

Water Pollution Control State Revolving Fund Base and Supplemental Intended Use Plan and Project Priority List

State Fiscal Year 2027

Updated 7/6/2026

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TABLE OF CONTENTS

I.	Introduction	1
II.	List of Projects	1
III.	Order of Funding	2
IV.	Uses of the Water Pollution Control State Revolving Fund	2
V.	Goals and Objectives	8
VI.	Information On the Activities To Be Supported.....	9
VII.	Assurances and Specific Proposals.....	9
VIII.	Criteria and Method For Distribution Of Funds	13
IX.	Extended Financing.....	17
X.	Public Comment, Amending IUP, State Financial Commitment	17
 ATTACHMENT I: WPCSRF Project Priority List SFY27		19
ATTACHMENT II: Base/Supplemental Program Funding Status for the Montana WPCSRF Program		25
ATTACHMENT III: Base/Supplemental Cap Grant Fundable Projects		26
ATTACHMENT IV: WPCSRF Priority List Ranking Criteria		27
 TABLE 1: Technical Assistance Funds Available and Utilized from Base and Supplemental Grants.....		5
TABLE 2: Base Amounts Available to Transfer Between State Revolving Fund Programs.....		7
TABLE 2A: Supplemental Amounts Available to Transfer Between State Revolving Fund Programs.....		8
TABLE 3: Proposed Equivalency Projects FFY26.....		13

MONTANA
WATER POLLUTION CONTROL STATE REVOLVING FUND
SFY27 INTENDED USE PLAN

I. INTRODUCTION

The primary purpose of the Intended Use Plan (IUP) is to identify the proposed annual intended uses of the federal and state funds available to the Montana Water Pollution Control State Revolving Fund (WPCSRF) program. Federal dollars appropriated in one federal fiscal year (FFY) are available for use in the next year (i.e., the FFY26 appropriation is available in FFY27). On November 15, 2021, the Infrastructure Investment and Jobs Act (IIJA) was signed into law. The IIJA reauthorized the CWSRF program for FFYs 2022 through 2026 with funding levels set through the annual appropriations process. With the enactment of IIJA, in FFY26 Montana's WPCSRF program will receive a supplemental capitalization grant to go along with the base grant issued under the FFY26 Consolidated Appropriations Act. Both grants are discussed in this document and will be referred to as either the "base" capitalization grant or the "supplemental" capitalization grant. Montana's WPCSRF federal base capitalization grant for FFY26 is \$3,507,000. Montana's WPCSRF federal supplemental capitalization grant for FFY26 is \$12,094,000. For the base and supplemental cap grants, Montana provides the required 20% matching funds by issuing state general obligation (GO) bonds and occasionally using cash. The draft IUP will be reviewed by the public and a hearing will be held to allow an opportunity to publicly comment on the draft IUP.

The IUP includes the following:

- I. Introduction
- II. List of Projects
- III. Order of Funding
- IV. Uses of the Revolving Fund
- V. Goals and Objectives
- VI. Activities to be Supported
- VII. Assurances and Specific Proposals
- VIII. Criteria and Method for Distribution of Funds
- IX. Extended Financing
- X. Public Comment, Amending IUP, State Commitment of Funds

II. LIST OF PROJECTS

The WPCSRF program was developed to provide low interest loans for the planning, design, and construction (or implementation) of water pollution control projects. A complete list of all eligible projects that are considered possible candidates for assistance from the WPCSRF program (with either the base or supplemental cap grant funds) can be found in **Attachment I**, the Project Priority List (PPL). A discussion of the ranking criteria used to develop the PPL is included in **Attachment IV**. In addition to the PPL, this IUP also contains a list of new projects expected to receive WPCSRF funds in the next State Fiscal Year 2027 (SFY27) which runs from

July 1, 2026, through June 30, 2027. These projects are listed in **Attachment III** for the base and supplemental allotments.

A binding commitment will be in the form of a letter to the borrower describing the project and indicating the amount of the loan and the time at which the funds will be made available. The binding commitment obligates the State to make the loan and the borrower to receive the proceeds and repay the loan, as per specified terms.

III. ORDER OF FUNDING

The following factors will be considered when the project is ranked by the program:

1. Need for and benefit to be derived from the project as determined by the annual project priority list. The criteria considered for ranking projects includes four major categories: 1) Water Quality and Public Health Impacts, 2) Water Quality Improvement, 3) Activity Specific Criteria, and 4) Readiness to Proceed (see **Attachment IV**). The ranking criteria integrates both point source and nonpoint source projects. Additional points are given if the project is part of a DEQ compliance strategy or a Total Maximum Daily Load (TMDL) watershed restoration plan. Also, starting in SFY27, additional points are given if the project addresses emerging contaminants, qualifies as a “Green Project”, incorporates climate resilience, or addresses infrastructure security/cybersecurity. Lastly, projects that are just refinancing existing long-term debt are only awarded a total of 10 priority points and interim financing projects are limited to 25 total points per project so that more funds are directed toward new projects that provide direct benefit to water quality or human health.
2. Ability of the municipality or private person to finance the project, with and without loan assistance (See Section IX).
3. Amount of financial assistance available from the revolving fund and the cumulative amount of funds requested by other applicants.

IV. USES OF THE WATER POLLUTION CONTROL STATE REVOLVING FUND

The WPCSRF may be used to:

1. Provide low interest loans to municipalities for wastewater treatment systems, new interceptors, collectors, and appurtenances, infiltration/inflow correction, sewer system rehabilitation, correction of combined sewer overflows, and construction of new storm sewers and detention basins. The low interest loans can be made for up to 100 percent of the total project cost. Approximately \$829 million in loans (this does not include agricultural nonpoint source projects) have been made to communities in Montana. Each of these loans has had a total loan interest rate of 4% or less. Program interest rates will be evaluated and set annually. The interest rate for WPCSRF loans for SFY27 will be 2.50%. The maximum term for these loans can be extended to 30 years or to the useful life of the project, whichever is less.

2. Provide interim financing during construction for eligible projects. The interim financing rate for SFY27 will be 1.75%. The maximum term of the interim loan is the shorter of the construction period or three years.
3. Refinance qualifying debt obligations for water pollution control facilities if the debt was incurred, and construction initiated after March 7, 1985. Approximately \$11.5 million of debt has been refinanced through this program in the past. However, due to high demand for WPCSRF funds during the period covered by this IUP, it is not anticipated that WPCSRF funds will be provided for refinancing in SFY27.
4. Guarantee or purchase insurance for local debt obligations. As of May 2026, no loans have been made for this purpose.
5. Provide a source of revenue or security for general obligation bonds, the proceeds of which are deposited in the revolving fund. There is a 0.25% loan loss reserve surcharge included as part of the 2.50% interest rate. The purpose of the surcharge is to pay principal and interest on state G.O. Bonds if the Debt Service Account is insufficient to make payments. The excess over the required reserve has periodically been transferred to the principal account to make loans. In SFY27, it is anticipated that approximately \$200,000 in excess loan loss reserve funds will be transferred to the principal account and would be counted as an additional state match for future capitalization grants.
6. Provide loan guarantees for similar revolving funds established by municipalities. As of May 2026, no loans have been made for this purpose.
7. Finance non-point source pollution control (Section 319) implementation projects or programs. As of May 2026, approximately \$100.8 million has been loaned for these types of projects. This includes irrigation, landfill, and stormwater projects.
8. Pay reasonable administrative costs of the WPCSRF program not to exceed 4% (or the maximum amount allowed under the federal act) of all federal grants awarded to the fund. In addition to using WPCSRF funds for administration, each loan has a 0.25% administrative surcharge included in the 2.50% interest rate. These fees are not considered part of the loan principal. The reserve generated from this loan surcharge will be used for WPCSRF administration costs not covered by the EPA grants. Capitalization grants are approved by Congress every year and EPA is currently projecting WPCSRF funding for at least several more years. However, if needed, these administrative funds could be transferred to the principal account and used to make loans. In SFY27, it is anticipated that no administrative surcharge funds will be transferred to the principal account.

The special administrative fees collected through loan repayments can be broken down into two categories. If the fees are repaid from direct federal loans during the grant period (i.e., from capitalization grants that are still open as of May 2026 – see list below) the uses of these fee funds will be limited to either SRF program administration or transfers to the principal account, as indicated above. However, fees repaid from loans made from capitalization grants that have been closed or from recycled funds, may be used for other purposes if those uses are consistent with the federal Clean Water Act,

this Intended Use Plan, the Operating Agreement between DEQ and EPA, the Trust Indenture and DEQ and DNRC rules and laws governing the WPCSRF program.

Capitalization grants for FFY23 (base and supplemental), FFY24 (base and supplemental), and FFY25 (base and supplemental) are currently open. Projects drawing funds from these grants are:

Denton Lagoon	Drummond Lagoon
Fort Peak Spray Irrigation	Harrison Collection
Hobson Collection	Jordan Treatment Expansion
Kalispell Biosolids	Kalispell EQ Basin Fermenter
Kalispell Green Acres Wastewater	Lockwood Emerging Contaminants
Missoula Garden City Compost	Superior Wastewater
Troy Wastewater	West Yellowstone WWTP
White Sulphur Springs	Whitehall Lift Station

The special administrative fee collected from these combined projects in SFY27 is expected to be approximately \$15,115. The total special administrative fees expected to be collected in SFY27 are approximately \$880,334. Therefore, approximately \$865,219 could be used for Clean Water Act-related purposes other than SRF administration and loans. Of the \$865,219 to be received in SFY27, it is anticipated that about \$534,919 will be available for SRF administration, and approximately \$330,300 will be used for Clean Water Act-related purposes, as indicated below.

