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AGENDA ITEM MEMO

BOARD MEETING DATE: October 2, 2025

TO: Board Members

THROUGH: Bryan McMath, Executive Administrator
Ashley Harden, General Counsel
Jessica Peña, Deputy Executive Administrator, Water Supply & Infrastructure

FROM: Marvin Cole-Chaney, Director, Program Administration & Reporting
Patrick Kading, Manager, Federal Program Administration

SUBJECT: Amended State Fiscal Year 2025 Drinking Water State Revolving Fund Lead Service Line Replacement Intended Use Plan

ACTION REQUESTED

Consider approving the Amended State Fiscal Year 2025 Drinking Water State Revolving Fund Lead Service Line Replacement Intended Use Plan.

BACKGROUND

The Infrastructure Investment and Jobs Act of 2021 (IIJA) appropriated capitalization grant funds for Federal Fiscal Years (FFY) 2022 to 2026 for Lead Service Line Replacement (LSLR) projects. This amended State Fiscal Year (SFY) 2025 Intended Use Plan (IUP) covers the Drinking Water State Revolving Fund (DWSRF) capitalization grant funds allocated to Texas from FFY 2024 appropriations in the amount of \$63,014,000 and from FFY 2022 reallocations in the amount of \$10,782,000.

The appropriations require 49 percent (\$36,160,040) of the capitalization grant amount to be provided as additional subsidization, which will be in the form of principal forgiveness. Per the U.S. Environmental Protection Agency's (EPA's) interpretative guidance, only projects that meet the state's disadvantaged community definition are eligible to receive the additional subsidization. A total of \$70,906,323 is available for projects under this amended IUP, including the required additional subsidization.

To be eligible for this financial assistance, projects must be an LSLR project or associated activity directly related to the identification (including service line inventories), planning, design, and replacement of lead service lines, and the system must be DWSRF program eligible. Any funded project involving the replacement of a lead service line must replace the entire lead service line, not just a portion, unless a

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portion has already been replaced or is concurrently being replaced with another funding source.

The significant amendment to this IUP is the addition of language to specify that Planning, Acquisition, Design, and Construction funds for replacement of service lines are only available for known, eligible service lines, regardless of the status of the inventory or the number of service lines of unknown material.

PUBLIC REVIEW, HEARING, AND COMMENTS

An opportunity was provided for public comment on the draft amended IUP, with the project priority lists included, from August 29, 2025, to September 14, 2025. The public comments received during the public comment period and the TWDB's response are shown in Attachment 1.

KEY ISSUES

If approved, this amendment will enable the TWDB to allocate funding for the replacement of lead service lines and galvanized service lines requiring replacement based on demonstrated need. This approach reduces the risk of there being significant project funds remaining once all required replacements are completed. The federal program's eligibility is strictly limited to lead service line replacement and inventory project activities, so any remaining funds after these activities are also restricted in use. This differs from the broader DWSRF – General Activities program.

RECOMMENDATION

The Executive Administrator recommends approval of the Third Amended SFY 2025 DWSRF LSLR IUP with the ability to make non-substantive changes if necessary.

Attachments:

1. Response to public comments on the draft Third Amended SFY 2025 DWSRF LSLR IUP.
2. Recommended Final Third Amended SFY 2025 DWSRF LSLR IUP.

**Texas Water Development Board
Response to Comments on the Draft State Fiscal Year (SFY) 2025 Drinking Water
State Revolving Fund (DWSRF) Lead Service Line Replacement (LSLR) Amended
Intended Use Plan (IUP)**

The following provides a summary of the public comments received during the public comment period from August 29, 2025, to September 14, 2025, the Texas Water Development Board (TWDB) responses, and changes to the draft Amended SFY 2025 DWSRF LSLR IUP.

General Comments

Comment submitted by: Usman Mahmood, Policy Analyst, Bayou City Waterkeeper

Comment Date: September 14, 2025

Comment:

Bayou City Waterkeeper submits these comments on the Third Amended SFY 2025 DWSRF Lead Service Line Replacement Intended Use Plan. While we appreciate the increased appropriations bringing total funding to \$70.9 million through revised FFY 2024 allocations and FFY 2022 reallocations, the 35 submitted projects request \$391.9 million, creating a \$321 million funding shortfall that leaves 82% of demonstrated need unmet. This substantial gap underscores the critical importance of maximizing program efficiency and ensuring equitable distribution of available resources.

The amended IUP maintains restrictions limiting galvanized line eligibility to those downstream of known (rather than unknown) lead components, potentially excluding contaminated services where upstream materials remain unverified. Additionally, requirements for complete system inventories before planning, design, and construction funding may delay replacement of already-identified priority lines where communities could begin protective work immediately.

We recommend TWDB consider successful approaches from other states to maximize program impact. California and Michigan demonstrate effective use of enhanced set-asides for direct technical assistance, significantly reducing administrative barriers for disadvantaged communities. Pennsylvania and New Jersey incorporate population-weighted scoring factors ensuring projects benefiting more residents receive appropriate consideration. EPA's Lead Service Line Replacement Accelerator states including Connecticut, New Jersey, Pennsylvania, and Wisconsin successfully implement simultaneous inventory and replacement activities.

Texas has a historic opportunity to protect public health through strategic LSLR implementation. We recommend TWDB consider increasing set-asides, incorporating population impact factors in scoring methodology, and developing flexible implementation approaches that accommodate both rural and urban system needs. These adjustments could significantly expand program reach while maintaining fiscal responsibility and ensuring all Texas communities have equitable access to these critical public health resources.

Respectfully submitted,
Usman Mahmood & Guadalupe Fernandez
Bayou City Waterkeeper
usman@bayoucitywaterkeeper.org | guadalupe@bayoucitywaterkeeper.org

Response:

The TWDB appreciates receiving this comment for the Amended SFY 2025 DWSRF LSLR IUP.

The use of LSLR funds is restricted for only lead service lines and galvanized service lines downstream of known lead components. This restriction is based on EPA guidance. There is not a requirement for complete inventories in order for systems to access planning, design, and construction funds for replacing already-identified eligible lead or galvanized requiring replacement service lines. The amended IUP limits planning, design, and construction funds available to only include the already-identified lead or galvanized requiring replacement service lines.

Thank you for the suggestions regarding set-asides and population impact factors for scoring methodology. When planning for future funding rounds of this program, the TWDB evaluates all rating criteria to ensure their effectiveness in meeting the goals of the program and the needs of the water systems. The TWDB will take this recommendation into consideration when assessing funding opportunities.

Change:

None.

Project Information Form (PIF) Comments

3-D Mobile Home and RV Park – PIF #16061

Comment Submitted by: John Doe (Submitted via MS Forms)

Comment Date: September 3, 2025

Comment: How the project is even eligible since its not even good use of LSLR money to spend on galvanized lines. Why is this ranked so high, it should not be eligible. Description says: Project will be to replace all galvanized lines without any mention of lead in system. The EPA only considers galvanized lines downstream of lead components as eligible for LSLR funding. TWDB is making exceptions for 3-D Mobile Home and RV Park Investments LLC.

Response: The TWDB appreciates receiving this comment for the Amended SFY 2025 DWSRF LSLR IUP. The DWSRF LSLR eligible applicants include privately-owned community water systems, such as 3-D Mobile Home and RV Park. Eligible projects include development of service line inventories and replacement of galvanized service lines that are currently, or ever were, downstream of known lead service lines or components. During the initial review of the Project Information Forms (PIFs) clarification was provided by the applicant stating the galvanized lines were downstream of known lead service lines.

Change: None.

City of Beaumont– PIF #16053

Comment Submitted by: John Pippins, III, P.E., Water Utilities Design Manager, City of Beaumont

Comment Date: September 12, 2025

Comment: The City of Beaumont Water Utilities Department (the City) would like to make a public comment on the Drinking Water State Revolving Fund Amended Intended Use Plan Lead Service Line Replacement Funding SFY 2025.

The City has been working with the Texas Water Development Board to finalize the application for the Board's approval, and this proposed change could significantly impede the previously submitted schedule for replacement. The City currently has 2 known lead service lines, 216 galvanized service lines that have unknown upstream history, 10,860 known service lines, and 38,193 unknown service lines.

Predictive modeling shows that over 4,000 service lines are high probability (Greater than 80%) of being lead or galvanized. The sooner we can begin inventorying and replacing qualifying lines during the inventory process, the safer our community will be.

Would the state consider earmarking funds for future replacement based on predictive modeling? With the Texas Commission on Environment Quality allowing predictive modeling to be utilized, is an inventory including predictive modeling considered sufficient for replacement funds or will all galvanized and lead lines need to be physically verified? Please define 'known' under the significant program changes portion of the draft.

If the proposed changes are approved, it will inevitably prevent or delay hazardous lead service lines from being replaced, pending how the state determines future funding and resource allocation.

Sincerely,
John Pippins III, P.E.
Water Utilities Design Manager
City of Beaumont

Response: The TWDB appreciates receiving this comment for the Amended SFY 2025 DWSRF LSLR IUP. Within the IUP, "known" is defined as what was reported to the Texas Commission on Environmental Quality (TCEQ), the regulatory agency for compliance with the lead and copper rules. The TWDB utilizes the inventory information applicants have submitted to the TCEQ to determine the number of lead or galvanized requiring replacement service lines. If an applicant utilized predictive modeling to determine their inventory, and that inventory was accepted by the TCEQ, then those are the numbers that the TWDB will utilize under the DWSRF-LSLR program.

Thank you for the suggestion regarding earmarking or reserving funds for future replacement. When planning for future funding rounds for this program, the TWDB evaluates program criteria to ensure its effectiveness in meeting the goals of the program

and the needs of Texas water systems. Suggestions related to reserving funds will be considered for future rounds.

Change: Clarification of “known” lead lines was added to the IUP, tying the definition to the submitted inventory.



Drinking Water State Revolving Fund
Amended Intended Use Plan
Lead Service Line Replacement Funding
SFY 2025
(Revised FFY 2024 Allotment and FFY 2022
Reallotment)

Amended DRAFT Date: 08/29/2025

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Texas Water Development Board rules governing the Drinking Water State Revolving Fund program (Texas Administrative Code, Title 31, Part 10, Chapter 371) may be accessed online at https://texas-sos.appianportalsgov.com/rules-and-meetings?chapter=371&interface=VIEW_TAC&part=10&title=31

Drinking Water State Revolving Fund Acronyms

ACS	American Community Survey
AIS	American Iron & Steel
AMHI	Annual Median Household Income
BABA	Build America, Buy America Act, 2021
CFR	Code of Federal Regulations
CWSRF	Clean Water State Revolving Fund
DWSRF	Drinking Water State Revolving Fund
EPA	Environmental Protection Agency
FFY	Federal Fiscal Year
FMT	Financial, Managerial, and Technical
IIJA	Infrastructure Investment and Jobs Act, 2021
IUP	Intended Use Plan
LSLR	Lead Service Line Replacement
MMD	Municipal market data
NEPA	National Environmental Policy Act
PIF	Project Information Form
POU	Point of Use
PPL	Project Priority List
PWS	Public Water System
SDWA	Safe Drinking Water Act
SFY	State Fiscal Year
SRF	State Revolving Fund
TCEQ	Texas Commission on Environmental Quality
TWDB	Texas Water Development Board

I. Overview

The Infrastructure Investment and Jobs Act, 2021, Pub. L. 117-58 (IIJA) appropriated capitalization grant funds for Federal Fiscal Years (FFY) 2022 to 2026 for lead service line replacement projects and associated activities directly connected to the identification, planning, design, and replacement of lead service lines.

This Intended Use Plan (IUP) covers the Drinking Water State Revolving Fund (DWSRF) capitalization grant funds allocated to Texas from FFY 2024 appropriations for Lead Service Line Replacements (LSLR) in the amount of \$63,014,000 and the FFY 2022 reallocations in the amount of \$10,782,000. The appropriations require 49 percent, or \$36,160,040 of the capitalization grant amount be provided as additional subsidization, which will be in the form of principal forgiveness. In the event the EPA reallocates LSLR funding from other states, the TWDB may apply for those funds through this IUP or a future IUP.

After the administrative set-aside, a total of \$70,906,323 is available for projects under this IUP.

The Environmental Protection Agency (EPA) implementation memorandum provides the following guidance and information:

Eligible Use of Funds:

For a project or activity to be eligible for funding under this appropriation, it must be otherwise DWSRF eligible and be an LSLR project or associated activity directly connected to the identification, planning, design, and replacement of lead service lines.

Any project funded under this appropriation involving the replacement of a lead service line must replace the entire lead service line, not just a portion, unless a portion has already been replaced or is concurrently being replaced with another funding source.

