

Trillion BTU Compliance Requirements

Projects financed through the Trillion BTU loan program must meet several compliance requirements:

- **Loan Approval** – Loans are approved by the Saint Paul Port Authority Credit Committee, which meets on the 4th Tuesday of each month
- **Prevailing Wage** – Workers must be paid local prevailing wages, and contractors must report certified payroll records.
- **Historic Preservation Review (SHPO)** – Projects require approval from the State Historic Preservation Office to ensure no adverse impact on historic properties.
- **Environmental Review** – Projects must meet environmental standards before funding is approved.

What is SHPO?

SHPO stands for **State Historic Preservation Office**. Each state has one, and its role is to protect historic properties.

Why is SHPO review required?

The Trillion BTU loan fund started with federal money. Under **Section 106 of the National Historic Preservation Act**, any project using federal funds must be reviewed for potential impacts on historic properties.

How long does SHPO review take?

Reviews can take **2 weeks to 45–60 business days**, depending on project complexity.

What does SHPO evaluate?

- Whether the project could impact historic sites, buildings, or objects (usually 50+ years old, but sometimes newer if especially significant).
- Potential archaeological impacts.

What happens if SHPO finds something?

- If archaeological materials are found, additional study (such as a Phase II excavation) may be required.
- Findings do not prevent private property owners from using their land, but **federal funds cannot be released until SHPO review is complete.**

What does the borrower need to provide?

- Photos of the property
- Project details or design plans
- Energy study and project description (submitted by the Saint Paul Port Authority)
- SHPO may also request an archaeological report with land history, soil conditions, and maps. In some cases, a **Phase I survey** must be completed before work moves forward.

Can the borrower contact SHPO directly?

Yes. Property owners can submit questions or documents directly to SHPO.

What is Prevailing Wage?

Prevailing wage is the **minimum hourly wage plus benefits** required by law for workers, typically laborers and mechanics. It ensures fair pay based on local standards for similar work.

What rates apply?

Both **federal and state prevailing wage rates** apply, depending on county and job type. Federal rates can be found at **SAM.gov**.

What reporting is required?

- Contractors must:
 - Report and certify wages paid to employees working on the project.
 - Submit pay statements.
 - Complete and sign a compliance form.

What if the contractor refuses to report?

If prevailing wage requirements are not met, **funding will not be available.**

Tips for borrowers

- Inform contractors early that prevailing wage compliance is required.
- Ask contractors to include prevailing wage costs in their bids.