The WPCSRF program is expecting to use up to \$15,000 of the special administrative fee funds for optimization assessments and advanced training of wastewater treatment operators at various wastewater treatment systems throughout Montana to help promote nutrient and ammonia reduction. This optimization assessment/training is a free service to Montana's wastewater treatment systems and their operators. Special administration fees (up to \$56,000 from SFY 27-29) are also expected to be used for partial funding of a wetland specialist to provide outreach, technical assistance and education for conservation and protection of natural wetlands. Approximately \$122,000 will be directed towards personal services and operating expenses for a wastewater technical assistance provider within DEQ to assist with optimization efforts, plant start-ups, O&M reviews, and operator training. Up to \$30,000 of these fee-based funds are anticipated to be used to fund water pollution control training costs for the Montana Water and Wastewater Operators Initiative (MW2OI), which provides specific education to water and wastewater operators in Montana. The WPCSRF program will contribute up to \$27,300 in SFY27 for the continued monitoring and testing of a constructed wetland pilot study to evaluate its use as a low-tech ammonia and nutrient reduction "technology" to help lagoons affordably reduce these effluent parameters. An additional \$30,000 will be provided in SFY27 to expand the pilot wetland study to assess phosphorus reduction and its bioavailability to algae. Due to limitations with access to federal PPG funding in FFY26, approximately \$50,000 of special administration fees will be used to pay salaries and operating costs of WPCSRF technical staff for technical assistance to Montana communities for operation and maintenance inspections, advanced operations training, and support. The total annual cost of the training, the wetland

specialist, MW2OI, technical assistance providers, and the nutrient pilot study, including indirect costs, is expected to be approximately \$330,300.

Beyond these measures, IJA funding allows the CWSRF program to use up to 2% of each FFY22 through FFY26 cap grant (base and supplemental) to provide technical assistance funds to enhance or build programs that proactively identify, reach out to, and help rural, small, and tribal publicly owned treatment works with a focus towards disadvantaged communities. Guidance states that the programs should be designed to help disadvantaged communities identify needs, develop projects, apply for funding, design and implement projects, and create training and career pathways. Funds can be directed toward the hiring of staff, nonprofit organizations, or State, regional, interstate, or municipal entities to provide technical assistance to the communities as characterized above. Funds available and funds utilized for technical assistance from the base and supplemental cap grants are shown in Table 1. The WPCSRF programs plans to use these funds towards personal services and operating expenses for a wastewater technical assistance provider within DEQ to assist small, rural, and tribal communities with technical assistance geared towards the optimization of their treatment system and to identify facility needs. In SFY27 approximately \$122,000 will be used from the FFY26 Base cap grant but will count towards reserved TA Allowance amount from the FFY22 IJA grants.

TABLE 1 – TECHNICAL ASSISTANCE FUNDS AVAILABLE AND UTILIZED FROM BASE AND SUPPLEMENTAL GRANTS

Grant	Amount	Reserved TA Allowance (2%)	Reserved TA Allowance Utilized (SFY utilized)	Grant Period
FFY22 Base	\$5,681,000	\$113,620	\$113,620 (SFY26)	10/1/2021-06/30/2026
FFY22 IJA	\$8,738,000	\$174,760	\$8,380 (SFY26) \$122,000 (SFY27)	07/01/2022-06/30/2026
FFY23 Base	\$3,683,000	\$73,660	\$0	8/18/2023-8/17/2028
FFY23 IJA	\$10,233,000	\$204,660	\$0	8/16/2023-8/15/2030
FFY24 Base	\$4,008,000	\$80,160	\$0	8/1/2024-7/31/2029
FFY24 IJA	\$11,164,000	\$223,280	\$0	8/1/2024-7/31/2029
FFY25 Base	\$7,788,000	\$155,760	\$0	7/1/2025-6/30/2032
FFY25 IJA	\$12,094,000	\$241,880	\$0	7/1/2025-6/30/2032

Grant	Amount	Reserved TA Allowance (2%)	Reserved TA Allowance Utilized (SFY utilized)	Grant Period
FFY26 Base	\$3,507,000	\$70,140		
FFY26 IJA	\$12,094,000	\$241,880		
Total Reserved Amount Available: (FFY22 - FFY25)		\$1,579,800		
Total reserved Amount Utilized:			\$244,000	
Remaining TA Balance:				\$1,335,800

A determination of which projects are to be selected from the PPL, the amount of assistance, and the financing terms and conditions will be made by the Montana Department of Environmental Quality (DEQ) and the Montana Department of Natural Resources and Conservation (DNRC). See Section VIII below for a discussion on the distribution of funds.

The entire state match for the current federal grant will be deposited into the SRF fund once the federal capitalization grants are received and disbursed on eligible activities. Administrative draws for all base cap grants and for the FFY26 supplemental cap grant will be at the conventional 83.33% federal and 16.67% state match. BIL supplemental funds for FFY22 and FFY23 will use a cash draw ratio of 90.91% federal and 9.09% state match. During SFY27, the State of Montana will continue to issue state match bonds and sweep excess SRF fees and deposit both sources of match into the SRF to be used for projects. These funds will be used to match future federal grants. Furthermore, we understand that there is flexibility which allows loan fund draws to be taken at 100% state match followed by 100% federal. That approach will be applied on a case-by-case basis.

At the Governor's discretion, the state may transfer up to 33% of its Drinking Water SRF base and supplemental cap grants, on a cumulative basis, to the WPCSRF or an equal amount from the WPCSRF to the Drinking Water SRF. This transfer authority was effective through fiscal year 2001. One-year extensions of this transfer authority were granted through the Appropriation Bills for federal fiscal years 2002 - 2026. In addition to transferring grant funds, states can also transfer state match, investment earnings, or principal and interest repayments between SRF programs.

Table 2 itemizes the amount of base funds available for transfer and that have been transferred between the WPCSRF and DWSRF programs to date based on the base SRF capitalization grants. It is not expected that any funds will be transferred from the base DWSRF to the base WPCSRF during the next 12 months. Table 2A itemizes the amount of supplemental funds that can be transferred between the WPCSRF and DWSRF program within the corresponding supplemental SRF capitalization grants.

TABLE 2 - AMOUNTS AVAILABLE TO TRANSFER BETWEEN STATE REVOLVING FUND BASE PROGRAMS

Year	Transaction Description	Banked Transfer Ceiling	Transferred from WPCSRF to DWSRF	Transferred from DWSRF to WPCSRF	DWSRF Funds Available for Transfer	WPCSRF Funds Available for Transfer
1997	DW Grant Award	4,892,646	---	---	4,892,646	4,892,646
1998	DW Grant Award	7,242,675	---	---	7,242,675	7,242,675
1999	DW Grant Award	9,705,729	---	---	9,705,729	9,705,729
2000	DW Grant Award	12,265,539	---	---	12,265,539	12,265,539
2000	Transfer (2nd Rnd \$)	12,265,539	4,750,328	-0-	17,015,867	7,515,211
2001	DW Grant Award	14,835,942	---	---	19,586,270	10,085,614
2001	Transfer (2nd Rnd \$)	14,835,942	4,032,158	-0-	23,618,428	6,053,456
2002	DW Grant Award	17,493,267	---	---	26,275,753	8,710,781
2004	DW Grant Award	20,134,608	---	---	28,917,094	11,352,122
2004	Transfer (2nd Rnd \$)	20,134,608	-0-	2,559,810	26,357,284	13,911,932
2005	Transfer (2nd Rnd \$)	20,134,608	-0-	2,570,403	23,786,881	16,482,335
2005	Transfer (2nd Rnd \$)	20,134,608	-0-	1,000,000	22,786,881	17,482,335
2005	DW Grant Awards	25,608,821	---	---	28,261,094	22,956,548
2005	Transfer (1st Rnd \$)		-0-	5,000,000	23,261,094	27,956,548
2006	DW Grant Award	28,324,490	-	-	25,976,763	30,672,217
2007	DW Grant Award	31,040,060	-	-	28,692,333	33,387,787
2008	Transfer (2nd Rnd \$)		2,500,000		31,192,333	30,887,787
2008	DW Grant Award	33,728,240			33,880,513	33,575,967
2009	Transfer (1st Rnd \$)			5,000,000	28,880,513	38,575,967
2009	DW Grant Award	36,416,420			31,568,693	41,264,147
2009	DW ARRA Grant Award	42,851,420			38,003,693	47,699,147
2010	DW Grant Award	47,330,510			42,482,783	52,178,237
2011	Transfer (1st Rnd \$)			3,000,000	39,482,783	55,178,237
2011	DW Grant Award	50,438,450			42,590,723	58,286,177
2012	DW Grant Award	53,400,200			45,552,473	61,247,927
2013	DW Grant Award	56,179,130			48,331,403	64,026,857
2014	DW Grant Award	59,097,980			51,250,253	66,945,707
2015	DW Grant Award	61,997,690			54,149,963	69,845,417
2016	DW Grant Award	64,740,650			56,892,923	72,588,377
2017	DW Grant Award	67,460,180			59,612,453	75,307,907
2018	DW Grant Award	71,208,650			63,360,923	79,056,377
2019	Transfer (2nd Rnd \$)			3,000,000	60,360,923	82,056,377
2019	DW Grant Award	74,839,970			63,992,243	85,687,697
2020	DW Grant Award	78,473,600			67,625,873	89,321,327
2021	DW Grant Award	82,103,930			71,256,203	92,951,657
2022	DW Grant Award	84,416,570			73,568,843	95,264,297
2023	DW Grant Award	86,046,110			75,198,383	96,893,837
2024	DW Grant Award	87,584,240			76,736,513	98,431,967
2025	DW Grant Award	91,132,743	---	---	80,285,003	101,980,457
2026	DW Grant Award	92,400,603			81,552,863	103,248,317
Total			\$11,282,486	\$22,130,213		

TABLE 2A - AMOUNTS AVAILABLE TO TRANSFER BETWEEN STATE REVOLVING FUND SUPPLEMENTAL PROGRAMS

Year	Transaction Description	Banked Transfer Ceiling	Transferred from WPCSRF to DWSRF	Transferred from DWSRF to WPCSRF	DWSRF Funds Available for Transfer	WPCSRF Funds Available for Transfer
2022	DW Grant Award	5,937,360	---	---	5,937,360	5,937,360
2023	DW Grant Award	12,885,510			12,885,510	12,885,510
2024	DW Grant Award	20,470,560			20,470,560	20,470,560
2025	DW Grant Award	28,686,900	---	---	28,686,900	28,686,900
2026	DW Grant Award	36,899,940			36,899,940	36,899,940
Total			\$0	\$0		

V. GOALS AND OBJECTIVES

Long-Term Goal and Objectives

The long-term goal of the WPCSRF is to maintain, restore and enhance the chemical, physical and biological integrity of the State's waters for the benefit of the overall environment and the protection of public health.