To define a “lead service line” for the purpose of this appropriation, EPA will use an amended version of the Lead and Copper Rule Revisions’ regulatory definition, which is,

“...a service line made of lead, which connects the water main to the building inlet. A lead service line may be owned by the water system, owned by the property owner, or both. For the purposes of this subpart, a galvanized service line is considered a lead service line if it ever was or is currently downstream of any lead service line or service line of unknown material. If the only lead piping serving the home or building is a lead gooseneck, pigtail, or connector, and it is not a galvanized service line that is considered a lead service line, the service line is not a lead service line.”

EPA has expanded the eligible uses beyond the definition above to also include the replacement of lead goosenecks, pigtails, and connectors as eligible expenses, whether standalone or connected to a lead service line. This Texas Water Development Board (TWDB) program uses the expanded EPA definition for this special funding. These funds cover and require replacement of the entire lead service line as defined above which terminates at the premise plumbing, regardless of the location of the water meter or isolation valve, or even the lack of an isolation value before the start of premise plumbing. Any portion of a “lead service line” as defined above that extends through the wall and into the house must be replaced. No portion of a particular “lead service line”, whether outside or inside the structure, may remain. The composition of the material, such as a lead service line pipe, should determine what must be replaced. Premise plumbing, though, is not eligible under this DWSRF program special funding.

Beginning with the FFY2024 grant, the EPA has clarified that galvanized service lines that are currently, or ever were, *downstream of known lead service lines or components are the only galvanized service lines eligible for Lead Service Line Replacement Funding*. Galvanized service lines that are downstream of unknown lines are not eligible for replacement using the funding under this program but are eligible under the regular DWSRF program.

Additional Subsidization:

The IIJA contained the following provision:

“Provided further, That for the funds made available under this paragraph in this Act, forty-nine percent of the funds made available to each State for Drinking Water State Revolving Fund capitalization grants shall be used by the State to provide subsidy to eligible recipients in the form of assistance agreements with 100 percent forgiveness of principal or grants (or any combination of these), notwithstanding section 1452(d)(2) of the Safe Drinking Water Act (42 U.S.C. 300j-12)”

This language requires states to provide 49% of the capitalization grant amount as additional subsidization in the form of principal forgiveness and/or grants. EPA’s guidance says states must provide all additional subsidization to water systems that meet the state’s disadvantaged community criteria.

II. Background

In 1996 Congress passed federal amendments to the Safe Drinking Water Act (SDWA) that established the DWSRF program. The TWDB is authorized by state law to administer this program for Texas.

The TWDB is the financing agency for the DWSRF and has a contractual relationship with the state’s primacy agency, the Texas Commission on Environmental Quality (TCEQ), to perform DWSRF activities. TCEQ performs DWSRF activities that include rating proposed projects, state program management, small systems technical assistance, assessments for

ground water sources, source water technical assistance, sanitary surveys, complaint investigations, enforcement activities, disaster assistance, and implementation of the State of Texas approved Capacity Development Strategy.

The IJA appropriated supplemental capitalization grant funds for FFY 2022 to 2026 for general activities, lead service line replacement, and emerging contaminants. The SFY 2025 IUP covering the FFY 2024 allotment was effective September 12, 2024. The SFY 2025 IUP was amended based on the revised FFY 2024 allotment and included the FFY2022 re-allotment and was effective April 17, 2024. This second amendment IUP includes the revised FFY 2024 allotment as dated on the EPA memorandum from May 30, 2025, and includes the FFY 2022 re-allotment.

III. Projects to Fund

A. Eligible Applicants

Applicants eligible to apply for assistance are:

- Existing community Public Water Systems (PWSs) including political subdivisions, nonprofit water supply corporations and privately-owned community water systems.
- Non-profit, non-community public water systems.
- State agencies.

An entity's project must meet the disadvantaged criteria to receive funding under this IUP. See Appendix D: Criteria to Determine Disadvantaged Community Eligibility for more information.

B. Eligible and Ineligible Use of Lead Service Line Replacement Funds

1. Examples of eligible projects and activities:

For a project or activity to be eligible for funding under this appropriation, it must be otherwise DWSRF eligible and be an LSLR project or associated activity directly connected to the identification, planning, design, and replacement of lead service lines. Any project funded under this appropriation involving the replacement of a lead service line must replace the entire lead service line, not just a portion, unless a portion has already been replaced.

- Complete removal of lead service lines (public and privately owned portion) or service lines made of galvanized iron or galvanized steel (that are currently or have previously been downstream of lead components) and replacement with a pipe that meets the requirements established under 40 CFR 143 and which complies with state and local plumbing codes and or building codes.
- Removal of lead or galvanized goosenecks, pigtails, and connectors, and replacement with an acceptable material that meets the requirements established under 40 CFR 143 and which complies with state and local plumbing codes and or building codes.
- Replacement of curb stops, curb stop boxes, and other service line appurtenances that are removed as part of full LSLR.
- Site restoration, including landscaping, sidewalks, driveways, etc. if the removal was

necessary to replace the lead service line.

- Permit fees if the fees are normal, required, and specific to the LSLR. It is recommended that communities waive these fees.
- Temporary pitcher filters or point-of-use (POU) devices certified by an American National Standards Institute accredited certifier to reduce lead during or for a short time period after LSLR projects.
- Development or updating of lead service line inventories, including locating and mapping lead service lines.
- Methods of investigation to develop inventories could include visual observation, water quality sampling (non-compliance), excavation, vacuum or hydro-excavation, statistical analysis, or other emerging technologies.
- Planning and design for infrastructure projects listed above.
- Community engagement planning related to projects listed above.
- Non-routine lead sampling (if not for compliance purposes) as part of a LSLR project.

2. Ineligible projects and activities:

- A project or activity that is not a lead service line replacement project or associated activity directly connected to the identification, planning, design, and replacement of lead service lines.
- Any project or activity not replacing the entire lead service line unless a portion of a lead service line has already been replaced or is concurrently being replaced with another funding source.
- Corrosion control studies, corrosion control infrastructure, replacing water meters, and replacing water mains. Also, consistent with the regular DWSRF program, funding for bottled water and premise plumbing are not eligible under this appropriation.
- Galvanized service lines that are downstream of unknown lines are not eligible for replacement using the funding.

- 3. Reimbursement for service line inventory activities** – An entity may include in its proposed project a request for reimbursement for eligible initial service line inventory activities that were required to comply with the EPA's Lead and Copper Rule Revisions regulation, or other service line inventories conducted or being updated. However, the activities must have been performed in accordance with all DWSRF program requirements to be reimbursed.

IV. Significant Program Changes

Significant program changes from the previous year's IUP are highlighted below.

These changes address the new DWSRF-LSLR program requirements while striving to ensure the programs continue to offer financial assistance to all eligible systems within the constraints of the program. These adjustments are intended to allow the TWDB to continue to meet the needs of its customers while addressing the new allocation and programmatic requirements.

1. Dedicated Construction-Ready funds would cease.

2. Beginning with FFY2024, the EPA has clarified that galvanized service lines that are currently, or ever were, downstream of known lead service lines or components are the only galvanized service lines eligible for Lead Service Line Replacement Funding.
3. Commitment for Planning, Acquisition, Design, and Construction (PADC) funds are only available for the known, eligible service lines, regardless of the status of the inventory or number of unknown service lines. For example, if an applicant has identified 20 lead service lines and has 100 unknown service lines, the commitment for PADC funds is limited to the 20 lead service lines that have been identified. The number of known service lines will be based on what was reported to the regulatory agency (TCEQ).

V. Amount Available / Allocations

1. Allocations

A total of \$70,906,323 is available for projects under this IUP. A total of \$36,160,040 will be allocated to the required additional subsidization funding and \$34,746,283 will be allocated to the loans/bonds, including the financed loan origination fee.

2. Principal Forgiveness / Loan Ratio

All financing will be made at the ratio of 51 percent principal forgiveness and 49 percent loan/bond, including the financed loan origination fee. The loan origination fee must be financed under this IUP as part of the DWSRF program commitment to ensure the TWDB maintains the required principal forgiveness percentage for the capitalization grant. An entity's project must meet the disadvantaged criteria to receive funding under this IUP. See Appendix D: Criteria to Determine Disadvantaged Community Eligibility for more information.

3. Inventories - Separate interest rates, closings requirements, and debt instruments offered

The loan portion of the approved project covering the service line inventories will be at zero percent (0%) interest, may close separately from any portion for approved for Planning, Acquisition, Design, and/or Construction, and may be in the form of a loan agreement to any entity that may legally employ that option to save on closing costs.

The loan/bond financing for Planning, Acquisition, Design, and/or Construction portion will be at the DWSRF program's regular reduced interest rate.

4. Interest rate reduction methodology:

The interest rate on these equivalency projects will be a 35-percent reduction from the Thomson Reuters Municipal Market Data (MMD) rate adjusted for yield to maturity that is applicable to the entity's rating, with non-rated entities using the Baa rate.

Exclusions from the interest rate reduction methodology - the interest rate reduction methodology does not apply to any portion of financing that is offered at zero percent.

Allocation of Grant Funds, including Additional Subsidization & Set-Asides:

DWSRF LSLR FFY 2024 Revision and Reallocated FFY 2022 Funds	\$73,796,000	% of Grant
DWSRF LSLR FFY2024 Allocation (Revised 5/30/2025)	\$63,014,000	
DWSRF LSLR FFY2022 Reallocation	\$10,782,000	
Minimum & Maximum – Principal Forgiveness		
Minimum & Maximum (Total)	\$36,160,040	49%
Current Allocation of Principal Forgiveness		
Total Currently Allocated	\$36,160,040	49%
Total Breakdown		
Total Principal Forgiveness Allocated to Projects	\$36,160,040	49%
Set-aside – TWDB Administration (including Project Management System)	\$2,889,677	3.92%
Loans/Bonds	\$34,746,283	47.08%
Total	\$73,796,000	

VI. Funding Options and Terms

Equivalency projects (Federal Requirements) – All projects will be considered equivalency projects, which must follow all federal requirements commonly known as “cross-cutters.” More information on the federal cross-cutters may be found in Appendix E.

1. Funding Options Available:

Entities with projects that meet the disadvantaged criteria and are listed on the Project Priority Lists (PPLs) may be invited to apply for the following funding options.

a. Inventories (Equivalency)

Funding for the development or updating of service line inventories, including locating and mapping service lines. To be eligible, the activity must have been performed in accordance with all DWSRF program requirements, including the Disadvantaged Business Enterprise requirements. All financing will be made at the ratio of 51 percent principal forgiveness and 49 percent loan/bond, including the financed loan origination fee (except TWDB may adjust the ratio slightly for some commitments to yield the 49 percent principal forgiveness amount to the mathematical precision EPA determines is required under the IIJA). The loan origination fee must be financed under this IUP as part of the DWSRF program commitment to ensure the TWDB maintains the required principal forgiveness percentage for the capitalization grant. The loan portion will have an interest rate of zero percent (0%). It will carry different closing timeframe requirements, and the repayable portion may be provided in the form of a loan agreement to any entity that may legally employ that option.

b. Planning, Acquisition, Design, and/or Construction (Equivalency)

Funding for all other eligible activities will be under this option. All financing will be made at the ratio of 51 percent principal forgiveness and 49 percent loan/bond, including the financed loan origination fee. The loan origination fee must be financed under this IUP as part of the DWSRF program commitment. The loan/bond portion will have the regular subsidized interest rate. The funding will have different closing timeframe requirements than the inventory funding option. This financing will only be provided in the form of a loan agreement to those entities that may only employ that option under state law. These funds are only available for known lead service lines or eligible galvanized requiring replacement, as reported to the regulatory agency.

2. Terms of Financial Assistance

Loans may be offered for a term of up to 15 years for the portion provided under the inventory only funding option. Loans may be offered up to 30 years for the planning, acquisition, design, and/or construction phases. If the project consists of service line inventories and planning, acquisition, design, and/or construction phases, then the cost for the inventories, if less than 25 percent of the total amount being financed, may be financed with a loan of up to 30 years. The zero percent rate on the costs for the service line inventories will reduce the overall interest rate on the total amount financed. The

term of financial assistance offered may not exceed the expected design life of an eligible project. The TWDB may allow principal and interest payments on a bond or loan to commence not later than 18 months after completion of the project, if considered appropriate as determined by the Executive Administrator.

3. Federal Requirements on Available Funds

Funds are subject to federal requirements such as Davis-Bacon Act prevailing wages and the Build America, Buy America Act (BABA). DWSRF-funded projects must follow all federal “cross-cutter” requirements and EPA’s public participation requirements. These requirements are outlined in Appendix E.

VII. Goals

The primary goal of the Texas DWSRF program is to improve public health protection. In addition, the overall goals of the Texas DWSRF program are to identify and provide funding for maintaining and/or bringing Texas’ PWSs into compliance with the SDWA; to support affordable drinking water and sustainability; and to maintain the long-term financial health of the DWSRF program fund. Goals specific to the lead service line replacement funding in this IUP are listed below.

A. Short-Term Goals

1. Fund eligible project proposals to identify and replace lead service lines up to the amount of funding available.
2. Provide outreach to systems within Texas on the availability of this funding to identify and replace lead service lines.
3. To improve public health throughout Texas by employing disadvantaged criteria that will maximize the number of systems able to identify and replace any lead service lines in Texas.
4. The TWDB and TCEQ will collaborate on the deployment of these funds in a manner that will provide the most beneficial assistance to entities conducting required service line inventories and replacing identified lead service lines.

B. Long-Term Goals

1. Use the lead service line grant funds provided to Texas to fund project proposals to replace all identified lead service lines in Texas.
2. To the extent eligible project proposals are received, use all the lead service line replacement funds allotted to Texas to improve public health and ensure compliance with the requirements of SDWA.

3. To enhance the timely identification and removal of any lead service lines in Texas, maximize the number of systems that receive the benefit of the subsidy available under the IIJA appropriations.
4. The TWDB and TCEQ will collaborate on the deployment of these funds in a manner that will provide the most benefit to public health and ensure compliance with the requirements of SDWA.
5. Employ these funds in a manner that will maintain the fiscal integrity of the DWSRF in perpetuity.

VIII. Participating in the DWSRF Program

A. Solicitation of Project Information

Project information was solicited from eligible entities across the state using direct emails, notices posted on the TWDB website, and financial assistance workshops held throughout the state. Potential applicants submitted a Project Information Form (PIF) by the response deadline in Appendix A. Potential applicants submitted PIFs by the response deadline of April 1, 2024.

The required information submitted on a PIF consisted of:

- A detailed description of the proposed project to identify and/or replace lead service lines.
- A map(s) showing the location of the service area.
- An estimated total project cost that is certified by a registered professional engineer if project costs are greater than \$100,000.
- A checklist and schedule of milestones to determine a project's readiness to proceed to construction.
- Information necessary to rank the project:
 - (a) Whether there are identified lead service lines
 - (b) Project area's Annual Median Household Income (AMHI)
 - (c) System size – number of connections
- Information necessary to determine disadvantaged eligibility.
- Signature of the applicant's authorized representative. Additional information detailed within the solicitation for projects.

Any survey being used for income determination must be completed within five years prior to the date the TWDB receives the PIF.

B. Evaluation of the Project Information Received and Priority Rating System

All PIFs submitted received a review by TWDB staff. The scores are based on information received by any established PIF deadline. Throughout the evaluation process, entities were contacted by staff if additional information was needed.

C. Ranking and Creation of the Project Priority List

Each project submitted by the initial deadline and determined to be eligible is ranked from highest to lowest by the rating factors and included on the PPL. In the event of ties in the rating, priority is given to the project serving the fewest connections. Project information submitted after the PIF deadline will not be considered for rating purposes prior to adoption of the initial PPL. Following approval of the IUP, changes to a ranked project that result in a project no longer addressing the issues for which it was rated will require the project to be re-rated and re-ranked. Changes in the project that do not trigger re-rating and re-ranking are:

1. The applicant for a proposed project changes but the project does not change;
2. The number of participants in a consolidation project changes and the change does not result in a change to the combined rating factor; and
3. The fundable amount of a proposed project does not increase by more than 10 percent of the amount listed in the approved IUP. The Executive Administrator may waive the 10 percent limit to incorporate additional elements to the project.

Based on a review of readiness to proceed to construction, the TWDB determines which phases would be eligible to receive funding. Only projects that have identified eligible lead service lines are eligible for planning, design, and construction funds. The phases indicated on the TWDB invitation represent the phases deemed eligible based on that review.

D. Bypassing Projects

The TWDB's Executive Administrator may decide to bypass, or skip, higher ranked projects in favor of lower ranked projects to ensure that funds available are utilized in a timely manner, that statutory and capitalization grant requirements are met. In addition, if an entity is offered funding for any project that has an interrelated project ranked lower on the list, the Executive Administrator has discretion to also offer funding for the interrelated project. Reasons for bypassing projects are discussed in Appendix F.

E. Phases for Invited Projects

1. Inventories Funding Only

This option covering both new service line inventories as well as reimbursement of costs to perform service line inventories is used to fulfill TCEQ's requirements for the EPA Lead and Copper Rule Revisions regulation. To be eligible for reimbursement,

the activity must have been performed in accordance with all DWSRF program requirements, including the Disadvantaged Business Enterprise requirements.

2. Pre-Design Funding Option (or Inventories, Planning, Acquisition, Design and Construction Funding)

The pre-design funding option allows an applicant to receive a single commitment for all phases of a project. The planning, acquisition, design, and construction funding commitment will be limited based on the number of known eligible lead service lines. The construction portion of the project must be deemed ready to proceed and lead service lines must be identified before funds for the construction phase will be released.

3. Construction Funding Only

Lead service lines must be identified before construction work proceeds.

4. Planning, Acquisition, and Design

A project that was not deemed ready to proceed to construction may receive an invitation to fund only the Planning, Acquisition, and/or Design portion of the project. The funds available are limited to the number of known lead service lines or eligible galvanized requiring replacement service lines, as reported to the regulatory agency.

5. Viability and Feasibility of Projects

A project must demonstrate to the TWDB that it is viable, feasible, and sustainable prior to being invited to submit an application and prior to receiving a commitment for any funding option for the acquisition, design or construction phases of the project. A project may receive funds for the planning phase to assess the viability and feasibility of a project.

F. Invitations and Application Submissions

The TWDB will invite certain entities on the PPL to submit an application for eligible project phases. An entity on the list may not submit an application until it receives an invitation from TWDB. TWDB will consider bypass procedures in Appendix F. when deciding whether it needs to bypass projects on the PPL.

Intent to Apply

As part of the invitation process the TWDB may require the applicant to submit an intent to apply form or information by a specified deadline showing the applicant's intent to request up to the eligible amount of funding in the IUP. Failure to submit the requested intent to apply information by the established deadline will result in TWDB bypassing the project on the IUP list.

Prior to submitting an application, entities are required to participate in a pre-application meeting to discuss the application process and project requirements. Invited applications from projects on the PPL that are received during the initial invitation round after Board approval of the IUP will be allotted available funding based on rank order. All projects must be determined administratively complete as submitted, or within 14 days from the date the applicant receives a notice to correct deficiencies, or any funding may be reallocated.

Each application received by the TWDB will be reviewed to ensure that the required milestones have been met to allow funding of the phase(s) being requested. If the application review determines that a project is not ready to proceed for funding for the phase(s) being requested, the project may be bypassed.

Projects may be bypassed if an applicant fails to timely submit a complete application or additional requested information.

Deadline for Receipt of Application

The TWDB will establish a deadline for receipt of the application. If the application is not received by the established deadline, the project will be bypassed.

Subsequent Invitations

TWDB may invite additional projects to submit if any funds remain unallocated after an initial invitation. Applicants may submit a PIF at any time for a project to be considered for inclusion on an amended PPL. The new projects will be considered after those on the original PPL list have been invited. The amended PPL will undergo a 14-day public review period that will be advertised on the agency website.

G. Addressing Any Water Loss Mitigation within the Application

If an applicant that is a retail public utility providing potable water has a water loss that meets or exceeds the threshold for that utility in accordance with §358.6 of Title 31, Part 10, Texas Administrative Code, the retail public utility must use any other additional financial assistance provided by the TWDB, to mitigate the utility's water loss. Due to the limited eligibility of which project activity expenses can be reimbursed through the LSLR program, the TWDB may waive this requirement if the TWDB finds that the utility is satisfactorily addressing the utility's system water loss. Mitigation, if necessary, will be in a manner determined by the retail public utility and the TWDB's Executive Administrator in conjunction with the project proposed by the utility and funded by TWDB.

H. Closing Deadlines

The deadlines to close a commitment is dependent on whether the commitment is 100% for inventory activities or some combination of inventory activities, along with planning, acquisition (if needed), design and/or construction. If the commitment is only for inventory activities it must close within twelve months from the date of commitment. If

the commitment is a combination of inventory activities, along with planning, acquisition (if needed), design and/or construction it must close within 24 months. The recipient may elect to close separately on the amount for inventory activities before closing on the remainder of the commitment within the 24-month timeframe. In extenuating circumstances, the Board may grant extensions of time to close if an applicant demonstrates sufficient reason for a delay. The TWDB may extend these closing deadlines if necessary to confirm to the closing schedule for concurrent financing for the project from another TWDB financing program. To manage cash flow and borrowing costs, TWDB may elect to close the loan portion to an escrow account before subsequently closing the principal forgiveness portion to an escrow account, or employ other methods.

Type of Financial Assistance	Closing Deadline
Commitment is only for inventory activities	12 months
Combination of inventory activities, along with planning, acquisition (if needed), design and/or construction	24 months

I. Limits

1. Proportionate Share/Capacity

The TWDB may limit the amount of total funding available to an individual entity or project based on a proportionate share of total funds available.

2. Additional Project Funding Before Closing

The total project costs may be increased if the entity shows that additional funds are necessary to implement the project.

3. Reduction in Closing Amount

If the closing amount is reduced from the commitment amount, then the principal forgiveness amount for the closing will be reduced on a pro rata basis to maintain the required ratio of 51 percent principal forgiveness and 49 percent loan, including the origination fee.

J. Leveraging to Provide Additional Funding

The TWDB may leverage the DWSRF program as necessary to meet the demand for funding additional drinking water projects. The TWDB does not anticipate leveraging the lead service line replacement grant funds at this time.

K. Updates to the Intended Use Plan

Substantive changes to the IUP may be made through an amendment after a 14-day public review and comment period. Non-substantive changes may be made by the TWDB without public notification.

IX. Set-Asides

Federal regulations allow states to set aside up to 31 percent of the capitalization grant funds for purposes other than financing construction projects for water systems. The set asides for the FFY 2024 capitalization grant for lead service line replacement will be allocated as shown below. The state reserves the right to make use of unused set-aside funds through future grant opportunities.

A. Texas Water Development Board Administration and Technical Assistance Activities

The SDWA allows a state to set aside funds to cover the reasonable costs of administering the DWSRF and to provide technical assistance to public water systems. The amount that may be taken for these purposes is the amount of any fees collected by the State, regardless of the source; and the greatest of (1) \$400,000, (2) one-fifth of one percent of the current valuation of the DWSRF (both loan and set-asides), and (3) an amount equal to four percent of all grant awards to the DWSRF for the particular fiscal year.

The TWDB will draw administrative and technical assistance set-asides from the FFY 2024 Capitalization Grants in the amount of \$2,889,677. This amount is based on the option of using four percent of the FFY 2024 capitalization grant for lead service line replacement activities. These funds will be used for allowable expenses such as reporting activities, payment processing, application assistance, project development and monitoring, and technical assistance to public water systems. These funds will be used by August 31, 2029 to administer this program. In addition, the TWDB assesses fees for the purpose of recovering administrative costs. These fees are placed in a separate account for future administrative expenses. The fees are generated by an assessment of 2.0 percent of the portion of the DWSRF financial assistance that is repaid and is assessed at closing. Fees collected will be deposited into the Administrative Cost Recovery Fund.

B. Coordination of Activities with the Texas Commission on Environmental Quality

The TWDB and TCEQ regularly communicate to discuss projects in need of financial assistance through the DWSRF program. The two agencies hold periodic DWSRF coordination meeting and TCEQ staff attend many of TWDB's pre-application meetings and financial assistance workshops.

C. Other Set-Aside Funds

All other set-aside authority from the grants is reserved.

X. Financial Status

A. State Match

No state match is required for the lead service line replacement grant funds.

B. Binding Commitment Requirement

The TWDB will enter into binding commitments with entities that equal the amount of a FFY 2024 grant payment allocated to projects within one year after the receipt of the grant payment. A binding commitment occurs when the TWDB's Board adopts a resolution to commit funds to a project.

C. Leveraging

The DWSRF program will be leveraged as necessary to provide funds to meet the needs of public water systems in the state. The TWDB does not anticipate leveraging the lead service line replacement grant funds at this time.

