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west virginia department of environmental protection

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Division of Water and Waste Management  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
Phone: 304-926-0495 / Fax: 304-926-0463

Harold D. Ward, Cabinet Secretary  
dep.wv.gov

**MEMORANDUM**

**To:** Marie Prezioso, Chair  
Funding Committee  
Infrastructure and Jobs Development Council

**From:** Katheryn Emery, P. E.  
Sewer Technical Review Committee

**Date:** February 15, 2023

**Subject:** Huntington Sanitary Board  
Preliminary Application: IJDC No. 2022S-2305  
Route 10 Extension Project

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1. This committee has reviewed the preliminary application and engineering report submitted for the above referenced project in accordance with Chapter 31, Article 15A. It has been determined that the proposed project is:
  - a.  Consistent with the intent of the Infrastructure and Jobs Development Act and is the most cost-effective, environmentally sound alternative for solving the wastewater needs in this area.
  - b.  Not consistent with the Act and may not be the most cost effective, environmentally sound alternative for solving the wastewater needs in this area.
  - c.  Same as (a) above except that certain issues need to be addressed prior to design and construction as the attached comments indicate.
2. Our recommendation is that:
  - a.  The Funding Committee needs to review the proposed sources of funding to determine the best mix of grant and/or loan funds in accordance with applicable guidelines.
  - b.  The Funding Committee should recommend that the Council approve the proposed project and its funding plan.

- c. \_\_\_ The Funding Committee does not need to review the funding assumptions on this project because of deficiencies in the engineering report. The proposed project funding should be tabled until technical comments have been resolved.
- d. \_\_\_ This project should be referred to the Consolidation Committee.

3. Other remarks:

The proposed project includes upgrades and modifications to 21 of HSB's 22 permitted CSOs, which consist of installing in-line check valves in existing outfalls.

The proposed total project cost is \$8,500,000, and the proposed funding scenario includes a CWSRF Principal Forgiveness Loan of \$870,000, Congressionally Directed Spending (CDS) funds of \$6,358,000, and CDS matching funds of \$1,272,000.

Attachments: Technical Comments

**Engineering Fees:**

Estimated construction cost =	\$ 7,250,000.00
Consultant's design fee =	\$ 425,000.00
Consultant's total fee =	\$ 1,000,000.00
Design fee percentage =	5.9 %
Design fee per ASCE curve =	6.6 %
Total fee percentage =	13.8%
Total fee per ASCE curve =	17.5%

**Preliminary Project Ratings:**

1. Public Health Benefits	10
3. Compliance with Standards	20
5. O & M Capabilities	3
6. Readiness to Proceed	0
8. Cost Effectiveness	1

STATE OF WEST VIRGINIA  
DEPARTMENT OF HEALTH AND HUMAN RESOURCES

Bureau for Public Health  
Office of Environmental Health Service

Jeffrey H. Coben, MD  
Interim Cabinet Secretary

Matthew Q. Christiansen, MD, MPH  
Commissioner & State Health Officer

**MEMORANDUM**

**TO:** Jason Billups, P.E.  
DEP/Infrastructure Sewer Technical Review Committee

**FROM:** William S. Herold, Jr., P.E., Assistant Manager  
I/CD/Environmental Engineering Division

**DATE:** February 13, 2023

**SUBJECT:** Huntington Sanitary Board  
Preliminary Application **Project No.: 2022S-2305**  
Backflow Prevention Project  
Cabell County

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**RECOMMENDATION:**

We have reviewed this preliminary application and recommend it be forwarded to the Funding Committee for review.

**PROJECT SCOPE:**

This preliminary application is to reduce river water intrusion at sewage collection system outfalls during high water events. Major work will consist of the installation of inline check valves, removal of the existing tide gates and closure of the onshore tide gate boxes, installation of new outfalls, new headwalls, and restoration of existing outfall pipes.

The cost per customer is **\$408**. Total estimated project cost is **\$8,500,000** (Congressionally Directed: **\$6,358,000**; CDS Match: **\$1,272,000**; and CWSRF Principal Forgiveness: **\$870,000**).

**NEED FOR PROJECT:**

The Preliminary Engineering Report indicates the City of Huntington's sewage collection system has been experiencing high inflow due to river water intrusion caused by failure of existing check valves & gates, and deteriorating outfalls, headwalls, and outfall pipes.