Objectives:

1. Provide affordable financial assistance for eligible applicants concurrent with the objective of maintaining a long-term, self-sustaining State Revolving Fund Program.
2. Fulfill the requirements of pertinent federal, state, and local laws and regulations governing water pollution control activities, while providing the state and local project sponsors with maximum flexibility and decision-making authority regarding such activities.
3. Direct additional subsidy (AS) to small, rural, tribal, and disadvantaged communities with eligible clean water projects.
4. Work with the DEQ 319 program and explore ways to fund more NPS projects.

Short-Term Goal and Objectives:

The short-term goals of the WPCSRF are to continue to preserve and improve the quality of the state's waters (surface and groundwater), meet the water pollution control needs of the state, and eliminate any public health hazards related to the discharge of inadequately treated wastewater or other pollutants. As an estimated measure of the environmental benefits attained through funding of water pollution control projects, the WPCSRF program will continue to enter into the EPA database the environmental benefits information for each project during SFY27.

Objectives:

1. Maintain and promote the WPCSRF program, which provides low interest financing (up to 100 percent loans) for water pollution control projects; provide loans for approximately 42 new projects in SFY27 with funding from the FFY26 base and supplemental capitalization grants.
2. Ensure the technical integrity of WPCSRF projects through the review of planning documents, design plans and specifications, construction activities and development of a sound operation and maintenance program.
3. Ensure compliance with all pertinent federal, state, and local water pollution control laws and regulations.
4. Obtain optimum turnover of the funds for the State in the shortest reasonable time; fund eligible NPS projects.
5. Simplify the administrative and regulatory requirements of the program, without sacrificing project quality, to make the financial assistance readily accessible; coordinate on a regular basis with DNRC and financial consultants to consider ways to improve the program and optimize use of resources.
6. Apply for all available appropriated federal funds, for which a need has been identified, contingent upon federal legislation.

VI. INFORMATION ON THE ACTIVITIES TO BE SUPPORTED

The primary type of assistance to be provided by the WPCSRF is expected to be loans. On a more limited basis, the State may provide funds for refinancing existing debt, guarantee or buy insurance for local debt obligations, or leverage bond issues, although none of these activities are expected during the period covered by this IUP.

These types of assistance will be provided to local communities, sanitary sewer districts, counties, eligible private persons, or other sub-governmental units recognized under Montana statutes for the construction of publicly owned wastewater treatment facilities or non-point source water pollution control projects.

The State plans on reserving 4% from both the base and supplemental federal capitalization grant (total \$624,040) for administrative expenses in SFY27.

VII. ASSURANCES AND SPECIFIC PROPOSALS

The State will ensure compliance with the following sections of the law in the State/EPA Operating Agreement, of which this document is a part. In addition, the State has developed specific proposals for implementation of those assurances in the rules promulgated by the Montana Department of Environmental Quality (DEQ) and the Montana Department of Natural Resources and Conservation (DNRC).

- Section 602(a) - Environmental Reviews - The State of Montana certifies that it will conduct environmental reviews of each Title II project receiving assistance from the WPCSRF. Montana will follow EPA approved, NEPA-like procedures in conjunction with such environmental reviews.
- Section 602(b)(3) - Binding Commitments - The State of Montana certifies that it will enter into binding commitments equal to at least 120% of each quarterly grant payment within one year after receipt (on a cumulative basis).
- Section 602(b) (4) - Timely Expenditures - The State of Montana certifies that it will expend all funds in the WPCSRF in an expeditious and timely manner.
- Section 602(b)(6) - Compliance with Title II Requirements - The State of Montana certifies that the applicable Title II requirements listed under this section will be satisfied in the same manner as projects constructed under Title II of the Clean Water Act.
- Report Use of Funds Under Title VI of the Clean Water Act (CWA) - The State of Montana agrees to report all uses of the funds no less than quarterly, as the Environmental Protection Agency specifies into the SRF Data System. This reporting shall include, but not be limited to, data with respect to compliance with the Green Project Reserve and additional subsidization requirements as specified in P.L. 117-328.

The requirements for Clean Water SRF programs, including Montana's WPCSRF program, included in the Federal Water Resources Reform and Development Act (WRRDA) which was passed by Congress in 2014 remain in effect for both the base and supplemental FFY26 capitalization grants. A summary of the requirements and a brief description of how the WPCSRF program will address them are included below.

Cost and Effectiveness: The SRF recipient must certify that it has studied and evaluated the cost and effectiveness of the proposed project and, to the maximum extent possible, has selected the alternative that maximizes the potential for water conservation and energy efficiency. With a continuing trend for the development of wastewater facilities that are more sustainable and resilient, it has been our experience that most, if not all, engineering consultants consider energy usage and practical opportunities for water conservation (which are limited in water pollution control projects) in the alternative analysis within Preliminary Engineering Reports. It is through the development of these planning documents that we feel the cost and effectiveness requirement is adequately addressed. The WPCSRF program requires a certification statement from the recipient in the final stages of the planning phase of a project that cost and effectiveness requirements have been met.

Engineering Procurement: The State must either certify that the laws required for procurement of engineering services are equivalent to the federal requirements, which stipulates a qualifications-based selection process, or adopt the federal procurement requirements (40 U.S.C. 1101). Although Montana's procurement laws are consistent or equivalent to the federal requirements in most respects, DEQ's legal counsel felt that the differences between the state and federal laws were significant enough that the

certification of equivalence could not be made. Therefore, the WPCSRF program will use the federal procurement requirements for architect and engineer procurement rather than try to change the state law.

Fiscal Sustainability Plans: A loan recipient must certify that it has developed and implemented a fiscal sustainability plan that includes: an inventory of critical assets; an evaluation of the condition and performance of the assets; evaluation and implementation of water and energy conservation efforts; and a plan for maintaining, repairing and replacement of treatment works. Some states, including Montana, do not give direct loans to communities. Rather, they buy the bonds that are issued by communities. The wording in the WRRDA pertaining to this requirement specifically refers to loans and, therefore, unless and until the wording in the law is modified, EPA has indicated that this requirement does not apply to Montana's WPCSRF program.

Extended loan terms: Loan terms can be extended to 30 years or to the useful life of the project, whichever is less. Affordability does not need to be a factor in extending loan terms. As indicated in this IUP, Montana WPCSRF program has removed the requirement that extended loan terms only apply to disadvantaged communities. However, the loan term cannot exceed the useful life of the project. For project components that may have a shorter life than the loan, replacement costs will be factored into the operating budget.

Disadvantaged Communities/Affordability: A key priority of the Infrastructure Investment and Jobs Act (IIJA) is to ensure that small (population < 10,000) or disadvantaged communities benefit equitably from this investment in water infrastructure. Disadvantaged communities can include low-income people, communities of color, or areas that experience, or are at risk of experiencing, disproportionately high exposure to pollutants. Both the base and supplemental capitalization grants mandate that a portion of the funds be provided as additional subsidy (AS) to communities that meet the state's affordability criteria. The Clean Water Act specifically requires states to develop affordability criteria for the distribution of AS based on income, unemployment data, and population trends. The criteria Montana uses for awarding AS (i.e., principal forgiveness loans), include unemployment rates, median household income, and population trends. The IIJA explicitly seeks to ensure that small or disadvantaged communities have access to funds to improve their wastewater infrastructure. To better ensure these communities receive AS, the criteria will also consider community size, and low- and moderate- income data. It is left up to each state as to how these criteria are incorporated into the evaluation of affordability. Please see discussion below for further details.

Build America/Buy America (BABA) Requirements: Effective May 14, 2022, all WPCSRF projects funded fully or in part with base or supplemental capitalization grant funds must comply with the Build America, Buy America Act. This Act requires that all the iron, steel, manufactured products, and construction materials used in the project must be produced in the United States.

For iron and steel products and construction materials that are permanently incorporated in the project, all manufacturing processes, from the initial melting state

through the application of coatings must occur in the United States. This includes products made primarily of iron or steel such as lined or unlined pipes and fittings, manhole covers and other municipal castings, hydrants, tanks, flanges, pipe clamps and restraints, valves, structural steel, and reinforced precast concrete and construction materials made primarily of iron or steel such as wire, cables, rebar, framing, joists, decking, grating, railings, stairs, and fencing.

