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**DELIVERED ELECTRONICALLY**

December 30, 2021

M. Bradford Ellis  
Vernon Homes  
61 Greenway Drive  
Vernon, VT 05354

**RE: Docket No. GMCB-025-21con, Vernon Homes Septic System Improvement Project.**

Dear Mr. Ellis:

Thank you for your December 29, 2021, letter providing additional information regarding the above-referenced project.

While we see interrelationships between the septic system replacement project (involving replacement of three separate septic systems serving Vernon Green, Vernon Hall, and Vernon Birches with a unified and integrated system that will serve all three properties) and the New Project (involving the demolition of the Vernon Green nursing home and the construction of a new facility that complies with the Green House Project® model and Design Guide), based on the totality of circumstances, we believe the projects should be treated as separate. Furthermore, because the septic system replacement project involves expenditures of less than \$1.5 million on behalf of Vernon Green, this project is not subject to certificate of need review at this time.

As you proceed with developing and implementing this project, if there are any changes in type, scope, or cost of the project, please contact the Board immediately so that we may determine whether any further process is necessary. Failure to do so as required by Green Mountain Care Board Rule 4.301(4) may result in sanctions, as specified in 18 V.S.A. § 9445.

If you have any questions, please do not hesitate to contact me at 802-585-4829.

Sincerely,

s/ Michael Barber  
General Counsel  
Green Mountain Care Board

cc. Donna Jerry, Senior Health Policy Analyst, GMCB



Laura Beliveau, Staff Attorney, GMCB

