
DELIVERED ELECTRONICALLY

December 23, 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 Letter of Intent dated December 17, 2021, conceding certificate of need (CON) jurisdiction and seeking an emergency CON for a septic system improvement project.

Based on your letter, we understand that Vernon Advent Christian Homes (Vernon Homes) owns and operates three different properties located on a common campus in Vernon, Vermont:

- Vernon Green, a 60-bed skilled nursing facility;
- Vernon Hall, a 44-bed assisted living center; and
- Vernon Birches, a complex of 15 independent living apartments.

Each of these three properties is currently served by a separate septic system. The septic system serving Vernon Hall has failed and the septic systems serving Vernon Green and Vernon Birches are at or near the end of their useful life. In order to use campus property most efficiently and to comply with the permitting requirement of the Agency of Natural Resources, Vernon Homes wishes to construct a unified and fully integrated septic system that will serve all three properties. The total cost for the project is expected to be \$2,597,000, of which approximately \$1,376,410 will be allocated to Vernon Green. Given the need to remedy the failed septic system serving Vernon Hall, Vernon Homes is seeking to complete the septic system improvement project in the summer of 2022.

Because the capital expenditure being made by or on behalf of Vernon Green for the septic system improvement project is less than \$1,500,000, it would be subject to CON review only if it is part of the "New Project," which will involve the replacement of the existing Vernon Green facility with a new 60-bed skilled nursing facility located in a single three-story building. Before



considering emergency review, the Board would like to briefly explore this jurisdictional issue. Therefore, please provide the following additional information:

1. Explain whether Vernon Homes would pursue the septic system replacement project even if the New Project did not move forward.
2. Briefly describe the rationale for the New Project and the need it is expected to meet.
3. At a high level, compare the time frames for the septic system replacement project and the New Project.
4. Briefly describe any financial interrelationships between the septic system replacement project and the New Project.

In responding, please restate the question in bold font and respond in un-bolded font. Send an electronic copy to Donna Jerry at donna.jerry@vermont.gov and one hard copy (three-hole punched) with a Verification Under Oath to Ms. Jerry's attention at the Green Mountain Care Board, 144 State Street, Montpelier, Vermont 05602.

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