The term “manufactured product” means the manufactured product was manufactured in the United States, and the cost of the components of the manufactured product that are mined, produced, or manufactured in the United States is greater than 55 percent of the total cost of all components of the manufactured product. This includes (but is not limited to) pumps, motors, drives, mixers, motorized screens, controls and switches, membrane bioreactor systems, membrane filtration systems, clarifiers, disinfection systems, HVAC systems, and skids that contain multiple components.

For construction materials, all manufacturing processes for the construction material occurred in the United States. This includes an article, material, or supply that is or consists primarily of non-ferrous metals (construction materials made of ferrous metals are covered under iron and steel), plastic- and polymer-based products including PVC, composite building materials, and polymers used in fiber optic cables, glass including optic glass, lumber, and drywall.

Specification inserts and certification forms have been developed by the WPCSRF program and will be used to help communities meet this requirement.

American Iron and Steel Requirements: All iron and steel products (as defined by WRRDA) in any project funded fully, or in part, with SRF recycled funds must be produced in the USA. Iron and steel products are defined in WRRDA as: lined or unlined pipes and fittings, manhole covers and other municipal castings, hydrants, tanks, flanges, pipe clamps and restrains, valves, structural steel, reinforced precast concrete, and construction materials. The WPCSRF program has been implementing this requirement, as required by previous federal grants, for several years now. Specification inserts and certification forms have been developed by the WPCSRF program and will continue to be used to help communities meet this requirement.

Federal Davis Bacon wages and Disadvantaged Business Enterprises: These requirements have been in place for some time and will continue to be a requirement. Davis Bacon requirements apply to all SRF-funded projects and DBE requirements apply to only those projects funded with federal WPCSRF funds.

Additional Subsidization: Under IIJA CWSRF programs must provide additional subsidization (AS). The maximum amount of AS that a state program may award from the base cap grant amount is dependent on the national appropriation amount. Some AS is allowed in proportion to federal appropriations greater than \$1 billion. If the federal appropriation is less than \$1 billion, no AS is allowed. The awarding of AS must be based on affordability criteria or for projects that address water or energy efficiency goals; mitigate stormwater runoff; or encourage sustainable project planning, design and construction. Montana has chosen to primarily use the affordability criterion for

awarding AS but reserves the right to award AS to projects in the other categories if funds are available.

In FFY26 the total amount of AS (i.e., principal forgiveness) that the CWSRF must allocate for the base capitalization grant ranges from a minimum of 20% up to a maximum of 40% of that capitalization grant. The Montana WPCSRF program has historically awarded approximately 35% of its base cap grant as AS in any individual year. The total amount of principal forgiveness that the CWSRF must allocate under the FFY26 supplemental capitalization grant is fixed at 49% of that capitalization grant. This amount is mandated in the IJA.

The awarding of PF in the CWSRF program has been based on user rates per median household income, unemployment rates, and population trends. And starting in FFY22, as a means of ensuring that small (population <10,000) or disadvantaged communities are prioritized to receive AS, the affordability criteria began taking into consideration community size, and low- to moderate- income data. Please see discussion above on affordability requirements and Section VIII, Criteria and Method for Distribution of Funds.

VIII. CRITERIA AND METHOD FOR DISTRIBUTION OF FUNDS

Historically, WPCSRF funds were allocated on a first-come, first-served basis because the supply of funds exceeded the demand. This allowed for the funding of all the projects as they went into construction. However, due to annual federal requirements for principal forgiveness and green project reserve, it has become important to identify in each IUP the projects that will likely receive SRF funds to meet these programmatic requirements for the next fiscal year. **See Attachment III for a list of projects expected to receive WPCSRF funds in SFY27 from the base and supplemental capitalization grants.** The CWSRF program will target the projects listed in Table 3 as equivalency projects for the FFY26 base and supplemental cap grants. While this list exceeds the required equivalency dollar amount, once equivalency is met for both FFY26 cap grants the remaining projects will be treated as non-equivalency projects from the CWSRF perspective. Given that an exact percentage for AS is required from the supplemental grant, the CWSRF program intends to award principal forgiveness from that grant first.

Table 3. Proposed Equivalency Projects FFY26	
Project Name	Estimated WPCSRF Loan Amount
Alder Wastewater System Improvements	\$534,000
East Helena Phase 2 Engineering	\$3,592,000
Lakeside Phase 2 Engineering	\$3,581,000
Wolf Point Phase 3 Collection System	\$1,100,000
Harrison Lagoon and Lift Station Phase 2	\$713,000
Round Up WWTF Improvements	\$2,721,000
View Vista Collection System Project	\$910,000
Poplar Collection System Project	\$1,018,000
Columbus 12th Street Sewer Crossing	\$800,000

Table 3. Proposed Equivalency Projects FFY26	
Project Name	Estimated WPCSRF Loan Amount
Ronan WWTF Improvements	\$2,715,000
St. Ignatius Collection System Improvements	\$300,000
Conrad stormwater	\$435,000
Riverside (connection to Bozeman)	\$2,542,000
Hardin Phase 2 and 3	3,400,000
Wolf Point Phase 2B	3,500,000
Total Estimated Loan Amount	\$27,861,000

The FFY26 Consolidated Appropriations Act through which the base capitalization grant was appropriated and the FFY26 Clean Water SRF federal appropriation provided through IIJA requires that at least 10% of the base capitalization grant and 10% of the supplemental capitalization grant must be used to fund green projects as defined by EPA. Projects that qualify for the Green Project Reserve are those that address green infrastructure, water or energy efficiency improvements, or other environmentally innovative activities. Examples of such projects include spray irrigation projects, the installation of water meters, elimination of I&I, installation of SCADA equipment, etc. These projects are identified based upon information provided in the Clean Water Needs Survey that is required for each project that requests funding from the WPCSRF program. Projects that qualify as a whole, or in part, for green reserve are identified in Attachment III.

The FFY26 Clean Water SRF federal appropriation is approximately \$3.57 billion, therefore, Montana has the option of awarding between 20% and 40% of its base capitalization grant in the form of principal forgiveness. The WPCSRF program is proposing to award 40% of its FFY26 base cap grant, or \$1,402,800. as principal forgiveness. The Clean Water SRF federal appropriation provided through the IIJA mandates that 49% of the funds provided through the FFY26 supplemental cap grant funding, or \$5,926,060 must be provided as principal forgiveness.

The following criteria will be considered in the allocation of principal forgiveness:

The WPCSRF program has historically and will continue to award principal forgiveness (PF) primarily through an affordability assessment for those projects deemed ready to proceed to construction in SFY27. For a project to be considered eligible for PF, the project must be consistent with the definition of “treatment works” as set forth in Section 212 of the CWA. As required by federal law, three factors will continue to be used to arrive at a composite affordability score: income, the local unemployment rate, and local population trends. The IIJA funding explicitly seeks to ensure that small or disadvantaged communities have better access to SRF funds to improve their wastewater infrastructure. To ensure that objective was achieved, the WPCSRF Program incorporated community size, and low- and moderate-income data in the affordability criteria analysis. Each criterion is described in more detail below.

Monthly Median Household Income (mMHI)

The WPCSRF program has chosen to incorporate income into the composite affordability score through comparison of the user rate per monthly median household income factor for each community. The WPCSRF program feels that this factor establishes a level playing field between different communities with regards to varied user rates and incomes. The idea is that communities with higher monthly median household incomes can afford higher rates than those with lower monthly median household incomes and those communities already paying high user rates should be given more points when considering which communities should benefit from AS. For example, if a community has a user rate of \$32.67 and a mMHI of \$3,192 the user rate/mMHI ratio would be 1.02 % and the composite affordability score would be increased by 1.02 points.

Unemployment

A local unemployment rate greater than 150% of the current state average unemployment rate (3.6%) will be added to the affordability criteria score. For example, if the unemployment rate for a community is 6.5%, that rate would be approximately 1.1 percentage points higher than 150% of the average state unemployment rate. So, the composite affordability score would be increased by 1.1 points.

Population Trends

Population growth rates of zero to 1.5% per year are viewed by the WPCSRF program as relatively normal based on many years of reviewing municipal wastewater planning documents. Therefore, growth rates above 1.5%/year or negative growth rates may pose exceptional affordability issues. Very high growth rates may put a higher financial burden on existing residents to accommodate the building of large treatment projects relative to the existing population. Decreasing growth rates leave fewer people to shoulder the financial burden of regulatory compliance. For a population growth factor, the WPCSRF proposes a method like the unemployment rate methodology and will award points if the growth rate is either above 1.5%/year or less than -0.25%/year. For example, if a community has a growth rate of -0.4%/year, this is 0.15 percentage points less than -0.25%/year. The composite affordability score would be increased by 0.15.

Community Size

A priority of the IJA is to ensure that small communities (population < 10,000) benefit equitably from the SRF investment in water infrastructure. To achieve this goal the SRF program used census data from the Montana Census and Economic Information Center to calculate the percentage below (positive number) or above (negative number) the baseline population of 10,000. For example, if a community has a population of 7,300, this is equivalent to a 0.27 percentage change whereas a community with a population of 14,900 would have a negative 0.49 percentage change. These percentages will increase or decrease the community's composite affordability score depending on the size of the community.

Disadvantaged Communities

Another priority of the BIL is to ensure that disadvantaged communities benefit equitably from the SRF investment in water infrastructure. To identify economically disadvantaged communities the WPCSRF program considered low- and moderate- income (LMI) data. This information is available for all incorporated city/towns and census designated places from the Montana Department of Commerce's Community Development Division and is based on the U.S. Census Bureau's American Communities Survey data set 2019-2023. The LMI percent is calculated by U.S. Housing and Urban Development (HUD) using data from the U.S. Census Bureau's Decennial Census. LMI families are defined as those families whose income does not exceed 80% of the county median income for the previous year or 80% of the median income of the entire non-metropolitan area of the State of Montana, whichever is higher. For example, a community with an LMI of 43.5% would receive 0.435 points to their overall composite affordability score.