D. Cross-Collateralization

On March 1, 2018, the TWDB has cross-collateralized the Clean Water State Revolving Fund (CWSRF) and the DWSRF as a source of revenue and security for the payment of the principal and interest on bonds for the DWSRF and CWSRF programs. State authority is provided under Section 15.6042 of the Texas Water Code. The TWDB has received a certification from the state Attorney General that state law permits the TWDB to cross-collateralize the assets of the CWSRF and the DWSRF. Cross-collateralization of the CWSRF and DWSRF will enhance the ability of the DWSRF to leverage its funds and increase its lending capacity without detriment to either of the SRF programs.

1. Summary of the cross-collateralization structure:

- a. The type of moneys which will be used as security – Pledged Political Subdivision Bonds and certain other funds included in the Master Resolution (program account, portfolio account, and revenue account) will secure the bonds.
- b. How moneys will be used in the event of a default - In the cross-collateralized scenario, Political Subdivision Bonds from the non-defaulting program will be used to cover the debt service delinquency on the defaulting program. If, for any reason, insufficient Political Subdivision Bonds exist in both programs, then program equity will be utilized.
- c. Whether or not moneys used for a default in the other program will be repaid; and, if it will not be repaid, what will be the cumulative impact on the funds. While a decision to repay or not repay would be made at the time of default, the TWDB would either require repayment when funds are available or transfer repayment funds.

2. Proportionality – The proceeds generated by the issuance of bonds will be allocated to the purposes of the CWSRF and the DWSRF in the same proportion as the assets from the two funds that are used as security for the bonds.

3. State Match – In accordance with Texas Water Code §§ 17.853(c)(1) and 17.859, the TWDB intends to provide state match through the issuance of one or more revenue bonds in a program series that will fund the two SRF programs. Supplemental bond resolutions for the issuance of each series will provide detail on what specific money is pledged as security for each program (CWSRF or DWSRF) within the series. As required, the CWSRF and DWSRF will continue to be operated separately. The cash flows for the DWSRF program and the CWSRF program will be accounted for separately. Repayments on loans in the CWSRF program will be paid to the CWSRF and repayments on loans made in the DWSRF program will be paid to the DWSRF.

Similar to other states' financing methods where state match is not provided by appropriation and is instead generated through debt issuance, the TWDB cross-collateralization structure allows the TWDB to retire bonds for the State Match with interest earnings payments only, not principal, earned from each SRF in accordance with 40 CFR § 35.3550(g)(3).

E. Method of Cash Draw

There is no state match and the EPA has revised its cash draw policy as described in "Class Exception from the Clean Water and Drinking Water State Revolving Fund Cash Draw Rules", dated November 18, 2022. Therefore, TWDB will draw federal funds using acceptable evidence of expenditures.

F. Long-Term Financial Health of the Fund

The long-term financial health of the DWSRF is monitored through ongoing cash flow and capacity modeling. The TWDB lending rate policy has been established to preserve the corpus of the capitalization grants and state match funds, excluding the amount of additional subsidization, set-aside amounts from each grant, and net transfers. The TWDB will continue to manage the DWSRF to ensure funds will be available in perpetuity for activities under the SDWA.

G. Interest Rate Policy

The interest rate will be a percentage reduction from the Thomson Reuters Municipal Market Data (MMD) rate adjusted for yield to maturity that is applicable to the entity's rating, with non-rated entities using the Baa rate, as follows:

- (a) Equivalency projects: 35% reduction

Exclusions from interest rate reduction methodology - the interest rate reduction methodology does not apply to any portion of financing that is offered at zero percent (0%).

Rates are set five business days prior to the adoption of the political subdivision's bond ordinance or resolution or the execution of the financial assistance agreement, but may be based on interest rate levels determined as of an earlier date, and are in effect for forty-five days.

H. Fees

The only fee is an origination fee of 2.0 percent on the loan portion that is assessed at closing. All fees must be financed through the DWSRF loan. Fees are not deposited into the DWSRF.

I. EPA Program Evaluation Report and Audit

EPA has conducted an annual program review of the DWSRF program for SFY 2022 and sent the final report to TWDB in July 2023. EPA made six recommendations: to continue hiring engineers; document BABA compliance; track BABA waivers; ensure compliance with Executive Order 14030 regarding the National Floodplain Risk Management Standard; meet the minimum additional subsidization requirements; and meet the binding commitments requirements following receipt of capitalization grants. The TWDB continues to implement strategies to address these recommendations and will provide status updates within the SFY 2024 Annual Report.

The Texas State Auditor's Office published the results of the SFY 2023 Single Audit of the DWSRF on February 22, 2024 (Report 24-318). There were no findings as a result of the review.

XI. Navigating the Lists

Appendices G – I are a series of lists that detail the proposed project information of each project based upon the PIFs received.

- **Appendix G** - The alphabetical list is the PPL sorted alphabetically. It contains the project information; the name of the applying entity, their total number of points and associated priority order rank, the total population, a detailed description of the proposed project, all project phases requested by the entity, and total project cost. A grand total for all of the projects is listed on the last page of the appendix.
- **Appendix H** – Projects that were deemed ineligible to receive DWSRF funding with a brief description as to why they were deemed ineligible.
- **Appendix I** – The ranked list is the PPL sorted in rank order. The content is the same as the alphabetical list in Appendix G.
- **Appendix J** – The list of projects that will be invited in the initial invitation round. The information provided in this list is similar to the alphabetical list (Appendix G) and priority order list (Appendix I). The TWDB has determined which project phases are eligible to receive funding during this SFY, which is depicted in the Phase(s) column. Projects on this list will receive an invitation letter from the TWDB upon Board approval of the IUP. Pertinent notes and the definitions of acronyms and footnotes are listed on the last page of the appendix along with a grand total for the projects.

Appendix A. Public Review and Comment

Public participation is an important and required component of the IUP development process. The TWDB takes seriously its responsibility in administering these funds and considers public input necessary and beneficial.

A. Notice

To seek public comment, the draft IUP including the PPL was made available until August 2, 2024. This amended draft IUP including the PPL was made available until September 14, 2025. The draft FFY 2024/SFY 2025 DWSRF Lead Service Line Replacement IUP will be announced as follows:

- Public notification of the draft IUP and the public comment period will be posted on the TWDB website at www.twdb.texas.gov.
- The notice will be sent via email to all entities that submitted projects for the SFY 2025 IUP and everyone who had signed up to receive TWDB email notifications.
- A copy of the draft IUP will be sent to EPA after publication.

B. Comment

Comments on the initial IUP were accepted from July 12, 2024, until 5:00 P.M. on August 2, 2024. Comments on this amended IUP were accepted from August 29, 2025, until midnight on September 14, 2025. Comments were accepted via the following methods.

1. Submission of a comment online via a Microsoft Form submittal. The link to the online form will be provided within an official notice of the public comment period.
2. Emailing comments on the DWSRF LSLR IUP to the following electronic mail address and specifying in the subject line "DWSRF LSLR IUP comments" DWSRF@twdb.texas.gov.
3. For the initial IUP, attending a public hearing on July 25, 2024, at 10:00 A.M. at the Stephen F. Austin State Office Building, Room 170, in Austin, Texas.

All comments on the proposed IUP will be responded to and made publicly available in the meeting documents for the TWDB Board meeting in which the IUP, in its entirety, is considered for Board approval.

C. Effective Date

The FFY 2024 DWSRF Lead Service Line Replacement IUP is considered final on the effective date.

D. Documentation

The final entire IUP, including project lists, will be formally submitted to the EPA and posted on the TWDB website once approved by the Board.

Appendix B. Projected Sources and Uses of Funds
(As of April 17, 2025)

SOURCES:

FFY 2024 Federal Capitalization Grant LSLR (Revised 5/30/25)	\$63,014,000
FFY 2022 Federal Capitalization Grant LSLR – Reallocation	\$10,782,000
TOTAL SOURCES:	\$73,796,000

USES:

<u>Set-Asides from FFY 2024 Grant</u>	
TWDB Administrative Set-Aside	\$2,889,677
Total TWDB Set-Aside:	\$2,889,677
TCEQ Small Systems Technical Assistance Program Set-Aside	\$0
TCEQ Texas State Management Program Set-Aside	\$0
TCEQ Local Assistance and Other State Programs Set-Aside	\$0
Total TCEQ Set-Asides	\$0
<u>Projects to be Funded:</u>	
SFY 2025 IUP Commitments – Additional Subsidization	\$36,160,040
SFY 2025 IUP Commitments – Bonds/Loans	\$34,746,283
Total Projects To Be Funded - SFY 2025:	\$70,906,323

TOTAL USES:	\$73,796,000
NET SOURCES (USES):	\$0

Fees are not deposited into the Fund; therefore, based on EPA guidance they are not included in the Sources and Uses for the Fund.

Appendix C. Rating Criteria

Identified Lead Service Lines

If the entity has:

- identified lead service lines as part of the water system – 25 points OR
- Included an inventory as part of the project to identify lead service lines – 25 points

Annual Median Household Income (AMHI) level:

State AMHI divided by the Project Area's AMHI as a ratio X 10 equals the points (to nearest hundredths)

Examples of otherwise identical applicants:

Project area has a lower income - $\$73,035 / \$45,000 = 1.496 \times 10 = 14.96$ (more points / ranks higher)

Project area has a higher income - $\$73,035 / \$85,000 = 0.792 \times 10 = 7.92$ (fewer points / ranks lower)

System size

Applicant entity serves under 1,000 connections – 10 points

Applicant entity serves between 1,000 and 10,000 connections – 5 points

Applicant entity serves over 10,000 connections but fewer than 50,000 connections – 2 points

Tie Breaker

Rating factors will be ranked in descending order with priority given to the entity serving the fewest connections first.

Appendix D. Criteria to Determine Disadvantaged Community Eligibility

An entity is considered an eligible disadvantaged community if it:

- 1) may have lead service lines within the distribution system, and
- 2) 51 percent or more of the proposed project beneficiary area based on household connections has an Annual Median Household Income (AMHI) level that does not exceed 150 percent of the state's AMHI level. The state AMHI from the U.S. Census 2018-2022 American Community Survey (ACS) 5-year estimate is \$73,035; therefore the AMHI of the proposed project beneficiary area must not exceed \$109,552.50.

City/Place, Census Tract and Block Group geographical U.S. Census geographical areas or an eligible income survey may be used for the AMHI calculation.

First method, easiest method to employ:

To lessen the burden on applicants who can meet the requirement without considering the 51% level, the TWDB will make the presumption that the average (mean) of the AMHI of all U.S. Census Bureau Cities/Places, Block Groups and/or Census Tracts containing any portion of the project service area is the AMHI for the project. Applicants must provide a list of all of the Cities/Places, Block Groups and/or Census Tracts containing any portion of the project service area, the AMHI for each City/Place, Block Group and/or Census Tract, and a detailed map of the proposed service area to be considered for using the presumptive approach in establishing the project's AMHI. TWDB will use the project area map to verify the associated Cities/Places, Block Groups and/or Census Tracts submitted. The Executive Administrator will then determine whether this option is a reasonable estimate of the AMHI for the project service area and may be used for the AMHI threshold calculation.

Second method, if first method does not meet the 150 percent threshold:

Any applicant that does not meet the 150 percent threshold by using the average (mean) of the U.S. Census Bureau Block Groups and/or Census Tracts containing any portion of the project service area may submit the actual number of household connections in each Block Group and/Census Tract and calculate the weighted average AMHI for the project service area.

Third method, if necessary to meet the 150 percent threshold:

Finally, if the AMHI of the applicant's project service area does not fall within 150 percent of the state AMHI threshold without consideration of the 51 percent calculation, the applicant would need to provide the number of household connections in each U.S. Census Bureau's geographical area that is used in the calculation.

Alternatively, as with general program activities, the entity may conduct an income survey for determining the applicable AMHI. Any survey being used for income determination must be completed within five years prior to the date the TWDB receives the PIF.

Acceptable Source of Socioeconomic Data for FFY 2024

For this IUP, the TWDB will utilize:

(1) U.S. Census 2018-2022 ACS 5-year estimates. An Excel spreadsheet containing this data is located here:

<https://www.twdb.texas.gov/financial/instructions/doc/ACS-data-for-SFY2025.xlsx>

Entities may also access their U.S. Census 2018-2022 ACS 5-year estimate data directly from the U.S. Census webpage. Census Data Search guidance (WRD-284) is available on the TWDB website at: <http://www.twdb.texas.gov/financial/instructions/doc/WRD-284.docx>

OR

(2) Data from a socioeconomic survey approved by the Executive Administrator of a statistically acceptable sampling of customers in the service area completed in accordance with the most current Socioeconomic Surveys Guidelines ([WRD-285](#)) posted on the TWDB website. Any survey being used for income determination must be conducted within five years prior to the date the TWDB receives the PIF. An entity must submit documentation that substantiates the inadequate or absent Census data that led to the need to conduct a survey. **All entities must obtain prior approval to use survey data instead of the most recently available ACS data.**

In instances where the ACS data does not adequately reflect an entity's service area (e.g. an entity serves a community outside of its Certificate of Convenience and Necessity, an entity serves another system, the entity is a system without a Census Bureau defined boundary, etc.), a prorated analysis of ACS block group data will be performed to calculate the AMHI. Systems owned and operated by a public school or school district will be evaluated for their annual median household income for their school district boundary.

If recent reliable data is unavailable for the school district to determine the AMHI, the TWDB will use information from the Texas Education Agency's Title I, Part A program to determine income eligibility. If more than 50 percent of the school districts campuses are eligible for the program, the district's AMHI will be assumed to be eligible.

Appendix E. Federal Requirements and Assurances

A. Federal Requirements

1. Davis-Bacon Wage Rate Requirements

A subrecipient must comply with the requirements of section 1452(a)(5) of the Safe Drinking Water Act (42 U.S.C. 300j-12(a)(5)) in all procurement contracts and must require contractors to include compliance with section 1452(a)(5) of the Safe Drinking Water Act in all subcontracts and other lower tiered transactions. All contracts and subcontracts for the construction project must contain in full in any contract in excess of \$2,000 the wage rate requirements contract clauses prescribed by TWDB. Section 1452(a)(5) requires compliance with 40 U.S. Code Sections 3141 to 3144, 3146, and 3147 covering wage rate requirements. TWDB guidance is available at <http://www.twdb.texas.gov/financial/instructions/doc/DB-0156.pdf>.

2. American Iron and Steel (AIS)

The TWDB and all DWSRF financial assistance recipients will comply with the American Iron and Steel (AIS) requirement in applicable federal law, including federal appropriation acts. Federal law requires DWSRF assistance recipients to use iron and steel products that are produced in the United States for projects for the construction, alteration, maintenance, or repair of a public water system or treatment works.

The term “iron and steel products” means the following products made primarily of iron or steel:

- lined or unlined pipes and fittings
- manhole covers and other municipal castings
- hydrants
- tanks
- flanges, pipe clamps and restraints
- valves
- structural steel
- reinforced precast concrete
- construction materials

EPA may waive the AIS requirement under certain circumstances.

TWDB guidance is available at <http://www.twdb.texas.gov/financial/instructions/doc/TWDB-1106.docx>.

3. Build America, Buy America Act, 2021 (BABA)

The requirements of the Build America, Buy America Act, 2021 (P.L. 117-58), known as BABA, will apply. Information on BABA is available on the TWDB website at <http://www.twdb.texas.gov/financial/programs/BABA/index.asp>

An additional source of information on BABA is EPA’s [website](#).

4. Environmental Reviews

The National Environmental Protection Act (NEPA)-like environmental review requirements are specified in Texas Administrative Code, Title 31, Part 10, Chapter 371 and apply to these projects.

5. Generally Accepted Accounting Principles

Assistance recipients must maintain project accounts according to Generally Accepted Accounting Principles as issued by the Governmental Accounting Standards Board, including standards relating to the reporting of infrastructure assets.

6. Compliance with Cross-Cutting Authorities

There are a number of federal laws, executive orders, and federal policies that apply to projects and activities receiving federal financial assistance, regardless of whether the federal laws authorizing the assistance make them applicable. These federal authorities are referred to as cross-cutting authorities or cross-cutters. All cross-cutters apply to Equivalency projects.

The cross-cutters can be divided into three groups: environmental; social policies; and, economic and miscellaneous authorities.

- Environmental cross-cutters include federal laws and executive orders that relate to preservation of historical and archaeological sites, endangered species, wetlands, agricultural land, etc. This cross-cutter requirement includes a National Environmental Policy Act (NEPA) compliant environmental review, which applies to these projects. When conducting the NEPA-like review the TWDB will inform EPA when consultation or coordination by EPA with other federal agencies is necessary to resolve issues regarding compliance with applicable federal authorities.
- Social policy cross-cutters include requirements such as nondiscrimination laws.
- Economic cross-cutters directly regulate the expenditure of federal funds such as the prohibition against entering into contracts with debarred or suspended firms.

The Equivalency projects that are considered federal are those entered into the Federal Funding Accountability and Transparency Act Subaward Reporting System.

7. Financial, Managerial, and Technical (FMT) Capacity

Prior to receiving or closing a commitment, the TCEQ will conduct a review of each applicant's FMT capacity. All applicants must receive FMT approval before closing on financial assistance funding.

8. Competency Statements

The following competency statements are provided to satisfy the EPA's policy entitled "Policy to Assure Competency of Organizations Generating Environmental Measurement Data under Agency Funded Assistance Agreements."

TCEQ Competency Statement:

TCEQ ascertains that competency can be demonstrated by the following:

1. EPA approval of the "Quality Assurance Project Plan for the Public Water Supply Supervision Program Relating to the Safe Drinking Water Act of the Texas Commission on Environmental Quality", Revision 14, (QTRAK #23-033), approved by EPA on November 10, 2022, which is approved through November 10, 2025.
2. The "TCEQ Quality Management Plan, Revision 29 (2024)" (QTRAK# 24-064) approved on December 7, 2023, by EPA Region 6 which demonstrates competency by providing a description of the quality policies including all requirements described in EPA QA/R-2.

9. Compliance with Capacity Development Authority, Capacity Development Strategy and Operator Certification Program

- A. Capacity development authority. The State of Texas, through the TCEQ, has the legal authority to ensure that all new community water systems, and new nontransient, noncommunity water systems that commence operations have demonstrated FMT capacity with respect to national primary drinking water regulations. If DWSRF financial assistance is being provided to the new system, TCEQ conducts and provides to TWDB the results of its FMT assessment prior to closing on the financial assistance.
- B. Capacity development strategy. The State of Texas, through the use of DWSRF set-asides provided to TCEQ, implements a strategy to assist public water systems in acquiring and maintaining financial, managerial, and technical capacity. The TWDB has set aside funds from the regular/base program FFY 2022 grant for TCEQ to implement a capacity development strategy. TCEQ will use funds from the State Program Management, Small Systems Technical Assistance, and Local Assistance and Other State Programs set-asides to conduct the capacity development activities. The TCEQ demonstrates compliance with the Capacity Development Strategy requirement of the SDWA by annually submitting the Capacity Development Report to EPA. The most recent report was provided to EPA on November 27, 2023. The TCEQ submitted the TCEQ Triennial Progress Report to the Governor on the Public Water Supply Capacity Development Program on September 29, 2023, as required by SDWA Section 1420(c)(3).
- C. Operator certification program. The State of Texas, through the TCEQ, has a program for certifying operators of community and nontransient, noncommunity public water systems. The TCEQ demonstrates compliance with the Operator Certification

Program Provisions by annually submitting an Operator Certifications Program Report to EPA. The most recent report was provided to EPA on September 12, 2023.

10. Public Participation

DWSRF projects must comply with the EPA public participation requirements that pertain to the lead service line replacement funding.

B. Assurances

Entry into the Federal Reporting Systems

The TWDB will enter information into EPA's DWSRF Reporting System, the DWSRF National Information Management System, and the Federal Funding Accountability and Transparency Act Sub-Award Reporting System as required.

Appendix F. Bypass Procedures

The Executive Administrator may decide to bypass, or skip, higher ranked projects in favor of lower ranked projects to ensure that funds available are utilized in a timely manner and that statutory and capitalization grant requirements are met. If an entity is offered funding for any project that has an interrelated project ranked lower on the list, the TWDB Executive Administrator will have discretion to also offer funding for the interrelated project.

Reasons for bypassing projects are listed below, but are not limited to:

1. Fulfill the Additional Subsidization Requirement

A project on the PPL may be bypassed to fulfill the federal additional subsidization requirement or to make commitments of the amount of funds that remain unallocated.

2. Intent to Apply and Application Submission Deadlines

A project may be bypassed if the applicant did not submit any intent to apply form or information by a specified deadline or the application is not received by the TWDB-established submission deadline and it is not administratively complete by the established deadline.

3. Readiness to Proceed

The Executive Administrator may bypass projects to include those deemed ready to proceed to construction.

4. Past Project Performance

If the applicant has failed to close a commitment or complete a project in a timely manner under a prior IUP, and it is determined that such failure to perform could jeopardize the timely use of funds for a project under this IUP, the Executive Administrator may bypass the project.

5. Financial Capacity

A project may be bypassed if the Executive Administrator determines that the applicant will be unable to repay the SRF financial assistance for the project.

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Rank	Points	Entity	PIF No.	PWS ID No.	Population Served	Project Name	Project Description	Requested Phase(s)	Total Project Cost
12	52.08	3-D Mobile Home and RV Park	16061	TX 0910072	95	Lead Service Line Replacement 3D	Project will be to replace all galvanized lines that were put in use when the mobile home park was built. Homes all have pex put in so will be main water lines to each lot that will need to be replaced.	DC	\$ 100,000.00
21	46.20	Alice	16057	TX1250001	17,891	City of Alice LSLR	The City of Alice is requesting funding in order to purchase a trailer-mounted hydro-excavator and truck to transport the hydro-excavator, funds to reimburse pay for City Staff doing the Inventory; funds to pay for clerk who will input into TCEQ/EAP excel spreadsheet, the inventory data; funds to hire a consulting firm to locate service lines with GIS map coordinates, to investigate and to determine material of service lines, and to categorize such lines to determine non-lead or lead for replacement. These activities and investigations will enable the City to have a more accurate figure to be determined for sampling requirements under the rule, excavation, and for the replacement cost of known lead service lines immediately upon their discovery.	P	\$ 769,321.00
29	43.05	Alvin	16077	TX0200001	26,780	Lead Service Line Location and Replacement Program	In March 2023, The City of Alvin began efforts toward identifying and replacing lead service lines (LSLs) as required by the updated regulations in the Lead and Copper Rule Revisions (LCRR). The City developed a phased approach. The City is seeking funding for Phase 3 (monitoring and public communications to support verification of LSLs) and Phase 4 (LSL replacement and mitigation).	PDC	\$ 5,003,272.00
32	37.66	Austin	16080	TX2270001	1,153,430	Galvanized Water Service Line Replacement	The Lead and Copper Rule Revision (LCRR) requires the replacement of any galvanized service line that is, or ever was, downstream of a lead service line. This project will replace galvanized services found in Austin Water's system on both the public and private side of the meter.	DC	\$ 6,000,000.00
6	54.54	Beaumont	16053	TX1230001	54,359	Lead Service Line Inventory and Replacement	The City of Beaumont aims to complete this service line inventory and replace lead and galvanized service lines requiring replacement in the area. This project includes finishing the inventory and replacing the galvanized and lead service lines in the defined project area. The project will also conduct public outreach for awareness.	PDC	\$ 7,602,000.00

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Rank	Points	Entity	PIF No.	PWS ID No.	Population Served	Project Name	Project Description	Requested Phase(s)	Total Project Cost
9	52.91	Beeville	16058	TX0130001	13,680	Beeville Lead Service Line Replacement	Beginning in 2021 the City utilized a GIS program to identify the City's main lines and location. The city of Beeville has contracted with Mid Cimarron, LLC to asset city utility maintenance crews to inventory customer water service lines to identify the applicable pipe material. Per Lead and Copper Rule Revisions (LCRR), upon completion all unidentified lead and galvanized pipe service lines will be replaced. As of March 29, 2024, 1,693 of the City's 4,761 services have been inventoried. The inventory of the remaining service lines and identification of existing lead and galvanized service line pipe materials will be completed/known by June 1, 2024.	PDC	\$ 1,960,231.80
13	51.82	Brady	16062	TX1540001	5,770	City of Brady Phase II LSLR Project	Replacement of galvanized lines for water services to include from the water main to the home plus paving repair, landscaping and other repairs as needed for affected areas.	C	\$ 11,950,000.00
3	58.17	Brazoria	16081	TX0200003	2,875	City of Brazoria Lead Service Line Replacement	City plans to complete a GIS database of existing water services, a complete lead service line inventory with the replacement of all identified lead service lines. The project includes lead service line inventory, lead service line replacement plan, public communications plan, water sample/testing plan. With completion of planning phases, city will complete the design, bidding, and construction of replacement of lead service lines.	PDC	\$ 3,224,520.00
23	44.98	Cleburne	16072	TX1260003	31,352	Cleburne LCRR Inventory and Replacement Plan	This project will include completion of a lead service inventory, supplemental lead sampling, planning and design for infrastructure, design, and construction cost for removal/replacement of goosenecks pigtails/connectors/service lines/ and acquisition of temporary water filter systems for affected households.	PDC	\$ 48,492,400.00
2	60.43	Cotulla	16051	TX1420001	3,996	Lead Service Line Inventory and Replacement	The City of Cotulla aims to complete the service line inventory and replace lead service lines in the area. This project includes finishing the inventory and replacing the galvanized and lead service lines in the system.	PDC	\$ 398,000.00

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Rank	Points	Entity	PIF No.	PWS ID No.	Population Served	Project Name	Project Description	Requested Phase(s)	Total Project Cost
11	52.26	Crystal City	16060	TX2540001	6,504	Crystal City Lead Service Line Replacement	The City of Crystal City requests funds to complete an inventory of potential lead-service lines, as well as replacement funds for identified lines. The city estimates that approximately 90% of all households were built before 1980, which suggests there is a high prevalence of lead-service lines. Replacing water lines has continued to be a high priority for Crystal City, as it has identified approximately 40,750 linear feet of old cast iron and asbestos line that need to be replaced due to high water losses and continuous leaks. The proposed budget includes an estimated 2,430 service connections that will need proposed line replacements, which will require approximately 135,000 linear feet of service lines in yards from water meters to residential homes. This project also includes inventory funds, which will determine the complete scope of lead service line replacement needs, as well as meet the Texas Water Development Board's inventory guidelines.	PDC	\$ 15,231,334.00
33	29.29	Cumby	16082	TX1120001	807	LSLR 2024	Inventory of lead-service lines will be performed prior to this project and prior to the October 16, 2024 deadline. This project will include field work to confirm and identify details of pre-inventoried lead-service lines including line sizes, lengths, etc. Prepare report, plans and specifications for lead-service line replacement in accordance with TCEQ Lead and Copper Rule Revisions (LCRR). Bid and construct the improvements. Prepare a GIS database of completed improvements.	DC	\$ 945,000.00
18	47.48	El Campo	16056	TX2410002	12,602	Lead Service Line Replacement Project	The City of El Campo is currently preparing the initial lead and copper service line inventory. The TWDB LSLR funds will be used for the lead service line replacement project throughout the entire City of El Campo. The project will include design and construction.	DC	\$ 10,053,000.00
1	62.99	Goliad	16050	TX0880001	1,624	City of Goliad LSLR 2024	The project will consist of digging on both sides of the meter for from water main tap to the meter from meter to the house service lines, evaluating the materials, classifying logging if, lead ,galvanized, copper, pvc, or poly tubing After making sure it is approved material, (a) document in the file in LSLR survey packet files and cover up dig site,(b) If material needs to be replace, do so with approved AWWA material or document that it needs to be changed out, file it in the LSLR survey report packet , and replace identified non-conforming services per TCEQ and guidelines.	PDC	\$ 530,000.00

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20	46.85	Granbury	16069	TX1110001	10,080	Lead Service Line Replacement	In accordance with the regulations set forth by the Texas Commission on Environmental Quality (TCEQ) in its revised Lead and Copper Rules, the City is required to develop an inventory of the materials of construction for all water service lines in the distribution system. The City currently provides potable water service to 6,159 connections within its distribution system. Based upon the age of the distribution system and insights provided by Staff, there is likely a significant portion of the distribution system which have water services which utilize lead or galvanized materials. The City is requesting financial assistance from Texas Water Development Board to determine the exact number and location as well as replacement of the lead and galvanized service lines within the distribution system.		\$ 4,240,000.00
34	25.26	Hempstead	16083	TX2370001	6,687	Lead Service Line Replacement	The City of Hempstead is currently preparing the initial lead and copper serve line inventory. The TWDB LSLR funds will be used for the lead service line replacement project throughout the entire City of Hempstead. The project will include design and construction related to the replacement of lead services lines throughout the entire City of Hempstead.	DC	\$ 7,161,000.00
35	18.13	Houston	16084	TX1010013	2,304,580	Lead and Copper Rule Revision Compliance	The proposed project will survey an estimated 494,856 household service line connections throughout the City of Houston to identify and replace lead service lines within the entire service area. The project is being conducted in three phases, the first of which has begun. Funding is requested for the second and third phases. Project will be staged in nine of Houston's Complete Communities. Second Phase is field inspections for initial Lead Service Inventory to verify accuracy. Third Phase involves the actual replacement of confirmed lead service lines and could be implemented concurrently with second phase.	PDC	\$ 30,000,000.00
4	54.69	Italy	16063	TX0700028	1,926	City of Italy LSLR	This project will identify, map, and inventory the water service connections within the City of Italy, including evaluation of the piping material. The inventory will identify any lead service lines which will need to be replaced with future funding for design and construction.	P	\$ 200,000.00

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Rank	Points	Entity	PIF No.	PWS ID No.	Population Served	Project Name	Project Description	Requested Phase(s)	Total Project Cost
24	44.96	Longview	16073	TX0920004	81,092	Water Service Line Replacement	The city is developing a water service line inventory to identify lead services. A crew is going to unknown services to identify material type. The city is also sending a survey to customers to identify their service line material. Any lines identified on the public side will be replaced. Private service lines identified will be reported to customers. The city will work with customers to replace lead/galvanized material. In addition, the City has hired KSA Engineers to assist in the data processing and reporting.	PDC	\$ 6,246,113.00
14	51.81	Lower Valley WD	16052	TX0710154	64,332	Lead Service Line Replacement Project	The District proposes to hire one (1) temporary staff person to continue inventory, catalogue, and identify lead service lines in private properties. Staff will submit for plumbing permits to replace lines that have been identified. The District will contract with a third-party vendor to replace those lines that have been identified. This vendor will replace lines from the water meter to the homes to be compliant. The project will include the installation of any service lines, plumbing fixtures and appurtenances needed to fulfill TCEQ's requirements on the resident's property. The District will task an inspector that will make sure that the work is completed to the resident's satisfaction and submit a final report for each property that was worked on.	PDC	\$ 570,000.00
16	49.59	Marshall	16068	TX1020002	23,461	Water Service Line Replacement	Design, bidding, inspection, and construction administration for replacement of an estimated 850 lead service lines to be confirmed in the lead service line inventory phase.	PDC	\$ 7,457,463.00
7	54.39	Meridian	16055	TX0180002	1,493	City of Meridian LSLR	The City of Meridian is requesting funds to assist in the final inventory and replacement of identified lead service lines.	PDC	\$ 7,940,395.00

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Rank	Points	Entity	PIF No.	PWS ID No.	Population Served	Project Name	Project Description	Requested Phase(s)	Total Project Cost
31	39.76	New Braunfels Utilities	16079	TX0460001	90,403	NBU Lead Service Line Inventory & Replacement	NBU identified 8,426 services in its service territory which had unknown materials on both the NBU-side and customer-side of the water meter. As of March 27, 2024 NBU through the use of Peabody Construction has visually identified 6,832 of the services. Roughly 48% of the identified service lines on the customer side are presumed to be identified as "galvanized requiring replacement" in the submitted inventory. NBU expects that roughly 4,000 services will be required to be replaced. NBU seeks funding to reimburse or pay for costs associated with the portion of the lead service line inventory which has already accomplished, the completion of the lead service line inventory, identifying any unknown materials in the system after submission of the LSLI to TCEQ, the required planning of the lead line replacement program, performing the design and replacement of lead service lines, covering the land acquisition costs associated with any required easements or construction, and a contingency amount of 10%.	PDC	\$ 25,856,185.00
25	44.78	Panorama Village	16074	TX1700026	2,513	Lead Service line Replacement Inventory Study	Create an inventory of the City's service lines connected to the water distribution system to develop an accurate analysis of the current condition and prepare for the removal of lead lines. This may include non-routine lead sampling, inventory methods, such as observation, excavation, vacuum, and analysis.	P	\$ 125,000.00
26	43.93	Pasadena	16075	TX1010293	153,000	LCRI Inventory and WL Replacement	This project will include building the inventory list as outlined in TCEQ-20943. The fieldwork required to validate the entries will also be included as part of the project as part of the project. The project will prepare a master plan to outline how and when the lead and copper lines will be replaced over the next 10 year period. The estimated construction cost is spread over a construction period of 10 years.	PDC	\$ 21,980,000.00

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Rank	Points	Entity	PIF No.	PWS ID No.	Population Served	Project Name	Project Description	Requested Phase(s)	Total Project Cost
5	54.68	Pine Village Public Utility District	16054	TX1010901	3,516	Lead Service Line Inventory and Replacement Program	The majority of the District's utilities date back to the early 1970s. Therefore, the maintenance and upkeep of the District's assets is critical to ensure quality and reliable service to its constituents. The proposed project is comprised of two phases which includes the 1) lead service line inventory and replacement plan, and 2) lead service line replacement. The inventory and replacement plan will identify and include both the public and private sides of the water service lines. Additionally, the inventory and replacement plans will identify possible changes to Lead and Copper sampling within the system, water system reporting, public education requirements, and the introduction of a new lead trigger level. Further details on the requirements of the lead service line replacement, including environmental impact analysis, will be identified at a later date. Once more information is available, we can then provide additional details into the planning and scoping for the lead service line replacement. For purposes of this PIF, we used best judgement practices to estimate the costs associated with the lead service line replacement. The District is in the process of completing the lead service line inventory. As of today, the District has confirmed 223 service lines do not contain lead material based on available historical data and record drawings. The remaining 499 service lines were constructed prior to 1988 (most date back to the early 1970s) and the material is currently listed as unknown. The District is preparing to perform field verification inspections soon to identify the material of the 499 service lines.	PDC	\$ 2,715,000.00
10	52.27	Port Arthur	16059	TX1230009	56,039	Lead Service Line Inventory	Develop inventory	P	\$ 4,806,260.00
8	53.66	RPM WSC	16056	TX2340016	2,300	FM 279 RPM Chandler County	RPM WSC is required to replace all lead water service lines. They have found lead service lines down FM279, FM2010 and along Chandler Interconnect that will need to be replaced. RPM is requesting funding to be able to replace the existing lead service lines and provide safe and reliable drinking water.	DC	\$ 250,000.00
27	43.84	San Angelo	16076	TX2260001	101,004	San Angelo Lead Service Line Location and Replacement Program	Revised PIF from SFY2023. Seeking funding for Phase 3 (Field Verification of Service Lines Material), Phase 4 (Monitoring & Replacement Plan) and Phase 5 (LSLs Replacement).	PDC	\$ 9,858,684.00

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Rank	Points	Entity	PIF No.	PWS ID No.	Population Served	Project Name	Project Description	Requested Phase(s)	Total Project Cost
30	41.28	San Antonio Water System	16078	TX00150018	1,949,969	Lead Service Line Replacement	Update to SAWS LSLR 2023 PIF; Inventory with field investigations, develop Lead Service Line Replacement Action Plan, design and bid services, construction costs for replacement of lead service lines.		\$ 114,034,371.00
22	45.88	Sherman	16070	TX0910006	43,645	Lead Service Line Location and Replacement Program	Revised PIF from SFY2023. Seeking funding for on-going Phase 3 (Field Verification of Service Lines Material) and future Phase 4 (Monitoring & Public Communications to Support Verification of LSLs) and Phase 5 (LSLs Replacement Planning and Mitigation).	PDC	\$ 8,768,258.28
28	43.20	Weatherford	16071	TX1840005	36,251	City of Weatherford Lead Service Line Replacement	The initial phase of this project will be focused on developing an initial service line inventory based on the best available data and a prioritized plan for investigation of unknown service lines. Assumptions for potential lead service line replacements are included herein for the subsequent phase of field investigation and replacement of lead service lines.	PDC	\$ 23,734,700.00
15	49.61	Willis	16065	TX1700003	6,561	Lead Service Line Inventory and Replacement	Create an inventory of the City's service lines connected to the water distribution system to develop an accurate analysis of the current condition and prepare for the removal of lead lines. This may include non-routine lead sampling, inventory methods, such as observation, excavation, vacuum, and analysis.	P	\$ 305,000.00
17	48.26	Wills Point	16064	TX2340005	6,648	Wills Point LSLR Project	Proposed project includes identifying lead service lines, design of removal and replacement, and construction work to remove and replace lead lines. City expects to use Force Accounting agreement to complete parts of the LSLR inventory.	PDC	\$ 631,400.00
19	47.39	Wilmer	16067	TX0570018	5,370	City of Wilmer Lead Service Line Inventory and Replacement Program	The City of Wilmer, Texas has deep concern about the problem of lead water services. Their concern is rooted with a strong interest in protecting the public's health from the harmful effects of lead in drinking water. By undertaking this project, the City intends to eliminate lead water services from their system if any are identified. This project will be approached in two phases. The first phase will be to perform the EPA and TCEQ mandated lead service inventory and submit said inventory to TCEQ well in advance of the October 2024 deadline. The second phase of the project will be to replace all identified lead services with appropriate new water service materials. This second phase will include planning, design, stakeholder coordination, and construction services.	PDC	\$ 2,768,073.75
TOTAL		35							\$ 391,906,981.83

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None.

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Rank	Points	Entity	PIF No.	PWS ID No.	Population Served	Project Name	Project Description	Requested Phase(s)	Total Project Cost
1	62.99	Goliad	16050	TX0880001	1,624	City of Goliad LSLR 2024	The project will consist of digging on both sides of the meter for from water main tap to the meter from meter to the house service lines, evaluating the materials, classifying logging if, lead ,galvanized, copper, pvc, or poly tubing After making sure it is approved material, (a) document in the file in LSLR survey packet files and cover up dig site,(b) If material needs to be replace, do so with approved AWWA material or document that it needs to be changed out, file it in the LSLR survey report packet , and replace identified non-conforming services per TCEQ and guidelines.	PDC	\$ 530,000.00
2	60.43	Cotulla	16051	TX1420001	3,996	Lead Service Line Inventory and Replacement	The City of Cotulla aims to complete the service line inventory and replace lead service lines in the area. This project includes finishing the inventory and replacing the galvanized and lead service lines in the system.	PDC	\$ 398,000.00
3	58.17	Brazoria	16081	TX0200003	2,875	City of Brazoria Lead Service Line Replacement	City plans to complete a GIS database of existing water services, a complete lead service line inventory with the replacement of all identified lead service lines. The project includes lead service line inventory, lead service line replacement plan, public communications plan, water sample/testing plan. With completion of planning phases, city will complete the design, bidding, and construction of replacement of lead service lines.	PDC	\$ 3,224,520.00
4	54.69	Italy	16063	TX0700028	1,926	City of Italy LSLR	This project will identify, map, and inventory the water service connections within the City of Italy, including evaluation of the piping material. The inventory will identify any lead service lines which will need to be replaced with future funding for design and construction.	P	\$ 200,000.00

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5	54.68	Pine Village Public Utility District	16054	TX1010901	3,516	Lead Service Line Inventory and Replacement Program	The majority of the District's utilities date back to the early 1970s. Therefore, the maintenance and upkeep of the District's assets is critical to ensure quality and reliable service to its constituents. The proposed project is comprised of two phases which includes the 1) lead service line inventory and replacement plan, and 2) lead service line replacement. The inventory and replacement plan will identify and include both the public and private sides of the water service lines. Additionally, the inventory and replacement plans will identify possible changes to Lead and Copper sampling within the system, water system reporting, public education requirements, and the introduction of a new lead trigger level. Further details on the requirements of the lead service line replacement, including environmental impact analysis, will be identified at a later date. Once more information is available, we can then provide additional details into the planning and scoping for the lead service line replacement. For purposes of this PIF, we used best judgement practices to estimate the costs associated with the lead service line replacement. The District is in the process of completing the lead service line inventory. As of today, the District has confirmed 223 service lines do not contain lead material based on available historical data and record drawings. The remaining 499 service lines were constructed prior to 1988 (most date back to the early 1970s) and the material is currently listed as unknown. The District is preparing to perform field verification inspections soon to identify the material of the 499 service lines.	PDC	\$ 2,715,000.00
6	54.54	Beaumont	16053	TX1230001	54,359	Lead Service Line Inventory and Replacement	The City of Beaumont aims to complete this service line inventory and replace lead and galvanized service lines requiring replacement in the area. This project includes finishing the inventory and replacing the galvanized and lead service lines in the defined project area. The project will also conduct public outreach for awareness.	PDC	\$ 7,602,000.00
7	54.39	Meridian	16055	TX0180002	1,493	City of Meridian LSLR	The City of Meridian is requesting funds to assist in the final inventory and replacement of identified lead service lines.	PDC	\$ 7,940,395.00
8	53.66	RPM WSC	16056	TX2340016	2,300	FM 279 RPM Chandler County	RPM WSC is required to replace all lead water service lines. They have found lead service lines down FM279, FM2010 and along Chandler Interconnect that will need to be replaced. RPM is requesting funding to be able to replace the existing lead service lines and provide safe and reliable drinking water.	DC	\$ 250,000.00

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10	52.27	Port Arthur	16059	TX1230009	56,039	Lead Service Line Inventory	Develop inventory	P	\$ 4,806,260.00
11	52.26	Crystal City	16060	TX2540001	6,504	Crystal City Lead Service Line Replacement	The City of Crystal City requests funds to complete an inventory of potential lead-service lines, as well as replacement funds for identified lines. The city estimates that approximately 90% of all households were built before 1980, which suggests there is a high prevalence of lead-service lines. Replacing water lines has continued to be a high priority for Crystal City, as it has identified approximately 40,750 linear feet of old cast iron and asbestos line that need to be replaced due to high water losses and continuous leaks. The proposed budget includes an estimated 2,430 service connections that will need proposed line replacements, which will require approximately 135,000 linear feet of service lines in yards from water meters to residential homes. This project also includes inventory funds, which will determine the complete scope of lead service line replacement needs, as well as meet the Texas Water Development Board's inventory guidelines.	PDC	\$ 15,231,334.00
12	52.08	3-D Mobile Home and RV Park	16061	TX 0910072	95	Lead Service Line Replacement 3D	Project will be to replace all galvanized lines that were put in use when the mobile home park was built. Homes all have pex put in so will be main water lines to each lot that will need to be replaced.	DC	\$ 100,000.00
13	51.82	Brady	16062	TX1540001	5,770	City of Brady Phase II LSLR Project	Replacement of galvanized lines for water services to include from the water main to the home plus paving repair, landscaping and other repairs as needed for affected areas.	C	\$ 11,950,000.00

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15	49.61	Willis	16065	TX1700003	6,561	Lead Service Line Inventory and Replacement	Create an inventory of the City's service lines connected to the water distribution system to develop an accurate analysis of the current condition and prepare for the removal of lead lines. This may include non-routine lead sampling, inventory methods, such as observation, excavation, vacuum, and analysis.	P	\$ 305,000.00
16	49.59	Marshall	16068	TX1020002	23,461	Water Service Line Replacement	Design, bidding, inspection, and construction administration for replacement of an estimated 850 lead service lines to be confirmed in the lead service line inventory phase.	PDC	\$ 7,457,463.00
17	48.26	Wills Point	16064	TX2340005	6,648	Wills Point LSLR Project	Proposed project includes identifying lead service lines, design of removal and replacement, and construction work to remove and replace lead lines. City expects to use Force Accounting agreement to complete parts of the LSLR inventory.	PDC	\$ 631,400.00
18	47.48	El Campo	16056	TX2410002	12,602	Lead Service Line Replacement Project	The City of El Campo is currently preparing the initial lead and copper service line inventory. The TWDB LSLR funds will be used for the lead service line replacement project throughout the entire City of El Campo. The project will include design and construction.	DC	\$ 10,053,000.00

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Rank	Points	Entity	PIF No.	PWS ID No.	Population Served	Project Name	Project Description	Requested Phase(s)	Total Project Cost
19	47.39	Wilmer	16067	TX0570018	5,370	City of Wilmer Lead Service Line Inventory and Replacement Program	The City of Wilmer, Texas has deep concern about the problem of lead water services. Their concern is rooted with a strong interest in protecting the public's health from the harmful effects of lead in drinking water. By undertaking this project, the City intends to eliminate lead water services from their system if any are identified. This project will be approached in two phases. The first phase will be to perform the EPA and TCEQ mandated lead service inventory and submit said inventory to TCEQ well in advance of the October 2024 deadline. The second phase of the project will be to replace all identified lead services with appropriate new water service materials. This second phase will include planning, design, stakeholder coordination, and construction services.	PDC	\$ 2,768,073.75
20	46.85	Granbury	16069	TX1110001	10,080	Lead Service Line Replacement	In accordance with the regulations set forth by the Texas Commission on Environmental Quality (TCEQ) in its revised Lead and Copper Rules, the City is required to develop an inventory of the materials of construction for all water service lines in the distribution system. The City currently provides potable water service to 6,159 connections within its distribution system. Based upon the age of the distribution system and insights provided by Staff, there is likely a significant portion of the distribution system which have water services which utilize lead or galvanized materials. The City is requesting financial assistance from Texas Water Development Board to determine the exact number and location as well as replacement of the lead and galvanized service lines within the distribution system.	\$	4,240,000.00
21	46.20	Alice	16057	TX1250001	17,891	City of Alice LSLR	The City of Alice is requesting funding in order to purchase a trailer-mounted hydro-excavator and truck to transport the hydro-excavator, funds to reimburse pay for City Staff doing the Inventory; funds to pay for clerk who will input into TCEQ/EAP excel spreadsheet, the inventory data; funds to hire a consulting firm to locate service lines with GIS map coordinates, to investigate and to determine material of service lines, and to categorize such lines to determine non-lead or lead for replacement. These activities and investigations will enable the City to have a more accurate figure to be determined for sampling requirements under the rule, excavation, and for the replacement cost of known lead service lines immediately upon their discovery.	P	\$ 769,321.00

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Rank	Points	Entity	PIF No.	PWS ID No.	Population Served	Project Name	Project Description	Requested Phase(s)	Total Project Cost
22	45.88	Sherman	16070	TX0910006	43,645	Lead Service Line Location and Replacement Program	Revised PIF from SFY2023. Seeking funding for on-going Phase 3 (Field Verification of Service Lines Material) and future Phase 4 (Monitoring & Public Communications to Support Verification of LSLs) and Phase 5 (LSLs Replacement Planning and Mitigation).	PDC	\$ 8,768,258.28
23	44.98	Cleburne	16072	TX1260003	31,352	Cleburne LCRR Inventory and Replacement Plan	This project will include completion of a lead service inventory, supplemental lead sampling, planning and design for infrastructure, design, and construction cost for removal/replacement of goosenecks pigtails/connectors/service lines/ and acquisition of temporary water filter systems for affected households.	PDC	\$ 48,492,400.00
24	44.96	Longview	16073	TX0920004	81,092	Water Service Line Replacement	The city is developing a water service line inventory to identify lead services. A crew is going to unknown services to identify material type. The city is also sending a survey to customers to identify their service line material. Any lines identified on the public side will be replaced. Private service lines identified will be reported to customers. The city will work with customers to replace lead/galvanized material. In addition, the City has hired KSA Engineers to assist in the data processing and reporting.	PDC	\$ 6,246,113.00
25	44.78	Panorama Village	16074	TX1700026	2,513	Lead Service line Replacement Inventory Study	Create an inventory of the City's service lines connected to the water distribution system to develop an accurate analysis of the current condition and prepare for the removal of lead lines. This may include non-routine lead sampling, inventory methods, such as observation, excavation, vacuum, and analysis.	P	\$ 125,000.00
26	43.93	Pasadena	16075	TX1010293	153,000	LCRI Inventory and WL Replacement	This project will include building the inventory list as outlined in TCEQ-20943. The fieldwork required to validate the entries will also be included as part of the project as part of the project. The project will prepare a master plan to outline how and when the lead and copper lines will be replaced over the next 10 year period. The estimated construction cost is spread over a construction period of 10 years.	PDC	\$ 21,980,000.00
27	43.84	San Angelo	16076	TX2260001	101,004	San Angelo Lead Service Line Location and Replacement Program	Revised PIF from SFY2023. Seeking funding for Phase 3 (Field Verification of Service Lines Material), Phase 4 (Monitoring & Replacement Plan) and Phase 5 (LSLs Replacement).	PDC	\$ 9,858,684.00
28	43.20	Weatherford	16071	TX1840005	36,251	City of Weatherford Lead Service Line Replacement	The initial phase of this project will be focused on developing an initial service line inventory based on the best available data and a prioritized plan for investigation of unknown service lines. Assumptions for potential lead service line replacements are included herein for the subsequent phase of field investigation and replacement of lead service lines.	PDC	\$ 23,734,700.00

