VERMONT

State of Vermont
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Kristin L. Clouser, Secretary

TO: Emergency Board Members
FROM: Kristin L. Clouser, Secretary of Administration
DATE: October 20, 2022
RE: Emergency Board Meeting, October 24, 2022

Kristin L. Clouser
Digitally signed by Kristin L. Clouser
Date: 2022.10.20 11:21:25 -04'00'

Governor Scott will convene a meeting of the Emergency Board on Monday, October 24, 2022, at 1:00 p.m. in the Governor's office in the State House.

Meeting materials will be posted online when available at https://aoa.vermont.gov/revenue.

The meeting will be broadcast publicly on the Joint Fiscal YouTube channel at https://legislature.vermont.gov/committee/streaming/vermont-joint-fiscal.

The agenda items are as follows:

1. ANR/AOE/VDH request for PCB mitigation funding per Act 178 of 2022
    a. Julie Moore, Secretary, Agency of Natural Resources
    b. Dan French, Secretary, Agency of Education
2. Request for supplemental LIHEAP funding
    a. Dr. Harry Chen, Interim Commissioner, Department of Children and Families
    b. Richard Giddings, LIHEAP Program Director, Department of Children and Families

Cc: Beth Pearce, State Treasurer
Michael Clasen, Deputy State Treasurer
Adam Greshin, Commissioner, Department of Finance and Management
Craig Bolio, Commissioner, Department of Taxes
Hardy Merrill, Deputy Commissioner, Department of Finance and Management
Catherine Benham, Chief Fiscal Officer, Joint Fiscal Office
Stephanie Barrett, Assoc. Fiscal Officer, Joint Fiscal Office
Sarah Clark, Deputy Fiscal Officer, Joint Fiscal Office
Graham Campbell, Senior Fiscal Analyst, Joint Fiscal Office
Jake Feldman, Senior Fiscal Analyst, Department of Taxes
Jeff Carr, State Economist for the Agency of Administration
Tom Kavet, State Economist for the Legislature
Michael Gaughan, Vermont Municipal Bond Bank
Elijah D. Emerson, Esq., Primmer Piper Eggleston & Cramer PC
Maura Collins, Vermont Housing Finance Agency
Cassie Polhemus, Vermont Economic Development Authority
Scott Giles, Vermont Student Assistance Corporation
Tom Little, Esq., Vermont Student Assistance Corporation

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Agency of Education
Agency of Natural Resources
Department of Health

MEMORANDUM

TO: Emergency Board
FROM: Daniel M. French, Ed.D., Secretary, Agency of Education
Julia S. Moore, P.E., Secretary, Agency of Natural Resources
Mark A. Levine, M.D., Commissioner, Department of Health
RE: Request for Act 178 PCB Funding for Significant Health Threats
DATE: October 20, 2022

Overview

Significant concentrations of PCBs (polychlorinated biphenyls) were discovered in indoor air in buildings on the Burlington High School Campus in fall 2020. PCBs are a known carcinogen. In response to concerns that similar conditions might exist in other school buildings statewide, the Legislature passed Act 74 (2021) requiring all schools built or renovated before 1980 to test indoor air for PCBs. Testing began in June 2022.

The Agencies of Education (AOE) and of Natural Resources (ANR) and the Department of Health (VDH) are requesting authorization from the Emergency Board for use of $2.5 million from the PCB reserve to support Vermont schools for specific and limited purposes where samples have been collected that exceed VDH's action levels and therefore meet the criteria of a significant health threat. These funds will be used to limit the potential dual harms of PCB exposure and further disruption within the school environment at a time when children need stability. Specifically, the purposes the funds will be used for are: state-led purchasing of priority mitigation supplies to be used in emergency response activities that immediately address PCB concentrations; and, providing cost-share to schools to conduct additional investigation and required materials testing.

In making this request, AOE/VDH/ANR are not predetermining the approach or plan for the balance of the $32 million PCB reserve. Schools that receive mitigation supplies or funding for expanded investigation and testing will need to apply separately for funding from the PCB reserve to conduct response activities needed to address PCBs on a more permanent basis (i.e., remediation, rather than mitigation, of sources of PCB contamination) following legislative action in early 2023.

