down (if not listed, it's categorically exempt)
 - i.
- b. Please provide a short description of the project's proposed scope of work (CWIP Preliminary Design Report is acceptable instead)

c. Are there other Agencies or funding partners involved?: Yes No
 i. **If yes**, which?

d. Does the project involves ground disturbance?: Yes No
 i. **If yes**, please describe type and extent of ground disturbance.

Specifically,

1. Whether disturbance will be performed by hand or heavy machinery,
2. The estimated total acreage and maximum depth of disturbance, and

APE is influenced by the scale and nature of an undertaking and may be different from different kinds of effects caused by the undertaking [36 C.F.R. § 800.16(d)]. When determining a project's APE remember to consider/include extent of restoration footprint; new, upgraded or existing access or haul roads; staging, storage, and stockpile areas; disposal sites or waste areas; borrow areas and other source locations for fill material; and areas impacted by drainage diversions or mechanical tree clearing and similar landscape alterations.

§106 Project Review Form

For Clean Water Projects funded by the DEC Clean Water Initiative Program

3. The history of prior natural caused or man-made ground disturbance to the site (if known):

e. Will the project cause direct or indirect impact/alterations or disturbance to any building or structure more than 50 years old (including dams, culverts, and bridges) or to any federally-listed historic building or structure?

Yes No Unknown

i. **If yes or unknown**, provide any known details on the buildings or structure(s), location/condition and extent of proposed impact or disturbance. Please include whether the resource is listed in the National Register of Historic Places if known:

f. Is the project APE located within, intersect with, or adjacent to/immediately abutting to a State- or National Register listed historic district, Designated Downtown, or Village Center?

Yes No Unknown

Email this form and supporting materials to ACCD.ProjectReview@vermont.gov

Please copy scott.dillon@vermont.gov

TO BE COMPLETED BY VDHP:

No Historic Properties/Sites Affected

No Historic Resource Present; or

No Effect on Historic Resource

Comments:

No Adverse Effect

Comments:

Historic Properties Affected

Potential for Historic Architectural Properties to be affected - a Qualified Architectural Historian/Historian* will be required (*please see list of consultants)

Determination of Eligibility required

Comments:

Potential for Archaeological Historic Properties to be affected - a Qualified Archaeological Consultant* will be required (*please see list of consultants)

Archaeological Resouce Assessment (ARA) required

Phase 1 archeolgoical investigation required

Comments:

Vermont State Historic Preservation Office Preliminary Concurrence:

X: _____

Date:

§106 Project Review Form

For Clean Water Projects funded by the DEC Clean Water Initiative Program

Final Project Review Section

To complete Final Project Review, re-submit this VDHP Project Review Form with the following additional elements included. Note that this should be added to the VDHP-signed version of the Preliminary Review Form so VDHP can reference their prior guidance on this project. This Final Project Review Form, once completed and signed by VDHP, should be submitted as a CWIP project deliverable.

1. Please provide a short description of any changes to the project’s proposed scope of work since the Preliminary Project Review was approved by VDHP:

2. Please attach:
 - a. Final (100%) Design Plans
 - b. Project narrative description of scope of work (CWIP Final Design Report will suffice)
 - c. Any historical resource assessments, or determination of eligibility forms
 - d. Any archaeological resource assessments, other archaeological reports, or end-of-field documents
 - e. Any Treatment Plans

Email this form and supporting materials to ACCD.ProjectReview@vermont.gov

Please copy scott.dillon@vermont.gov

TO BE COMPLETED BY VDHP:

No Historic Properties Affected

No Historic Resource Present ; or

No Effect on Historic Resource Comments:

No Adverse Effect

Adverse Effect

Concur with Project Treatment Plan or other agreement docs executed

Comments:

Vermont State Historic Preservation Office Final Concurrence:

X: _____

Date:

Updates and Conclusion

Future Funding Rounds

Future Rounds – Lamoille

Round #	Open	Deadline
4	February 7, 2024	March 14, 2024
5	April 4, 2024	May 9, 2024

Project Status

General Project Information									
WPD ID*	Row Type*	Project Manager / Sub-Grantee*	Project Name*	Project Description*	Project Type*	Project Latitude* (5 decimal places)	Project Longitude* (5 decimal places)	Town, County or Region*	Watershed Sub-basin (Watershed Boundary ID)*
11361	General Project	Lamoille County Conservation District	Rocky Woods Strategic Wood Additions	Objective: The objective of this project is to implement 2.5 linear miles of this project to one of many streams in	Preliminary Design	44.4935	-72.54142	Elmore	7 - Tributaries to Upper Lamoille River (VT07-08)
11358	General Project	Lamoille County Conservation District	Church St Post Office Stormwater Project	Hyde Parks Net Zero program, the goal being to capture all Phosphorus and	Preliminary Design	44.5943	-72.6168	Hyde Park	7 - Tributaries to Upper Mid Lamoille (B) (VT07-06)
9536	General Project	Town of Fairfax, VT	Bellows Free Academy East	A system of StormTech MC-3500 chambers is proposed for placement. This new project will expand upon	Final Design	44.66307	-73.01157	Fairfax	7 - Mill Brook (VT07-09)
11322	General Project	Town of Jericho	Jericho Center Stormwater Management-Development	previous studies in the area, take a more holistic look at multiple stormwater creation areas, and engage the community/stakeholders in creating a	Assessment ID or Development	44.469521	-72.972236	Jericho	7 - Upper Browns River (VT07-11)
10655	General Project	Lamoille County Conservation District	West Loop Road Assessment - Elmore	Improvements Preliminary Design Project: This project is one of many	Road Project - Preliminary Design	44.53886	-72.53108	Elmore	7 - Tributaries to Upper Lamoille River (VT07-08)
10299	General Project	Lamoille County Conservation District	MRGP Road Improvements and Stormwater Treatment	Final Design: This project is one of many defined in Lake Elmore Watershed	Road Project - Final Design	44.504	-72.5046	Elmore	7 - Tributaries to Upper Lamoille River (VT07-08)
11433	General Project	Lamoille County Planning Commission	Replacement/Floodplain Restoration Project	over the Wild Branch (a tributary to the Lamoille River) southeast of the	Floodplain/Stream Restoration - Preliminary	44.57176	-72.47843	Wolcott	7 - Wild Branch (VT07-19)
			Removal and Wetland	along Centerville Brook, on a 0.25 acre					

Funding Information				
Sub-Grant Agreement ID Number	Date Project Selected for Funding	Formula Grant Funding Amount Awarded*	Date Formula Grant Sub-Agreement Executed*	
CWSP-2023- LCCD Subgrant Task Award 2-11361	23-Mar-23	\$2,874	6/27/2023	
CWSP-2023- LCCD Subgrant Task Award 1-11358	23-Mar-23	\$ 21,173.75	6/27/2023	
CWSP-2023- Fairfax Subgrant Task Award 1-9536	23-Mar-23	\$ 75,000.00	6/27/2023	
CWSP-2023- Jericho Subgrant Task Award 1-11322	23-Mar-23	\$ 22,158.00	7/19/2023	
CWSP-2023-LCCD Subgrant Task Award 3-10655	21-Jul-23	\$ 7,898.50		
CWSP-2023- LCCD Subgrant Task Award 4-10299	21-Jul-23	\$ 5,098.50		
CWSP-2023- LCPC Subgrant Task Award 1-11433	21-Jul-23	\$ 44,000.00		
CWSP-2023- LCPC Subgrant Task Award 1-11395	21-Jul-23	\$ 45,000.00		

Funding Status

AWARD INFO		STATE REMAINING GRANT \$		CWSP CASH ON HAND	
Total Award Amount:	\$ 643,330.00	Amount Available at Grant Start	\$ 643,330.00	Total Requested to Date	\$ 246,916.39
Administrative Costs (AC): 15%	\$ 96,499.50	Total Requested	\$ 246,916.39	Total Expenditures	\$ 31,400.84
Project Completion Costs (PCC): 85%	\$ 546,830.50	Grant Total Remaining	\$ 396,413.61	Remaining Grant-Cash on Hand	\$ 215,515.55
Quarterly MAX (AC): 25%	\$ 24,124.88	Total AC Remaining	\$ 40,973.78	Cash on Hand- AC	\$ 24,124.88
Quarterly MAX (PCC): 35%	\$ 191,390.68	Total PCC Remaining	\$ 355,439.83	Cash on Hand- PCC	\$ 191,390.68
				Cash on Hand with Interest	\$ 215,618.85

		Initial Advance	Cumulative Totals	% Remaining
Quarter End Dates				
Administrative Costs (AC)	Total Expenditures this Quarter- AC		\$ 31,400.84	67%
	Quarter to Date Cash Reimbursements- AC		\$ -	
	New Advance Request	\$ 24,124.88	\$ 24,124.88	
	Quarter End Draw Request		\$ 31,400.84	
	Total Amount AC Currently Requested	\$ 24,124.88	\$ 55,525.72	
Project Completion Costs (PCC)	Total Expenditures this Quarter- PCC		\$ -	100%
	Quarter to Date Cash Reimbursements- PCC		\$ -	
	New Advance Request	\$ 191,390.68	\$ 191,390.68	
	Quarter End Draw Request		\$ -	
	Total Amount PCC Currently Requested	\$ 191,390.68	\$ 191,390.68	
Totals for Form 430/A	Total Draw Requested		\$ 31,400.84	
	Total Reimbursement Requested		\$ -	
	Total Advance Requested		\$ -	
	Quarter Totals Requested	\$ 215,515.55	\$ 246,916.39	
	PCC Non- Match Eligible		\$ -	
	PCC- Match Eligible		\$ -	
	Interest Earned		\$ 103.30	
	Quarter End Request (ANR Online)			