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29	43.05	Alvin	16077	TX0200001	26,780	Lead Service Line Location and Replacement Program	In March 2023, The City of Alvin began efforts toward identifying and replacing lead service lines (LSLs) as required by the updated regulations in the Lead and Copper Rule Revisions (LCRR). The City developed a phased approach. The City is seeking funding for Phase 3 (monitoring and public communications to support verification of LSLs) and Phase 4 (LSL replacement and mitigation).	PDC	\$ 5,003,272.00
30	41.28	San Antonio Water System	16078	TX00150018	1,949,969	Lead Service Line Replacement	Update to SAWS LSLR 2023 PIF; Inventory with field investigations, develop Lead Service Line Replacement Action Plan, design and bid services, construction costs for replacement of lead service lines.		\$ 114,034,371.00
31	39.76	New Braunfels Utilities	16079	TX0460001	90,403	NBU Lead Service Line Inventory & Replacement	NBU identified 8,426 services in its service territory which had unknown materials on both the NBU-side and customer-side of the water meter. As of March 27, 2024 NBU through the use of Peabody Construction has visually identified 6,832 of the services. Roughly 48% of the identified service lines on the customer side are presumed to be identified as "galvanized requiring replacement" in the submitted inventory. NBU expects that roughly 4,000 services will be required to be replaced. NBU seeks funding to reimburse or pay for costs associated with the portion of the lead service line inventory which has already accomplished, the completion of the lead service line inventory, identifying any unknown materials in the system after submission of the LSLI to TCEQ, the required planning of the lead line replacement program, performing the design and replacement of lead service lines, covering the land acquisition costs associated with any required easements or construction, and a contingency amount of 10%.	PDC	\$ 25,856,185.00
32	37.66	Austin	16080	TX2270001	1,153,430	Galvanized Water Service Line Replacement	The Lead and Copper Rule Revision (LCRR) requires the replacement of any galvanized service line that is, or ever was, downstream of a lead service line. This project will replace galvanized services found in Austin Water's system on both the public and private side of the meter.	DC	\$ 6,000,000.00

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33	29.29	Cumby	16082	TX1120001	807	LSLR 2024	Inventory of lead-service lines will be performed prior to this project and prior to the October 16, 2024 deadline. This project will include field work to confirm and identify details of pre-inventoried lead-service lines including line sizes, lengths, etc. Prepare report, plans and specifications for lead-service line replacement in accordance with TCEQ Lead and Copper Rule Revisions (LCRR). Bid and construct the improvements. Prepare a GIS database of completed improvements.	DC	\$ 945,000.00
34	25.26	Hempstead	16083	TX2370001	6,687	Lead Service Line Replacement	The City of Hempstead is currently preparing the initial lead and copper serve line inventory. The TWDB LSLR funds will be used for the lead service line replacement project throughout the entire City of Hempstead. The project will include design and construction related to the replacement of lead services lines throughout the entire City of Hempstead.	DC	\$ 7,161,000.00
35	18.13	Houston	16084	TX1010013	2,304,580	Lead and Copper Rule Revision Compliance	The proposed project will survey an estimated 494,856 household service line connections throughout the City of Houston to identify and replace lead service lines within the entire service area. The project is being conducted in three phases, the first of which has begun. Funding is requested for the second and third phases. Project will be staged in nine of Houston's Complete Communities. Second Phase is field inspections for initial Lead Service Inventory to verify accuracy. Third Phase involves the actual replacement of confirmed lead service lines and could be implemented concurrently with second phase.	PDC	\$ 30,000,000.00
TOTAL		35							\$ 391,906,981.83

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1	62.99	Goliad	16050	TX0880001	1,624	City of Goliad LSLR 2024	The project will consist of digging on both sides of the meter for from water main tap to the meter from meter to the house service lines, evaluating the materials, classifying logging if, lead ,galvanized, copper, pvc, or poly tubing After making sure it is approved material, (a) document in the file in LSLR survey packet files and cover up dig site,(b) If material needs to be replace, do so with approved AWWA material or document that it needs to be changed out, file it in the LSLR survey report packet , and replace identified non-conforming services per TCEQ and guidelines.	PDC	\$ 530,000.00
2	60.43	Cotulla	16051	TX1420001	3,996	Lead Service Line Inventory and Replacement	The City of Cotulla aims to complete the service line inventory and replace lead service lines in the area. This project includes finishing the inventory and replacing the galvanized and lead service lines in the system.	PDC	\$ 398,000.00
3	58.17	Brazoria	16081	TX0200003	2,875	City of Brazoria Lead Service Line Replacement	City plans to complete a GIS database of existing water services, a complete lead service line inventory with the replacement of all identified lead service lines. The project includes lead service line inventory, lead service line replacement plan, public communications plan, water sample/testing plan. With completion of planning phases, city will complete the design, bidding, and construction of replacement of lead service lines.	PDC	\$ 3,224,520.00
4	54.69	Italy	16063	TX0700028	1,926	City of Italy LSLR	This project will identify, map, and inventory the water service connections within the City of Italy, including evaluation of the piping material. The inventory will identify any lead service lines which will need to be replaced with future funding for design and construction.	P	\$ 200,000.00

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5	54.68	Pine Village Public Utility District	16054	TX1010901	3,516	Lead Service Line Inventory and Replacement Program	The majority of the District's utilities date back to the early 1970s. Therefore, the maintenance and upkeep of the District's assets is critical to ensure quality and reliable service to its constituents. The proposed project is comprised of two phases which includes the 1) lead service line inventory and replacement plan, and 2) lead service line replacement. The inventory and replacement plan will identify and include both the public and private sides of the water service lines. Additionally, the inventory and replacement plans will identify possible changes to Lead and Copper sampling within the system, water system reporting, public education requirements, and the introduction of a new lead trigger level. Further details on the requirements of the lead service line replacement, including environmental impact analysis, will be identified at a later date. Once more information is available, we can then provide additional details into the planning and scoping for the lead service line replacement. For purposes of this PIF, we used best judgement practices to estimate the costs associated with the lead service line replacement. The District is in the process of completing the lead service line inventory. As of today, the District has confirmed 223 service lines do not contain lead material based on available historical data and record drawings. The remaining 499 service lines were constructed prior to 1988 (most date back to the early 1970s) and the material is currently listed as unknown. The District is preparing to perform field verification inspections soon to identify the material of the 499 service lines.	PDC	\$ 2,715,000.00
6	54.54	Beaumont	16053	TX1230001	54,359	Lead Service Line Inventory and Replacement	The City of Beaumont aims to complete this service line inventory and replace lead and galvanized service lines requiring replacement in the area. This project includes finishing the inventory and replacing the galvanized and lead service lines in the defined project area. The project will also conduct public outreach for awareness.	PDC	\$ 7,602,000.00
7	54.39	Meridian	16055	TX0180002	1,493	City of Meridian LSLR	The City of Meridian is requesting funds to assist in the final inventory and replacement of identified lead service lines.	PDC	\$ 7,940,395.00
8	53.66	RPM WSC	16056	TX2340016	2,300	FM 279 RPM Chandler County	RPM WSC is required to replace all lead water service lines. They have found lead service lines down FM279, FM2010 and along Chandler Interconnect that will need to be replaced. RPM is requesting funding to be able to replace the existing lead service lines and provide safe and reliable drinking water.	DC	\$ 250,000.00

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9	52.91	Beeville	16058	TX0130001	13,680	Beeville Lead Service Line Replacement	Beginning in 2021 the City utilized a GIS program to identify the City's main lines and location. The city of Beeville has contracted with Mid Cimarron, LLC to asset city utility maintenance crews to inventory customer water service lines to identify the applicable pipe material. Per Lead and Copper Rule Revisions (LCRR), upon completion all unidentified lead and galvanized pipe service lines will be replaced. As of March 29, 2024, 1,693 of the City's 4,761 services have been inventoried. The inventory of the remaining service lines and identification of existing lead and galvanized service line pipe materials will be completed/known by June 1, 2024.	PDC	\$ 1,960,231.80
10	52.27	Port Arthur	16059	TX1230009	56,039	Lead Service Line Inventory	Develop inventory	P	\$ 4,806,260.00
11	52.26	Crystal City	16060	TX2540001	6,504	Crystal City Lead Service Line Replacement	The City of Crystal City requests funds to complete an inventory of potential lead-service lines, as well as replacement funds for identified lines. The city estimates that approximately 90% of all households were built before 1980, which suggests there is a high prevalence of lead-service lines. Replacing water lines has continued to be a high priority for Crystal City, as it has identified approximately 40,750 linear feet of old cast iron and asbestos line that need to be replaced due to high water losses and continuous leaks. The proposed budget includes an estimated 2,430 service connections that will need proposed line replacements, which will require approximately 135,000 linear feet of service lines in yards from water meters to residential homes. This project also includes inventory funds, which will determine the complete scope of lead service line replacement needs, as well as meet the Texas Water Development Board's inventory guidelines.	PDC	\$ 15,231,334.00
12	52.08	3-D Mobile Home and RV Park	16061	TX 0910072	95	Lead Service Line Replacement 3D	Project will be to replace all galvanized lines that were put in use when the mobile home park was built. Homes all have pex put in so will be main water lines to each lot that will need to be replaced.	DC	\$ 100,000.00
13	51.82	Brady	16062	TX1540001	5,770	City of Brady Phase II LSLR Project	Replacement of galvanized lines for water services to include from the water main to the home plus paving repair, landscaping and other repairs as needed for affected areas.	C	\$ 11,950,000.00

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14	51.81	Lower Valley WD	16052	TX0710154	64,332	Lead Service Line Replacement Project	The District proposes to hire one (1) temporary staff person to continue inventory, catalogue, and identify lead service lines in private properties. Staff will submit for plumbing permits to replace lines that have been identified. The District will contract with a third-party vendor to replace those lines that have been identified. This vendor will replace lines from the water meter to the homes to be compliant. The project will include the installation of any service lines, plumbing fixtures and appurtenances needed to fulfill TCEQ's requirements on the resident's property. The District will task an inspector that will make sure that the work is completed to the resident's satisfaction and submit a final report for each property that was worked on.	PDC	\$ 570,000.00
15	49.61	Willis	16065	TX1700003	6,561	Lead Service Line Inventory and Replacement	Create an inventory of the City's service lines connected to the water distribution system to develop an accurate analysis of the current condition and prepare for the removal of lead lines. This may include non-routine lead sampling, inventory methods, such as observation, excavation, vacuum, and analysis.	P	\$ 305,000.00
16	49.59	Marshall	16068	TX1020002	23,461	Water Service Line Replacement	Design, bidding, inspection, and construction administration for replacement of an estimated 850 lead service lines to be confirmed in the lead service line inventory phase.	PDC	\$ 7,457,463.00
17	48.26	Wills Point	16064	TX2340005	6,648	Wills Point LSLR Project	Proposed project includes identifying lead service lines, design of removal and replacement, and construction work to remove and replace lead lines. City expects to use Force Accounting agreement to complete parts of the LSLR inventory.	PDC	\$ 631,400.00
18	47.48	El Campo	16056	TX2410002	12,602	Lead Service Line Replacement Project	The City of El Campo is currently preparing the initial lead and copper service line inventory. The TWDB LSLR funds will be used for the lead service line replacement project throughout the entire City of El Campo. The project will include design and construction.	DC	\$ 10,053,000.00

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20	46.85	Granbury	16069	TX1110001	10,080	Lead Service Line Replacement	In accordance with the regulations set forth by the Texas Commission on Environmental Quality (TCEQ) in its revised Lead and Copper Rules, the City is required to develop an inventory of the materials of construction for all water service lines in the distribution system. The City currently provides potable water service to 6,159 connections within its distribution system. Based upon the age of the distribution system and insights provided by Staff, there is likely a significant portion of the distribution system which have water services which utilize lead or galvanized materials. The City is requesting financial assistance from Texas Water Development Board to determine the exact number and location as well as replacement of the lead and galvanized service lines within the distribution system.		\$ 4,240,000.00

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22	45.88	Sherman	16070	TX0910006	43,645	Lead Service Line Location and Replacement Program	Revised PIF from SFY2023. Seeking funding for on-going Phase 3 (Field Verification of Service Lines Material) and future Phase 4 (Monitoring & Public Communications to Support Verification of LSLs) and Phase 5 (LSLs Replacement Planning and Mitigation).	PDC	\$ 8,768,258.28
23	44.98	Cleburne	16072	TX1260003	31,352	Cleburne LCRR Inventory and Replacement Plan	This project will include completion of a lead service inventory, supplemental lead sampling, planning and design for infrastructure, design, and construction cost for removal/replacement of goosenecks pigtails/connectors/service lines/ and acquisition of temporary water filter systems for affected households.	PDC	\$ 48,492,400.00
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