**CONCERNS:**

None.

**PERMITS:**

A permit **will not be** required from the WV Bureau for Public Health, since CWSRF funds are proposed.



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Harold D. Ward, Cabinet Secretary  
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## MEMORANDUM

**TO:** Katheryn Emery, P.E., Director, DWWM

**FROM:** Thomas Cazad, P.E., Engineer, DWWM

**DATE:** February 10, 2023

**SUBJECT:** Huntington Sanitary Board  
Preliminary Application: IJDC No. 2022S-2305  
CSO Backflow Prevention Valves Project

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### RECOMMENDATION

The IJDC Application and Preliminary Engineering Report (PER), prepared by Potesta & Associates, Inc., for the above referenced project has been reviewed and is technically feasible.

### PROJECT DESCRIPTION

The Huntington Sanitary Board (HSB) serves approximately 20,836 customers in the City of Huntington and the surrounding area, including customers served by the Towns of Ceredo and Kenova, and the Northern Wayne, Spring Valley, and Pea Ridge Public Service Districts (PSDs). HSB operates a combined sewer system that conveys sewage to an activated sludge wastewater treatment plant (WWTP) rated for an average daily flow (ADF) of 17.0-million gallons per day (MGD). The combined sewer system contains 22 permitted combined sewer outfalls (CSOs) and is tied into the floodwall's pumping system as well.

The proposed project includes upgrades and modifications to 21 of HSB's 22 permitted CSOs, which consist of installing in-line check valves in existing outfalls sized 12 to 72 inches in diameter, replacing and raising the existing submerged outfall pipes and headwalls, raising existing weirs at regulators, closing existing tide gates and gate boxes, and installing riprap channels from the raised outfalls to the receiving streams. These improvements include installation of 21 in-line check valves ranging between 12 and 72 inches, 21 flow meters, approximately 700 lineal feet (LF) of outfall piping between 30 and 66 inches in diameter, and nine (9) new headwalls and riprap channels at relocated and/or raised outfalls; rehabilitation of approximately 1,600 LF of existing outfall piping; removal of 17 tide gate valves and closures of the valve boxes; earthwork and shoring at five (5) locations; and all necessary dewatering, pumping, and appurtenances.

The proposed total project cost is \$8,500,000, and the proposed funding scenario includes a CWSRF Principal Forgiveness Loan of \$870,000, Congressionally Directed Spending (CDS) funds of \$6,358,000, and CDS matching funds of \$1,272,000. The current monthly rate for 3,400 gallons is \$28.29, but rates will be increased to \$65.15 as part of IJDC Project Nos. 2022S-2244 and 2022S-2245.

### **NEED FOR PROJECT**

HSB's NPDES Permit contains 22 permitted CSO Outlets. The PER indicates that HSB installed an in-line check valve at CSO Outlet 016 in 2020. This project would make necessary improvements to eliminate river intrusion from the remaining 21 CSO Outlets, raise submerged CSO Outfalls above the normal pool elevations of the receiving streams, install flow meters on the outfalls, and close existing tide gate valves. The in-line check valves will all be sized to accommodate 35' of backwaters. Of the remaining CSO Outlets, only CSO Outlet 009 (4th St. Pump Station) is not proposed to receive an in-line check valve due to site constraints with the floodwall and existing businesses that would make construction, access, and maintenance infeasible or very difficult. The proposed project appears to be in accordance with HSB's Plan of Corrective Action, approved on 8/8/22, in response to Consent Order No. 8753.

### **DEFICIENCIES/COMMENTS**

- It is recommended that further investigation be performed on the outlets at Roby Rd. Pump Station (CSO Outlet 17) to determine whether both outlet discharges are combined and are included in HSB's existing NPDES Permit.
- Further discussion of the existing EDUs, existing and proposed O&M costs, proposed reduction in energy usage, I/I, and CSO events, including documentation of overflows, will be necessary in the facilities plan.
- A public meeting must be held to discuss the project, costs, and associated customer rates.
- Based on the project's schedule, a CWSRF Project Priority List application will need to be submitted for FY 2024.
- The PER will need to be developed into the facilities plan that meets CWSRF requirements.

#### **Engineering Fees:**

Estimated construction cost =	\$ 7,250,000.00
Consultant's design fee =	\$ 425,000.00
Consultant's total fee =	\$ 1,000,000.00
Design fee percentage =	5.9 %
Design fee per ASCE curve =	6.6 %
Total fee percentage =	13.8%
Total fee per ASCE curve =	17.5%

#### **Preliminary Project Ratings:**

Public Health Benefits	10
Compliance with Standards	20

# Public Service Commission of West Virginia

201 Brooks Street, P.O. Box 812  
Charleston, West Virginia 25323



Phone: (304) 340-0300  
Fax: (304) 340-0325

February 14, 2023

Ms. Kathy Emery, P. E.  
Office of Water Resources  
Department of Environmental Protection  
601 57<sup>th</sup> St.  
Charleston, West Virginia 25304

Re: Public Service Commission Staff Review Comments  
Application No. 2022S-2305  
Huntington Sanitary Board  
Infrastructure Preliminary Application

Dear Ms. Emery:

As requested, the Technical Staff of the Public Service Commission of West Virginia has completed its review of the above-referenced Infrastructure application. In light of the District's current financial condition, we are recommending the application be:

- forwarded to the Funding Committee
- forwarded to the Consolidation Committee
- return to the Applicant

Please advise if you have any questions.

Sincerely,

A handwritten signature in red ink, appearing to read "Jonathan M. Fowler".

Jonathan M. Fowler, P.E.  
Engineering Division

JMF:vb

**PUBLIC SERVICE COMMISSION STAFF  
TECHNICAL REVIEW**

**DATE:** February 13, 2023

**PROJECT SPONSOR:** HUNTINGTON SANITARY BOARD

**PROJECT SUMMARY:** The proposed Backflow Prevention Project will reduce inflow into the sanitary sewer system of water from Four Pole Creek, the Guyandotte River and the Ohio River during moderate to high water levels.

<b>PROPOSED FUNDING:</b> Congressionally Directed Funds	\$ 6,358,000
CDF Matching Grant	1,272,000
CWSRF Principal Forgiveness	<u>870,000</u>
Total	\$ 8,500,000

<b>CURRENT RATES:</b>	\$28.29	3,400 gallons
	\$31.50	4,000 gallons

<b>PROPOSED RATES:</b>	\$65.15	3,400 gallons
	\$72.50	4,000 gallons

Application No. 2022S-2305

**RECOMMENDATION:**  forward to the Funding Committee.  
 forward to the Consolidation Committee.  
 return to the Applicant.

**FINANCIAL: William Nelson**

1. Current rates (\$28.29 for 3,400 gallons) are below the rates attributable to 1.25% (\$34.39), 1.5% (\$41.27), 1.75% (\$48.14), and 2.0% (\$55.02) of the Median Household Income (MHI). Increasing current rates to 1.25%, 1.5%, 1.75%, and 2.0% of the MHI would provide additional revenues of \$7,333,052, \$15,604,157, \$23,875,263, and \$32,146,368 respectively.
2. Using Scenario 1, the preferred funding package consisting of Congressionally Directed Funds(CDF) of \$6,358,000, a CDF Matching Grant of \$1,272,000, and a CWSRF Principal Forgiveness of \$870,000,

proposed rates (\$65.15 for 3,400 gallons) will provide a cash flow surplus of \$3,310,336 and debt service coverage of 190.76%.

3. Using the Scenario 2 alternate loan package of \$2,142,000 (in uncommitted funds) at 5% for 40 years (paid back over 38 years), and committed funds consisting of a Congressionally Directed Funds of \$6,358,000, proposed rates (\$70.98 for 3,400 gallons) will provide a cash flow surplus of \$2,811,406 and debt service coverage of 166.94%.

#### 4. NOTES TO COMMENTS

- A. It should be noted that the project sponsor is pursuing four separate projects (2022S-2302, 2022S-2303, 2022S-2304, and 2022S-2305). This project is referred to as Backflow Prevention Project. NOTE: The City is proposing an increase in rates (\$65.15 for 3,400 gallons) applicable for all four projects. The review of this project includes adjustments associated with the Backflow Prevention Project, but also incorporates adjustments reflected in 2022S-2302, 2022S-2303, and 2022S-2304.
- B. Staff's detailed adjustments are listed on Attachment A for Scenario 1 (Preferred Funding Package) and Attachment B for Scenario 2 (Loan Package).
- C. Staff prepared the attached Cash Flow Analysis utilizing information from the Annual Report for the Fiscal Year Ended June 30, 2022, and the applicant's Rule 42 Exhibit submitted with the application.
- D. On December 12, 2022, the City adopted a 4 phase rate increase. Phase 1, effective February 1, 2023, rates will increase to \$37.00 (3,400 gallons). Phase 2, effective January 1, 2024, rates will increase to \$43.00 (3,400 gallons). Phase 3, effective January 1, 2025, rates will increase to \$51.45 (3,400 gallons). Phase 4, effective January 1, 2026, rates will increase to \$65.15 (3,400 gallons).
- E. Senate Bill 234, effective June 12, 2015, required water and sewer utilities that are political subdivisions of the state to maintain a cash working capital reserve in an amount of no less than one-eighth (1/8) of actual annual operation and maintenance expenses. It should be noted that the cash flows provided by the project sponsor include funding for the 1/8 cash



working capital reserve. Staff accepted that amount in its analyses. However, this amount may be reviewed by the Commission in future filings in accordance with Public Service Commission General Order 183.11.

- F. The City of Huntington should carefully evaluate its revenue requirements before passing a rate ordinance in order to ensure that rates are sufficient to provide a reasonable surplus and meet coverage requirements. Staff notes that the City is a political subdivision of the state and it has at least 4,500 customers and annual gross revenues of \$3 million or more. Therefore, in accordance with Senate Bill 234, effective June 12, 2015, the Commission has no jurisdiction regarding the City's rates pursuant to WV Code 24-2-4b. However, the Commission does have jurisdiction pursuant to WV Code 24-2-1 (b)(6) for the investigation and resolution of disputes involving political subdivisions of the state regarding inter-utility agreements, rates, fees and charges, service areas and contested utility combinations.

**ENGINEERING:** Jim Spurlock

1. This project will not require a Certificate of Convenience and Necessity from the PSC. (see financial comment above)
2. Scope: The Huntington Sanitary Board (HSB) proposes a Backflow Prevention Project to reduce river water inflow into the collection system from the Fourpole, Guyandotte, and Ohio Rivers during high river levels. Various renovations will be performed at 22 CSO outfalls, including installation of check valves.

Customer Density: N/A (Internal Improvements)

Cost per Customer: \$408 ((taken from the total project cost estimate of \$8,500,000 spread over 20,815 existing customers).

3. Project Feasibility: The project is technically feasible. The cost per customer is reasonable. The project will reduce backflow of river water into the collection system, which causes excessive flow and river sediment to be pumped and treated as well as increasing sewer overflow events.

4. Project Alternatives: The nature of the project does not lend itself to alternatives other than the ubiquitous and unacceptable “no action”.
5. Consolidation: No consolidation opportunities are presented by the project.
6. Inconsistencies: None were noted.
7. Operation and Maintenance (O & M) Expenses: The estimated maintenance cost for the outfalls after the project is \$74,000 annually. Supporting calculations were provided. This will be offset by an unquantified amount due to the cost savings associated with reduction of backflow.
8. Engineering Agreement: The application includes the Board’s plan regarding compliance with West Virginia Code §§5G-1-1, et seq. The Board is preparing an advertisement for design and construction related engineering services. The PER was prepared under an existing General Services Agreement. Total technical services (engineering) costs for the project are \$1,000,000 which is equal to 13.79% of the construction cost of \$7,250,000 (including contingency).

<b><i>Preliminary Project Ranking</i></b>		
O & M Capabilities		
Performance Measures:	1	<i>Pt.</i>
Asset Management:	1	<i>Pt.</i>
Environmental Management:	1	<i>Pt.</i>
Readiness to Proceed:	0	<i>Pt.</i>
Cost Effectiveness:	1	<i>Pt.</i>
Compliance with PSC Orders:	0	<i>Pt.</i>

HUNTINGTON SANITARY BOARD  
 CASH FLOW ANALYSIS  
 YEAR ENDED: June 30, 2022  
 APPLICATION NO: 2022S-2305  
 February 13, 2023

**PREFERRED FUNDING PACKAGE  
 SCENARIO 1**

	Rule 42 Going Level Per Application Before Project	Rule 42 Proforma Per Application with Project	Staff Adjustments	Per Staff Analysis
	1	2	3	4
	\$	\$	\$	\$
<b>AVAILABLE CASH</b>				
Operating Revenues	14,773,535	27,053,287	(1,740,907) (1)	25,312,380
Other Operating Revenue	691,446	691,446	-	691,446
SB 234 Annual Working Cash Collections			1,740,907 (2)	1,740,907
Interest Income & Other Misc.	16,488	16,488	-	16,488
<b>Total Cash Available</b>	<b>15,481,469</b>	<b>27,761,221</b>	<b>-</b>	<b>27,761,221</b>
<b>OPERATING DEDUCTIONS</b>				
Operating Expenses	12,744,618	13,927,253	918 (3)	13,928,171
Taxes	491,840	558,788	-	558,788
<b>Total Cash Requirements Before Debt Service</b>	<b>13,236,458</b>	<b>14,486,041</b>	<b>918</b>	<b>14,486,959</b>
Cash Available for Debt Servi (A)	2,245,011	13,275,180	(918)	13,274,262
<b>DEBT SERVICE REQUIREMENTS</b>				
Principal & Interest (B)	1,537,069	6,957,696	875 (4)	6,958,571
Other Debt	-	-	-	-
Reserve Account @ 10%		614,265	87 (5)	614,352
Renewal & Replacement Fund (2.5%)	387,037	694,031	(43,935) (6)	650,096
<b>Total Debt Service Requirement</b>	<b>1,924,106</b>	<b>8,265,992</b>	<b>(42,973)</b>	<b>8,223,019</b>
SB 234 Cash Working Capital	1,593,077	1,740,907	-	1,740,907
<b>Remaining Cash</b>	<b>(1,272,172)</b>	<b>3,268,281</b>	<b>42,055</b>	<b>3,310,336</b>
Percent Coverage (A) / (B)	146.06%	190.80%		190.76%
Average rate for 3,400 gallons	\$ 28.29	\$ 65.15	\$ -	\$ 65.15
Average rate for 4,000 gallons	\$ 31.50	\$ 72.50	\$ -	\$ 72.50

Staff Adjustments

<u>Adjustment Description</u>		\$	Increase <Decrease>
(1)	<b>Operating Revenues</b>	<b>Per Staff Analysis</b>	
		<b>Per Application with Project</b>	
		25,312,380	(1,740,907)
		27,053,287	
	Adjust revenues in accordance with PSC General Order 183.11.		
(2)	<b>SB 234 Annual Working Cash Collections</b>	<b>Per Staff Analysis</b>	
		<b>Per Application with Project</b>	
		1,740,907	1,740,907
		-	
	Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.		
(3)	<b>Operating Expenses</b>	<b>Per Staff Analysis</b>	
		<b>Per Application with Project</b>	
		13,928,171	918
		13,927,253	
	To adjust for a .25% administrative fee associated with two(2) \$11,000,000 CWSRF Loans for 38 yrs., and a third CWSRF Loan of \$7,000,000 with .25% administrative fee for 38 yrs., for Applications 2022S-2302, 2022S-2303, and 2022S-2304.		
(4)	<b>Principal &amp; Interest</b>	<b>Per Staff Analysis</b>	
		<b>Per Application with Project</b>	
		6,958,571	875
		6,957,696	
	The difference in P&I is related to Staff's calculation of two (2) CWSRF Loans of \$11,000,000 each for 38 years at .25%, and a third CWSRF Loan of \$7,000,000 for 38 years at .25%, for Applications 2022S-2302, 2022S-2303, and 2022S-2304.		
(5)	<b>Reserve Account @ 10%</b>	<b>Per Staff Analysis</b>	
		<b>Per Application with Project</b>	
		614,352	87
		614,265	
	Staff assumed a 10% reserve on the new debt.		
(6)	<b>Renewal &amp; Replacement Fund (2.5%)</b>	<b>Per Staff Analysis</b>	
		<b>Per Application with Project</b>	
		650,096	(43,935)
		694,031	
	Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.		

HUNTINGTON SANITARY BOARD  
 CASH FLOW ANALYSIS  
 YEAR ENDED: June 30, 2022  
 APPLICATION NO: 2022S-2305  
 February 13, 2023

**LOAN PACKAGE  
 SCENARIO 2**

	Rule 42 Going Level Per Application Before Project	Rule 42 Proforma Per Application with Project	Staff Adjustments	Per Staff Analysis
	1	2	3	4
	\$	\$	\$	\$
<b>AVAILABLE CASH</b>				
Operating Revenues	14,773,535	28,903,703	(1,738,717) (1)	27,164,986
Other Operating Revenue	691,446	691,446	-	691,446
SB 234 Annual Working Cash Collections			1,738,717 (2)	1,738,717
Interest Income & Other Misc.	16,488	16,488	-	16,488
<b>Total Cash Available</b>	<b>15,481,469</b>	<b>29,611,637</b>	<b>-</b>	<b>29,611,637</b>
<b>OPERATING DEDUCTIONS</b>				
Operating Expenses	12,744,618	13,909,740	-	13,909,740
Taxes	491,840	558,788	-	558,788
<b>Total Cash Requirements Before Debt Service</b>	<b>13,236,458</b>	<b>14,468,528</b>	<b>-</b>	<b>14,468,528</b>
Cash Available for Debt Servi (A)	2,245,011	15,143,109	-	15,143,109
<b>DEBT SERVICE REQUIREMENTS</b>				
Principal & Interest (B)	1,537,069	9,079,748	(8,766) (3)	9,070,982
Other Debt	-	-	-	-
Reserve Account @ 10%		777,286	48,308 (4)	825,594
Renewal & Replacement Fund (2.5%)	387,037	740,291	(43,880) (5)	696,411
<b>Total Debt Service Requirement</b>	<b>1,924,106</b>	<b>10,597,325</b>	<b>(4,339)</b>	<b>10,592,986</b>
SB 234 Cash Working Capital	1,593,077	1,738,717	-	1,738,717
<b>Remaining Cash</b>	<b>(1,272,172)</b>	<b>2,807,067</b>	<b>4,339</b>	<b>2,811,406</b>
Percent Coverage (A) / (B)	146.06%	166.78%		166.94%
Average rate for 3,400 gallons	\$ 28.29	\$ 70.98	\$ -	\$ 70.98
Average rate for 4,000 gallons	\$ 31.50	\$ 79.03	\$ -	\$ 79.03

Staff Adjustments

<u>Adjustment Description</u>			\$	Increase <Decrease>
(1)	<b>Operating Revenues</b>	<b>Per Staff Analysis</b>	<b>27,164,986</b>	<b>(1,738,717)</b>
		<b>Per Application with Project</b>	<b>28,903,703</b>	
	Adjust revenues in accordance with PSC General Order 183.11.			
(2)	<b>SB 234 Annual Working Cash Collections</b>	<b>Per Staff Analysis</b>	<b>1,738,717</b>	<b>1,738,717</b>
		<b>Per Application with Project</b>	<b>-</b>	
	Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(3)	<b>Principal &amp; Interest</b>	<b>Per Staff Analysis</b>	<b>9,070,982</b>	<b>(8,766)</b>
		<b>Per Application with Project</b>	<b>9,079,748</b>	
	The difference in P&I is related to Staff's calculation of a Loan of \$47,000,000 for 40 years (paid back over 38 yrs.) at 5%, and a loan of \$2,142,000 for 40 years (paid back over 38 years) at 5% for Applications 2022S-2302, 2022S-2303, and 2022S-2304.			
(4)	<b>Reserve Account @ 10%</b>	<b>Per Staff Analysis</b>	<b>825,594</b>	<b>48,308</b>
		<b>Per Application with Project</b>	<b>777,286</b>	
	Staff assumed a 10% reserve on the new debt.			
(5)	<b>Renewal &amp; Replacement Fund (2.5%)</b>	<b>Per Staff Analysis</b>	<b>696,411</b>	<b>(43,880)</b>
		<b>Per Application with Project</b>	<b>740,291</b>	
	Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			