

Unified Water Infrastructure Plan (UWIP) Public Meeting Question/Comment Response Sheet

Date: 01/08/2026

Purpose: The following questions/comments have been compiled from in-person and Google form submissions during the Unified Water Infrastructure Plan (UWIP) public meetings on the prioritization process. The questions/comments have only been edited to correct grammar and remove personal information. Please see water.utah.gov/uwip-projects for recordings of all four meetings. The comment submission form was open from 10/14/2025 to 11/14/2025.

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I. Funding

Question/Comment	Response
How is the state funding this?	Currently, the Water Infrastructure Fund does not have any funding source assigned to increase the fund. It contains a consolidated fund (the Cities Waters Loan Fund) and initial appropriation, which in total is about \$6 million. The fee study (can be viewed at Water.utah.gov/uwip-projects) evaluates various ways (users fees and/or taxes) to fund the gap between existing funds and needed funds.
What year is funding available?	This process goes into effect fiscal year 2027, which begins July 1, 2026. This timing is due to any funds or decisions made in the 2026 legislative session. Until notification is given that the UWIP is in effect, please use the existing agency application process.
Do you anticipate any federal funding opportunities, or is that kept separately?	Federal funding will be kept separate. The UWIP process is state funds only.
I might've missed it, but is this currently a one-time program, or will this same thing happen every five or 10 years or something?	This is an ongoing process. The agency plans are required to be updated annually and the UWIP needs to be updated at least every four years. The Utah Project Portal is open year-round for project entries.
If the district or municipality that I live in is funding their projects, why should I be responsible to pay for a project outside of the area I live in?	This comment period is on the UWIP process, but we encourage you to reach out to your legislators to voice your concerns about the potential fee or tax. Currently, no fee or tax is in place, and it will be up to the Legislature to pass this recommendation. That being said, one recommendation from the fee study is to evaluate the revenue collected within a watershed basin, compare it to the project needs and direct those funds to be used within the watershed boundary.
Will this funding have project requirements that are similar to federally funded projects (Buy America, Davis Bacon, etc...)?	No, these are state funds. The guidelines or regulations for the existing state agencies will be utilized.
Can you have a project that is partially funded by this program and partially funded by the state revolving fund?	Yes. The state revolving fund is one of many funding mechanisms within this process.
If our water system is good at planning and does not need state funds, do we need to submit our projects?	No, if you will not need state funds, you do not need to be on the list. But, if a fee and/or tax is put into place, you may want to have access to those grant funds. If a system anticipates funding decisions may change, they can submit projects with a 0% anticipated state funding and can edit projects later.
If most of our projects are federally funded projects, are they eligible?	If they are fully federally funded, then you would not need additional state funds. If additional funds are needed, then yes.
Does this process include repair and replacement? Or only new.	It covers all – rehabilitation and replacement and new infrastructure.

I. Funding

Question/Comment	Response
<p>Is there information regarding how the application process for funding would work, once funding is granted by the Legislature? For example, will only projects with a certain ranking/prioritization/designation be able to apply for funds? Will the divisions of Drinking Water, Water Resources and Water Quality choose the highest-ranked projects, and those are the candidates that may apply? Or would it be an open application process, and the project's ranking will be considered in the evaluation of the project/application? Will each of the agencies keep their current application process, or will it be revised or added to, to adjust for Water Infrastructure Fund funding? Thanks!</p>	<p>The intention is that if the Legislature allocates an appropriation or a fee or tax is put into place, which would be placed into the Water Infrastructure Fund and distributed as grant funds. The existing application process for most of the relevant agency water funds are distributed as loans, therefore the existing application process may need to be adjusted for the Water Infrastructure Fund and the legislative timeline. It is not the intention to only allow the highest-ranked projects to apply for funding. It is understood by the UWIP team that a project's ranking is likely to change once there is more information collected; therefore we do not want to limit entities from applying for funding, both loans and grants. The funding distribution depends on how much funds are available at the time projects are actually ready to go and could utilize the funds.</p>
<p>How are the UWIP, Water Infrastructure Fund and Community Impact Board related?</p>	<p>The UWIP is the comprehensive planning and prioritization document that will inform the state funding needs for water infrastructure projects in the next twenty plus years. The Water Infrastructure Fund is a new funding account that is managed by the Water Development Coordinating Council. The Community Impact Board is a separate funding account managed by Workforce Services Housing and Community Development.</p>
<p>Please clarify whether UWIP and Water Infrastructure Fund will be in place of or as well as the existing revolving loan funds (drinking water and clean water act).</p>	<p>The existing revolving loan funds will remain in place. The money in the Water Infrastructure Fund is separate and would be grants. Entities must submit projects to be included in the UWIP in order to be eligible for most water infrastructure funds (loans and grants).</p>
<p>On the table listing the criteria, it says 1.5% of the MAGI to qualify. Could you explain more</p>	<p>The 1.5% of the MAGI (median adjusted gross income) refers individually to water and sewer rates. Based on feedback from the public, this criteria has been updated to "Adequate usage rates: Service providers should be charging customers or end users an appropriate amount for supplies and/or water-related services. This criterion focuses funding to projects where additional funding is most needed, and proponents have met or exceeded a cost of service that is reasonably based on the income of their customers."</p>
<p>1. If a water system doesn't plan on needing any UWIP/Water Infrastructure Fund state funding, should they still submit projects?</p>	<p>1. If a system does not need or want state funds, they do not need to submit projects. If the system anticipates funding decisions may change, they can submit projects with a 0% anticipated state funding and can edit projects later.</p>