Principal forgiveness will be provided for eligible projects (i.e., treatment works as defined in Section 212 of the CWA) on a first-come, first-serve basis. The program will assess eligibility based on a composite affordability score using the criteria described above. A project must have a composite score of at least 2.0 to be eligible for PF. Projects with a composite score between 2.0 and 2.75 will be awarded PF in the amount equal to 40% of their overall loan request, or \$700,000, whichever is less. Projects with a composite score between 2.75 and 3.5 will be awarded PF in the amount equal to 60% of their overall loan request, or \$850,000, whichever is less. Projects with an affordability score of 3.5 or higher will be eligible for 80% PF of the overall loan request, or \$1,000,000, whichever is less. A project will be notified of their eligibility and PF amount once they submit a Uniform Application to the program and have submitted draft plans and specifications to DEQ for review. Principal forgiveness will be made available to projects until the cap grant conditions regarding PF have been fully met for any open cap grants. The CWSRF program will reserve the right to adjust maximum PF amounts or award PF to projects with a composite affordability score of less than 2.0 should it be necessary to meet the 2-year commitment period for an open cap grant.

Additional factors considered when awarding PF

1. Consideration will be given to the effectiveness of the principal forgiveness in reducing user rates for each project. If the infusion of principal forgiveness funds into a project result in a similar reduction of grant funds from another funding agency, with the result being no or limited decrease in user rates, the WPCSRF program may instead allocate the principal forgiveness to another project where final user rates will, in fact, be reduced.
2. Generally, no project shall be awarded principal forgiveness more than once. However, in some circumstances if project costs (after bidding) are considerably higher than anticipated, that project may be awarded additional principal forgiveness to help offset the higher costs provided there is still an open capitalization grant that has not fully allocated the maximum amount of AS allowed for under its grant conditions. Projects receiving additional principal forgiveness must be at or above the target rate for wastewater (i.e., 0.9% of the mMHl).

3. Projects seeking short-term financing will not be given principal forgiveness; only long-term loans will be eligible for additional subsidy. Principal forgiveness will not be given for refinancing of projects.
4. Any project receiving a congressional grant is not eligible for principal forgiveness from the Montana CWSRF program.
5. To ensure the timely use of AS, any project “awarded” principal forgiveness **must bid the project within 6 months of plan and spec approval**. Failure to meet this deadline, and at the discretion of the WPCSRF program, the AS may be reassigned and used to fund another project on the project priority list.

The proposed list of projects that will receive WPCSRF funds in SFY27 is included as Attachment III.

Loan terms and interest rates will be determined in accordance with the Administrative Rules adopted by the DNRC. The WPCSRF program may choose to limit the maximum amount of any loan if the demand for loan funds exceeds the availability of funds. Interest rates must be established to generate sufficient revenues to allow the State to make the principal and interest payments on general obligation bonds sold to generate the State match or meet project demand and to ensure the program is operated in perpetuity. The ability to repay the loan will also be considered when establishing loan terms. The types of financial assistance provided by the WPCSRF will initially be based on the applicant’s request. It is anticipated that most of the assistance will be provided in the form of direct loans (more precisely, the purchase of community-issued bonds by the WPCSRF program).

While the Base/Supplemental Program Funding Status for the Montana WPCSRF Program (Attachment II) shows a surplus of funds in the program, it should be noted that the “new loan amount” listed is based on estimated loan amounts many of which will likely need to be increased due to inflation which have resulted in higher costs for recently bid projects. EPA should also keep in mind that the WPCSRF program has historically never had a problem fully obligating most of its funds and expect that will be the case this year as well.

IX. EXTENDED FINANCING

To provide additional assistance to communities, the WPCSRF program will offer extended finance terms to qualifying projects. The extended loan terms allow communities up to 30 years to repay the loan. In all cases, loan terms cannot extend past the useful life of the improvements to be funded. The WPCSRF program will require a short-lived assets assessment for each project to ensure that replacement costs for the shorter-term assets (pumps, blowers, controls, lagoon liners, etc.) are set aside by the community on an annual basis to ensure continuity of treatment or use throughout the term of the loan. The WPCSRF program reserves the right to limit extended term financing at any time to ensure the perpetuity of the fund.

X. PUBLIC COMMENT, AMENDING IUP, STATE FINANCIAL COMMITMENT

Public Review and Comment – One public meeting was held on June 18, 2026, in Helena to discuss the SFY27 PPL and to allow public comment on the draft IUP. Public notice concerning

the PPL and IUP was posted in major newspapers across the state, and the notice and draft IUP was published on DEQ's website. There was a 30-day public comment period for the public to review and comment on the draft IUP. That comment period ended June 29, 2026. No comments were received during the comment period.

Amending the IUP - Any changes made to the IUP and/or PPL will be allowed after notification has been provided to affected projects (if any) already on the PPL. The amended IUP will be posted to the DEQ website, and another public notice will be issued via the DEQ website for a 15-day public comment period.

If a project scheduled to receive loan assistance within the year is displaced by the addition of a new project, a formal public meeting, if requested, will be held to allow comment on the amended IUP and/or PPL.

State Financial Commitment - The 1989 Montana Legislature passed House Bill (HB) 601, entitled the Wastewater Treatment Revolving Fund Act, which was subsequently signed into law by the Governor. The Act created the new program, established administrative procedures and allowed for the sale of state general obligation bonds in an amount not to exceed ten million dollars. The 1995 Montana Legislature passed HB 493, which was subsequently signed into law by the Governor. Among other things, the Act allowed for the sale of state general obligation bonds in an amount not to exceed an additional five million dollars. The 1999 Montana Legislature passed HB 110, which gives the WPCSRF an additional fifteen million dollars in general obligation-bonding authority. The 2003 Montana legislature passed HB 46, which gives the WPCSRF an additional ten million dollars in general obligation-bonding authority. The combined bonding authority provided by these four bills furnishes the WPCSRF with forty million dollars in state general obligation bond authority, which provides enough funds to match all federal appropriations (1989-2025) that have been awarded to the program to date, as well as excess bond authority to match potential future federal appropriations. In 2005 with HB 142, the Legislative session allowed the bond authority to be up to \$40 million in outstanding bonds.

The State held its first bond sale in 1991. In June of 1996, Montana held its second and third bond sales to provide State match funds for projects scheduled to proceed in FFY 1997. In March of 1998, a fourth bond sale was held to provide State match for projects scheduled to proceed in FFY 1998 and 1999. In March of 2000, a fifth bond sale was held to provide State match for projects scheduled to proceed in FFY 2000 and 2001. In June 2001, a sixth bond sale was held to provide a match for projects scheduled to proceed in 2002. In June of 2003, a sixth bond sale was held to provide match for projects projected to proceed in 2003. In April of 2004, a seventh bond sale was held to provide match for projects projected to proceed in 2004. An eighth bond sale was held in April of 2005, to provide state match for proposed projects to proceed in 2005. The bond authorization includes notes to be issued instead of bonds. Note sales were held in October 2007, for \$500,000, in April 2008, for \$400,000, and in March 2009, for \$2,000,000. A bond sale of \$6,450,000 was held in 2010. In 2013, a bond sale of \$5,000,000 was held. A bond sale of \$24,365,000 was held in June 2015. A revenue anticipation note was issued in October 2016.

As discussed previously, the increased demand for funds may force the WPCSRF program to issue periodic bond anticipation notes (BANs) for the program to keep the projects moving through construction with adequate SRF funds. Two bond anticipation notes of approximately \$1,600,000 and \$2,419,000 are anticipated in SFY27.

MONTANA

WPCSRF Project Priority List

State Fiscal Year: 2027

<i>Rank</i>	<i>Name</i>	<i>EPAID MPDES ID</i>	<i>Categories</i>	<i>Ranking Points</i>	<i>Amount Assist Type</i>	<i>Commit Date Project Type</i>
1	Hobson WW Improv.	C303714 MT0021636	I. IIIB.	500	\$1,350,000 Loan	5/1/2025
2	Wibaux Spray Irrigation	C301302 No MPDES perm	I.	405	\$1,400,000 Loan	5/1/2023
3	Fort Smith W&S WWTP Upgrades	C301218 No MPDES perm	I. IVA. IVB.	400	\$2,600,000 Loan	7/1/2023
4	Philipsburg WWTP Improvements	C301318 MT0031500	I.	400	\$1,220,000 Loan	5/1/2024
5	Riverside Connection to Bozeman	C302257 MT0022608	IVB.	385	\$3,700,000 Loan	6/1/2026
6	Jordan Treat. Sys. Improv.	C301312 MT0021385	I.	375	\$450,000 Loan	9/1/2025
7	Columbus UV Disinfection Project	C301330 MT0031801	II.	365	\$1,150,000 Loan	4/1/2025
8	Darby Collection and UV System	C303726 MTG580011	I. IIIA.	360	\$2,020,000 Loan	3/1/2027
9	Kallispell - Morning Star Comm.	C302281 MT0021938	IVA. IVB.	350	\$137,100 Loan	7/1/2025
10	Kalispell - Green Acres Collection System	C302285 MT0021938	IVA.	340	\$427,200 Loan	7/1/2025
11	Darby WW Collection and Treatment Improvements	C303727 MTG580011	I. IIIA.	340	\$1,950,000 Loan	5/1/2025
12	White Sulphur Springs Collection Sys.	C302286 MT0020699	IVA.	330	\$210,800 Loan	8/1/2025
13	Hardin WWTP Improv Ph 2 & Ph 3	C301316 NPDES MT0030	I.	330	\$7,866,000 Loan	7/1/2025
14	Missoula Garden City Compost	C301321 No MPDES perm	I.	330	\$4,600,000 Loan	6/1/2025
15	Fort Peck Spray Irr. Project	C301322 MTG580019	I.	330	\$230,000 Loan	6/1/2025
16	Broadview Total Retention	C301341	I.	330	\$4,354,000 Loan	5/1/2029
17	Lockwood WSD Ph3 Sewer Improve.	C302262 MT0022586	IVA. IVB.	320	\$5,900,000 Loan	6/1/2025
18	West Yellowstone WWTP 2021	C301313 MTX000244	II.	320	\$30,400,000 Loan	6/1/2024
19	Momont LS Project-Missoula	C302271 MT0022594	IIIB.	315	\$1,327,000 Loan	7/1/2024