Background

Act 178, "An act relating to setting the homestead property tax yields and the non-homestead property tax rate" was signed into law on June 7, 2022. Sections 2 and 3 pertain to the

appropriation, disbursement and requirements for the provision of state Education Funds to AOE to support the investigation, testing, assessment, remediation, and removal of PCBs in Vermont's schools; specifically, $32 million was been reserved within the Education Fund to support this work. AOE, ANR and VDH staff are currently working together to prepare a written plan ("the Plan") to the General Assembly that sets out a recommended process for the disbursement of these funds, which will be submitted on or before January 15, 2023.

Act 178 also provides the Emergency Board with the authority to *"…in the event of a significant health threat based on the concentration and location of PCBs in schools… to transfer monies in an amount not to exceed $2,500,000… for purposes of remediation, removal, or other required responses to the presence of PCBs in schools."* This allowance was provided in recognition of the fact that indoor air testing was being initiated in mid-2022 and that there could be need to access these funds to avoid, minimize and mitigate potential disruptions to in-person learning if concentrations were detected that exceeded established action levels prior to the General Assembly adopting legislation implementing or approving the Plan.

Update on Testing for PCBs in Schools

Testing began in June 2022 and, to date, testing has been completed at the following schools: Cavendish, Cabot, Oak Grove (Brattleboro), Bethel, Alburgh, and White River Valley School (Royalton Campus). In addition, results are expected back shortly for: Brownington Central, Soar Learning Center (St Albans), Richford Elementary, Early Essential Education (Burlington), and Barton Graded School.

In the six schools where testing has been completed, PCB concentrations were found in the Oak Grove Elementary School in Brattleboro and the Cabot School that exceeded either the School Action Level (SAL) or the Immediate Action Level (IAL) and therefore require prompt attention.

A list of schools required to test and the schedule of testing is available on the DEC website (https://dec.vermont.gov/waste-management/contaminated-sites/pcbsinschools).

Proposal for Funding

Minimizing disruption to students in-person learning and instruction needs to be coupled with steps to avoid or minimize use of rooms with test results at or above the applicable action levels established by VDH. In instances where the room will remain in-use, VDH and ANR have developed recommended immediate, emergency corrective actions to reduce exposure which are, in order of priority:

- Eliminating the use of rooms where samples exceed the IAL;
- Limiting the amount of time the space is used; and then

- Deploying mitigation measures to reduce PCB concentrations in indoor air.

Common mitigation measures include: increasing ventilation and providing or increasing filtration. This proposal would make funding available for immediate, emergency measures to both understand sources of and reduce exposure to PCBs in instances where concentrations exceed established action levels and limiting or eliminating use of the space is not practicable. ANR will oversee the appropriateness and cost of measures deployed at impacted schools and the funding would be used for the following limited purposes:

- Allow the State to purchase and preposition mitigation supplies such as granular activated carbon (GAC) filters which can filter PCBs from air. When necessary and appropriate, these supplies will be made immediately available to schools with PCB concentrations that exceed the action levels which therefore, by definition, represent a significant health threat. Further, given the myriad challenges currently with supply chains, state-led purchasing in the immediate term will avoid delay likely with waiting until the need is identified on a site-specific basis.

- Provide cost-share to schools to conduct additional investigation and required materials testing necessary to ensure permanent corrective action can be pursued in an expeditious and cost-effective manner. These companion measures are important because unfortunately, many times, the source(s) of the PCBs are not immediately evident and so additional investigation and materials testing is needed to develop an effective approach to remediation. Access to funding is essential to responding quickly to exceedances of established action levels. Cost-share is proposed at 80/20 (state/school), with additional investigation and testing for most school anticipated to cost between $30-75k.

ANR staff will provide direct oversight of these activities, using the framework established in the *Investigation and Remediation of Contaminated Properties Rule* (or I-Rule). Adhering to the I-Rule ensures all schools seeking to access funding from the PCB reserve utilize a consistent approach to evaluating conditions, deploying mitigation measures, identifying the least-cost solution, and establishing a timeline for the work. It is important to note that were the Emergency Board to authorize use of the $2.5 million, these funds will not be used to support remediation; remediation work would be eligible for the balance of $32 million in the PCB reserve once the General Assembly adopts legislation implementing or approving the Plan from AOE/VDH/ANR due in January 2023.

Proposed Motion

Given this, the proposed motion for the disbursement of funds for the purpose of responding to a significant health threat based on the concentration and location of PCBs in schools is as follows:

> *Motion is made, pursuant to Act 178 of 2022, Section 3(b) and 32 VSA Sec. 133, to transfer $2.5 million from the adjusted education payment appropriation of Sec. B.505 of Act 185 of the 2022 session. This transfer is to the Agency of Education to establish a new appropriation line item for the purposes of supporting immediate action to reduce PCB exposure in school locations where established action levels are exceeded and therefore present a significant health threat, limited to pre-purchasing and deploying emergency mitigation supplies and providing cost share to conduct additional investigation and required materials testing to inform permanent remediation. Expenditures from this appropriation shall be made consistent with recommendations from the Agency of Natural Resources and the Vermont Department of Health. The Agency of Natural Resources, Vermont Department of Health and Agency of Education shall include an update on the status of expenditures from this appropriation in the disbursement plan required by Act 178 of 2022, Section 3(a).*

Request for Act 178 PCB Funding for Significant Health Threats

Julia S. Moore, P.E., Secretary, Agency of Natural Resources
Daniel M. French, Ed.D., Secretary, Agency of Education

October 24, 2022

What are PCBs?

- PCBs = polychlorinated biphenyls
- PCBs were manufactured between 1930 – 1979
  - During this time an estimated 1.5 billion pounds of these industrial chemicals were produced in the US
- Monsanto Corporation was the sole producer of PCBs in the US
  - Production was banned by EPA in 1979

Why were PCBs Banned?

- Persistent, meaning they do not break down quickly
- Bioaccumulative, meaning PCBs can travel up the food chain
- Hazardous even at very low levels and can affect our health in many ways
  - Known carcinogen
  - May harm the immune, reproductive, nervous and endocrine systems

Cancer	Noncancer
• Breast • Liver • Melanoma	• Immune • Reproductive • Nervous • Endocrine

Why Test for PCBs in Vermont Schools?

- PCBs were used in hundreds of industrial and commercial applications
  - Common uses in school buildings include: caulking, paint, fluorescent light ballasts, window glazing, ceiling tiles, spray-on fireproofing, floor finishes, mastics (glue or resin) and carbonless copy paper
- Summer 2019: as part of planned high school renovation, Burlington conducted standard building material sampling
- August 2020: ANR notified Burlington found PCB concentrations in soil well-above standards; PCBs attributed to building materials
  - August 19, 2020: ANR/VDH request indoor air sampling
  - September 9, 2020: limited, preliminary data received
    - Indoor air concentrations range from ND to 6,300 ng/m3
    - Background concentrations assumed 22.5 ng/m3
  - September 10, 2020: all BHS classes go remote
- Concerns raised that similar conditions might exist in other school buildings, statewide

Why Test Indoor Air for PCBs?

- Historically, diet was assumed to be the primary source of PCB exposure
  - PCBs accumulate up the food chain
- When there are high levels of PCBs in indoor air, this can contribute much more exposure than diet alone
- Testing indoor air in Vermont schools and remediating sources helps reduce exposure
- When all other PCB exposure pathways (school and non-school) are set to average background levels, school indoor air PCB concentrations should not cause an unacceptable exposure
  - In addition to indoor air and diet, other common PCB exposure pathways include: outdoor air; indoor dust; and soils

How is Testing of Vermont Schools being Approached?

- Public schools and recognized independent schools constructed or renovated before 1980 are required to test by July 1, 2025
- DEC has hired consultants to do the indoor air testing for PCBs
- Sampling at each school will be representative
  - Consultants inventory and group “like rooms” in each facility before sampling indoor air (or any building materials) to ensure representative testing
- VDH and DEC have created a “temporary occupancy framework” to provide guidance on continued use of facility if PCBs are detected
- DEC will help schools remediate any areas that exceed action levels in a manner consistent with I-Rule standards

How is Testing of Vermont Schools being Approached?

- All site work at contaminated sites must be conducted consistent with the I-Rule
  - Not limited to PCBs
- I-Rule is shorthand for ANR's *Investigation and Remediation of Contaminated Properties Rule*
- Establishes procedures and requirements for conducting investigations and corrective actions at properties where "a release of hazardous materials has occurred"
  - DEC regulates PCBs indoor air in schools as a release
- Includes requirements for identifying the source and extent of contamination, consideration of corrective actions and cost-effective alternatives for mitigation and treatment (e.g., removal or containment), and assessment of the need for long-term monitoring or institutional controls

Approach: Indoor Air Sampling

- As part of Act 74 (2021), the Vermont legislature committed $4.5 million for DEC to *"…complete air indoor quality testing for Polychlorinated Biphenyls (PCBs) in public schools and approved and recognized independent schools that were constructed or renovated before 1980."*
- VDH derived Screening Levels, School Action Levels (SALs) and Immediate Action Levels (IALs) to prioritize the need for action when PCBs are detected
  - PCB levels in the indoor air of schools should be kept as low as possible
  - SALs indicate when schools need to identify and abate potential sources of PCBs inside their buildings
  - IALs indicate the need for immediate, emergency corrective actions to reduce exposure. In order of priority, these actions are:
    - Eliminating the use of rooms where samples exceed the IAL;
    - Limiting the amount of time the space is used; and then
    - Deploying mitigation measures to reduce PCB concentrations in indoor air.

Current Status: Indoor Air Testing

- Testing began in June 2022
- Test results have been received for the following six schools: Cavendish, Cabot, Oak Grove (Brattleboro), Bethel, Alburgh, and White River Valley School (Royalton Campus)
  - PCB concentrations in the Oak Grove and Cabot schools exceeded either the School Action Level (SAL) or the Immediate Action Level (IAL) and therefore require prompt attention
- Samples have been collected and results expected back shortly for: Brownington Central, Soar Learning Center (St Albans), Richford Elementary, Early Essential Education (Burlington), and Barton Graded School

Approach: Mitigation

- Mitigation measures are immediate steps to reduce or offset known negative effects. Common measures for mitigating PCB levels in indoor air include:
  - Increasing ventilation
  - Providing or increasing air filtration
- Mitigation is typically coupled with additional investigation and materials testing to inform permanent corrective actions
  - Important because often source(s) of the PCBs are not immediately evident
  - Access to funding is essential to responding quickly to exceedances of established action levels
  - Investigation and testing for most school anticipated to cost between $30-75k

Approach: Mitigation

- Act 178 (2022) provides the Emergency Board with the authority to *"…in the event of a significant health threat based on the concentration and location of PCBs in schools… to transfer monies in an amount not to exceed $2,500,000… for purposes of remediation, removal, or other required responses to the presence of PCBs in schools."*
- Authorization is being sought (today) to utilize this funding for:
  - State-led purchasing of key supplies used to immediately mitigate PCB concentrations
    - Will avoid supply chains delays with waiting until need is identified on a site-specific basis
  - Providing 80/20 cost-share to schools to conduct additional investigation and required materials testing

Approach: Remediation

- Remediation measures are intended to permanently address identified sources of PCB contamination. Common measures for remediating PCB levels in indoor air include:
  - Upgrading air handling/ventilation systems
  - Isolating/encapsulating suspected or known PCB source(s)
  - Removing and properly disposing of PCB-containing building materials
- Act 178 (2022) reserves $32 million *"…within the Education Fund for purposes of funding the investigation, testing, assessment, remediation, and removal of polychlorinated biphenyls (PCBs) in schools."*
  - AOE, ANR and VDH staff are drafting a plan for the General Assembly that will recommend how to disburse these funds, due on or before January 15, 2023.

Next Steps

- Continue with testing efforts
  - DEC anticipates testing 30-40 schools per quarter through June 30, 2025
- Work with schools with results above action levels to develop remediation plans, consistent with I-Rule standards
- Prepare recommendations for legislative review/action on utilization of $32 million PCB reserve for remediation
- Receive E-Board authorization to access $2.5 million to fund the following supports for schools where samples have been collected that exceed VDH's action levels:
  - State-led purchasing of key supplies used to immediately mitigate PCB concentrations; and,
  - Providing cost-share to schools to conduct additional investigation and required materials testing.

Proposed Motion

Motion is made, pursuant to Act 178 of 2022, Section 3(b) and 32 VSA Sec. 133, to transfer $2.5 million from the adjusted education payment appropriation of Sec. B.505 of Act 185 of the 2022 session. This transfer is to the Agency of Education to establish a new appropriation line item for the purposes of supporting immediate action to reduce PCB exposure in school locations where established action levels are exceeded and therefore present a significant health threat, limited to pre-purchasing and deploying emergency mitigation supplies and providing cost share to conduct additional investigation and required materials testing to inform permanent remediation. Expenditures from this appropriation shall be made consistent with recommendations from the Agency of Natural Resources and the Vermont Department of Health. The Agency of Natural Resources, Vermont Department of Health and Agency of Education shall include an update on the status of expenditures from this appropriation in the disbursement plan required by Act 178 of 2022, Section 3(a).

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Department for Children and Families
Economic Services Division
280 State Drive
Waterbury, VT 05671-1020

Agency of Human Services

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[toll free] 800-479-6151

Memorandum

To: **Emergency Board Members**
From: **Dr. Harry Chen, Interim Commissioner, Department for Children and Families**
Date: **October 19, 2022**
Re: **FY23 LIHEAP Benefit Need**

The memo is in response to the recent rise in heating fuel costs and the negative impact on the amount of heating fuel Low Income Home Energy Program (LIHEAP) beneficiaries will be able to purchase with their FY23 benefit.

Background

LIHEAP helps keep approximately 20,000 households safe and healthy through assistance with energy costs. The benefit amount is based on the federal funding block grant, number of beneficiaries, and cost of fuel (or home energy source).

In State Fiscal Year 2022, Vermont received an extraordinary amount of LIHEAP funding through a one-time American Rescue Plan Act (ARPA) block grant of $26.6 million on top of $21.8 million annual funding. The funding increase allowed ESD to offer an unprecedented average benefit of nearly $1,900 (approx. 520 gallons) per household for households that heat with oil, propane, or kerosene. In FY21 the average benefit was over $1,000 (approx. 491 gallons).

For households that heat with wood or pellets, ESD typically provides a benefit in the fall. The benefit for the fall of 2022 was moved to the spring of 2022 to help households purchase wood earlier in the season when it is less expensive. By moving the benefit to the spring, households were able to purchase more wood to heat their homes. A fall wood benefit will only be provided to households in 2022 who were newly eligible and did not receive the spring wood benefit.

The one-time ARPA funding was successfully liquidated by the September 30, 2022 deadline. To meet the deadline, ESD provided an early season benefit to households that heat with oil or kerosene, utilizing unspent LIHEAP ARPA funds. ESD was able to provide a $625 benefit, enough to fill a tank, to approximately 5,900 households. The benefit was provided to households at or less than 128% of the federal poverty limit.

Proposal

DCF requests $5.8 million of state funds to protect vulnerable Vermonters this winter. This would be a total budget of $35,066,942 for SFY23 to serve 20,000 households.

The federal Consolidated Appropriations Act is expected to provide an additional $5.7 million to Vermont in LIHEAP funding. The $5.7 million is in addition to Vermont's regular federal allocation and DCF is waiting on confirmation from the Administration for Children and Families on the allocation timeline. Without this additional federal funding, DCF would be requesting over $11 million to support households.

Based on a volatile heating fuel prices and projections provided by the Vermont Fuel Dealers Association, fuel prices are expected to average $4.81 per gallon in the coming winter. The average benefit in SFY23 with the LIHEAP base funding will be $744 or 175 gallons. Depending on fuel type, this benefit will barely fill a household's tank one time or not meet the minimum delivery requirements. Compared to pre-pandemic benefits, households received $715 to purchase approximately 278 gallons in SYF19 when fuel prices were $2.57 per gallon.

$4.8 million of the request will be utilized to enhance the LIHEAP program to cover all the needs of low-income households during the fuel season. For every $1M the average benefit increases by $58. $4.3 million of the additional state funds will provide households an average benefit of 275 gallons ($1,324). $500,000 in requested funding will help Vermonters with heating repairs and replacements during emergencies through the Emergency Heating System Grant Program, for a total of $1.25 million in the program.

Additional money is also needed to support the crisis fuel program run by the community action agencies. In FY22, $2M in crisis fuel benefits were provided to Vermont households. With the increased cost of heating fuel, DCF proposes an additional $1 million, for a total of $3 million in funding for the crisis fuel program.

Proposed Motion

Pursuant to 32 VSA Sec. 133(a), $5,800,000 in General Fund appropriated to the Agency of Human Services' Secretary's Office Global Commitment appropriation shall be reduced and transferred to the Department for Children and Families' Home Heating Fuel Assistance and LIHEAP appropriation in fiscal year 2023 to be used to meet expected heating needs. These General Funds shall be re-appropriated to the Agency of Human Services' Secretary's Office Global Commitment appropriation in the fiscal year 2023 Budget Adjustment Act in the amount of $5,800,000.

LIHEAP Funding & Benefit Stats Compilation

14-Oct-22

SFY	LIHEAP Total	LIHEAP Carry-Over (1)	State Funds	TOTAL FUNDS		Fuel Liability Households	Full Season Fuel Liability Avg. Benefit O/P/K	Nov-Apr Avg cost petro/gal (2)	Purchase Power Gallons / %age (3)	SFY
2023	$26,700,000	$1,000,000	$7,366,942	$35,066,942	Households >128% FPL	14,000	$1,324	$4.81	275/36%	**2023**
**with additional 5.7m federal funds and 4.3m in state funds*					Households 128% FPL and below	6,000	$1,949	$4.81	405/53%	
							**this includes a Sept 2022 $625 payment per household*			
2022	$47,361,943	$2,000,000	$3,066,942	$52,428,885		18,728	$1,893	$3.67	516/68%	**2022**
							**this includes a late season $325 payment per household*			
2021	$15,746,232	$7,073,509	$3,066,942	$25,886,683		18,015	$1,096	$2.24	489/64%	**2021**
		**$5m in CARES money included in carry-over numbers*								
2020	$18,257,418	$1,467,240	$3,066,942	$22,791,600		18,725	$798	$2.60	307/ 40%	**2020**
2019	$17,546,576	$945,866	$2,899,704	$21,392,146		19,768	$715	$2.57	278/ 36%	**2019**
2018	$16,120,387	$3,706,712	$2,967,984	$22,795,083		20,526	$849	$2.65	320 / 42%	**2018**
2017	$16,181,020	3,646,376	3,837,000	23,664,396		21,286	$831	$2.16	385 / 50%	**2017**
2016	$14,664,644	$1,939,626	$2,857,970	$19,462,240		22,618	$699	$2.11	331 / 43%	**2016**
2015	$18,965,161	$2,074,954	$5,000,000	$26,040,115		25,147	$783	$2.87	274 / 36%	**2015**
2014	$19,140,144	$591,060	$8,100,000	$27,831,204		26,625	$792	$3.62	219 / 29%	**2014**
2013	$18,359,509	$1,583,684	$9,700,000	$29,643,193	**(4)**	27,776	$898	$3.85	233 / 31%	**2013**
2012	$19,529,156	$4,005,000	$6,100,000	$29,634,156		27,100	$900	$3.61	249 / 33%	**2012**
2011	$27,557,850	$6,687,000	$0	$34,244,850	**(5)**	26,546	$866	$3.31	262 / 34%	**2011**
2010	$27,341,881	$5,447,000	$0	$32,788,881		20,399	$1,064	$2.68	397 / 52%	**2010**
2009	$38,642,377	$363,000	$0	$39,005,377	**(6)**	19,227	$1,718	$2.62	656 / 86%	**2009**
2008	$16,883,723	$1,780,000	$5,898,032	$24,561,755	**(7)**	15,369	$1,362	$3.24	420 / 55%	**2008**

(1) The carry-over amounts are as of June 30 State Fiscal Year 2020 close-out plus pending fuel dealer refunds
(2) 2021 Heating Season "Blended price" for oil/propane/kerosene including MOR/DOR discounts
(3) Assumes average winter consumption of 764 gallons for a delivered petro fuel (oil/propane/kerosene)
(4) Includes $130,000+ in non-block grant LIHEAP funds
(5) Income maximum increased from 156% federal poverty level gross per month to 185% fpl, and resource test eliminated
(6) In July 2008 - heating oil approached $5.00/gallon
(7) State Funds Contributed Prior to SFY 2008: SFY2007 $590,769; SFY2006 $10,200,000; and SFY 2005 $1,000,000
No state funds were contributed to LIHEAP prior to FFY2005

* LIHEAP Totals for 2016 - 2021 are total federal block grant awarded during the respective fiscal years less the 15% transfer to Weatherization
** 2016 LIHEAP block grant award is less $2.8M transfer to Wx *and* less 10% of block grant, which was carried over into 2017. Projected 2017