I. Funding

Question/Comment	Response
2. Contingent on the state fee study. If a water system has no intention of needing UWIP funds, why are they still potentially going to be required to pay into the Water Infrastructure Fund?	2. Water infrastructure is a state need. It can be argued that clean, reliable and recreational water around the state is a state's issue and therefore funding from the state is utilized and distributed to uphold this goal. The fee study contains recommendations, but ultimately the Legislature will make the final decision.
3. With HB 280 and SB 80 going into effect around the same time, how much consideration has been given to the potential impacts this will have on end users and ratepayers?	3. This has been considered. Fees and rate increases can be a hardship. Large work groups have provided input to represent all entities across the state. One of the recommendations from the fee study is to implement a fee in phases to reduce the impacts.
4. Can an applicant use UWIP funds with state revolving funds on a project or other state and federal funding sources?	4. Yes.
5. It is our understanding that we can submit projects through the portal at any time throughout the year. Is that correct? If our water system has not yet submitted any projects, can we do so now?	5. Yes and yes. The portal will be live in November 2025. Moving forward, there will be a cutoff date to export data and create the annual agency plans.
If UWIP funding will be in conjunction with the Division of Drinking Water for drinking water projects, would that be two separate applications or just one?	The first step in the process is entering project data into the portal, which will be incorporated into the annual agency plans. The second step will be applying through the agency's existing application process.
Is it mandated that a certain percentage of this money is loans versus grants?	The relevant agencies all manage and distribute existing funding accounts that are typically loans. The new Water Infrastructure Fund is expected to be grants.
Is it determined how the funding for the Water Infrastructure Fund will be collected?	It is not determined yet. The fee study contains recommendations, but ultimately the Legislature will make the final decision. The fee study was completed on October 31, 2025 and can be viewed at Water.utah.gov/uwip-projects .
If grants will be offered and we are required to pay into this fund, then I am worried that a system that incentivizes people to apply for state funding is being created. Cities who wouldn't normally apply for funding would come for funding.	Thank you for your comment. Yes, there is potential that this would occur. The decision to implement a fee or tax will be decided by the state Legislature.
How much will the fee be? Even 3 cents on the thousand gallon would be a substantial amount	The fee study was completed on October 31, 2025 and can be viewed at Water.utah.gov/uwip-projects . The Legislature will move forward with the provided information to decide if any funding mechanisms should be put into place. It may or may not pass.

I. Funding

Question/Comment	Response
What are the anticipated monthly costs per connection, and will there be an opt out available?	The fee study was completed on October 31, 2025 and can be viewed at Water.utah.gov/uwip-projects , which proposes costs. The Legislature will move forward with the provided information to decide if any funding mechanisms should be put into place. It is anticipated that there will not be an option to opt out.

I. Funding

Question/Comment	Response
<p>Using a threshold of 1.5% of median adjusted gross income (MAGI) overlooks the economies of scale that allow larger systems to operate more efficiently.</p> <p>Current fees are 0.80% for water and 0.66% for sewer (a combined 1.46%). Meeting the 1.5% threshold would require rate increases of 87% for water and 126% for sewer – a combined 105% increase – yielding an additional \$21.6 million annually.</p> <p>This system proposes 14 projects totaling \$35.7 million. The proposed UWIP fee of \$4.11 million per year would divert funds from the city’s system. Raising rates to 3% of MAGI would allow the city to self-fund all projects within 1.65 years, whereas using the \$4.11 million per year that UWIP would divert would extend that timeline to 8.68 years.</p> <p>If this system must double rates to qualify for UWIP funding, participation offers no direct benefit – residents would be subsidizing projects in other communities. Meanwhile, another entity already collects funds for system rehabilitation in addition to user fees. Residents would effectively pay for three systems.</p> <p>The proposed \$4.11 million consumption tax equates to a 20% increase in combined water and sewer rates – about \$16.32 per month per household. Historically, even modest 3-4% increases (\$1 per month) require substantial public justification. Staff cannot justify this increase when local residents would see no direct return.</p> <p>The current grant structure also over-benefits projects under \$10 million. Funding should focus on large, regionally significant projects. Requiring systems to contribute more toward their own projects would reduce the statewide funding burden and promote fiscal responsibility and operational efficiency.</p> <p>As currently structured, larger systems will fund but rarely benefit from the program. Communities like this system, which have responsibly managed and funded their own growth, would be required to subsidize both underfunded and expanding systems elsewhere. Therefore, systems that cannot or will not receive UWIP funding should be allowed to opt out and continue self-funding their projects without diverting local revenue.</p>	<p>Thank you for your comment and providing specific examples and metrics for how the criteria and a potential fee would affect your system. As for the comment on the grant structure, we would like to emphasize that the proposal is for the <i>maximum</i> grant allowed and not necessarily the amount that projects under \$10 million will receive. The fee study identified and recommended a few funding options, but ultimately the authority upon implementation of a fee or tax is up to the Legislature, which has not occurred yet. We encourage you to reach out to your senators and representatives regarding your concerns on the fee study.</p>

II. Legislative Requirements

Question/Comment	Response
Can you give us an idea of how in-depth the capital asset management plan will be and if the requirements for that will differ some for irrigation/canal companies?	Utah Code 73-10g-605 describes requirements for receiving Water Infrastructure Fund money. Among other items, the code specifies that the recipient must conduct a reserve study and comply with relevant capital asset management requirements. The code lists various items to include in a reserve study. Relevant capital asset management requirements include: section 19-5-202 for a water infrastructure project related to wastewater or sewage infrastructure, section 73-10g-502 for a water conservancy district and section 73-10g-502.5 for a public water system (as defined in that code) that is not a water conservancy district. Agencies may provide funds to assist in complying with the planning, reserve analysis and capital asset management requirements.
Do you have an idea of what tax or fee on agricultural water would look like? Would it be on acre-feet depleted or diverted?	The fee study is not recommending a tax or a fee for agricultural projects. It is not feasible for these types of projects.
Will there be funds to help with the creation of capital asset management plans?	Yes. Water infrastructure funds can be used for planning purposes which includes capital asset management plans.

III. Other

Question/Comment	Response
We are from a small community and simply cannot compete with surrounding communities and developers. We have had many board members over the years, and board members come and go. We don't know if we have submitted proper applications. Where do we find if our community submitted an application? How do we know if we are selected? Someone allegedly submitted information, but we have no way of knowing if there has been correspondence and communication, can you please add me to the list of contacts? If we submitted an application, what is our score? If we submitted, will we be notified of the open period for proposal changes?	The UWIP team will look in the database and reach out to verify your project data and contact information. Simply being in the UWIP is not an application, it is the first step in the prioritization process. The next step is submitting the application with the agency. Information regarding the process will be sent out via UWIPprojects@utah.gov .
Is the funding and application for dam safety being rolled into this process as well?	Dam safety funding is based on a separate prioritized list, which is managed by the Division of Water Rights. If there is maintenance or other work that does not qualify under the dam safety grants, that project may apply for other loans or grants through the UWIP process.
When does the state of Utah (relevant agencies) say that a community or system is not meeting standards?	This question is related to the Division of Drinking Water and not specific to the UWIP. For example, the division performs sanitary surveys where staff goes out and inspects water systems. Deficiencies in the system will be noted in the improvement priority system. In some cases a water system can become an unapproved water system and there are consequences to that. The division will step in when larger deficiencies are noted that affect public health.
What is the leading recommendation that is coming from the fee study? How does agriculture pay into this?	The fee study was completed on October 31, 2025 and can be viewed at Water.utah.gov/uwip-projects . The Legislature will move forward with the provided information to decide if any funding mechanisms should be put into place. To be eligible for UWIP funding for agricultural entities, it has been discussed that the company provide some other public benefit like conservation, recreation, etc. instead of the user fee.
Does a capital improvement plan need to be included in a capital asset management plan?	The capital asset management plan rules vary depending on the type of entity. The plans should include the criteria outlined in the rules and code.
What does the application process look like once the lists are finalized?	Once the project is on the list and a UWIP Provisional Score is calculated, the entities with projects scoring above a to-be-determined threshold will either be invited to apply, and agencies will collect more information. Or the entity will apply through the existing funding application when the project is ready to apply for funds.

IV. Project Database

Question/Comment	Response
Currently, the project database is not publicly accessible. Public access is essential for transparency and to justify the proposed fees. Stakeholders must be able to review the list to understand how funds will be allocated.	Agreed. The Utah Project Portal is now live with UWIP data, which will allow entities to better manage their projects. Scores will be viewable by the public within relevant agency plans or the UWIP.

V. Project Submission Process

Question/Comment	Response
I've heard that watershed councils would have input on project ranking. Is this true?	This was discussed as a part of the fee study process. It recommends comparing revenue collected versus projects' needs by watershed basin. Before the UWIP is amended or adopted, it is required to be reviewed by the Utah Watersheds Council, which consists of all local watershed councils.
Will we get to add projects every year to the list?	Yes. The Utah Project Portal will be open year-round for entities to enter and update information. There will be an annual date where project information is pulled from the database to create the agency plans.
If the water system doesn't plan on needing state funding, should they still submit projects?	If a system does not need or want state funds, they do not need to submit projects. If the system anticipates funding decisions may change, they can submit projects with a 0% anticipated state funding and can edit projects later.
When should entities that submitted projects go into the portal and review their submissions?	The Utah Project Portal will be open in November 2025. An email will be sent out and prompt entities to view and edit any submitted projects or enter additional projects.
Do you feel that the request is inflated? Previously entities were asked to only submit the projects for which they anticipate needing state funds for. Now you are asking that all projects be submitted.	If a project was submitted but not expecting state funding, it was recommended to enter in the data field as 0% for state funding. These projects were then excluded from the expected state funds needed but included in the total project costs. When collecting data with such a large projected timeline (20 years+) it is likely there is some sort of error.
The submission process encouraged a wish list of projects rather than a realistic assessment of system needs or funding priorities. In May 2025, our city submitted 14 projects because inclusion on the UWIP list was required for future funding eligibility. Only one of these projects is large enough for potential funding consideration; the remaining 13 were submitted merely to preserve eligibility should the city's financial position change. This raises the question: how many projects on the UWIP list truly need funding? The database should be reviewed and refined to remove projects lacking regional significance or impact. Projects should also be categorized as replacement/rehabilitation or growth-related to clarify intended funding uses.	The UWIP most likely does not include all projects and as the comment mentioned, there may be inflated estimates from some projects. During the initial project collection, it was recommended to add all projects even if they weren't expected state-funding when submitted. If a project was not expecting state funding, it was recommended to enter in the data field as 0% for state funding. These projects were then excluded from the expected state funds needed but included in the total project costs. To address replacement/rehabilitation comment, the project submission included a question asking "[i]s the project new infrastructure or repair/replacement or improvement" to help analyze the data.

VI. Ranking and Prioritization

Question/Comment	Response
When will we be able to review our projects submitted and their ranking?	The Utah Project Portal will be open November 2025 for entities to view their submitted project data or create accounts. Any ranking or prioritization will be included in the UWIP that will be published March 1, 2026. This process is in draft format, and therefore no scores have been published yet.
How will the calculation of MAGI and that portion of ranking work with agriculture projects?	Currently, this criteria does not apply to agriculture projects. These types of projects do not have the same capabilities that municipal projects may have and therefore cannot be compared directly with this criteria. There has been discussion of how agricultural projects could offer up other items for public benefits.
How will regional wholesalers/conservancy districts be prioritized (in lieu of usage rates as a percent of MAGI) when they are applying for funds in the same category as a retail/municipal supplier?	The plan is to consider what percentage of the wholesaler's/conservancy district's (or other entities with taxing authority) taxing capacity is being utilized.
Would the 1.5% MAGI criteria consider the user end fee?	The evaluation would include any related fees.
Does the 1.5% apply for just drinking water rates? How are other utility rates considered?	Drinking water rates are evaluated at 1.5% of the MAGI. Sewer rates are 1.5% MAGI and stormwater is 0.3%.
How are the distribution of funds to each agency looked at? There is concern that large drinking water projects will overshadow other projects like dams or reservoirs.	The prioritization process allocates a portion of the Water Infrastructure Fund to each relevant agency. The Division of Water Resources' primary projects are dams, secondary and agricultural.
How often will ranking be updated?	Relevant agencies are required to update the agency plan by June 30 each year.
<p>1. In looking at the 1.5% median household income criteria, is that 1.5% just looking at culinary water fees? Or does that include all of the utility and service fees that a rate payer could be paying at one time based on a municipality utility service? For example, most municipalities bill for water, sewer, stormwater and garbage. Will those be taken into consideration as being part of that 1.5%?</p> <p>2. Contingent on a state fee being imposed on a ratepayer. Would the fee that the state potentially imposes be included in looking at the 1.5% median household income criteria?</p>	<p>1. Drinking water rates are evaluated at 1.5% of the MAGI. Utilities unrelated to water are not evaluated.</p> <p>2. Yes.</p>
The prioritization method proposed includes good criteria, but I believe misses four key questions, which will potentially lead to unintended consequences.	Thank you for your comments. They will be taken into consideration. General responses are below.

VI. Ranking and Prioritization

Question/Comment	Response
<p>1. There is currently no mechanism to identify whether the infrastructure is needed to provide for existing users or commitments (i.e. for example building lots already sold by developers to potential end users), or whether this is simply the result of growth projections. This means that the principle which otherwise underlies the Utah Code that “Development pay for Development” (e.g. in the Impact Fee statute) is not necessarily included in the process you have outlined.</p> <p>I suggest that this question should be asked, and possibly as a separate category, to make sure that existing users (who will be paying the Water Infrastructure Fund fee or tax) are given a high priority – and indeed that if this is a grant-based system, that it is not used for development.</p> <p>In principle, developers should pay their way through loans, especially given that they now have a mechanism to get money through the tax-exempt market (public infrastructure financing districts, etc.)</p> <p>2. The system you propose may have unintended consequences – by rewarding the emergency project dealing with a public health emergency – these may be artificially created to drive the high point values and scoring, especially if this is for grants, not loans. Well-managed systems are not rewarded.</p> <p>3. A further unintended consequence is that private wells will not be paying, unless the Legislature considers the possibility of applying the fee through the Division of Water Rights – or some other approach that captures the private well withdrawals. While this issue is small in total, there is a fairness principle. There is already a problem with lack of enforcement. We see this firsthand in our area, where there are many hundreds of private wells, with minimal supervision or oversight. And that doesn’t count those that lack water rights.</p> <p>4. The water efficiency value is undefined – I suggest you need to look closely at evaporation, which is the way all of our water is completely lost to the overall natural system. My suggestion would be to increase the relative weighting of that type of efficiency driver, and consider having as an additional factor whether there are landscaping guidelines in use, and enforced (which is really hard), and/or potentially making WaterSense standards for culinary mandatory as a criteria for system applying for funds.</p>	<p>1. The UWIP process intends to balance the needs of repair/replacement and new infrastructure. Determining whether a project is supporting the growth of existing users versus growth related to new development can be ambiguous. These project-specific nuances will be evaluated when the project applies through the existing processes. Staff members identify sources of revenue for the project, which could include impact fees. These fees would affect the funding portfolio.</p> <p>2. The provisional scoring criteria gives higher points to projects identified in a report or study. The critical need criteria do not mean that the project is an emergency. The project could be addressing a risk that was identified through the applicant's planning process.</p> <p>3. Private wells are private individual systems and do not typically qualify for typical state funding within this process.</p> <p>4. The water efficiency criteria is defined broadly as a project that reduces or conserves water. The purpose of the efficient use of water can be different between project types therefore is left undefined.</p>

VI. Ranking and Prioritization

Question/Comment	Response
Where do watershed councils come in with this process?	The fee study is looking at this. There is a consideration that revenue gained from a watershed basin should go back to the basin. Additionally, whenever the UWIP is adopted or amended, the Utah Watersheds Council will review the draft and make recommendations to the Water Development Coordinating Council. The state watershed council consists of representatives from each basin council.
Does the prioritization list give priority to projects that were entered into the system first?	No, we understand that projects will be entered throughout the year, and a first in line principle does not apply.
Is this priority list a continual effort, or would you need to reapply for funds each year?	The project list will be continual and include all projects in the database. Each year project data will be exported to create the agency plans. When the entity is serious about securing funding, they will need to apply through the existing agency process. The project must be in the UWIP (which is informed by the annual agency plans) to qualify for funding.
How would this apply to private companies? Would they have to go through the local district?	Any water provider can submit their projects. Private irrigation companies and water suppliers are included in this process.
<p>1. Prioritization bonus and funding for systems for whom the expenditure isn't their fault. One I will give as an example is for small systems who have their water rights expiring due to not being in the right place at the right time due to Regional Groundwater Water Management Plans.</p> <p>2. This was on the recording, but one question that I also asked is how do projects insert in the priority lists? Small systems often don't know their needs quickly and in advance. These may be more urgent in the perspective of they do not have a huge long term plan. They do not have the knowledge or staffing to plan that well. One example is a local project 20 years ago: they were looking for funding and never proceeded. This should have been looked at and proceeded while there was money available. As it wasn't, it has fallen on the newer residents and board to push these ideas and projects forward.</p>	<p>Thank you for your comments. They will be taken into consideration.</p> <p>1. Every project will be investigated and evaluated to understand the needs of the system. The intent is to not use a fee collected by properly managed systems to fix or repair systems that were not managed properly. The funding will consider all aspects of a project.</p> <p>2. We understand that projects will be entered throughout the year, and a first in line principle does not apply. Additionally there will be thresholds created for determining small projects and emergency projects. Projects that fall within these criteria will not be subject to follow the UWIP process.</p>

VI. Ranking and Prioritization

Question/Comment	Response
<p>Wanted to ensure that the recent Utah-Navajo Water Settlement is documented and prioritized for moving forward. I have seen many needs on Utah-Navajo lands for getting water to households, agriculture and overall food security. Thank you for considering.</p>	<p>Thank you, your comment will be taken into consideration.</p>
<p>There should be some sort of consideration for whether or not the project was the system's fault.</p>	<p>This consideration will be looked at during Phase 2 or when an applicant applies for the agency funding. This is when an agency staff member will review the project specific details. Determining fault is ambiguous and therefore needs to be evaluated by a staff member.</p>
<p>The proposed prioritization scoring rubric appears modeled after the state revolving fund criteria, which tends to favor systems with fewer resources. Based on the current UWIP ranking and prioritization proposal – and without access to the preliminary scores – it appears that larger city projects will receive minimal funding consideration, despite contributing an estimated \$4.11 million annually to the program.</p>	<p>Response applies to three separate parts of this comment:</p> <ol style="list-style-type: none"> 1. The prioritization process attempts to balance the needs of small and large systems. It is common that larger systems have the resources (i.e. staff and knowledge) to prepare other funding sources in advance whereas small communities have limited resources and therefore focus on imminent system problems. The criteria titled 'population benefitted and nonstate funding' attempts to balance the needs of both small projects <i>and</i> large projects. 2. Preliminary scores are not yet visible to the public as this process is still in its draft format and subject to change. Moving forward, scores will be viewable within agency plans or the UWIP. 3. Currently, no additional fee or tax is implemented. The fee study identified and recommended a few funding options, but ultimately the authority to implement a fee or tax will be determined by the Legislature.
<p>I did not see anywhere in the criteria an analysis or evaluation of whether or not the entity applying for grant funding has the ability to finance and repay bonds using existing or projected revenues. Water suppliers that can do so should not be given priority for state grant subsidies, in my opinion. Additionally, hardship based upon area median income does not get to this issue of whether or not a water supplier can amortize and pay back loans for its proposed project. Hardship in the community does not necessarily equate to hardship of the supplier's ability to repay debt incurred for a project.</p>	<p>Thank you for your comment. The hardship criteria is a high-level attempt to determine the area's general affordability within the provisional scoring. When the entity applies for funding, their project will be reviewed by a staff member who will perform an in-depth analysis of the system's ability to pay back a loan, affordability and rate impact.</p>