Rank	Name	EPAID MPDES ID	Categories	Ranking Points	Amount Assist Type	Commit Date Project Type
20	DNRC NPS Projects	C307175	VIIIA. VIIID.	310	\$2,000,000	5/1/2026
		No MPDES perm			Loan	
21	Kalispell Biosolids Project	C301334	II.	305	\$2,900,000	8/1/2025
		MT0021938			Loan	
22	Hideaway Com. W&S - Col. Falls	C303719	I. IVA. IVB.	295	\$767,600	9/1/2025
		MT0020036			Loan	
23	Superior Wastewater System Improvements	C301327	I.	290	\$1,984,000	6/1/2025
		MT0020664			Loan	
24	Missoula - Bitterroot Outfall	C305188	VIA.	290	\$408,000	7/1/2025
		No MPDES Per			Loan	
25	Sunburst Collection System Improvements	C304261	IIIA. IIIB.	290	\$1,122,000	8/1/2025
		MT0021679			Loan	
26	Terry WWTP Upgrades	C301285	I. IIIA.	290	\$962,000	5/1/2023
		MTG580017			Loan	
27	Manhattan WWTP Improvements	C301311	II.	290	\$5,100,000	11/1/2024
		MT0021857			Loan	
28	Wolf Point Ph2A Wastewater Improvements	C303716	I. IIIB.	290	\$1,050,000	6/1/2024
		NPDES MT0030			Loan	
29	Cooke City - New WWTF	C303711	I. IVA.	285	\$3,000,000	4/1/2026
		No MPDES perm			Loan	
30	Evergreen Lift Station #19	C302291	IIIB.	280	\$4,060,000	6/1/2025
		MT0021938			Loan	
31	Conrad Storm Sewer & L.S. Project	C306122	IVA. VIA.	280	\$1,385,000	6/1/2025
		MT0020079			Loan	
32	Missoula STEP and STEGM Conversion Project	C302300	IIIB.	275	\$2,122,000	6/1/2026
		MT0022594			Loan	
33	Fromberg Transmission Main	C304260	IIIB.	275	\$413,500	5/1/2024
		MTG580033			Loan	
34	Missoula - Momont 1 Sewer Upsize	C302294	IIIB.	275	\$828,000	5/1/2025
		MT0022594			Loan	
35	Lockwood EC Project	C302295	VIIID.	275	\$1,000,000	8/1/2025
		MT0022578			Forgiven	EC
36	HelenaPrim. Clar pump stat.	C301317	I.	275	\$1,529,500	6/1/2025
		MT0022641			Loan	
37	Harrison Collection System & Force Main Project	C304263	IIIA.	270	\$700,000	9/1/2025
		No MPDES Per			Loan	
38	Drummond Lagoon Improvements	C304154	I.	265	\$1,550,000	6/1/2025
		MTG580002			Loan	
39	Big Sky Canyon Phase 1	C302273	IIIA.	265	\$16,600,000	5/1/2027
		No MPDES perm			Loan	
40	Bigfork West Trunk Main Coll.	C304257	IIIA. IIIB.	265	\$3,480,000	9/1/2025
		MT0020397			Loan	

Rank	Name	EPAID		Ranking Points	Amount Assist Type	Commit Date Project Type
		MPDES ID	Categories			
41	Chester WW Improv. Project	C303715 MT0020338	I. IIIA. IIIB.	265	\$600,000 Loan	8/1/2024
42	Cascade WW System Improvements	C304258 No MPDES perm	IIIB.	265	\$768,320 Loan	4/1/2025
43	Lakeside LS & WWTF Improvements	C303712 No MPDES perm	I. IIIA.	260	\$1,935,000 Loan	7/1/2025
44	Kalispell EQ Basin and Fermenter	C301314 MT0021938	II.	255	\$1,810,000 Loan	6/1/2025
45	Missoula Treat, Collect, Compos	C303713 MT0022594	II. IIIA. IIIB.	255	\$3,100,000 Loan	9/1/2022
46	Willow Creek Collection and Spray Irrigation	C303723 MT0025038	I. IVA.	250	\$384,000 Loan	5/1/2026
47	Troy Wastewater System Improvements	C303728 MTG580038	I.	250	\$1,213,000 Loan	6/1/2025
48	Harlowton CIPP 2026	C304270	IIIA.	250	\$6,560,100 Loan	6/1/2026
49	East Helena Wastewater Improv.	C303710 MT0022560	I. IIIA.	245	\$6,902,000 Loan	6/1/2025
50	Glendive - 2022 Main Repl./Rehab	C302268 MT0021628	IIIA.	245	\$1,400,000 Loan	5/1/2024
51	Columbus 12th Street Sewer Main	C302298	IIIB.	245	\$1,100,000 Loan	6/1/2026
52	Whitehall Lift Station Upgrade	C302299 MT0020133	IVA.	245	\$342,000 Loan	8/1/2025
53	Missoula Clark Fork Sewer Crossing	C304267 MT0022594	IIIB.	245	\$13,600,000 Loan	6/1/2027
54	Arlee Wastewater Improvents	c303730 No MPDES Per	I. IVB.	235	\$205,000 Loan	5/1/2026
55	Lewistown Solids Handling Upgrade	C301346 MT0020044	I.	225	\$3,600,000 Loan	10/1/2026
56	Winnett WWTF Improvements	C301329 MTG580041	I.	225	\$540,000 Loan	5/1/2025
57	View Vista Collection System	C302284 MT0020435	IIIB.	225	\$1,100,000 Loan	5/1/2026
58	East Helena WWTP Phase 2	C301337 MT0022560	II.	225	\$21,958,800 Loan	6/1/2027
59	East Helena WWTP Phase 2 - Engineering	C301344 MT002560	II.	225	\$3,592,000 Loan	9/1/2026
60	Eureka Force Main Replacement	C302305	IIIB.	225	\$2,957,000 Loan	5/1/2028
61	DPHHS Lab Equipment for EC	C307198 N/A		220	\$1,043,000 Forgiven	9/1/2025 EC

Rank	Name	EPAID MPDES ID	Categories	Ranking Points	Amount Assist Type	Commit Date Project Type
62	Hingham WW Sys Improv	C303717	I. IIIB.	220	\$5,000,000	6/1/2026
		No MPDES perm			Loan	
63	Logan WWTP	C303733	I. IVA.	220	\$3,000,000	4/1/2029
					Loan	
64	Victor Wastewater Improvements	C303722	I. IIIA.	220	\$696,068	6/1/2025
		No MPDES Per			Loan	
65	Libby Lift Station Replacement	C302302	IIIB.	215	\$434,000	5/1/2026
		MT0020494			Loan	
66	Deer Lodge Collection System Phase 2	C302292	IIIA.	215	\$750,000	9/1/2026
		MT0022616			Loan	
67	Missoula Hellgate ROC	C302309	IVB.	210	\$423,611	4/1/2028
					Loan	
68	Belgrade Lagoon Rehab	C301323	I.	210	\$3,500,000	8/1/2025
		MTX00116			Loan	
69	Lakeside Wastewater Phase 2 - Engineering	C301345	II.	210	\$3,581,000	8/1/2026
		MTX000307			Loan	
70	Hinsdale Phase 1 Wastewater Improvement	C303732	I. IIIB.	205	\$360,000	7/1/2028
		MT0020656			Loan	
71	Lolo RS WWTP Improv.	C301325	I.	195	\$5,500,000	4/1/2027
		MT0020168			Loan	
72	Ekalaka Wastewater System Improvements	C303731	I. IIIA.	195	\$1,261,000	6/1/2028
		MT0020371			Loan	
73	Wolf Point Phase 3 Collection System	C304264	IIIA.	195	\$1,000,000	6/1/2026
		NPDES MT0030			Loan	
74	Three Forks Flood Mitigation	C307196	VIA.	195	\$3,000,000	7/1/2026
		No MPDES perm			Loan	
75	Melstone Phase 1 Collection System Replacement	C302308	IIIB.	180	\$768,000	6/1/2028
					Loan	
76	Red Lodge Collection System Improvements Ph 2&3	C302296	IIIA.	175	\$980,000	6/1/2026
		MT0020478			Loan	
77	Evergreen Lift Station #19 - Phase 2	C302303	IIIB.	175	\$0	
					Loan	
78	White Sulphur Springs Collection 2026	C302310	IIIB.	175	\$2,392,644	6/1/2028
		MT0020699			Loan	
79	Charlo W&SD Lagoon Rehab	C301339	I.	170	\$1,300,000	5/1/2028
					Loan	
80	West Yellowstone Vector Truck	C302288	IIIA.	170	\$225,000	9/1/2025
		MTX000244			Loan	
81	Bozeman Digester 2026	C301340	II.	170	\$13,292,900	11/1/2026
		MT0022608			Loan	
82	Cut Bank Liftstation Improvements	C302306	IIIB.	165	\$861,000	4/1/2028
		MT0020141			Loan	

