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GreatWest ENGINEERING

November 17, 2023

City of White Sulphur Springs
PO Box 442, 105 West Hampton
White Sulphur Springs, MT 59645
Attn: Mayor Rick Nelson

RE: November 21, 2023, Council Meeting Agenda Items
White Sulphur Springs On-Call Engineering Services
Great West Engineering Project No. 1-21278

Dear Council:

The following narratives provide additional background information and recommendations regarding Unfinished Business Agenda Items 1 and 2 and New Business Item 1 for your consideration at the upcoming City Council meeting on November 21, 2023.

1. **Water System Draft PER Document**
   The water system PER provided to the Council on 11/6 has been edited to reflect a revised user rate increase calculation. The change is related to the use of two new numbers in the rate calculation:
   - Changed 644 EDUs to **623 active billed services**
   - Changed $47.94 existing average user cost/month/EDU to **$52.45 existing average user cost/month/billed service**

   To summarize, the city does not currently use an EDU system for calculation of rate charges so trying to equate the system to EDUs is not how the funding agencies will calculate the loan coverage. The proposed user rate increase has been updated to reflect **$1.43 per month per billed service** in place of the original $4.18 increase per month per EDU. It is important to note these are just estimates at this time, as the final rate increase will be based on actual construction bid prices and SRF loan coverage calculations.

   There were minimal changes to the document and Shelly has been provided with a fully revised electronic copy and new hard copy pages for insertion into the hard copy document. For reference, the pages with changes are 4, 60-64, 132, 134, 135, 139, and 140. These updated pages are attached to this letter.

2. **Sewer Line Easement Request – 300 block East Larime Property – Bruce Lay**
   It is understood a property owner within the city would like to develop an existing lot located at the 300 block of Larime Street. Based upon available mapping, there appears to be a 6-inch PVC water main located within Larime Street and water service connection could be accomplished in a straightforward manner by a water service line connection to this existing main in Larime Street. Available sewer mapping, however, indicates there is not an available sewer main adjacent to the property proposed for development (sewer map is attached with Lay property

HELENA
2501 Belt View Drive
Helena, MT 59601
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS
6780 Trade Center Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE
1921 E Overland Road
Meridian, ID 83642
Ph: (208) 576-6646

GREAT FALLS
702 2nd Street Ste #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE
10220 N Nevada Street
Suite 130
Spokane, WA 99218
Ph: (509) 413-1430

marked in red). The nearest sewer main appears to be located in 3rd Avenue NE, flowing to the south. In order to serve the proposed lot with sanitary sewer service, best practice is to install a main extension from the existing line in 3rd Avenue NE in either the alley between Washington Street and Larime Street or within Larime Street. It is not standard practice to install long lengths of service line (that are privately maintained) within public right of way. The practice of running long lengths of service line promotes crowding of pipes in the right of way, does not promote orderly expansion of the system, and promotes the potential for shared service lines which can create capacity concerns and result in sewage backups. Many other communities in Montana maintain engineering design standards or ordinances to guard against this potential situation. Below are examples of standard language that can be found within design standards for cities such as Three Forks, Helena, Kalispell, and Great Falls.

"Any extension of an existing City sanitary sewer main must be extended through the entire frontage length of the property to be served, with a standard manhole located at the terminus of the new sewer main."

"Improvement Extent: Roadways and utilities shall be constructed from existing facilities to the far property line of the development or such other point within the development that may be specified by the City. Extension of water mains beyond the property line may be required as determined by the City for looping and redundancy. All utilities shall be within a public right-of-way or easement to permit free and unobstructed access."

Great West Engineering recommends the city require the developer to extend a sewer main extension to the eastern edge of the proposed property and also recommended the city develop a policy or ordinance to enforce this standard. A sewer main extension will require design by a professional engineer and approval by the Montana Department of Environmental Quality (MDEQ) and the City of White Sulphur Springs. The city may also want to consider development of a permit process for construction within the city right-of-way.

3. **Mountain View Medical Center Water Main Connection**
   The Contractor for Mountain View Medical Center determined through field investigation that the water main and valving layout at the intersection of E. Folsom Street and 4th Avenue SE differs from what is shown on the construction drawings TD&H Engineering prepared. The City has the option to consider asking the contractor to reconstruct the intersection, with the addition of valving and piping to provide a more practical layout of waterlines in the area, which will cost the City an estimated $40,000 to $50,000. The alternative is to have the contractor install the new 12" line and valve and connect to the existing tee in the intersection. The City could then improve the waterlines and valving layout in the intersection as part of a future project.

Please let us know if you have any questions.

Sincerely,

Great West Engineering, Inc.

Jessica L. Salo

Jessica L. Salo, PE
Project Engineer

line and re-align the main along Castle Mountain Road and along property lines in the adjoining subdivision.

This preferred alternative includes construction of approximately 4,000 lineal feet of new 12-inch PVC water transmission main from the water storage tank to the existing water main connection near the Townsend Ranch property line. The project will abandon the existing 1940's era steel transmission main which is known to be leaking excessively. The new PVC transmission main will deviate from the original 1940s alignment and will follow the Castle Mountain Road alignment as well as existing property lines in the adjoining subdivision. Easement negotiations will be required for this realignment with the goal to benefit property owners by re-aligning the water line along property lines versus the current alignment which traverses through the properties and potentially limits the owner's use of their properties. There will be no water services off of the new transmission main as the subdivision has its own drinking water source and is outside of the city limits. The project will include a pipeline bore underneath the South Side Canal.

1.5 Project Costs and Budget

The total project cost for the proposed project is $1,325,500. This cost is detailed in Table 7-1. The city's preferred funding package and that recommended by this PER includes:

- ARPA MAG: $306,708
- SRF Loan Forgiveness: $750,000
- SRF Loan: $268,792

Table 8-2 presents a detailed project budget based upon the proposed funding strategy. With the proposed funding package, water rates are anticipated to increase by approximately $1.43 per month per active billed service.

Table 3-12 – Water System Revenue Summary

Description	FY 2019	FY 2020	FY 2021	FY 2022
Metered Water Sales	$180,853	$163,837	$186,952	$209,709
Bond Principal Assessments	$171,535	$170,622	$171,066	$171,822
Unmetered Water Sales	$34,875	$34,993	$36,138	$36,164
Total Revenue from Rate Charges	***$387,263***	***$369,452***	***$394,156***	***$417,694***
Intergovernmental Revenue	$1,505	$891	$2,483	$121,550
Miscellaneous (meter, or turn on/off)	$11,195	$9,342	$3,834	$9,342
Investment Earnings	$8,003	$5,268	$1,331	$1,658
Water Installation Charges	$4,500	$2,216	$5,462	$3,581
Water Permits	$0	$80	$0	$0
Miscellaneous Revenues	-$31	$0	$0	$0
Total Other Revenue	***$25,171***	***$17,797***	***$13,109***	***$136,131***
Total Revenue	**$412,434**	**$387,249**	**$407,266**	**$553,825**

Table 3-13 summarizes the water system expenses for the past four years. Personnel salaries make up the largest component of operation and maintenance expenses with power costs coming in second. The average cost of power to run the city's well pumps is approximately $47,000 per year which equates to 21% of total operation and maintenance expenses. On average, the water system operation and maintenance expenses are approximately $250,000 per year. Year 2020 appeared to have been a less than normal year in terms of O&M. Additional expenses apply to depreciation, debt service, and engineering. These expenses are broken out separately from general operation and maintenance expenses and vary from year to year. Detailed expense reports are included in Appendix U.

The city is currently paying on four SRF drinking water loans to cover costs for water projects that date back to 2012. The current balance of the revenue bonds to be repaid is $1,026,000 ($619,000 + $58,000 + $118,000 + $231,000). These bonds will reach maturity in 2033, 2034, 2035, and 2042. The loan balance sheets are included in Appendix U. The debt service represents the annual payments made for the loans. The most recent loan was initiated in March of 2022 which explains the reason for the increase in debt service payments in FY 2022.

Table 3-14 summarizes the net revenue for the water system by subtracting the operation and maintenance and debt service expenses from the water sales revenue.

Table 3-13 – Water System Expense Summary

Description	FY 2019	FY 2020	FY 2021	FY 2022
Salaries	$69,070	$49,124	$109,255	$52,645
Power	$53,941	$46,069	$42,267	$44,614
Repair Parts	$26,941	$21,576	$64,731	$26,576
Repair and Maintenance Supplies	$53,603	$1,710	$12,342	$17,900
Repair and Maintenance Services	$14,720	$8,193	$19,441	$28,330
Employer Contributions	$8,420	$9,351	$10,773	$8,011
Office Supplies and Materials	$5,272	$6,007	$6,548	$5,721
Payroll	$18,120	$0	$0	$0
Machinery and Equipment	$0	$0	$0	$16,577
Communication and Transportation	$4,044	$3,770	$2,897	$3,355
Water Testing	$1,803	$3,297	$1,074	$1,080
Travel	$1,222	$2,208	$659	$1,664
Consumer Fee	$1,200	$1,200	$1,200	$1,200
Other O&M Expense[1]	$3,003	-$1,656	$2,997	$1,870
Total O&M Expense	***$261,358***	***$150,850***	***$274,183***	***$209,543***
Depreciation	$91,920	$92,276	$93,673	$0
Debt Service	$34,585	$32,585	$30,510	$108,622
Engineering	$34,293	$549	$1,365	$122,503
Total Other Expense	***$160,799***	***$125,410***	***$125,548***	***$231,126***
Total Expense	**$422,157**	**$276,260**	**$399,732**	**$440,669**

[1]Includes a summation of several minor items which are generally each less than $1,000.

Table 3-14 – Net Revenue Summary

Description	FY 2019	FY 2020	FY 2021	FY 2022
Total Revenue from Rate Charges	$387,263	$369,452	$394,156	$417,694
Total O&M Expense	$261,358	$150,850	$274,183	$209,543
Debt Service	$34,585	$32,585	$30,510	$108,622
Net Revenue	**$91,320**	**$186,017**	**$89,463**	**$99,528**

White Sulphur Springs currently implements the water rate schedule as summarized in Table 3-15. Water rate and user category information is provided in Appendix V. Per the rate structure, users are charged a flat fee of $42.87 (base fee + pipe fee + tank fee) plus an additional usage fee based on the amount of gallons used each month. This rate structure has been in place since 2018. The city does not currently use a rate structure based on water meter size or equivalent dwelling units (EDUs).

Table 3-15 – Existing Water Rate Structure

Usage per Month (Gallons)	Base Fee	Pipe Fee	Tank Fee	Usage Fee	Total Fee
1,000	$16.00	$5.00	$21.87	$1.80	$44.67
1,500	$16.00	$5.00	$21.87	$2.70	$45.57
2,000	$16.00	$5.00	$21.87	$3.60	$46.47
2,500	$16.00	$5.00	$21.87	$4.50	$47.37
3,000	$16.00	$5.00	$21.87	$5.40	$48.27
4,000	$16.00	$5.00	$21.87	$7.20	$50.07
5,000	$16.00	$5.00	$21.87	$9.00	$51.87
6,000	$16.00	$5.00	$21.87	$10.80	$53.67
7,000	$16.00	$5.00	$21.87	$12.60	$55.47
8,000	$16.00	$5.00	$21.87	$14.40	$57.27
9,000	$16.00	$5.00	$21.87	$16.20	$59.07
10,000	$16.00	$5.00	$21.87	$18.00	$60.87
20,000	$16.00	$5.00	$21.87	$36.00	$78.87
30,000	$16.00	$5.00	$21.87	$54.00	$96.87
40,000	$16.00	$5.00	$21.87	$72.00	$114.87
50,000	$16.00	$5.00	$21.87	$90.00	$132.87
60,000	$16.00	$5.00	$21.87	$108.00	$150.87
70,000	$16.00	$5.00	$21.87	$126.00	$168.87
80,000	$16.00	$5.00	$21.87	$144.00	$186.87
90,000	$16.00	$5.00	$21.87	$162.00	$204.87
100,000	$16.00	$5.00	$21.87	$180.00	$222.87

In order to gain insight into how costs are distributed among users, an analysis was conducted on a March 2023 billing report provided by the city. This report is included in Appendix V. The report breaks out monthly water charges by meter size and the analysis is summarized in Table 3-16.

Because of the large variation in demand that can occur between commercial users, many communities classify customers on the basis of meter size rather than classes such as residential, commercial, industrial, etc. The premise behind this method is the smallest meter size is used as the base level of service with an established base rate, and equivalent ratios are applied to the larger meters to calculate resulting water rates by multiplying the equivalent ratio by the base rate. If this methodology is applied to the White Sulphur Springs billing data using the average charge per meter for the ¾-inch meter as the base rate, the resulting equivalent ratios and equivalent dwelling units (EDUs) are shown in Table 3-16. The resulting equivalent ratios for 2-inch meters

and larger are generally only slightly above 1, indicating the larger metered users are not being charged much more than a standard residential connection.

Table 3-16 – Charges Based on Meter Size

Meter Size	No. of Meters	Total Charges (March 2023 Billing)	Average Charge per Meter	Equivalent Ratios	EDUs
3/4"	596	$27,648.98	$46.39	1.00	596.00
1"	9	$786.82	$87.42	1.88	16.96
1-1/2"	3	$442.69	$147.56	3.18	9.54
2"	13	$891.09	$68.55	1.48	19.21
3"	1	$42.87	$42.87	0.92	0.92
4"	1	$56.35	$56.35	1.21	1.21
Total	**623**	**$29,869**	**$47.94**		**644**

There are many different methodologies for computing equivalent ratios for larger meters. An EDU calculation is presented in Table 3-17 which utilizes the White Sulphur Spring meter numbers with an area-based EDU method. EDUs are calculated based on the cross-sectional area of the pipe diameter for each service line size, assuming a ¾-inch pipe diameter is the base value. This method results in relatively high ratios for meters 2-inch and larger and may not always be an appropriate method, depending on the community and the type of commercial account associated with the larger meter.

Table 3-17 – EDU Calculation based on Meter Size (Area Method)

Meter Size	No. of Meters	Area (in^2)	Equivalent EDUs	EDUs
3/4"	596	0.44	1.00	596.00
1"	9	0.79	1.78	16.00
1-1/2"	3	1.77	4.00	12.00
2"	13	3.14	7.11	92.44
3"	1	7.07	16.00	16.00
4"	1	12.57	28.44	28.44
Total	**623**			**761**

White Sulphur Springs may want to re-evaluate its current rate structure and look at ways to allocate a larger portion of the water rate charges to the larger commercial users. The city could implement a rate study to determine a rate methodology appropriate for the community.

For simplicity and to remain consistent with methodology used for rate calculations by funding agencies, the existing average water user rate for White Sulphur Springs can be calculated by dividing the average monthly revenue from rate charges ($392,141/12 = $32,678) by the active water system accounts (623). The city currently has 623 active water system accounts with an existing average water user rate of $52.45.

3.6 Water/Energy/Waste Audits

No water, energy, or waste audits have been conducted for White Sulphur Spring's water system.

Revenue from the collection of water rates for recent years was discussed in Section 3.5 of this report and on average is about $392,000 per year. The projected income as a result of the user rate increase that is proposed for the transmission main project is approximately $10,691 annually, or $1.43 per month per active billed service. The proposed rate increase is discussed further in Chapter 8.

7.6.2 Annual O&M Costs

O&M costs are not anticipated to increase with the proposed project and may in fact be reduced with proposed improvements due to less power required for pumping costs. If the city does recognize a cost savings, the extra funds can be used to pay down the debt that will result from this project or to further build a reserve account for future system improvements.

Current O&M costs are approximately $250,000 per year, excluding debt service payments. O&M costs are currently covered by the existing water rates.

7.6.3 Debt Repayments

The city is currently paying on four SRF drinking water loans to cover costs for water projects that date back to 2012. The total proposed financing for this project includes a $268,792 SRF loan. The estimated annual debt service for the loan is $19,569. The loan payments will be covered through user fees which will increase as necessary to cover the additional loan payments. The proposed funding package is discussed further in Chapter 8.

7.6.4 Reserves

Debt Service Reserve

As shown on the coverage calculation included within Appendix U, the highest existing debt service payment is expected to be $121,133 occurring in fiscal year 2026. Assuming 10% loan coverage, the highest total existing annual debt service cost is $133,246.

The proposed funding scenario for the transmission main project will include a fifth low-interest loan from the Drinking Water State Revolving Fund. SRF requires a 10% bond reserve to be maintained on loan funds. The estimated debt service annual reserve amount for this project is $19,569, bringing the total proposed debt service cost to approximately $153,000.

8.0 CONCLUSIONS AND RECOMMENDATIONS

The previous sections of this report have focused on the need for the project, physical and socioeconomic characteristics of the community, project costs, and the technical viability. This section will focus on the financial strategy and implementation schedule. One of the main goals of a comprehensive PER is to provide a workable funding plan for recommended improvements included in the preferred alternative. This section will discuss available funding sources as well as develop various funding scenarios. Ultimately, a preferred funding scenario will be selected and further analyzed along with an associated implementation plan.

8.1 Funding

Due to the high cost of the proposed improvements, the City of White Sulphur Springs plans to pursue outside assistance to fund the project in the form of grants and loans. Prior to examining the funding sources available to the city, it is important to understand the concept of “Target Rate” as established by the Montana Department of Commerce (MDOC). The target rate is used to determine if a municipality is paying its fair share of a project’s cost. To apply for grant funding from the MDOC, user rates after completion of the project must meet or exceed the established target rates.

The target rates are calculated as a percentage of the median household income (MHI) for the municipality, as listed in the 2019 American Community Survey. The MDOC has determined, based on surveying communities that have undergone recent upgrades to their water and/or wastewater systems that the “fair share” of cost per user after completing a project should be approximately 1.4% of the median household income for water only, 0.9% for wastewater only, or 2.3% for water and wastewater combined.

According to the MDOC’s website, the MHI for the City of White Sulphur Springs is $41,458 and the target rate for the combined water and sewer system is $79.46. The existing average water rate for the city is $52.45 and the existing sewer rate is $42.00. The current combined rate of $94.45 is 119% of the target rate, prior to implementation of this project. Appendix W includes MHI and target rate information for White Sulphur Springs.

8.1.1 Funding Sources

The following sections provide a brief description of the potential funding sources and whether or not the City of White Sulphur Springs would be eligible for those funds.

Montana Coal Endowment Program (MCEP)

MCEP is a state funded grant program, which is administered by the Montana Department of Commerce (MDOC). MCEP provides financial assistance to local governments for infrastructure improvements. Grants can be obtained from MCEP for up to $500,000 if the projected user rates are less than 125% of the target rate, for up to $625,000 if projected user rates are between 125% and 150% of the target rate, and for up to $750,000 if the projected user rates are over 150% of the target rate. MCEP grant recipients are required to match the grant dollar for dollar, but the match may come from a variety of sources including other grants, loans, or cash contributions.

The proposed project is eligible for MCEP funds. The city's user rates are currently 119% of the target rate for the community. With the existing rates, the city is eligible for a $500,000 MCEP grant. Additionally, the focus of the MCEP program is public health and safety. Preserving the integrity of the city's water transmission system is vital to protecting public health and safety of the White Sulphur Springs residents. A new transmission main will greatly reduce the threat of main breaks and backflow contamination of the water system.

The use of MCEP grant funding was ultimately not selected in the city's preferred funding strategy for this project due to timing of the availability of grant funds. MCEP grant applications are only accepted every other year, in the spring of even numbered years. If applied for, MCEP funds for this project would not become available until spring of 2025. The city prefers to pursue an alternate funding package that would allow for earlier design and construction of the transmission main project.

Renewable Resource Grant and Loan Program (RRGL)

RRGL is a state program that is funded through interest accrued on the Resource Indemnity Trust Fund and the sale of Coal Severance Tax Bonds and is administered by the Montana Department of Natural Resources and Conservation (DNRC). The primary purpose of the RRGL is to enhance Montana's renewable resources. For public facilities projects that conserve, manage, develop, or protect renewable resources, grants of up to $125,000 are available.

- ARPA Local Fiscal Recovery Funds (LFR) – The act provided direct assistance from Treasury to towns, cities, and counties. Direct assistance was given to local governments in two tranches. The first tranche became available in June 2021, and the second in June 2022. The funds can be used for various purposes, including water and sewer infrastructure.
- ARPA Minimum Allocation Grants (MAG) – The act appropriated $463 million to the State of Montana. The State of Montana, through House Bill 632, allocated $150 million of the appropriation to towns, cities, districts, and counties through the Minimum Allocation grant process that was developed in Montana's 2021 legislative session through House Bill 632. Minimum Allocation Grants can be used for water and sewer infrastructure and must be committed by January 1, 2023. A commitment of funds requires local governments to have all matching funds for the proposed project in place by January 1, 2023.

The city has dedicated its Local Fiscal Recovery Funds for other uses. The city submitted an ARPA MAG application in November 2022 and has dedicated $306,708 for the proposed water transmission main project.

8.1.2 Funding Strategy

Table 8-1 shows various funding strategies for the proposed project. The potential funding scenarios are:

- Scenario 1 – ARPA MAG, DNRC Grant, MCEP Grant, and RD Loan (3.875% for 40 years)
- Scenario 2 – ARPA MAG, SRF Loan Forgiveness, and SRF Loan (2.5% for 20 years)
- Scenario 3 – ARPA MAG, DNRC Grant, MCEP Grant, SRF Loan Forgiveness, and SRF Loan (2.5% for 20 years)

The city's preferred funding package and that recommended by this PER includes:

- ARPA MAG: $306,708
- SRF Loan Forgiveness: $750,000
- SRF Loan: $268,792

With the proposed funding package, water rates are anticipated to increase by approximately $1.43 per month per EDU. Using the preferred Scenario 2 as a basis, a detailed project budget is presented in Table 8-2, which provides a breakdown of each of the line item costs by funding source.

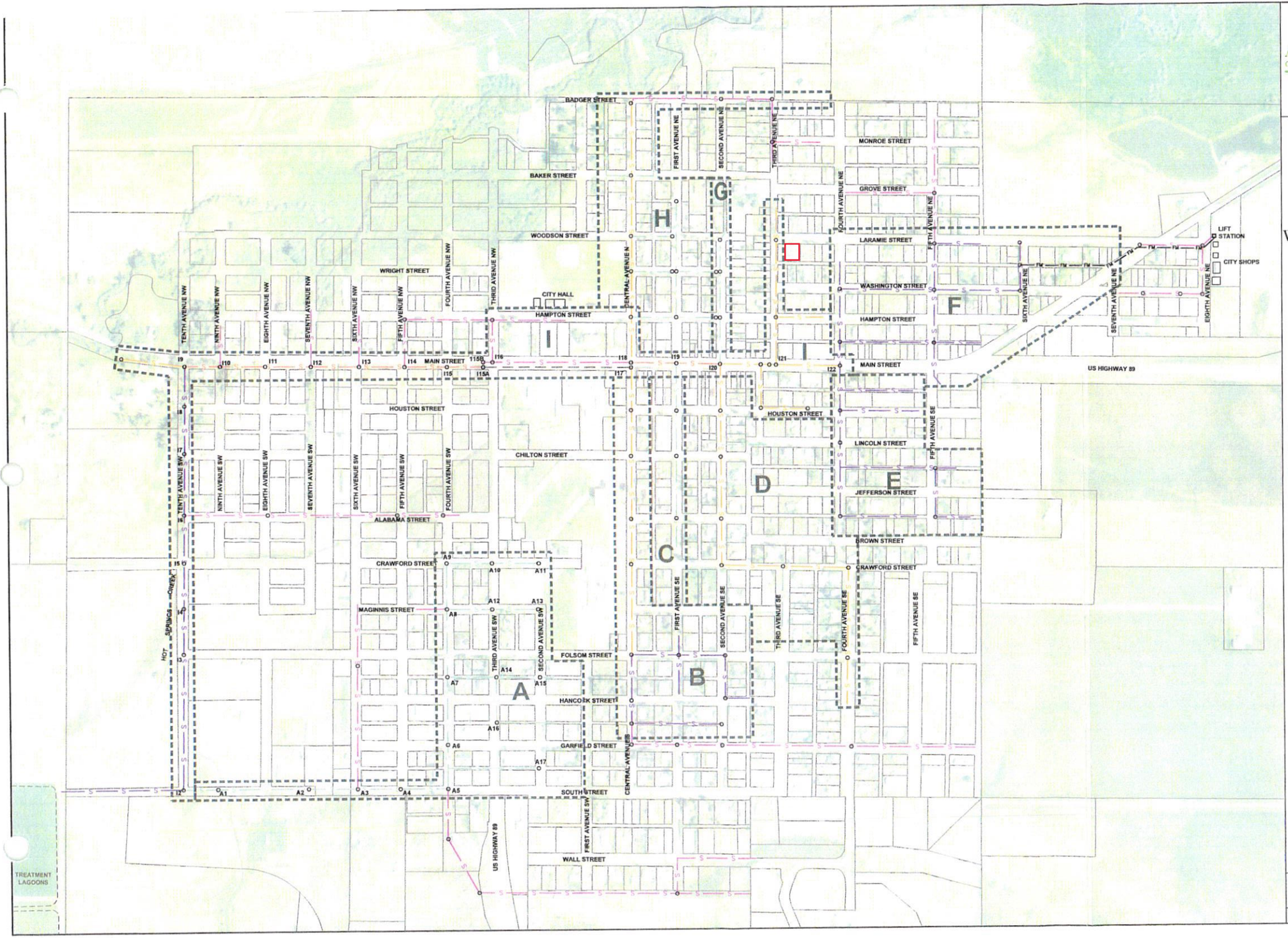
8.2 Implementation

The city submitted an ARPA MAG application in November 2022 and will submit an SRF application in November 2023. Upon securing all funding, the project start-up for the grant programs is expected to be about a two-month process. It is anticipated that final design and approvals would be completed by February 2024 and bidding could take place in March 2024. Commencement of construction activities is anticipated to start in June 2024. Table 8-3 provides a summary of the project implementation schedule.

Table 8-1 – Funding Scenarios for Water System Improvements

ITEM	SCENARIO #1	SCENARIO #2	SCENARIO #3
Preferred Alternative Project Cost	**$1,325,500**	**$1,325,500**	**$1,325,500**
ARPA MAG (City & County Combined)	$306,708	$306,708	$306,708
DNRC Grant	$125,000		$125,000
MCEP Grant	$500,000		$500,000
RD Grant or SRF Loan Forgiveness		$750,000	$295,344
RD or SRF Loan	$393,792	$268,792	$98,448
Total Project Funds	**$1,325,500**	**$1,325,500**	**$1,325,500**
SRF Bond Reserve (1/2-year payment)		$8,615	$3,155
Total Loan Amount	**$393,792**	**$277,407**	**$101,603**
Annual Loan Payment	$19,540	$17,790	$6,520
Total Loan Payments Over Life of Loan	$781,600	$355,800	$130,400
Total Interest Paid Over Life of Loan	**$387,808**	**$78,393**	**$28,797**
Annual Loan Coverage	$1,954	$1,779	$652
TOTAL ANNUAL CAPITAL DEBT	**$21,494**	**$19,569**	**$7,172**
User Capital Cost/Month[1]	**$2.88**	**$2.62**	**$0.96**
Current Annual O&M[2]	$250,000	$250,000	$250,000
Current Annual Debt Service[3]	$133,246	$133,246	$133,246
Additional O&M Due To Project	$0	$0	$0
TOTAL ANNUAL O&M COSTS	**$383,246**	**$383,246**	**$383,246**
User O&M Cost/Month[1]	**$51.26**	**$51.26**	**$51.26**
TOTAL USER COST/MONTH[1]	**$54.14**	**$53.88**	**$52.22**
Existing Average User Cost/Month/Svc.	$52.45	$52.45	$52.45
COST/MONTH INCREASE/Service	**$1.69**	**$1.43**	**-$0.23**
Existing Other System Cost/Month	$42.00	$42.00	$42.00
Total Proposed Water & Sewer	$96.14	$95.88	$94.45
Combined Systems Target Rate	$79.46	$79.46	$79.46
PERCENT OF COMBINED TARGET	**121%**	**121%**	**119%**

[1]Based on 623 active billed services.
[2]Based on analysis of last four years actual expenditures.
[3]Based on highest calculated coverage calculation - SRF Debt Service Schedule on Current Drinking Water Loans



Anderson-Montgomery
CONSULTING ENGINEERS

1064 No. Warren
Helena, MT 59601
Phone: 406-449-3303
FAX: 406-449-3303

Figure II-6
White Sulphur Springs, Montana
Existing System and Subbasins

Legend

- Subbasin Boundary
- Existing 15" Gravity Sewer Line
- Existing 12" Gravity Sewer Line
- Existing 10" Gravity Sewer Line
- Existing 8" Gravity Sewer Line
- Newer 8" Gravity Sewer Line
- Existing 6" Gravity Sewer Line
- Existing Unknown Sewer Line
- Existing Force Main Sewer Line
- Property Lot Lines
- Manhole
- Lift Station

N W E S

250 125 0 250 500
Feet

Map Projection is NAD 83 State Plane Feet.

Project: White Sulphur Springs Sewer System

Date: October 2011

File: WhiteSulphurSpringsSewer.dwg