VI. Ranking and Prioritization

Question/Comment	Response
<p>Thank you for the opportunity to provide comments on the public review draft of the UWIP prioritization process. HB 280 and HB 285 provide guidance on the prioritization process and factors that should be considered in ranking and prioritizing water infrastructure projects. We appreciate the state's efforts to create a transparent and equitable process for prioritizing and funding critical water infrastructure needs statewide.</p> <p>This commenter is one largest retail water supplier in the state, and provides drinking water, sewer and stormwater services. They provide drinking water to approximately 389,000 residents.</p> <p>We respectfully recommend several refinements that would make the prioritization process more equitable for municipal utilities with aging infrastructure and diverse socioeconomic conditions:</p> <ol style="list-style-type: none">1. Incorporate census-tract and other data-driven socioeconomic metrics: Use U.S. Census tract-level data (median household income, poverty rate, housing age, lowest quintile income) to measure affordability and vulnerability within each utility's service area. Tract-based data better captures local variation and ensures equitable treatment of urban communities with mixed-income populations.	<p>Thank you for your comments, we will take them into consideration. General responses are below:</p> <ol style="list-style-type: none">1. The hardship criteria are a high-level attempt to determine the area's general affordability within the provisional scoring. When the entity applies for funding, their project will be reviewed by a staff member who will perform an in-depth analysis of the system's hardship, affordability and rate impact.

2. Generation of revenue for the state Water Infrastructure Fund:

The [HB 280](#) funding study process evaluated revenue generation via volumetric fees applied to utility bills. This commenter is concerned about its utility bills being used to generate revenue for the state Water Infrastructure Fund. Revenue generated by our ratepayers should be used to finance internal projects. Ratepayers should not be paying for projects that do not benefit the system they rely upon. This system has made tough decisions to raise rates significantly each year to finance major aging infrastructure projects, and will need to continue to raise rates to pay for infrastructure and debt service. A state fee (or tax) on our utility bills that would be distributed to other systems undermines our ability to raise rates for our own system, and is inequitable to our ratepayers. In addition, the changing regulatory environment is also adding significant pressure to our rate payers to comply with new requirements such as PFAS treatment and lead service line replacements.

3. Add a system age and renewal need scoring element:

Include a defined point category for system age and renewal needs, recognizing proactive replacement of aging infrastructure. Points could be awarded based on the average age of assets relative to expected service life. For example, 0-10 points with the highest weighting for systems exceeding 60% of design life.

4. Increase weight for source protection and resilience projects:

Elevate projects focused on watershed protection, wildfire mitigation and climate resilience, especially where they directly safeguard drinking water sources for large populations.

5. Include an affordability and rate impact criterion:

Consider household utility costs and post-project rate impacts, prioritizing projects that maintain affordability under median household income and lowest quintile income metrics.

2. We appreciate the specific example of how the potential revenue generation would affect your system. This comment period is on the UWIP process, but we encourage you to reach out to your legislators to voice your concerns about the potential fee or tax. Currently, no fee or tax is in place, and it will be up to the Legislature to pass this recommendation.

3. The sound design criteria for the provisional scoring gives more points to projects that were identified in a study or report. Additionally, [HB 285](#) requires that applicants create a capital asset management plan or perform a reserve analysis. The UWIP process encourages planning while balancing the needs of repair/replacement and new infrastructure projects. When the entity applies for funding, their project will be reviewed by a staff member and more specific system metrics and needs will be evaluated.

4. The prioritization process does not weigh project type as a criteria. The criteria are used to compare across project types. That being said, this specific comment regarding source protection and resilience is relevant and important. If a project includes these aspects we expect that it would increase the score for the critical need criteria during the provisional scoring.

5. See answer 1.

6. Enhance transparency and applicant feedback:

Publish detailed scoring matrices and provide draft scoring results to applicants with an opportunity for review and clarification prior to final funding decisions.

Collectively, these refinements would promote a more balanced, data-driven prioritization process that acknowledges both statewide equity and the distinct needs of Utah's large urban utilities. They would also support reinvestment in aging infrastructure while protecting affordability for ratepayers.

We appreciate the division's leadership in advancing the UWIP and the opportunity to participate in this important dialogue. Please consider these comments in your final revisions.

6. Agreed, one of the goals of the UWIP process is to increase funding transparency.

There are many moving parts to the development of the UWIP process, therefore scores have not been displayed to the public. For this initial year, scores will be released when the UWIP is released on March 1, 2026. It should be noted that the intent of the UWIP is to understand the funding need and allocate money to assist this need. The UWIP will not strictly say a specific amount of money only goes to a specific number of projects because they have the highest ranking. The ranking and prioritization is a fluid process, and it is understood that there will be changes to a project's score as it moves through the design and application process.