Rank	Name	EPAID MPDES ID	Categories	Ranking Points	Amount Assist Type	Commit Date Project Type
83	Scobey Wastewater Force Main Project	C302304 No Permit	IIIB.	160	\$485,000 Loan	6/1/2028
84	Sunburst Collection Phase 2	C302311 MT0021679	IIIB.	155	\$402,918 Loan	3/1/2028
85	Geyser Wastewater System Improvements	C303725 N/A	I. IIIB.	155	\$1,042,000 Loan	5/1/2026
86	Missoula Sewer Main Rehabilitation Project	C304268 MT0022594	IIIA.	155	\$6,800,000 Loan	6/1/2027
87	Joliet WW System Improvements	C301331 MT0020249	I.	150	\$1,657,000 Loan	9/1/2026
88	Fairview Trunkline Replacement	C302307	IIIB. IVA.	150	\$1,377,930 Loan	7/1/2028
89	South Winds Drainfield Expansion	C301333	I.	140	\$200,000 Loan	5/1/2026
90	Lakeside Wastewater Improvements - Phase 2	C301326 No MPDES perm	II.	135	\$13,000,000 Loan	6/1/2027
91	Red Lodge Storm Water Phase 4	C305189 No Permit	VIA.	135	\$975,000 Loan	5/1/2028
92	Conrad Wastewater System Improvements	C303724 MT0020079	I. IIIB.	135	\$2,400,000 Loan	5/1/2027
93	Manhattan Infiltration Cells	C301343 MT0021857	I.	130	\$4,335,778 Loan	4/1/2027
94	Lakeside EC Treatment	C301342 MTX000307	II.	130	\$3,461,065 Loan	2/1/2027
95	Missoula Land Application	C307195 MT0022594	VIIIA.	125	\$1,612,500 Loan	2/1/2027
96	Missoula Stormwater EC	C305190 MT0022594	VIA.	110	\$750,000 Loan	
97	Absarokee Collection System Improvements	C304265 MT0021750	IIIA.	70	\$500,000 Loan	5/1/2028
98	Roundup Wastewater System Improvements	C303729	I. IIIA.	25	\$1,684,000 Loan	6/1/2026
99	Ronan WWTF Improvements	C301338	II.	25	\$2,715,000 Loan	7/1/2026
100	Alder Wastewater System Improvements	C301336	I.	25	\$534,600 Loan	6/1/2026
101	Poplar Collection System Phase 2	C304269 MT0030597	IIIA.	25	\$1,018,000 Loan	4/1/2026
102	Harrison Ph 2 Lagoon and LS Improvements	C301335 No MPDES Per	I. IIIB.	25	\$588,450 Loan	4/1/2026
103	Wolf Point Phase 4 Collection System	C304271 NPDES MT0030	IIIA.	25	\$1,025,000 Loan	6/1/2028

<i>Rank</i>	<i>Name</i>	<i>EPAID MPDES ID</i>	<i>Categories</i>	<i>Ranking Points</i>	<i>Amount Assist Type</i>	<i>Commit Date Project Type</i>
104	Thompson Falls Phase 3&4	C302283 MTG580035	IVA.	25	\$4,793,000 Loan	9/1/2025
105	Wolf Point Ph2B Collection System Improvements	C304262 NPDES MT0030	IIIB.	25	\$3,500,000 Loan	7/1/2025
106	St. Ignatius Collection System Improvements	C304266	IIIA.	25	\$1,031,890 Loan	6/1/2026
107	Chinook WW Treatment Improvements	C303721 MT0020125	I. IIIB.	25	\$1,100,000 Loan	8/1/2024

Total Project Assistance: \$304,278,274

Project Description Categories	
I. Secondary Treatment	VIIIA. NPS Agricultural-Cropland
II. Advanced Treatment	VIIIB. NPS - Agricultural-Animals
IIIA. Infiltration/Inflow Correction (CIPP)	VIIIC. NPS Silviculture
IIIB. Sewer System Rehabilitation (open cut)	VIIID. NPS Groundwater (Unknown Source)
IVA. New Collector Sewers	VIIIE. NPS Marinas
IVB. New Interceptors	VIIIF. NPS Resource Extraction
V. Combined Sewer Overflow	VIIIG. NPS Brownfields
VIA. Gray Infrastructure	VIIIH. NPS Storage Tanks
VIB. Green Infrastructure	VIIII. NPS Sanitary Landfills
VIIA. Energy Efficiency	VIIIJ. NPS Hydromodification
VIIB. Renewable Energy	VIIIK. NPS Individual/Decentralized Sewage
VIIC. Water Efficiency	VIIIL. NPS Land Conservation
VIID. Water Reuse	IX. Desalination
	X. Estuary Assistance
	XI. Planning and Assessment

ATTACHMENT II**PROGRAM FUNDING STATUS
MONTANA WPCSRF BASE/SUPPLEMENTAL CAP GRANT PROGRAM****STATE FISCAL YEARS 1990 TO 2026**

Capitalization Grants (NIMS line 57)	\$ 301,304,765
State Match (20% of cap grants).....	\$ 58,363,853
Overmatch: RIT, COI fees, investments, LLS (incl GO bonds in excess of 20% match)	\$ 105,717,569
Program Administration Expenses (NIMS line 244)	\$ 11,386,915
Available to Loan	\$ 459,999,272
 Principal Repayments and Interest as of May 2026 (DNRC)	\$ 567,913,952
Transfers to DWSRF (principal repayments) (NIMS line 83).....	\$ (10,847,727)
Transfers from DWSRF (direct capitalization grants) (NIMS line 61)	\$ 13,000,000
Total Funds Available to Loan through May, 2026.....	\$1,024,065,497

SFY27

Capitalization Grant (FFY26)	\$ 15,601,000
DWSRF Transfer.....	\$ 0
State Match for FFY26	
- Normal G.O. Bond match.....	\$ 3,120,200
- Additional BAN match.....	\$ 0
- Estimated Loan Loss Surcharge (LLS)	\$ 200,000
Program Administration Allowance.....	\$ 624,040
Anticipated Investment Transfers (DNRC).....	\$ 528,888
Anticipated Principal Repayments and Interest (DNRC).....	\$ 27,366,419
Anticipated Overmatch (RIT or other)	\$ 0
Anticipated transfers from special administration Acct	\$ 0

Available to Loan SFY27 **\$ 46,192,467**

Total Funds Dedicated to Loan\$ 1,070,257,964

Loans closed as of May 2026 (DNRC)872,211,717

Funds available for Loans in SFY27 \$ 198,046,247

Amount of estimated new loans identified on Attachment III

For the State Fiscal Year 2027 Intended Use Plan..... \$ 153,063,900

Attachment III – Base/Supplemental Cap Grants Fundable Projects

State Fiscal Year 2027 IUP Attachment I updated 07/06/26

\$3.507M Base Cap Grant (FFY26)

\$12.094M BIL Cap Grant (FFY26)

Fundable projects for 2026/2027 construction

Total Loan Amount Requested **Green Project Reserve** **Principal Forgiveness FFY26**

SFY 2027 Construction Starts

Big Fork West Trunk Main*	1,767,000		previous award
Geyser W/W System Improvements*	415,600		previous award
Hardin W/W Treatment System (Phases 2&3)*	3,400,000		previous award
Hidaway Community (Columbia Falls)*	1,023,700		previous award
Hingham W/W Improvements*	2,004,000		previous award
Lockwood Sewer (Phase 3)*	5,900,000		previous award
Morning Star (Kalispell)*	138,400		previous award
Red Lodge Collection System Phase 2&3*	977,000		previous award
Sunburst Collection System*	1,112,000		previous award
View Vista Collection System*	411,000	411,000	previous award
Wolf Point Collection System Phase 3*	1,194,000		previous award

Alder Wastewater System Improvement (interim funding)	534,600		N/A
Arlee Wastewater Improvements	205,000		To Be Determined
Bozeman Digester	13,293,000		To Be Determined
Columbus 12th Street Sewer Main (Congressional Grant)	677,000		N/A
Conrad Stormwater	823,000		N/A
Conrad Wastewater System Improvements	1,825,000		To Be Determined
Cooke City W/WTF	3,000,000		To Be Determined
Darby Collection and UV System Phase 2	2,020,000		To Be Determined
Deer Lodge Collection System Phase 2	750,000		To Be Determined
East Helena W/WTP Phase 2 (Engineering Only)	3,592,000		N/A
East Helena W/WTP Phase 2 (Construction)	18,883,000		To Be Determined
Evergreen Lift Station #13 Phase 2	2,000,000		To Be Determined
Harrison Lagoon & Lift Station Improvements (Interim Funding)	588,500	588,500	N/A
Harlowton CIPP	6,560,100		To Be Determined
Joliet W/W System Improvements	1,657,000		To Be Determined
Lakeside W/W Improvements Phase 2 (Engineering Only)	3,581,000		N/A
Lakeside W/W Improvements Phase 2 (Construction Only)	18,697,000		To Be Determined
Lewistown Solids Handling Improvements	3,600,000		To Be Determined
Libby Lift Station Replacement	434,000		To Be Determined
Lolo W/WTP Improvements	5,500,000		To Be Determined
Manhattan Infiltration Cells	4,336,000		To Be Determined
Missoula Clark Fork Sewer Crossing	13,600,000		To Be Determined
Missoula Land Application	1,613,000	1,613,000	To Be Determined
Missoula Sewer Main Rehabilitation Project	6,800,000		To Be Determined
Missoula Stormwater EC	1,002,000		To Be Determined
Poplar Collection System Improvements Phase 2 (Interim Funding)	1,018,000		N/A
Ronan W/WTF Improvements (Interim Funding)	2,715,000		N/A
Roundup W/W System Improvements (Interim Funding)	1,684,000		N/A
St. Ignace Collection System Improv. (Congressional Grant)	1,032,000		N/A
Three Forks Flood Mitigation	3,000,000		To Be Determined
Victor W/W Improvements	700,000	700,000	To Be Determined
West Yellowstone Vector Truck	225,000		To Be Determined
White Sulphur Springs W/W Improvements	2,392,000		To Be Determined
Willow Creek Collection and Spray Irrigation	384,000	384,000	To Be Determined

