

# **STATE OF UTAH**

## **Capacity Development Program**

**Triennial Report**  
to the Governor of Utah  
for Fiscal Years 2018 – 2020

**In Compliance with the Requirements  
of the Federal Safe Drinking Water Act  
Section 1420(c)(3)**

**Utah Division of Drinking Water  
Salt Lake City, UT  
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## **Executive Summary**

The 1996 Amendments to the Federal Safe Drinking Water Act added provisions for each state to develop a Capacity Development Program. The Program's objective is to enhance public health protection by helping water systems develop and maintain the technical, managerial, and financial capacity, or capability, to maintain compliance with the health-based standards in the Safe Drinking Water Act and national drinking water regulations to protect public health.

The Utah Division of Drinking Water's Capacity Development Program actively evaluates Public Water System technical, managerial, and financial capabilities to assist them as they seek to improve their overall performance goals. The Division's Capacity Development and Technical Assistance personnel provide support and guidance as needed where indicated by these evaluations.

Capacity Development Program staff, in conjunction with partners and stakeholders, strives to identify ways of helping PWSs to address technical, managerial, and financial issues through innovative and improved methods of operation, maintenance, and management. Over 86% of the 498 Community Water Systems in the state serve communities with less than 10,000 people; over 76% serve communities with less than 3,300. Division Capacity Development staff continue to work with all PWS's to improve performance, achieve compliance, and increase technical, managerial, and financial capacity.

## **1 INTRODUCTION**

### **1.1 Triennial Program Report to the Governor and Annual Program Report to EPA**

The 1996 Safe Drinking Water Act (SDWA) Amendments, Section 1420(c)(3) requires that state Capacity Development Programs submit a Program report to the Governor every three years. The report must be made available to the public as well.

The Triennial Report is intended to inform the Governor and the public about the Capacity Development Program and its effectiveness implementing the state's Capacity Development Strategy. The Strategy informs the Capacity Development Program staff's efforts to assist public water systems acquire and maintain the technical, managerial, and financial capacity, or capability, to comply with the health-based objectives of the SDWA and national drinking water regulations to protect public health.

Following the Office of Inspector General's Capacity Development Program Evaluation in 2003, EPA's Office of Water made a commitment to establish consistent reporting criteria for the required reports. Criteria were compiled to guide and assist the states in developing their annual program reports. The criteria are also intended to help EPA Regions maintain uniformity when assessing each State's implementation of its approved Capacity Development Program. The criteria also act as an aid to the states as they develop their triennial reports to their Governors.

### **1.2 Safe Drinking Water Act, State Primacy, and State Capitalization Grants**

The Safe Drinking Water Act (SDWA) was passed in 1974 with the intention to assure safe drinking water in public water systems (PWS's) throughout the United States. SDWA authorized the Environmental Protection Agency (EPA) to delegate primary enforcement authority, or primacy, to any individual state deemed sufficiently capable to administer its state program of Public Water System Supervision (PWSS). Utah was granted primacy on February 28, 1980 and The Department of Environmental Quality, Division of Drinking Water is the primacy agency for drinking water programs.

Minor amendments to SDWA in 1977, 1979, and 1980, and major amendments in 1986 and 1996 expanded federal focus from the original chemical contaminants of interest to additional concerns with drinking water. The 1986 Amendments focused on disease-causing microbial contaminants in drinking water and established minimum treatment requirements for all surface waters. They also encouraged EPA to quicken the pace of Maximum Contaminant Level (MCL) promulgation with specific direction to EPA to establish MCL's and MCLG's (maximum contaminant level goals) for 83 specific contaminants including synthetic chemical contaminants of ground water. The 1986 Amendments also addressed lead and copper contamination in drinking water at the consumer's tap, principally as a result of distribution system and fixture corrosion.

The 1996 Amendments implemented stronger prevention programs, empowered the states with greater flexibility, afforded consumers access to better information ("right to know") in consistent format (Consumer Confidence Reports), and overhauled EPA's regulatory

development process including how many and which contaminants are to be selected for regulation. The 1996 Amendments redirected drinking water contamination prevention efforts to the new programs of source water protection, capacity development, and operator certification. The 1996 Amendments also establish federal funding for states and their PWS's through the Drinking Water State Revolving Fund (DWSRF) Program. The DWSRF assists communities in drinking water treatment and protection in much the same way that wastewater treatment and clean water have been promoted through the Clean Water State Revolving Fund (CWSRF).

The 1996 Amendments to SDWA allow the option of designation of portions of a state's grant monies as set-aside funds for specific priority activities and other administrative requirements. As much as 10 percent of a state's capitalization grant may be used for implementation of source water protection, capacity development, and operator certification programs, as well as for the state's overall drinking water program [§1452(g)]. Up to 15 percent (no more than 10 percent for any one purpose) can be used for prevention projects in water systems, including source water protection loans, technical and financial assistance to systems as part of a state capacity development strategy, source water assessments, and wellhead protection [§1452(k)].

The 1996 Amendments to SDWA make it incumbent upon the states to adopt program modifications and additions prescribed by EPA. EPA designates these program requirements for the states as either *mandatory* or *voluntary*. Failure of a state to enact a *mandated* program by the allotted deadline can result in state forfeiture of *primacy* for its own Public Water System Supervision (PWSS) program and loss of the entire program capitalization grant. Failure to enact a *voluntary* program calls for loss of only a portion of the program capitalization grant, typically 20 percent.

### **1.3 State-Level Capacity Development Programs**

In the time leading up to the 1996 Amendments to SDWA, EPA became aware of demonstrated success in several states in reliably delivering safe drinking water. These states had each focused on improvements in the technical, managerial, and financial capabilities of their PWS's. The 1996 Amendments represent EPA's efforts to build nationally on this demonstrated success by imposing certain mandates on the states.

Namely, in order to receive the full allotment of funds to which they are entitled under the DWSRF, states have had to develop:

1. A program to ensure that all new community and new non-transient, non-community water systems commencing operation after October 1, 1999, demonstrate sufficient technical, managerial, and financial capacity to comply with national primary drinking water regulations (NPDWR's); and,
2. A strategy to assist existing PWS's in acquiring and maintaining technical, managerial, and financial capacity to comply with SDWA requirements.

As intended by the 1996 SDWA Amendments, "capacity" encompasses the technical, managerial, and financial capabilities of a water system to achieve, maintain, and plan for

compliance with applicable drinking water standards given the available water resources and the characteristics of the population served by the water system. It is EPA's intent that states use DWSRF set-aside funds for their capacity development program and implementation efforts.

*Technical capacity* refers to the physical infrastructure of the water system, including but not limited to the adequacy of source water, infrastructure adequacy (source, treatment, storage, and distribution), and the ability of system personnel to implement the requisite technical knowledge.

*Managerial capacity* refers to the management matrix of the water system, including but not limited to ownership accountability, staffing and organization, and effective external linkages.

*Financial capacity* refers to the financial resources of the water system, including but not limited to the revenue sufficiency, credit worthiness, and fiscal management and controls.

Failure to meet the requirements of the provisions for Capacity Development published by EPA subjects a state to a 20 percent withholding from its DWSRF allotment. In the several years since the 1996 Amendments, most states have identified and prioritized PWS's most in need of assistance in enhancing their technical, managerial, and financial capacity. In addition, the states (including Utah) have for a number of years been targeting deficient PWS's for technical and financial assistance.

Capacity Development is intended to be a commitment by the states on behalf of their PWS's to

- (i) protect public health by ensuring consistent compliance with drinking water standards, including federal and State regulations and other applicable standards of performance;
- (ii) enhance performance beyond compliance through measures that bring about efficiency, effectiveness, and service excellence; and
- (iii) promote continuous improvement through monitoring, assessment, and strategic planning.

EPA's policy position is that all water systems, regardless of size or other characteristics, can benefit from a program of ongoing capability development. Capable water systems are better positioned to consistently comply with applicable standards and provide customers with safe and reliable water service. Furthermore, capable systems also are better positioned to meet other standards of performance that are generally accepted in the industry or required by other regulatory agencies – e.g., the aesthetic quality of water (taste, color, and odor), water pressure, water loss minimization, or other measurable aspects of performance.

## **2 UTAH'S CAPACITY DEVELOPMENT PROGRAM**

### **2.1 Rule Promulgation**

#### *2.1.1 Authority*

The Utah Drinking Water Board, a nine-person Board appointed by the Governor, operates under authority granted in Utah Code Title 19 Chapter 4, the Utah Safe Drinking Water Act. Section 104 of the Act defines the Board's authority, including adopting rules governing the design, operation, and maintenance of Utah's public drinking water systems. The Utah Capacity Development Program is codified in Utah Administrative Code *Rule 309-800 Capacity Development Program*.

#### *2.1.2 Most Recent Reporting Period*

The Division of Drinking Water has not substantively changed Drinking Water Rule *R309-800 Capacity Development Program* during the previous three fiscal years.

### **2.2 Range of Program and Activities**

#### *2.2.1 Allocation of Budget Resources*

The State of Utah allocates money to a specific Capacity Development set-aside fund in accordance with SDWA program guidelines. The State's fiscal year begins each calendar year on July 1<sup>st</sup> and ends on June 30 of the following calendar year. The Division of Drinking Water (DDW, the Division) began FY2020 with \$22,218 in the Capacity Development set-aside fund (Unit Code 3823). During the year \$22,218 was charged against this fund, and an amount of \$30,000 was requested for this set-aside for FY2021.

In addition to funds expended for staff salary from the Capacity Development set-aside fund, the Division has also entered into a contract with a third-party technical assistance provider to promote capacity development at the county and local health department level. Initial results appeared promising, however, over time it has become apparent that positive results have diminished and recently little progress has been made. The Division is contemplating taking a new direction with this aspect of the Capacity Development Program by bringing this responsibility back under direct Division control. The Division is currently exploring a new staff position to manage the Capacity Development Program to provide more direct oversight to the program and more closely meet the changing program requirements that Congress mandated in the 2016 Water Infrastructure Improvements for the Nation Act as well as the 2018 and 2020 America's Water Infrastructure Acts. A staff member dedicated to Capacity Development Program oversight will allow a deeper dive into program intricacies and will give water system and local government staff a single, knowledgeable contact point within the Division as an important resource in maintaining technical, managerial, and financial capacity.

### *2.2.2 Drinking Water State Revolving Fund (DWSRF)*

The Utah Capacity Development Program's principal activity is in support of the federal and State Drinking Water SRF programs. For Fiscal Year 2020, the State of Utah Drinking Water Board authorized funding for 30 projects through the SRF programs. Allocated funding for the projects authorized in FY2020 was \$43,020,000; of which \$38,665,000 was allocated from the federal SRF program and \$4,335,000 was allocated from the State SRF program. Total authorized project funding from the beginning of the DWSRF through FY2020 is approximately \$588,074,000, which includes a certain number of projects authorized then later de-authorized for various reasons.

From the pool of authorized projects, Division Staff closed loans to complete the funding process for 26 projects totaling approximately \$78,322,187 of which \$73,119,947 was committed from the federal SRF program and \$5,202,240 was committed from the State SRF program.

### *2.2.3 System Consolidation and Restructuring*

The Division continued with its initiative to work closely with local and county planners and the Division of Public Utilities to develop guidelines and a cooperative environment whereby new developments are not approved for construction without the appropriate review and approval of the drinking water system engineering plans and specifications. Counties continue to investigate adopting ordinances and developing a relationship with the Division of Drinking Water to assure that new development or proposed new water systems receive Division approval prior to county plat approval.

### *2.2.4 Training Efforts Fiscal Year 2020*

A portion of Utah's Capacity Development Program fund is allocated to drinking water system operator education and certification. State Drinking Water Information System database records for the State of Utah report 498 community water systems and 86 non-transient non-community water systems during FY2020. Of these systems, 31 community and 12 non-transient non-community systems are reportedly lacking a certified operator. Collaboration between State Division of Drinking Water staff and the Intermountain Section of the American Water Works Association, the Rural Water Association of Utah, and the Rural Community Assistance Corporation, to provide operator training resources, including pre-certification training, is an ongoing effort to assure that all water systems in the state of Utah have access to certified personnel.

Utah had 2,533 certified operators holding 3,013 certifications in FY2020. Operator Certification records show that 367 written examinations were administered in Utah for all levels of distribution and treatment operators during FY2020. Water distribution is the more common certification and accounts for approximately 78 percent of the total number of operator certificates in the State of Utah.



In addition to water system operator training and certification, the Division of Drinking Water also provides funding (through DWSRF set-aside funds) for training and certification for backflow technicians. Division records indicate there are 1,042 certified backflow technicians holding 1,114 certifications in the State of Utah and that 401 written examinations were administered during FY2020.

However, small water systems in Utah struggle to adequately compensate certified water operators. Of the 498 water systems that serve water to primary residences, 50% serve a population of fewer than 500 people. These systems are much more likely to rely on volunteer or temporarily assigned, unpaid, unskilled people to handle all of their drinking water requirements. This leads to operational mistakes and missed samples that create real public health risks.

## **2.3 State Capacity Development Program for New Water Systems**

### *2.3.1 Background*

At the state level, Utah Code 19-4-104(1)(a)(v) was promulgated and specifically grants authority to the Drinking Water Board to make rules regarding the Capacity Development Program and it references SDWA Section 1420. Utah Drinking Water Rule *R309-800 Capacity Development Program* requires that new water systems demonstrate they have adequate technical, managerial, and financial capacity before they may be approved as a public water system (PWS). It also requires both new community and new non-transient non-community water systems to submit a Capacity Assessment Review, which includes a Project Notification Form and a Business Plan. The Business Plan must include a Facility Plan, a Management Plan, and a Financial Plan as described in R309-800-5.

The Facility Plan must describe the scope of the water services that the proposed community or non-transient non-community water system plan to provide, and must include:

1. A description of the nature and extent of the area to be served and provisions for extending the water supply system to meet growth;
2. An assessment of current and expected drinking water compliance based on monitoring data from the proposed water source;
3. A description of the alternatives considered, including interconnections with other existing water systems, and the technical, managerial, financial, and operational reasons for the approach selected; and,
4. An engineering description of the facilities to be constructed, including the construction phases and future phases as well as future plans for expansion and an estimate of the full cost of any required construction, operation, and maintenance.

The Management Plan must describe how the proposed community or non-transient non-community water system will provide effective system management and operation. It must include:

1. Documentation that the applicant has water rights, and the legal right and authority to construct, operate, and maintain the system;
2. An Operating Plan that describes the tasks to be performed in managing and operating the system including administrative and management organization charts, plans for staffing the system with certified operators, and provisions for an operations and maintenance manual; and,
3. Documentation of management credentials of operations personnel and documentation of cooperative agreements or service contracts including demonstration of compliance with the water system operator certification rule.

The Financial Plan must describe the proposed community or non-transient non-community water system's projected revenue, cash flow, and debt (issuing and repayment) for meeting the costs of construction as well as the costs of operation and maintenance for five years from the date the applicant expects to begin system operation.

After the Division deems that the information submitted by the applicant is complete, the Division conducts a Capacity Assessment Review. The applicant is notified in writing whether or not the proposed new system has met the Rule requirements for technical, managerial, and financial capacity. *R309-800 Capacity Development Program* stipulates that no new community water system, nor non-transient non-community water system, shall be approved in the absence of demonstrated adequate capacity.

### *2.3.2 Most Recent Reporting Period*

In any given fiscal year, the Division of Drinking Water receives numerous inquiries from developers, landowners, and other entities about creation of new public water systems. In such inquiries, the Division promotes alternatives such as consolidation with, or annexation by, existing public water systems where such alternatives are available. *R309-800 Capacity Development Program* is written in straightforward language and the Division refers those individuals proposing the new water system to this Rule to acquaint them with the tasks involved in creating a new water system.

In an average year 5-10 new water systems are proposed, about half of which are new community or new non-transient non-community water systems that are subject to the requirements of *R309-800 Capacity Development Program*. Staff typically responds to the initial inquiry and capacity assessment within 30 days.

## 2.4 State Capacity Development Program for Existing Water Systems

### 2.4.1 Background

Congress, in the 1996 SDWA Amendments, worked from the premise that enhancing and ensuring the technical, managerial, and financial capabilities of small water systems is the best strategy for correcting and preventing noncompliance with public drinking water system requirements. To this end, penalties for not implementing strategies “to assist public water systems in acquiring and maintaining technical, managerial, and financial capacity” (SDWA Sec. 1420(c)) were included in the legislation to prompt states to adhere to this philosophy.

Utah implemented the wishes of Congress on several regulatory fronts. Utah Drinking Water Rule *R09-705, Financial Assistance: Federal Drinking Water Project Revolving Loan Program*, has several components that interface with issues of system capacity and systems with histories of significant noncompliance. The purpose of *R309-705, Financial Assistance: Federal Drinking Water Project Revolving Loan Program* is to establish criteria for financial assistance to public drinking water systems in accordance with a federal grant established under 42 U.S.C. 300j *et seq.*, federal Safe Drinking Water Act. The Rule defines an *eligible water system* as any community drinking water system, either privately or publicly owned, and nonprofit non-community water systems.

Historically, State financial assistance through *Rule 309-705* has been sought by water systems across the entire compliance spectrum from those systems with significant compliance issues to those with few if any compliance issues. An important stipulation of *Rule 309-705-4(3)(a)* is that no financial assistance is authorized for any project for a water system in significant noncompliance, as measured by a *not approved* rating, unless the project will resolve all outstanding issues causing the noncompliance. *Rule 309-705-5(3)* further requires that as part of the application and project initiation procedures, Division staff will prepare a capacity development analysis (i.e., capacity assessment) of the applicant water system. Thus, the elements of the State’s Capacity Development Program for new community water systems and non-transient non-community (NTNC) water systems (see Section 2.3, State Capacity Development Program for New Systems) can be used in the analysis of existing water systems.

### 2.4.2 Most Recent Reporting Period

During FY2020, staff completed Capacity Assessments, according to the procedures outlined in *R309-800 Capacity Development Program*, for the following federal DWSRF applicants:

Kanab City	Willow Creek Water Co.
Central Utah WCD – Duchesne Valley	San Juan Spanish Valley SSD
Hyde Park City	Sigurd Town
Spring Creek Water Users	Diamond Valley Acres

Capacity assessments for these applicants were conducted according to the procedures outlined in *R309-800 Capacity Development Program*. A capacity assessment report was prepared and submitted to the water system and a copy was placed in each applicant’s project folder.

### **3 STATE APPROACH TO IDENTIFIED NEEDS AND CONCERNS**

#### **3.1 Improvement Priority System (IPS)**

##### *3.1.1 Program Description*

The State of Utah employs a system for assessing deficiency points against public water systems on the basis not only of the monitoring and reporting shortcomings addressed in the *EPA Enforcement Targeting Tool (ETT)* but also a spectrum of other public health concerns. According to information in the quarterly ETT list submitted to the states: “The purpose of the Enforcement Targeting Tool is to prioritize public water systems for enforcement response. It assigns points for each unaddressed violation at a PWS during the last 5 years, which are added to create a total score for each PWS.”

Utah public drinking water systems are subject to additional observation and compliance monitoring than that included on the EPA ETT list alone. The program is authorized under *State of Utah Administrative Rules for Public Drinking Water Systems Rule 309-400, Improvement Priority System Rule*, which enumerates Improvement Priority System (IPS) deficiency points for administrative violations, infrastructure construction irregularities, unauthorized water source or other infrastructure use, and other practices that are inconsistent with delivering safe drinking water to public drinking water system users.

IPS points are assigned as a result of deficiencies identified during water system inspections (i.e., sanitary surveys), for failure to comply with monitoring and reporting requirements and are typically assigned as soon as the deviations from these requirements are noted in the State’s data base, or for failure to follow design and construction rules (such as using an unapproved source, failure to follow plan approval procedures, or failure to obtain an operating permit). *Rule 309-400* requires that a community water system that is assessed more than 150 deficiency points be classified by the Utah Division of Drinking Water as “*Not Approved.*”

#### **3.2 Utah Top 25 Significant Noncompliance (SNC) List**

##### *3.2.1 Origin of the List*

The State of Utah has developed a list of systems with a history of significant noncompliance in monitoring and reporting as well as physical system deficiencies in anticipation of using the list as compliance tools. Four times per year, the State develops a *Utah Top [Worst] 25 Significant Noncompliance (SNC) List*. This list is generated before regularly scheduled, quarterly meetings, and is a tabulation of the worst 25 scores of all public water system *IPS* scores (i.e., those water systems with the highest point totals). This list supplements the *EPA ETT List*.

It is not unusual for Utah water systems with severe technical, managerial, and financial challenges to regularly and repeatedly appear on this list. In contrast, water systems that achieve and maintain sufficient technical, managerial, and financial capabilities rarely

appear on the list for more than one quarter. An isolated incident, such as failure to complete the design approval process correctly for new water system infrastructure, or failure to take scheduled water samples, occasionally occurs among even the most capable water systems but is generally resolved as soon as the problem is brought to the attention of a technically, managerially, and financially capable public water system.

### 3.2.2 *Most Recent Reporting Period*

For Fiscal Year 2020, Utah Action Compliance Strategy (ACS) quarterly meetings were held in August 2019, November 2019, February 2020, and May 2020. Meetings are normally held within 45 days of the end of the previous quarter.

## 3.3 **Utah Rating Change List**

### 3.1.1 *Origin of the List*

The utility of the *Utah Top [Worst] 25 SNC List* has been supplemented by the State's generation of an additional quarterly list entitled the *Utah [Water System] Rating Change List*. This list identifies water systems whose IPS scores have fallen below (a good development) or exceeded (a bad development) the critical IPS point threshold between "Approved" and "Not Approved" status. This list thus serves as a convenient method to identify on a quarterly basis those systems that either merit a return to "Approved" status or warrant a change to "Not Approved" status relative to their previous quarter's status.

### 3.1.2 *Most Recent Reporting Period*

In any given fiscal year, the four Utah quarterly ACS meetings have the primary purpose of addressing the *EPA ETT List* and the *Utah Top [Worst] 25 Significant Noncompliance (SNC) List*. A secondary function of the quarterly meetings is serving as a forum for discussion of public water systems whose ratings warranted change from *approved* or *not approved*. In each case, the meeting's findings are officially sent to the affected water systems.

## 3.4 **Review of Program Implementation**

The Division of Drinking Water does not conduct regularly scheduled reviews of the implementation of its Capacity Development Program. There is a great deal of flexibility in program administration under *Rule R309-800 Capacity Development Program* and program implementation evolves in response to water system applicant (new systems) and operator (existing systems) feedback.

During the previous three fiscal years 26 new public water systems were identified or organized in the State of Utah. These systems are detailed in the table below.

New Water Systems State Fiscal Years 2018-2020

SYSTEM NO.	SYSTEM NAME	IDENTIFIED DATE	SYSTEM TYPE	SYSTEM RATING	SYSTEM COUNTY	DEFICIENCY
UTAH12028	HOUWELINGS TOMATOES	6/28/2018	NTNC	NOT APPROVED	JUAB	UNAPPROVED SOURCE
UTAH25153	HOBBLE CREEK HAVEN DEVELOPMENT	7/18/2018	C	NOT RATED	UTAH	
UTAH18160	KENNECOTT - ZONE A RO	9/6/2018	C	APPROVED	SALT LAKE	
UTAH29124	WILDWOOD WATER LLC	9/17/2018	C	APPROVED	WEBER	
UTAH18181	SALT LAKE CITY UTAH AIR NATIONAL GUARD	2/6/2019	NTNC	NOT RATED	SALT LAKE	
UTAH11091	MONUMENTS ACADEMY	2/27/2019	C	APPROVED	IRON	
UTAH18179	L & B RESOURCES	3/14/2019	NTNC	CORRECTIVE ACTION	SALT LAKE	UNAPPROVED SOURCE
UTAH16011	LITTLE MEADOW ESTATES	8/14/2019	NTNC	NOT RATED	PIUTE	
UTAH18178	SUMMIT VISTA WATER COMPANY	9/6/2019	C	NOT RATED	SALT LAKE	
UTAH11071	HARMONY MTN RANCHES	9/9/2019	C	NOT RATED	IRON	
UTAH11098	SUMMERTREE	9/16/2019	C	NOT RATED	IRON	
UTAH13060	CLARK BENCH WATER COMPANY	9/18/2019	C	NOT RATED	KANE	
UTAH11067	ALLARD RANCH WATER CO	9/18/2019	C	NOT RATED	IRON	
UTAH29087	VALLEY WATER COMPANY	10/24/2019	NTNC	NOT RATED	WEBER	
UTAH25184	BATEMANS MOSIDA FARMS	11/13/2019	C	CORRECTIVE ACTION	UTAH	UNAPPROVED SOURCE
UTAH16014	COYOTES AND COWBOYS LINE CAMP	1/14/2020	C	NOT RATED	PIUTE	
UTAH03103	PARADISE WEST SUBDIVISION	2/6/2020	C	NOT RATED	CACHE	
UTAH18057	UNIVERSITY OF UTAH	2/10/2020	C	APPROVED	SALT LAKE	
UTAH21049	SAINT ELIZABETH CATHOLIC CHURCH	2/10/2020	NTNC	APPROVED	SEVIER	
UTAH18183	MUIRHOUSE HOMEOWNERS ASSOCIATION	3/31/2020	C	NOT RATED	SALT LAKE	
UTAH29126	COBBLES CONDOMINIUM HOA	5/19/2020	C	NOT RATED	WEBER	
UTAH24051	DESERT SAGE HOA	7/28/2020	C	NOT RATED	UINTAH	
UTAH18047	SOLITUDE MOUNTAIN SKI AREA LLC	8/4/2020	NTNC	APPROVED	SALT LAKE	
UTAH19080	SAN JUAN SPANISH VALLEY SSD	8/5/2020	C	NOT RATED	SAN JUAN	
UTAH23063	SETTLEMENT CANYON IRRIGATION	8/11/2020	C	NOT RATED	TOOELE	
UTAH11099	SCOTTSVILLE WATER USERS INC.	9/9/2020	C	NOT RATED	IRON	

### **3.5 Modifications to the Program Strategy**

There were no major modifications to the program strategy during State Fiscal Years 2018-2020.

### **3.6 Availability of the Report to the Public**

The Division of Drinking Water posts its annual Capacity Development Program Report to EPA and its Triennial Capacity Development Report to the Governor on its web site.

<https://deq.utah.gov/division-drinking-water>