

COMMENT NO. 18: The Department should provide an update to Table 2-1 of “*Economic Analysis of Meeting Base Numeric Nutrient Standards: Supplement to First Triennial Review of Base Numeric Nutrient Standards and Variances*” (April 28, 2017) which includes each community’s secondary score. (EPA)

RESPONSE: The Department considered secondary scores in our analysis. The secondary scores were calculated using the latest economic data, and confirmed significant impact for almost all towns. They have been included in the table shown below, as requested (2nd column from right), along with the associated %MHI cost cap which are derived from the secondary scores (see last column on right).

Community	Median Household Income (2010) MHI.	Median Household Income (2015)	Estimated Number of Households (Population / 2.5) based on 2000 Census	Estimated Number of Households American Community Survey 2011-2015	Current Average Annual Household Wastewater Bill	Design Flow (MGD)	Actual Flow (MGD)	Current wastewater MHI	2015 Percent MHI needed to get to RO/Base Numeric Nutrient Criteria (including current fees)	2015 Increase over current Wastewater Bill to Reach RO	Average Secondary Score (latest data-- 2015 to 2017)	Cost Cap
Helena	\$47,152.00	\$49,852.00	12,337	13,095	\$265.44	5.4	3.00	0.56%	1.59%	185%	2.2	1.7
Billings	\$45,004.00	\$51,012.00	41,841	44,092	\$218.28	26	26	0.49%	2.04%	377%	2	1.5
Butte	\$37,335.00	\$37,686.00	14,041	14,798	\$360.00	8.5	4.00	0.96%	2.07%	117%	1.6	1.1
Kalispell	\$39,953.00	\$41,097.00	7,705	8,608	\$216.00	5.4	3.10	0.54%	2.34%	166%	1.8	1.3
Bozeman	\$41,661.00	\$45,729.00	14,614	16,573	\$372.00	13.8	5.80	0.89%	2.45%	201%	2.2	1.7
Manhattan	\$50,729.00	\$52,135.00	523	547	\$362.40	0.6	0.4	0.71%	2.45%	253%	2.6	2.1
Stevensville	\$33,776.00	\$32,337.00	795	818	\$535.08	0.3	0.29	1.58%	3.27%	97%	1.6	1.1
Whitefish	NA	\$51,122.00	NA	3,032	\$915.00	1.8	0.92	1.79%	4.10%	129%	1.8	1.3
East Helena	NA	\$44,828.00	NA	934	\$797.00	0.434	0.307	1.78%	2.79%	57%	1.8	1.3
Conrad	NA	\$39,063.00	NA	1,003	\$489.00	0.54	0.32	1.25%	2.27%	81%	1.8	1.3
Colstrip	NA	\$84,145.00	NA	783	\$357.00	0.6	0.195	0.42%	2.16%	408%	2.2	1.7