Total Funding Demand 153,063,900 3,696,500

Total Required Project Funding from Cap Grants

17,975,160

Total Required Green Project Reserve

1,560,100

Total Principal Forgiveness Not To Exceed

7,328,860

\$3.507M Base Cap Grant (FFY26)

2% Technical Assistance \$70,140

Min green project reserve required: \$350,700

350,700

Minimum Principal Forgiveness required \$701,400

Max Principal Forgiveness allowed: \$1,402,800

1,402,800

Administration (4% of cap grant) = \$140,280

140,280

State match (20% of grant): \$701,400

Total grant with Match \$4,208,400

\$12.094M BIL Cap Grant (FFY26)

2% Technical Assistance up to \$241,880

122,000

Min green project reserve required: \$1,209,400

1,209,400

Required Principal Forgiveness \$5,926,060

5,926,060

Administration (4% of cap grant) = \$483,760

483,760

State match (20% of grant): \$2,418,800

Total grant with Match \$14,512,800

Total FFY26 Cap Grant (including match) expenditures

18,721,200

* awarded principal forgiveness in prior years awaiting loan closing

ATTACHMENT IV:

**WATER POLLUTION CONTROL
STATE REVOLVING FUND
PRIORITY LIST RANKING CRITERIA**
Revised May 22, 2026

A. WATER QUALITY OR PUBLIC HEALTH IMPACTS RELATED TO THE PROJECT

*May assign points to all that apply
(Give zero or full points only)*

Public Health

Is the purpose of the project to protect a public health? 75 ____

- e.g., public drinking water source from a leaking lagoon or pipes, sewer on-site systems, conservation easement for source water protection, sewage back-ups into homes, operator safety, contact recreation, surfacing sewage, flooding, etc.

Water Quality

Is the purpose of the project to reduce toxic effects to aquatic life? 25 ____

- e.g., ammonia or metals toxicity in a surface water discharge

Is the purpose of the project to reduce sediment loading to a surface water body? 25 ____

- e.g., Channel storm water runoff to settling ponds.
Protect streambanks by providing alternate sources of stockwater.
Install buffer strips between fields and streams.
Generally green infrastructure.

Is the purpose of the project to reduce nutrients in a surface water body? 25 ____

- e.g., Implement nutrient management plans to prevent excess fertilizer use.
Install waste control structures at animal feeding operations.
(Note: Concentrated animal feeding operations do not qualify for nonpoint source projects.)
Improve irrigation water use management to reduce return flows.
Replace failing septic tanks or sewer the area.

Is the purpose of the project for compliance with national secondary standards? 25 ____

- e.g., national secondary standards or basic stabilization req. are not met

Is the proposed project to help meet a TMDL? 50 ____

Project addresses a formal state or federal enforcement action? 50 ____

Project to address an emerging contaminant? 25 ____

- e.g., Emerging Contaminants (ECs) are characterized as substances and microorganisms, including manufactured or naturally occurring physical, chemical, biological, radiological, or nuclear materials, which are known as anticipated in the environment, that may pose newly identified or re-emerging risks to human health, aquatic life, or the environment. Example ECs include: perfluoroalkyl and polyfluoroalkyl substances (PFAS) as well as some compounds of personal care products, pharmaceuticals, industrial chemicals, pesticides.

TOTAL POINTS IN WATER QUALITY AND PUBLIC HEALTH IMPACTS _____

B. EFFECTIVENESS OF PROPOSED PROJECT IN IMPROVING WATER QUALITY OR PUBLIC HEALTH

Pick one of the following:

Project is expected to eliminate health hazards or restore local water body to fully supporting all uses that are impacted by the activity: **100** _____

Examples: All septic tanks in an area are being replaced by sewer.
A small stream is listed for nutrients and the primary source of the nutrients is the WWTP and BNR, total retention or spray irrigation is proposed.
(Note: This scenario would probably only apply for a large discharge in a small stream.)
Stormwater project which eliminates flooding that is public health related.
Eliminate sewer backups into homes.

Any project that directly improves the quality of ground or surface water, but may not fully restore uses as indicated above. **50** _____

Examples: Stormwater retention to prevent runoff from reaching sediment-impacted stream.
I/I correction to eliminate SSOs or to improve treatment efficiency.
Separation of sanitary and storm sewers.
WWTP upgrade that improves treatment capabilities/effluent quality.
Fix existing leaking lagoons (unless conversion to spray irrigation or total retention, in which case, it may be given more points as indicated above).
Replacement of failing lift station.

Project is primarily designed to improve infrastructure and/or may not have direct impacts to improving water quality. **25** _____

Examples: Stormwater collection not related to public health or safety.
Upgrading unit processes – not expected to reduce pollution.
Landfills and related equipment.
Replacing old collection systems – not related to treatment improvement or overflows.

TOTAL POINTS FOR WATER QUALITY IMPROVEMENT _____

C. ACTIVITY-SPECIFIC CRITERIA

Select either category 1 (Point Source Projects) or 2 (Nonpoint Source Projects) below.

1. Wastewater Projects

May assign points in all categories that apply
(Give 0 points or full points only)

Capacity Issues

10 _____

One or more-unit processes is nearing or beyond capacity, resulting in adverse impacts to performance.

Reliability or Obsolescence

10 _____

Reliability and/or equipment obsolescence is adversely affecting one or more existing unit processes and the proposed project will replace or upgrade the unit process. (This could include leaking lagoons or pipes.)

Beneficial Use

20 _____

Proposed project involves beneficial use of biosolids or treated wastewater resulting in reduction or elimination of a discharge to state water AND provides some further benefit such as the growth of crops or turf, industrial reuse.

Water Conservation

10 _____

Water meters are installed in the entire project area.

An I/I reduction program is being implemented or will be part of the proposed project OR I/I is currently less than 20% of the total wastewater flow on an annual basis (i.e., I/I is not a significant problem).

10 _____

Energy Conservation

10 _____

Proposed project reduces energy consumption or includes energy reducing principles or technologies.

Green Project Reserve

20 _____

Proposed project will address green infrastructure, water or energy efficiency improvements, or other environmentally innovative activities (e.g., stormwater management (e.g., green streets, riparian buffers, sustainable landscaping), incorporated renewable energy, projects that result in 20% reduction in energy, installation of water meters, water reuse, II correction, etc.)

Climate Resilience

10 _____

Proposed project will construct levies/berms to protect facility from flooding, installation of backup generators, floodproofing of structures, etc.

Security/Cybersecurity

10 _____

Proposed project will install fencing, provide security cameras/security lighting/motion detectors, will project implement cybersecurity measures, etc.

Other:

10 _____

Enter Details:

TOTAL POINTS FOR WASTEWATER PROJECTS

2. Nonpoint Source Projects

*May assign points in all categories
(Give 0 points or full points)*

The proposed project will improve water use efficiency **20** _____

Examples: Improve irrigation water use management to increase return flows or groundwater recharge or to decrease stream withdrawals.

Proposed project will have beneficial uses in addition to water quality protection such as promoting wildlife habitat. **25** _____

Examples: Construct, restore, and protect wetlands
Projects designed to increase in-stream flows to protect aquatic life.
Stream bank restoration, green stormwater projects such as green roofs, vegetated swales, wetlands treatment, etc.

The proposed project's primary purpose is to protect water quality or public health. **25** _____

Example: Sewering in area with on-site systems to protect DW supply.

TOTAL POINTS FOR NONPOINT SOURCE PROJECTS _____

D. READINESS TO PROCEED

May assign points for each category.

Engineer has been formally hired for planning and design **20** _____
(0 or full points only)

Planning document or complete, conceptual plan has been approved by SRF program **20** _____
at DEQ. (10 points for submittal of draft planning document)

All other project funding is in place. **20** _____
(0 or full points only)

Rates and Charges are in place and deemed by SRF adequate to cover loan **10** _____
(0 or full points only)

Final plans and specs have been approved or final project approval has been given by **20** _____
SRF program. (10 points for submittal of draft P&S)

Construction is expected to begin with the next 12 months **75** _____

TOTAL POINTS FOR READINESS TO PROCEED _____

E. TOTAL PRIORITY POINTS

Refinancing of existing long-term debt: (total project points) **10** _____

Interim financing: (total project points) **25** _____

TOTAL POINTS IN CATEGORY A. (Purpose) _____
(Maximum points -- 300)

TOTAL POINTS IN CATEGORY B. (Effectiveness) _____
(Maximum points -- 100)

TOTAL POINTS IN CATEGORY C. (Activity-specific) _____
(maximum points -- 120)

TOTAL POINTS IN CATEGORY D. (Readiness) _____
(maximum points -- 165)

TOTAL PRIORITY POINTS _____

Ranked By: _____ Date: _____

Comments: