

State of Illinois
Illinois Environmental Protection Agency



Water Pollution Control Loan Program (WPCLP)

FY2027 Intended Use Plan

FINAL

Bureau of Water
State Revolving Fund

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I. Introduction

The Illinois Environmental Protection Agency (Illinois EPA) administers statewide programs for air, water, waste, and site remediation. The 2027 Water Pollution Control Loan Program (WPCLP) Intended Use Plan (IUP) describes how the Agency will prioritize projects, distribute funds, and administer the loan program for State Fiscal Year (SFY) 2027, from July 1, 2026-June 30, 2027. Section 606(c) of the Federal Water Pollution Control Act (FWPCA), as amended, requires that the State develop an annual IUP identifying the uses of funds available for its Clean Water State revolving loan program after providing for public comment and review.

A. Public Participation

The Draft 2027 IUP will be released for public comment on May 29, 2026, opening a 30-day public comment period closing on June 27, 2026. Notice was posted on the Agency's State Revolving Funds (SRF) website ([State Revolving Fund Postings \(illinois.gov\)](https://www.illinois.gov/state-revolving-funds-postings)) and also distributed by email to SRF stakeholders, engineering firms, professional associations, and other interested groups. Comments were directed to the Office of Community Relations.

B. Benefits of the Water Pollution Control Loan Program (WPCLP)

The WPCLP provides long-term, below-market financing for wastewater and water quality projects. Key benefits include:

- 1) Significant cost savings through reduced interest rates.
- 2) Streamlined state-administered processes that minimize administrative burden.
- 3) Technical and financial review that supports sound, cost-effective, and environmentally protective projects.
- 4) Principal forgiveness, which functions like a grant by reducing the repayable loan amount and avoiding duplicative federal requirements.
- 5) Targeted assistance for small and economically disadvantaged communities.

II. Goals for the WPCLP

Certain goals for the SRF have been established by the State. These goals are categorized into Short-Term/ Long-Term and are listed below.

A. Short-Term Goals

- 1) Apply for the Federal Fiscal Year 2026 Infrastructure Investment Jobs Act (IIJA) Clean Water State Revolving Fund (CWSRF) General Supplemental capitalization grant alongside the base CWSRF grant, with required 20% state match for each.
- 2) Provide 49% of the IIJA Supplemental grant as principal forgiveness; provide 20-40% of the base CWSRF grant as required subsidization (includes appropriations and extensions Act).
- 3) Transfer IIJA CWSRF Emerging Contaminants funding to the Public Water Supply Loan Program (PWSLP) as no current WPCLP EC applications received.

- 4) Fund as many eligible projects as possible, given available resources and program requirements.
- 5) Prioritize projects necessary to achieve or maintain compliance with federal and state law.
- 6) Support green infrastructure, water efficiency, and environmentally innovative projects.
- 7) Manage a program that provides applicants with a streamlined approach to financing wastewater treatment works and other eligible projects.
- 8) Maintain a streamlined loan process and provide continuous financial planning to ensure fund perpetuity.

B. Long-Term Goals

- 1) Support broad range of water quality improvement actions that fulfill the Clean Water Act objectives.
- 2) Facilitate technically sound and financially sustainable projects, especially for small communities.
- 3) Target assistance to small and disadvantaged communities to reduce the capital improvement burden on users.
- 4) Manage the SRF to ensure appropriate levels of financing levels and adequate administrative funds.
- 5) Continue to assist in the development and implementation of innovative and non-traditional projects that benefit water quality resources.
- 6) Incentivize consolidation and regionalization of wastewater systems to realize economies of scale.
- 7) Continue partnering with the Illinois Finance Authority (IFA) to support SRF leveraging efforts, enabling the program to raise additional capital to meet demand while maintaining long-term fund sustainability

III. Sources and Uses of the WPCLP for FY2027

A. Sources and Amounts of FY2027 Funds

Total funds available for WPCLP in FY2027 will be \$627,035,579. The table below summarizes all the funding sources the loan program will be utilizing for FY2027. The funding sources are derived from both federal and state resources.

WPCLP Funding Sources as of July 1, 2026	Amount
Base Cap Grant	\$32,305,000
Base Cap Grant State Match Funds (20%)*	\$6,461,000

IIJA Supplemental Cap Grant	\$111,415,000
IIJA Supplemental Cap Grant State Matching Funds (20%)*	\$22,283,000
Trustee Cash Balance	\$276,983,978
Bond Proceeds Being Utilized in FY2027	\$100,000,000
Loan Repayments, Reimbursements, Accrued Interest	\$310,480,604
Total	\$859,928,582

* Illinois SRF Fees are being used to provide for State Match in FY2027.

WPCLP Funding Uses as of July 1, 2026	Amount
Estimated Loan Capacity for SFY2027	\$627,035,579
Affordability Criteria Forgiveness	\$63,883,430
Disbursements for Existing Loan Commitments	\$206,153,669
Set Asides	\$4,501,600
Bond Debt Service	\$115,608,285
Total	\$1,017,182,563

B. Federal Capitalization Grants

a.) Base Capitalization Grant

Illinois EPA will apply for the FFY 2026 CWSRF base capitalization grant of \$32,305,000, requiring a 20% state match of \$6,461,000.

b.) Infrastructure Investment and Jobs Act (IIJA) Funding

The federal IIJA, signed November 15, 2021, provides five years of supplemental funding plus new Emerging Contaminants funding for water and wastewater infrastructure improvements. Illinois EPA applies for IIJA grants concurrently with the base CWSRF grant. FY2027 will be the final year for IIJA CWSRF General Supplemental Funding.

Currently, there are no Emerging Contaminants CWSRF projects, therefore, the CWSRF EC grant of \$9,617,000 will be transferred to DWSRF EC.

The table below summarizes all CWSRF IIJA funding for FY2027:

IJA Category	Key Details
General Supplemental	\$111,415,000 grant; 49% (\$54,593,350) must be provided as principal forgiveness.
Emerging Contaminants	100% of grant to eligible recipients as loans with 100% principal forgiveness. No current WPCLP EC applicants so transferred to PWSLP EC.
Eligibility Requirement	Fundable project list must equal or exceed the grant amount before Illinois EPA can apply.

Historical Funding Capacity

	2023	2024	2025	2026	2027
WPCLP	\$519.0M	\$436.5M	\$612.0M	\$583.0M	\$627.0M

State Match

The required 20% state match for the Base and IJA Supplemental capitalization grant is authorized under state law and will be generated based on proceeds from the SRF fees. Illinois EPA will enter loan agreements equal to at least 120% of each Capitalization Grant Payment within one year of receipt. The SRF program reserves the right to use program fees (loan support) to satisfy state match requirements in FY2027.

Leveraging

The Illinois EPA completed their leveraging exercise for the Water Pollution Control Loan Program (WPCLP) in 2025. The bond proceeds from the issuance are reflected in the funding capacity for FY2027. The Agency does have plans to leverage again in SFY2027. Timing and amounts will be determined shortly after the fiscal year begins.

Transfer of Funds

Section 302 of the Safe Drinking Water Act (SDWA) Amendments of 1996 offers States the flexibility to transfer funds from one SRF program to the other. Moneys may be transferred between the SRF programs on a net basis provided that the 33% ceiling is maintained. Once money has been transferred, even if the donor SRF reached the 33% limit, it may still be transferred back to the donor SRF from the receiving SRF by a subsequent transfer. Illinois EPA is reserving the right to transfer an amount up to 33% of the cumulative Drinking Water State Revolving Fund (DWSRF) Capitalization Grants from the WPCLP to the PWSLP, or an equivalent amount from the PWSLP to the WPCLP.

Illinois EPA is also taking advantage of this transfer authority in transferring IJA Wastewater Emerging Contaminants funding into PWSLP as noted in Section II.C. The statutory ceiling of funds available to transfer is 33% of the DWSRF Emerging Contaminant allotment. Illinois has \$16,852,440 remaining in the transfer authority, therefore, the full transfer of \$9,617,000 is eligible for FY2027.

Financial Planning & Perpetuity

Illinois EPA has engaged financial advisors to determine the optimal annual disbursement level sustainable over 20 years while meeting USEPA perpetuity requirements. Cash flow forecasting,

bond sale timing, and ongoing monitoring ensure the program can meet current and future obligations. Annual funding levels are reviewed and set each year during IUP development.

Grant Payment Schedule

In each wastewater Capitalization Grant Application (Form 424), and in the cover letter to USEPA, Illinois EPA requests the Capitalization Grant be immediately placed in the “Automated Standard Application for Payment” system for drawing for projects.

Federal Equivalency Projects

If there is a “Yes” next to a project on the Intended Funding List Federal Equivalency column (Appendix D), then that project is selected to help the agency meet their Federal Equivalency requirement for FY2027. All projects seeking SRF funding must satisfy Illinois State requirements regardless of their equivalency status.

The federal equivalency requirements are listed below. Projects selected for equivalency in FY2027 must comply with the following requirements:

- Single Audit Requirements
- A/E Contract Procurement Requirements (CWA 602(b)(14))
- Environmental Cross-Cutting Laws
- Socioeconomic Cross-Cutting Laws
- Disadvantaged Business Enterprises Requirements (40 CFR Part 33)
- Federal Funding Accountability and Transparency Act (FFATA) Requirements
- EPA Signage Required Terms and Conditions
- Prohibition of Certain Telecom and Video Surveillance Services/Equipment (2 CFR 200.216)

Bid Specifications/Contracts:

- Disadvantaged Business Enterprises Requirements (40 CFR Part 33)
- Build America, Buy America Act (P.L. 117-58)
- Debarment and Suspension Prohibitions (EO 12549)

A non-equivalency SRF project is still expected to satisfy the following federal requirements along with ALL state level requirements:

- American Iron and Steel (AIS)
- Davis-Bacon Wages
- Cost and Effectiveness
- Fiscal Sustainability Plans
- Technical, Managerial, and Financial Capability (TMF)
- Federal Anti-Discrimination Laws (Civil Rights Act, Rehabilitation Act)
- Uniform Relocation Act
- Debarment/Suspension Certification

C.) Project Priority List

The Project Priority List (PPL) in Appendix E identifies all eligible applicants who submitted a Funding Nomination Form prior to March 31, 2026. Total requested project value on the PPL is \$2,018,006,214 far exceeding available funding of \$627,035,579. Projects on the PPL are in various stages of the SRF funding application process. Each of the stages are described below in greater

detail.

- a. **Intended Funding List (IFL)**- The IFL is a scored subset of the PPL reserved for funding in the first half of the fiscal year (July 1 to Dec 31). To be on the IFL, a project must have achieved project planning approval by March 31st, 2026, and be scheduled to begin construction before March 31st, 2027. Projects are ranked as a priority score per 35 Ill. Adm. Code 365.345.
- b. **Planning Approved but Funds Exhausted**- Projects that received Planning Approval before March 31, 2026, but were not scored high enough to be included on the Intended Funding List (IFL) are placed on a waitlist. These projects are eligible for funding only after higher-ranked IFL projects are bypassed due to an IFL project's failure to meet readiness requirements by the applicable deadline or for other reasons.
- c. **Construction Start Date After March 31, 2027**- Projects seeking SRF funding must start construction no later than March 31, 2027. Projects that indicate a later construction start date will not be scored and, therefore, will not have funding reserved.
- d. **Projects without Planning Approval**- The project failed to receive planning approval by March 31st, 2026. Therefore, the project was not scored.

Project Bypass Procedure

After January 1, 2027, Illinois EPA may bypass projects on the IFL that have not submitted a loan application, obtained required permits, or demonstrated a bid opening date before March 31, 2027. Bypassed projects retain PPL eligibility but lose reserved funds. During the bypass period (January 1 – June 30, 2027), funds are awarded to any waitlisted projects meeting readiness criteria under Section 365.350, in order of completing Section 365.410 requirements.

Projects may notify Illinois EPA between July 1 – December 31, 2026, that they will not proceed, triggering early bypass and freeing funds for other projects.

All projects that submitted a Funding Nomination Form before March 31, 2026, but have not yet obtained Project Plan approval have been placed on the Project Priority List in alphabetical order, resulting in an equal ranking for those entries. Projects that have not submitted a Project Plan at all are shown with their project number (L17#) listed as “to be determined” (TBD).

D.) Program Administrative Costs and Fees

Administrative Costs: The Water Infrastructure for the Nation (WIIN) Act (Public Law 114-322) allows state Clean Water Programs to establish their annual administrative expenditure levels based on the following criteria:

The administrative costs are authorized up to the greatest of: (a) 4% of all capitalization grants, (b) \$400,000/year, or (c) 1/5% of current fund valuation.

Banked Administrative Set-Aside	Amount
4% of all Capitalization Grants	\$117,221,573
Historical Administrative Outlays	(\$97,250,669)
Projected June 30, 2027, Administrative Banked Balance	\$19,970,904

Illinois EPA will set aside 4% of the IJIA CWSRF supplemental capitalization grant, an amount totaling \$4,501,600 to be used for loan program administration as provided for under the IJIA (P.L. 117-58).

Loan Support Program (SRF Fees): The Illinois EPA has operated and maintained a Loan Support Program (LSP) outside the Federal SRF since 1996. The LSP is maintained as a single entity in Illinois statute, but the Illinois EPA accounts separately for funds attributable to WPCLP and PWSLP loans. The LSP is financed by the loan support portions of the fixed loan rate, with that portion currently established at 50% of the fixed loan rate in the WPCLP. To date, the LSP has been used primarily to finance the reasonable costs incurred by the Illinois EPA for functions that support the management of the Water Revolving Fund, which is the financial mechanism used in administering Illinois' SRF programs.

WPCLP Loan Support – Balance/Receipts/Outlays	WPCLP Loan Support
Estimated Balance July 1, 2026	\$ 47,857,721
Estimated SFY2027 Receipts	\$ 26,849,472
Operational Outlays	\$ (15,504,957)
State Match (Base + IJIA)	\$ (21,384,880)
Match for 319(h) Grants	\$ (1,500,000)
Estimated WPCLP Loan Support Balance June 30, 2027	\$ 36,317,356

IV. Program Management

A. Principal Forgiveness

The program staff complete an internal checklist at the time of loan application to determine eligibility for principal forgiveness, the applicable interest rate, and maximum loan term. The WPCLP may reduce the amount of principal an applicant is required to repay, a reduction known under the Clean Water Act as "principal forgiveness". In practice, principal forgiveness functions like a grant, it is applied directly to eligible project costs, reducing both the principal balance and the interest the borrower would otherwise owe over the life of the loan. It is important to note that WPCLP principal forgiveness covers only a portion of a project's total eligible costs, not the full loan amount. Borrowers remain responsible for repaying the balance.

Forgiveness Type	Authority/Source	FY2027 Amount
Affordability Criteria PF (CWA 603(i) - Required)	Base CWSRF Grant (10%-30% = \$3.2-\$9.7M required)	\$9.7M (PF cap of \$7.0 million per applicant)
IIJA Supplemental PF (49% of IIJA Grant – Required)	IIJA Supplemental Grant \$111,415,000	\$54,593,350
Carryover PF from FY2026 (if applicable)	\$0	\$0
Appropriations PF – Consolidation	Annual Appropriations Act (10% of Base Grant)	\$1,615,250
Appropriations PF – Compliance	Annual Appropriations Act (10% of Base Grant)	\$1,615,250
Total FY2027 PF		\$67,515,350

Affordability Criteria Principal Forgiveness

Section 603(i) of the Clean Water Act requires states to provide a minimum of 10% and a maximum of 30% of their annual capitalization grant funds as subsidization, in the form of principal forgiveness for eligible loan applicants. The Illinois EPA will provide the full 35% affordability-criteria principal forgiveness in FY2027, totaling \$9,691,500 for eligible communities. In addition, the Agency will distribute principal forgiveness from the IIJA General Supplemental grant. Federal law requires that 49% of this supplemental grant be awarded as forgiveness, which amounts to \$54,593,350. These funds will be combined with the affordability-criteria principal forgiveness to maximize assistance to communities most in need. Eligibility for affordability principal forgiveness is determined by a point-scoring system under Section 365.250 of the Loan Rules (Appendix C). In FY2027, the Illinois EPA will provide \$63,883,430 in principal forgiveness with a \$7,000,000 per-project cap.

Affordability PF is funded from three sources:

- CWSRF Base Capitalization Grant
- IIJA Supplemental CWSRF Capitalization Grant
- Carryover PF from FY2026 (if any)

Appropriations Act Principal Forgiveness

Beyond the subsidization required under the Clean Water Act, the annual appropriations act permits states to use up to 10% (\$3,230,500) of the base capitalization grant for additional principal forgiveness, referred to here as "appropriations principal forgiveness." States have full discretion over how these funds are used and who qualifies.

For FY2027, Illinois EPA directs appropriations PF into two equal segments:

CATEGORY	AMOUNT	PER APPLICANT CAP
WASTEWATER TREATMENT FACILITY CONSOLIDATION PF	\$1,615,250	\$807,625

WASTEWATER TREATMENT FACILITY COMPLIANCE SOLUTION PF	\$1,615,250	\$807,625
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Eligibility criteria for each category are described in the sections below. Any appropriations PF that goes unused in either category will roll into the affordability criteria PF pool. This forgiveness is first reserved for applicants who have funding reserved through December 31, 2026 (i.e. are on the WPCLP IFL). No applicant can receive more than 50%, or \$807,625, of the funding.

1.) Wastewater Facility Consolidation PF (\$1,615,250)

Available to applicants who own and operate a wastewater treatment facility whose project would result in the consolidation of two or more wastewater treatment facilities. The funded project must result in the elimination of one or more NPDES Permit(s) for a wastewater treatment facility meeting the following requirements:

- 1) The wastewater treatment facility being eliminated has an NPDES Permit Design Average flow of less than one-million gallons per day.
- 2) The wastewater treatment facility is in a community with an MHI less than the Illinois state-wide MHI of \$83,390 according to the American Community Survey 5-year estimate.

2.) Wastewater Facility Compliance Solution PF (\$1,615,250)

Available to applicants who own and operate a wastewater treatment facility whose project would result in the treatment facility coming into compliance with their NPDES Permit conditions. The funded project must occur at a wastewater treatment facility meeting the following requirements:

- 1) The Wastewater Treatment Facility has a history of long-term significant non-compliance (> 6 quarters of last 12 quarters) with its NPDES Permit effluent limits.
- 2) The Wastewater Treatment Facility has an NPDES Permit Design Average Flow of less than one-million gallons per day.
- 3) The Wastewater Treatment Facility is in a community with an MHI less than the Illinois state-wide MHI of \$83,390 according to the Census Bureau website.

Interest Rate and Loan Term Determinations

The fixed loan rate is set annually at one-half the interest rate of the 20 Year General Obligations Bond Buyer Index from July 1-June 30 of the preceding fiscal year (rounded to nearest 0.01%). Rates for FY2027 are set on July 1, 2026.

Interest Rate Category	FY2027 Interest Rates	Eligibility Criteria	Qualifying Conditions
Base Rate	2.44%	All eligible applicants	Default Rate

Small Community Rate	1.83%	Service Population < 25,000	1.) MHI below statewide average 2.) Unemployment above statewide average 3.) Annual user charge >1.0% of MHI
Hardship Rate	1.00%	Service Population < 10,000	1.) MHI < 70% statewide average 2.) Unemployment ≥ 3 percentage pts above statewide average 3.) Annual user charge > 1.5% of MHI
Environmental Discount	-0.20%	≥50% of eligible costs in qualifying category	At least 50% of the eligible project costs fund the criteria listed in 365.210(d).

Environmental Impact Discount (365.210(d))

When at least 50% of the eligible project costs fund any of the following components, the loan applicant shall receive a 0.2% discount from the rates summarized in the table above.

- 1.) New projects for the collection or treatment of unsewered communities
- 2.) Projects involving nutrient removal or nutrient loss reduction
- 3.) Green infrastructure projects
- 4.) Projects lowering water demand
- 5.) Projects reducing energy demands at a wastewater treatment facility

B. Loan Repayment Period (Section 365.220)

a) Except as provided in subsection (b), the loan repayment period cannot exceed the lesser of 30 years beyond the initiation of operation date, 30 years beyond the initiation of the loan repayment period, or the projected useful life of the project to be financed with proceeds of the loan.

b) The Agency may require a loan repayment period of less than the maximum. In evaluating the appropriateness of alternative loan terms, the Agency shall consider such factors as the scope of the proposed project, the impacts of alternative loan terms on user fees, and the overall cost of the project

V. Federal Assurances

Illinois EPA provides the following assurances and certifications to U.S. EPA as required by the Clean Water Act, the WPCLP Operating Agreement, and as conditions of capitalization grants.

Assurance	Description
A. Environmental Reviews (§602(a))	Illinois EPA will conduct environmental reviews for all projects per the Operating Agreement with U.S. EPA and 35 Ill. Adm. Code Part 365, ensuring all loan-funded projects are environmentally acceptable.
B. Timely Expenditure (§602(b)(4))	All WPCLP funds will be expended in a timely and expeditious manner.
C. First Use for Enforceable Requirements (§602(b)(5))	The first use requirement has been met in Illinois.
D. Planning Consistency (§603(f))	Projects funded with Federal Capitalization Grant funds will comply with CWA Sections 205(j), 208, 303(e), and 319, as applicable.
E. Fiscal Sustainability Plans (§603(d)(1)(E))	All loan recipients must certify that a Fiscal Sustainability Plan has been developed and implemented per the Water Resources Reform and Development Act of 2014.
F. A/E Procurement (§603(b)(14))	A/E contracts funded by Federal Capitalization Grant funds (applications after October 1, 2014) must be negotiated using qualifications-based selection per 40 U.S.C. Chapter 11 or equivalent. Illinois will meet this requirement through equivalency.
G. Cost and Effectiveness (§602(b)(13))	Effective FFY2016, all WPCLP loan recipients must certify they selected the most sustainable and cost-effective project, maximizing potential for efficient water use, reuse, recapture, and energy conservation.

H. Benefits Reporting	All funded projects will be reported to U.S. EPA's Office of Water SRF database. Illinois EPA will also meet FFATA reporting requirements and report annually to the National Information Management System.
I. Davis-Bacon Wage Standards	All WPCLP projects must comply with Federal wage and employment standards under the Davis-Bacon Act.
J. Green Project Reserve (GPR)	Illinois EPA will direct at least 10% of Capitalization Grant funds (\$11,141,500 base; additional 10% of IIJA supplemental) to green infrastructure, water/energy efficiency, or environmentally innovative activities. GPR-eligible projects are listed in Section V; final amounts are reported in the Annual Report.
K. Historic Preservation (PL 93-291)	National Historic Preservation Act provisions apply to all SRF loan activities.
L. Public Awareness / Signage	Loan recipients must post a sign at the project site (or equivalent public notification) acknowledging State and Federal funding for the project duration. Certification must be submitted before the first disbursement.
M. Equivalency	Illinois will select a group of projects from the IFL to meet equivalency requirements for crosscutter and single audit compliance. The IFL includes a 'Federal Equivalency' column. When a project has a 'Yes' in that column, it means the State has formally designated that project to meet federal equivalency requirements.
N. AIS, Build America, Buy America (BABA)	All WPCLP projects receiving SRF funding after July 1, 2024, must comply with BABA: (1) iron and steel produced in the U.S.; (2) manufactured products with ≥55% U.S.-made components by cost; (3) all construction materials manufactured in the U.S.
O. Accounting & Auditing	Illinois uses accounting and audit procedures conforming to GASB standards (GAO Government Auditing Standards). All SRF recipients must maintain separate project accounts per GASB standards.

Appendices

The following appendices are included in the full document:

Appendix	Title
A	Definitions and Acronyms
B	Summary of Public Participation and Public Comments
C	Additional Subsidization
D	FY2027 WPCLP Project Priority List (Intended Funding List, Scored Projects, and Unscored Projects)

APPENDIX A: Definitions and Acronyms

As used in this document, the following words and terms mean:

Agency - Illinois Environmental Protection Agency. (415 ILCS 5/19.2(a))

Binding Commitment – A legal obligation between the Agency and a loan recipient to provide financial assistance from the Public Water Supply Loan Program to that loan recipient, specifying the terms and schedules under which assistance is provided. The loan agreement will be considered a binding commitment.

BMP(s) - Best Management Practice(s).

Bypass - An action by Illinois EPA to remove a project from funding consideration in a State FY.

Capitalization Grant - The actual Federal funds received by the Agency for deposit into the WPCLP as a result of the Capitalization Grant agreement with U.S. EPA.

Construction - Means any one or more of the following: preliminary planning to determine the feasibility of treatment works, engineering, architectural, legal, fiscal, or economic investigations or studies, surveys, designs, plans, working drawings, specifications, procedures, field testing of innovative or alternative wastewater treatment processes and techniques meeting guidelines promulgated under Section 304(d)(3) of the Clean Water Act, or other necessary actions, erection, building, acquisition, alteration, remodeling, improvement, or extension of treatment works, or the inspection or supervision of any of the foregoing items.

CWA - The Clean Water Act, as amended (33 USC 1251 *et seq.*).

CWSRF - Clean Water State Revolving Fund

Director - Director of the Illinois Protection Agency

Energy Efficiency - The use of improved technologies and practices to reduce the energy consumption of water quality projects, including projects to reduce energy consumption or produce clean energy used by a treatment works.

EPA - Environmental Protection Agency

Facilities - Equipment or operating systems that are constructed installed or established to serve the particular purpose of mitigating the impacts of sewerage, industrial waste or non-point sources of pollution in a watershed. Facilities may involve stand-alone projects or be involved as component pieces of treatment works. Facilities in the context of the Green Project Reserve will address green infrastructure, water and energy efficiency improvements and other environmentally innovative activities.

FFATA – Federal Funding Accountability and Transparency Act

Fund - The Water Revolving Fund, as authorized by 415 ILCS 5/19.3, consisting of the Water Pollution Control Loan Program, the Public Water Supply Loan Program, and the Loan Support Program.

FY - Fiscal Year

Green Infrastructure - Includes a wide array of practices at multiple scales that manages and treats stormwater, and that maintains and restores natural hydrology by infiltrating, evapotranspiring and capturing and using stormwater.

GPR - Green Project Reserve, which is the portion of funded projects from the Capitalization Grant, that are required to be documented by the Agency in its Intended Use Plan and Annual Report These projects address green infrastructure, water and energy improvements and other environmentally innovative activities as directed by Federal law.

Initiation of Operation - The date that the funded treatment works are in full and sustained operation as planned and designed.

IUP - Intended Use Plan - A plan that includes a description of the short- and long-term goals and objectives of the Water Pollution Control Loan Program, project categories, discharge requirements, terms of financial assistance and the loan applicants to be served. (415 ILCS 5/19.2(e))

Interest Rate - The interest rate of the loan agreement shall be a fixed loan rate.

IUP - Intended Use Plan

Loan Agreement - The contractual agreement document between the Agency and the loan recipient that contains the terms and conditions governing the loan issued from the WPCLP.

Market Interest Rate - The mean interest rate of the 20 General Obligation Bond Buyer Index, from July 1 through June 30 of the preceding State FY rounded to the nearest 0.01%.

Median Household Income or MHI - The median household income is the American Community Survey 5-year estimate from the United States Department of Commerce, Bureau of the Census.

Municipality - A municipality as defined in Section 502 of the Federal Clean Water Act. (33 USC 1362(4))

NPS - Nonpoint Source

Operating Agreement - The agreement between the Agency and U.S. EPA that establishes the policies, procedures and activities for the application and receipt of Federal Capitalization Grant funds for capitalization of the WPCLP.

Principal - The total amount of funds distributed to loan recipients for eligible project costs.

Principal Forgiveness - The portion of a loan principal for which there is no repayment obligation, consistent with the terms of the project's loan agreement.

PPL - Project Priority List, which is an ordered listing of projects developed in accordance with the priority system described in 35 Ill. Adm. Code 365.345 (Loan Priority Score) that the Agency has determined are eligible to receive financial assistance from the WPCLP.

Public Loan Applicant - A loan applicant that is a municipality, intermunicipal agency, interstate agency, or local government unit that has applied for a loan under the WPCLP.

PWSLP - The Public Water Supply Loan Program as authorized by Section 19.2 of the Environmental Protection Act. (415 ILCS 5/19.2).

Readiness to Proceed - Timely progress toward achieving a binding commitment during the State FY and initiating project activities. This is measured by an applicant's success in meeting all applicable pre-award WPCLP program requirements.

Service Population - The number of people served by the public loan applicant.

SRF - State Revolving Fund

Title VI - Title VI of the Federal Clean Water Act. (33 USC 1251 *et seq.*)

Treatment Works – Treatment works, as defined in section 212 of the federal Water Pollution Control Act (33 USC 1292), including, but not limited to, the following:

any devices and systems owned by a local government unit and used in the storage, treatment, recycling, and reclamation of sewage or industrial wastes of a liquid nature, including intercepting sewers, outfall sewers, sewage collection systems, pumping power and other equipment, and appurtenances.

extensions, improvements, remodeling, additions, and alterations thereof.

elements essential to provide a reliable recycled supply, such as standby treatment units and clear well facilities.

any works, including site acquisition of the land that will be an integral part of the treatment process for wastewater facilities; and

any other method or system for preventing, abating, reducing, storing, treating, separating, or disposing of municipal waste, including storm water runoff, or industrial waste, including waste in combined storm water and sanitary sewer systems as those terms are defined in the Federal Water Pollution Control Act. [415 ILCS 5/19.2(f)]

Unemployment Rate - The annual average unemployment rate calculated by the Illinois Department of Employment Security's Economic Information and Analysis Division.

Useful Life - The estimated period during which treatment works is intended to be operable, as certified by the project's consulting licensed professional engineer.

U.S. EPA - United States Environmental Protection Agency.

User Charge - A charge levied on the users of treatment works to produce adequate revenues for the operation, maintenance and replacement of the treatment works.

WPCLP - Water Pollution Control Loan Program, as authorized by Section 19.2 of the Environmental Protection Act. (415 ILCS 5/19.2)

WRRDA - Water Resources Reform and Development Act of 2014. (P.L. 113-121)

APPENDIX B: Summary of Public Participation and Public Comments

The program received comments collectively from the Alliance for the Great Lakes, American Rivers, Friends of the Chicago River, Equity Legal Services, and Centreville Citizens for Change. They largely reiterate comments that have been submitted in the past cycles. The coalition's comment letter argues that Illinois EPA should make the Clean Water SRF more transparent, more accessible to disadvantaged communities, and more aligned with human-health, equity, and climate-resilience goals. They request clearer public notification of IUP releases, better project data (including GPR and Environmental Impact Discount details), more equitable principal-forgiveness formulas, and stronger support for nature-based stormwater solutions. A major theme is the need for technical assistance: they note that Illinois has not articulated any CW-SRF technical assistance plan despite federal authority to use up to 2% of BIL funds for rural, small, and tribal systems. They also urge IEPA to conduct a statewide "gap analysis" of stormwater/wastewater needs, expand leveraging, and adopt practices used by peer states to better reach underserved communities.

- **Transparency Improvements:** Their requests for sortable PPL data, clearer GPR identification, and consistent public notification are reasonable, widely adopted in other states, and directly tied to public-access requirements. The Illinois SRF program will look to incorporate these suggestions into FY2027 and future Intended Use Plans. However, it only makes sense to provide an excel version of the Project Priority List after the IUPs are finalized. During the public-comment period, the PPL is still in flux because several projects scored for the upcoming fiscal year are also on the current year funding list and may receive loan awards before June 30 of the current fiscal year. As those awards are issued, those projects come off the list and the rankings and totals shift. Until the fiscal year closes, the PPL is not a stable dataset, so releasing a sortable spreadsheet earlier would give the public a version that is immediately outdated. There is a separate column added in the WPCLP Intended Funding List for Green Project Reserves. The projects have been denoted a "yes" that qualify for receiving GPR funding.
- **Additional Subsidization:** IEPA appreciates the groups interest in directing more principal forgiveness to communities with the greatest need. It is important to clarify, however, that Illinois does not have independent statutory authority to create or expand principal forgiveness beyond what is required under federal law. Principal forgiveness in the Clean Water SRF is strictly a function of the percentage of the federal capitalization grant that the Clean Water Act requires to be provided as additional subsidization. IEPA has already applied the maximum allowable 30% of the base capitalization grant for FY2027 and reallocates unused amounts within the existing federal categories to ensure those dollars reach disadvantaged communities. Any increase in principal forgiveness beyond these federally defined limits would require changes to federal statute, not state policy. The commenters note the draft FY2027 principal forgiveness cap of \$4.5 million and compare it to the FY2026 cap of \$6 million. It is important to clarify that the \$4.5 million figure appeared only in the *draft* IUP and should not be treated as final. The draft IUP is published roughly one month before the close of the state fiscal year, and during that period several communities that are scored for both FY2026 and FY2027 may still receive loan awards before June 30. As those awards are issued, funding allocations shift and the PF cap must be recalculated to reflect the remaining available subsidization. After the fiscal year closed and all FY2026 awards were finalized, the PF cap for FY2027 increased to \$7 million per applicant, one million higher than the FY2026 cap.
- **Provide Technical Assistance:** The group correctly note that the Clean Water Act allows states to use up to 4% of the base capitalization grant for program administration and that the Bipartisan Infrastructure Law permits up to 2% of the CWSRF BIL supplemental grant for technical assistance to rural, small, and tribal publicly owned treatment works. However, these authorities are limited and

targeted, and they do not create a broad technical-assistance program for all communities with stormwater or wastewater needs. Illinois EPA's ability to use these funds is constrained by several factors:

- i. **The 2% BIL authority is narrow and applies only to rural, small, and tribal POTWs.** It cannot be used for general stormwater assistance, application support for all municipalities, or broader community-capacity work. The groups recommendation to use the 2% authority for "other types of communities" is not permissible under federal law.
- ii. **Illinois does not have state statutory authority to create a standalone CW-SRF technical-assistance program.** Unlike Wisconsin and Ohio, Illinois does not have state-funded SRF TA positions or state appropriations dedicated to TA. Any expansion beyond the narrow federal authority would require legislative action.
- iii. **Comparisons to Wisconsin and Ohio are not directly applicable.** Those states have significantly different statutory frameworks, staffing levels, and historical SRF capitalization. Wisconsin's 9.5 FTE TA team and Ohio's \$2.5 million TA program are funded through mechanisms that Illinois does not currently have. Illinois cannot replicate those models without new state appropriations or statutory changes.

Other comments included increasing PF for nature-based infrastructure projects, providing 0% interest rates for GSI SRF loans, exploring alternative financing mechanisms for GSI and nature-based infrastructure and leveraging SRF net cash flow to support new opportunities for nature-based infrastructure. Illinois EPA appreciates the commenters' interest in innovative financing approaches for green and nature-based infrastructure. However, models such as Sponsorship Lending and WRRSP require statutory authority, rulemaking, and fund capacity that Illinois does not currently possess. Illinois' SRF must maintain long-term sustainability and comply with federal perpetuity requirements, and redirecting net cash flow or applying blended interest-rate structures would jeopardize future lending capacity. IEPA will continue to monitor national SRF practices but must operate within Illinois' existing legal and financial framework that is aligned with the water infrastructure demand the program is currently seeing.

The City of Chicago submitted a comment noting that Loan L17-7069 was listed at \$14,000,000 in the draft WPCLP IUPs, while the actual request was \$63,775,000. The final WPCLP IUP has been updated to reflect the correct loan amount.

USEPA submitted comments for the WPCLP Intended Use Plans as well. The comments were mainly focused on formatting changes, and seeking clearer guidance on some of the concepts discussed in the IUPs. All comments were addressed accordingly and are reflected in the changes made in this document.

Appendix C
2027 Water Pollution Control Loan Program – Additional Subsidization

365.250 Additional Subsidization

- a) The Agency may provide additional subsidization as provided in section 603(i) of the CWA or as otherwise prescribed by USEPA in the annual capitalization grant agreement.
- b) Pursuant to section 603(i)(2) of the CWA, the Agency adopts the following affordability criteria.
 - 1) To be eligible for additional subsidization under section 603(i)(1)(A)(i) of the CWA, a public loan recipient must
 - A) have a service population of 30,000 or less, unless the loan applicant's median household income (MHI) is 70% or less of the statewide average; and
 - B) score at least 21 points based on the following criteria.
 - i) Median Household Income

Points	MHI as % of Statewide MHI
0	Above 100%
5	95-99.99%
10	90-94.99%
15	85-89.99%
20	80-84.99%
25	75-79.99%
30	70-74.99%
35	65-69.99%
40	60-64.99%

45	55-59.99%
50	50-54.99%
55	45-49.99%
60	0-44.99%

ii) Population

Points	Service Population
0	Above 30,000
5	20,000-30,000
10	15,000-19,999
15	10,000-14,999
20	5,000-9,999
25	2,000-4,999
30	1,000-1,999
35	0-999

iii) Additional Criteria

Points	Additional Criteria
1	Unemployment rate is greater than the statewide average unemployment rate by one percentage point or more
4	Decrease in service population greater than 5.0% in the last 5 years from the date of the loan application

- 2) The amount of additional subsidization provided under section 603(i)(1)(A)(i) of the

CWA will be capped for qualifying public loan recipients and applied only to eligible projects costs as follows:

Points	Percent
0-20	0%
21-40	up to 15%
41-60	up to 30%
61-80	up to 45%
81-100	up to 60%

- c) Notwithstanding the additional subsidization caps in subsection (b)(2), the Agency may establish a base cap applicable to each loan recipient within its Intended Use Plan each year. The base cap shall be the same amount for each loan recipient receiving additional subsidization. In determining the base cap, the Agency must consider the following factors:
- 1) the amount of federal appropriation allocated to the Agency for additional subsidization;
 - 2) the number of qualifying loan recipients;
 - 3) the availability of equity in the State Water Revolving Fund while ensuring the fund operates in perpetuity; and
 - 4) requirements established by USEPA.
- d) The Agency shall prioritize public loan applicants who score at least 21 points under the affordability criteria in subsection (b), and shall award additional subsidization to loan applicants in the order that loan applicants have been issued a loan by the Agency pursuant to Section 365.410.

Appendix D
2027 Water Pollution Control Loan Program – Project Priority List

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If there is a “Yes” next to a project in the Federal Equivalency project, this means the project is selected to help meet the program its equivalency requirement.

**State of Illinois
Illinois Environmental Protection Agency**

Illinois EPA Water Pollution Control Loan Program (WPCLP) FY2027									
Projects with Funding Reserved through December 31, 2026									
Loan Applicant	Project Description	L17#	Estimated Construction Start Date	Requested Funding Amount	Principal Forgiveness	Loan Priority Score	NPDES Permit	Federal Equivalency	Green Project Reserve
Oglesby	Construct sludge handling facilities, excess flow facilities, and new outfall sewer.	7045	2/10/2027	\$ 23,000,000	\$ 3,450,000	880	IL0024996		
Alexis	Cleaning and televising of sewer system, lining of sewer system, spot repairs.	7279	3/1/2026	\$ 2,000,000	\$ 600,000	740	IL0021211		
Sauget	Construct new sludge dewatering building.	7591	10/1/2026	\$ 16,760,000	\$ 7,000,000	675	IL0065145		
Maestown	WWTP needs two additional septic tanks, rebuild sand filters, and other improvements.	7179	7/28/2026	\$ 2,045,000	\$ 306,750	640	IL0071226		
Buckley	Contract A - Loan #1 - New Wastewater collection system and treatment.	6282	8/15/2026	\$ 8,500,000	\$ 3,825,000	630	IL0080257		
Buckley	CoContract B - Loan #2 - New wastewater collection system and treatment.	7547	8/15/2026	\$ 8,500,000	\$ 3,825,000	630	IL0080257		
Decatur	Rehab and line Jasper and Upper/Lower Broadway sewer corridors.	7825	3/31/2027	\$ 20,640,000	\$ 6,192,000	630	IL0028321		
Peoria	Combined sewer overflow Consent Decree milestone #2 offline storage project.	7846	3/1/2027	\$ 80,400,000	\$ -	630	IL0037800		
Ashmore	Construction 39,790 LF of vacuum sewer main and laterals, a vacuum control station, 179 valve pits, and a treatment facility to supply sewer to an unserved community.	6567	1/31/2027	\$ 4,879,305	\$ 2,195,687	620	IL0080271		
Anna	Phase 1: Construct the new oxidation ditch system and rehab the existing headworks system.	7783	10/1/2026	\$ 19,000,000	\$ 7,000,000	615	IL0027481		Yes
Metropolitan Water Reclamation District of Greater Chicago	MWRDGC Contract No. 19-856-3E TARP Control System Replacement, SSA, CSA, NSA.	6037	7/30/2026	\$ 25,000,000	\$ -	600	IL0028061	Yes	
Roanoke	Treatment plant improvements and sewer lining.	7682	3/1/2027	\$ 3,000,000	\$ 450,000	590	ILG580074		
Ottawa	WWTP upgrades.	7391	7/15/2026	\$ 32,000,000	\$ 4,800,000	585	IL0030382		
Flagg Creek W.R.D.	Construct tankage and equipment to facilitate Biological Nutrient Removal, disinfection improvements, excess flow improvements, solar power generation and general process improvements at the John McElwain Sewage Treatment Plant.	6306	3/31/2027	\$ 68,500,000	\$ -	580	IL0022586	Yes	Yes
Elmwood	Sludge removal from lagoon and replace rock filter.	7728	9/1/2026	\$ 2,500,000	\$ 375,000	565	ILG582012		
Colp	Build new headworks and forcemain to pump current sewage collection system in to the new regional wastewater treatment plant.	7853	10/1/2026	\$ 7,456,678	\$ 4,474,007	560	ILG580155		
Shelbyville	Improvements at East & SW CSO Facilities & Add Chlorination/Dechlor at CSO Outfall 002.	6021	10/1/2026	\$ 2,310,000	\$ 1,039,500	550	IL0021890		

Illinois EPA Water Pollution Control Loan Program (WPCLP) FY2027

Projects with Funding Reserved through December 31, 2026									
Loan Applicant	Project Description	L17#	Estimated Construction Start Date	Requested Funding Amount	Principal Forgiveness	Loan Priority Score	NPDES Permit	Federal Equivalency	Green Project Reserve
Carrier Mills	Sanitary Sewer Treatment Plant Improvements.	6527	2/1/2027	\$ 4,800,000	\$ 2,160,000	540	ILG582014		
Cambria	Build a new headworks and forcemain to pump current sewage collection system in to the new regional wastewater treatment plant.	7855	6/1/2026	\$ 7,801,378	\$ 3,510,620	520	ILG580045		
Hoopeston	Phase 1: Improve oxidation ditch, two secondary clarifiers, STP outfall structure, excess flow pump station, and influent flow splitter.	6587	8/1/2026	\$ 11,200,000	\$ 3,360,000	505	IL0024830		
Morton	WWTP improvements at Plant 2 and Plant 3.	7370	10/1/2026	\$ 42,427,000	\$ -	505	IL0030015		
Coffeen	Sanitary sewer system improvements.	7518	3/1/2027	\$ 136,000	\$ 40,800	495	ILG580243		
Addison	North WWTP expansion and upgrades project.	7289	11/1/2026	\$ 125,000,000	\$ -	485	IL0033812	Yes	
Crainville	Build a new headworks and forcemain to pump current sewage collection system in to the new regional wastewater treatment plant.	7854	6/1/2026	\$ 7,029,218	\$ 2,108,765	485	ILG52002		
New Berlin	Replace lift station pumps, connecting pipe, control panel, HVAC, and install generator.	7645	5/29/2026	\$ 651,000	\$ 195,300	485	ILG580171		
Auburn	WWTP Improvements.	7629	2/28/2027	\$ 17,500,000	\$ 2,625,000	480	IL0022403		
Kishwaukee Water Reclamation District	Construct pump station, with forcemain, and gravity sewers.	7632	1/21/2027	\$ 18,000,000	\$ 2,700,000	475	IL0023027		Yes
Roselle	Devlin WWTF biological phosphorus removal and expansion project.	6366	12/1/2026	\$ 55,000,000	\$ -	475	IL0030813	Yes	
Leaf River	Modify WWTP: Construct new influent lift station, influent screen and WWTP building; convert the existing tertiary lagoons to primary treatment aerated lagoons; and construct an aerated rock filter.	5705	11/1/2026	\$ 6,000,000	\$ 900,000	465	IL0029475		
Wood River	Phase 2 - Expansion of stormwater facilities, construction of gravity storm sewers and a gravity discharge line.	7095	5/1/2026	\$ 5,000,000	\$ 750,000	455	IL0031852		
Total FY2027 IFL				\$ 627,035,579	\$ 63,883,430				

Illinois EPA Water Pollution Control Loan Program (WPCLP) FY2027 Project Priority List

Scored Projects But Funds Exhausted					
Loan Applicant	Project Description	L17#	Estimated Construction Start Date	Estimated Loan Amount	Loan Priority Score
Manhattan	Expand STP from a design average flow of 1.35 mgd to 2.70 mgd.	3024	11/23/2026	\$ 45,300,000	450
East Dubuque	Rehab 2 lift stations.	6919	1/1/2027	\$ 1,006,021	445
Le Roy	Upgrade influent pump station and headworks, replacing lagoon aeration equipment, replacing clarifier mechanism, add secondary clarifier.	7286	12/15/2026	\$ 16,704,000	445
Litchfield	Upgrade WWTP	7796	3/31/2027	\$ 23,000,000	445
Moweaqua	STP Improvements	6291	11/1/2026	\$ 2,640,000	445
Murrayville	CIPP lining of 8,500 LF of 8" and 1,650 LF of 10" of sewer main and 57 manholes.	5462	10/20/2025	\$ 1,030,000	445
Salem	Sanitary Sewer System Improvements	7725	3/1/2027	\$ 160,000	445
Thorn Creek Basin S.D.	Convert existing anaerobic digestion to aerobic digestion. Construct new building, new covered biosolids storage buildings.	6749	11/18/2026	\$ 82,000,000	445
Urbana and Champaign Sanitary District	Plant upgrades to Northeast Plant (NEP) including disinfection, sludge thickening, anaerobic digesters, replace EE3 digester cover	7093	1/2/2027	\$ 31,100,000	440
Crystal Lake	Upgrades to WWTP no. 2 & WWTP no. 3.	7845	3/15/2027	\$ 19,730,000	420
Joliet	Westside WWTP project: increase OAF from 14 MGD to 18.16 MGD and the DMF from 28 MGD to 42 MGD.	6073	3/15/2027	\$ 157,300,000	420
Stillman Valley	Construct 3,636 ft sanitary sewers and line 1,140 ft of sanitary sewer.	6133	11/1/2026	\$ 1,727,000	420
Energy	Treatment facility and collection system improvements.	6950	9/15/2026	\$ 2,300,000	415
Dallas City	Lift station improvements.	6083	12/15/2026	\$ 3,322,000	410
Fox River Water Reclamation District	Replace RAS screw pumps and telescoping valves	7327	11/27/2026	\$ 9,459,000	410
Geneseo	Construct an oxidation ditch, selector tanks, replace RAS pump, non-potable water pumps and final clarifier mechanisms.	7806	2/1/2027	\$ 13,921,000	410
Salt Creek Sanitary District	2021 Facility Plan Improvements Phase 2	6124	9/8/2026	\$ 48,000,000	410
Jacksonville	WWTP Improvements Phase 2.	5941	12/1/2026	\$ 25,000,000	405
Crossville	Lining of existing sanitary sewer manholes due to high inflow and infiltration.	7815	2/1/2027	\$ 1,300,000	390
Fox River Water Reclamation District	Upgrading the existing ferric chloride chemical polishing system for phosphorus removal and trimming	7696	1/15/2027	\$ 3,400,000	390
Knoxville	Retelevising and line sanitary sewer pipes and reinstall laterals	4660	3/2/2027	\$ 2,800,000	390
Havana	Improve screen chamber, splitter chamber, aeration tank, clarifiers, digesters, handrails, aeration piping, electrical facilities, recycle pump station, influent flow meter, and decant pump station.	4655	12/1/2026	\$ 3,000,000	385
Mount Morris	Replace West Lift Station and 2200 LF of 8" sanitary force mains	1625	10/1/2026	\$ 2,200,000	385
Metropolitan Water Reclamation District of Greater Chicago	Contract 21-092-3P Battery E Activated Sludge Facility, OWRP	7090	7/15/2026	\$ 325,005,000	380
Wood River	Expansion of 6th Street Detention Pond	6595	7/1/2026	\$ 10,000,000	375
Dixon	Construct new lift station and 19,500 ft of force main to connect Sauk Valley Community College	7840	2/1/2027	\$ 3,640,000	370
Metropolis	Completion of combined sewer separation.	7081	2/15/2027	\$ 20,000,000	370
Chicago	Sewer lining program.	7069	3/31/2027	\$ 63,775,000	365
Forrest	WWTP improvements and upgrades.	6530	2/28/2027	\$ 4,700,000	365
Fox River Water Reclamation District	Electrical equipment improvements at ADP and North Plant.	7541	3/15/2027	\$ 44,000,000	360
Greenville	Improve sludge storage tank, clarifiers and headworks at the WWTP.	2907	3/1/2027	\$ 3,045,000	360
Sangamon County Water Reclamation District	Modify tertiary pond and Cook Street Lagoon.	7239	10/1/2026	\$ 19,660,000	360
St. Clair Township	WWTP improvements.	5777	3/29/2027	\$ 12,334,000	360
Maryville	Sanitary Sewer lining of VCP sewers/brick manholes in Old Town area.	7568	11/2/2026	\$ 1,200,000	355
Olmsted	Improve Front Street Lift Station, Route 37 Lift Station, and Cedar Street Lift Station. Modify lagoon embankment.	6030	9/1/2026	\$ 825,000	355
Edwardsville	Replacement of 9,300 LF of existing sanitary sewer.	6920	8/30/2026	\$ 9,000,000	350
Forrest	Lift station improvements.	6390	10/1/2026	\$ 2,500,000	350
Sangamon County Water Reclamation District	Collection system improvements.	7242	10/1/2026	\$ 19,700,000	345
New Lenox	Construct conveyance modifications to convey flow from the existing STP 1 to the new WRRF.	6010	3/26/2027	\$ 26,000,000	340
West Frankfort	Phase 2 - Sanitary sewer collection system rehabilitation.	7325	2/1/2027	\$ 1,800,000	340
Itasca	Phase 4 - North Side Infrastructure Improvements.	6247	3/15/2027	\$ 8,500,000	335
Markham	Rehab combined sewer system within the Phase 2 area of the East side neighborhood	6397	12/11/2026	\$ 3,785,967	335
Marion	Add phosphorus removal technology to wastewater treatment plant.	7766	3/1/2027	\$ 23,119,625	320
Chatsworth	WWTP improvements.	6170	1/1/2027	\$ 3,510,000	310
Oregon	Replace headworks, and install new influent lift station	6940	12/1/2026	\$ 9,500,000	310
Villa Park	Washington Street sewer separation-Section 2-constructing 6,300 LF of storm sewers.	7738	3/1/2027	\$ 16,000,000	310
Chicago	PN7663 Argyle Large Diameter Sewer Lining Rehabilitation.	7072	3/31/2027	\$ 12,000,000	305
Chicago	Sewer Improvements.	5801	3/31/2027	\$ 14,000,000	305
Chicago	PN7547 Sewer Improvement project.	6152	3/31/2027	\$ 7,000,000	305

Illinois EPA Water Pollution Control Loan Program (WPCLP) FY2027 Project Priority List

Scored Projects But Funds Exhausted					
Loan Applicant	Project Description	L17#	Estimated Construction Start Date	Estimated Loan Amount	Loan Priority Score
Rock Island	Construct new mechanical bar screen structure, submersible influent pumping station and force main.	7660	12/15/2026	\$ 4,500,000	305
Annawan	Sanitary sewer improvements, including lift station rehabilitation and lagoon sludge removal.	7842	9/1/2026	\$ 655,000	295
Germantown Hills	Replace sand filters with disk filters and replace motor control center and backup generator.	3977	2/1/2027	\$ 2,000,000	295
Lena	Phase I: Improve WWTP	7118	3/1/2027	\$ 4,000,000	295
South Fork S.D.	Valve Stem replacement, Rip-Rap Lagoon Bank Stabilization , replace pumps and controls in all lift stations, and rehab manholes	6792	6/1/2026	\$ 2,190,680	290
Rock Falls	New fine screen, drying structure and emergency generator	7475	2/1/2027	\$ 1,655,000	285
Westville - Belgium S.D.	Wastewater treatment plant and pump station improvements.	7600	3/1/2027	\$ 5,866,000	285
Wilmette	Phase 2 - Approximately 9,230 LF of sewer lining, grouting and reinstatement of 214 sewer services.	6042	3/8/2027	\$ 1,640,000	275
Northern Moraine Wastewater Reclamation District	Sewer extension to 73 homes in Holiday Hills an unsewered community.	6165	3/31/2027	\$ 4,585,710	270
Rock Island	Anaerobic digester improvements.	7723	11/4/2026	\$ 15,500,000	270
South Beloit	Demo 2 lift stations and construct new singular lift station.	3562	12/1/2026	\$ 8,000,000	265
Chicago	Rehabilitate sediment force main.	3628	10/20/2026	\$ 13,070,000	250
Metropolitan Water Reclamation District of Greater Chicago	Contract 25-192-3P: Install Aerated Grit Tanks 1 and 8 at the West Side Aerated Grit Facility, and replace 3 turbo blowers.	7717	3/17/2027	\$ 9,000,000	250
Metropolitan Water Reclamation District of Greater Chicago	19-255-3D Rehabilitation of Pump and Blower House, CWRP	0384	12/31/2026	\$ 25,000,000	250
Metropolitan Water Reclamation District of Greater Chicago	MWRDGC Contract 19-156-3E Low Voltage Pump & Blower Switchgear and Aerated Grit MCC Replacement, SWRP	5904	10/3/2026	\$ 12,750,000	250
Metropolitan Water Reclamation District of Greater Chicago	MWRDGC Contract 23-417-3S, Kirie-Egan Solids Pipeline Rehabilitation Section No. 2, NSA	7206	10/6/2026	\$ 12,500,000	250
Metropolitan Water Reclamation District of Greater Chicago	19-154-3E Low Voltage Switchgear Replacement, Mainstream Pumping Station.	6921	11/20/2026	\$ 25,000,000	250
Northern Moraine Wastewater Reclamation District	Adding solar array to WWTP	6371	3/31/2027	\$ 3,000,000	245
South Beloit	Install equipment at WWTP to allow the production of USEPA 502 regulation Class A Biosolid.	7112	2/1/2027	\$ 3,700,000	245
New Lenox	Construct conveyance modifications to convey flow from STP 1 to new WRRF.	6009	3/27/2027	\$ 42,209,378	235
Albers	New Wastewater Treatment Plant	7839	2/1/2027	\$ 5,187,000	220
Bloomington	Replace RAS screw pumps and other miscellaneous RAS improvements	8030	12/6/2026	\$ 2,200,000	220
Chester	Reconstruction of Lift Station No. 1, new generator, and related appurtenances.	7869	8/17/2026	\$ 3,150,900	220
Northern Moraine Wastewater Reclamation District	Interceptor expansion - construct 4,420 LF of 42-inch sanitary sewer.	5823	3/31/2027	\$ 7,108,000	220
Northern Moraine Wastewater Reclamation District	Interceptor expansion - construct a new screening facility at the District's WWTF.	2930	3/31/2027	\$ 6,317,000	220
Northern Moraine Wastewater Reclamation District	UV disinfection project	6372	3/31/2027	\$ 2,100,000	220
Evanston	Rehab 9,500 LF of brick or clay tile sewers.	7512	3/2/2027	\$ 7,087,355	195
Projects with Planning Approval but Funds Exhausted Total				\$ 1,390,970,635	

NOT SCORED PROJECTS: PROJECTS WITH PLANNING APPROVAL - ESTIMATED CONSTRUCTION START AFTER MARCH 31, 2027

Loan Applicant	Project Description	L17#	Estimated Construction Start Date	Projected Loan Amount
Alexis	Construction of a new aerated lagoon treatment plant and excess flow lagoon to replace the existing mechanical treatment plant.	7280	6/1/2027	\$ 6,000,000
Auburn	Wastewater System Improvements to include rehab collection system, including 5 lift stations.	7630	2/28/2029	\$ 3,110,000
Bloomington	WWTP improvements. Including Enhanced Biological Phosphorus Removal and Chemical Phosphorus Removal facilities	4697	12/20/2027	\$ 7,000,000
Bloomington	Install wet well and hydrocyclone	7789	11/30/2030	\$ 1,200,000
Bloomington and Normal Water Reclamation District	Phase 5A of the Biological Nutrient Removal conversion and upgrades.	6137	6/1/2028	\$ 50,000,000
Cuba	Various improvements to the existing WWTP for effluent compliance, replacement of dilapidated equipment	6125	5/1/2027	\$ 4,000,000
Dakota	Various WWTP Improvements.	6395	3/22/2028	\$ 752,000
Danville	Phase 1 sanitary sewer rehab.	7023	4/1/2027	\$ 7,006,781
Decatur	Rehab and replace sewer mains, manholes, and laterals, and repairing lateral connections.	7570	2/29/2028	\$ 15,676,542
Elkhart	New wastewater collection and treatment system.	0472	8/1/2027	\$ 14,107,170
Galesburg S.D.	Improvements to new waste activated sludge thickening facilities to prevent nutrient release, septage/hailed waste receiving station, hauled waste holding tank, side stream nutrient equalization / treatment tanks	6581	7/15/2027	\$ 27,000,000
Glen Carbon	Construct interceptor pump station #2 and new force main to the IAWC system in Granite City.	4893	1/15/2028	\$ 10,500,000
Glenbard Wastewater Authority	CSO Facility Rehab Project: Replace mechanical screen, 4 raw sewage pumps and motors, 2 aerated grit blowers, 2 CSO clarifier mechanisms, and upgrade chlorine disinfection process.	7448	6/1/2028	\$ 15,239,441
Hoopeston	Phase 2: Rehab excess flow outfall, excess flow clarifier, plant process controls and storage building, two sludge drying beds, and existing tertiary filters and building.	6588	8/1/2027	\$ 11,200,000
Hoopeston	Phase 3: conversion of former 40' dia. secondary clarifier for use as aerobic digester and miscellaneous plant improvements.	6589	8/1/2028	\$ 8,100,000
Jacksonville	Phase 3: rehab existing aeration tanks, final clarifier's, and RAS/WAS pump station along with a new biological nutrient removal treatment system.	5942	1/1/2032	\$ 15,000,000
Ludlow	New wastewater collection and treatment system.	6600	8/1/2027	\$ 9,916,000
Markham	Rehab combined sewer system within the Phase 3 area of the east side neighborhood	6398	11/9/2027	\$ 2,925,468
Markham	Rehab combined sewer system within the Phase 4 area of the east side neighborhood	6399	11/9/2028	\$ 2,927,561
Markham	Rehab combined sewer system within the Phase 5 area of the East Side neighborhood.	6400	11/7/2029	\$ 2,492,052
Mattoon	Replace the aeration treatment system with one that will biologically reduce effluent phosphorus and nitrogen	3552	10/1/2028	\$ 53,000,000
Metropolitan Water Reclamation District of Greater Chicago	19-257-3D 6th Street Construction and Utility Tunnel Rehabilitation, Calumet WRP	0389	5/29/2027	\$ 5,000,000
Metropolitan Water Reclamation District of Greater Chicago	MWRDGC Contract No. 23-264-3S Calumet Intercepting Sewer No. 13 Rehabilitation, CSA	7718	7/28/2027	\$ 14,500,000
Metropolitan Water Reclamation District of Greater Chicago	MWRDGC Contract No. 20-162-3S West Side Intercepting Sewer No. 2 Rehabilitation, SSA	7207	10/12/2027	\$ 3,000,000
Metropolitan Water Reclamation District of Greater Chicago	MWRDGC Contract No. 23-173-3S Southwest Side Intercepting Sewer 15, 16, and 17B Rehabilitation, SSA	7214	12/14/2027	\$ 12,000,000
Metropolitan Water Reclamation District of Greater Chicago	MWRDGC Contract No. 19-258-3E Switchgear and MCC Replacement, Calumet WRP	7716	5/8/2028	\$ 23,000,000
Metropolitan Water Reclamation District of Greater Chicago	MWRDGC Contract 23-418-3S, Kirie-Egan Solids Pipeline Rehabilitation Section No. 3, NSA	7256	12/8/2028	\$ 30,000,000
Metropolitan Water Reclamation District of Greater Chicago	Contract 16-129-3D Battery C Final Settling Tanks, Rehabilitation of Concrete, SWRP	6217	2/20/2030	\$ 20,000,000
Moweaqua	Phase 2: Sewer System Improvements in Basin #1 - Cleaning and Televising of 20,000 LF of sewers in drainage Basin #1. CIPP lining or removal & replacement of sewers	6292	8/1/2027	\$ 8,770,000

NOT SCORED PROJECTS: PROJECTS WITH PLANNING APPROVAL - ESTIMATED CONSTRUCTION START AFTER MARCH 31, 2027

Loan Applicant	Project Description	L17#	Estimated Construction Start Date	Projected Loan Amount
Ottawa	Headworks structure modifications, converted Integrated Fixed Film Activated Sludge based on BNR Structure, and portion of new sludge thickener tank.	7348	10/1/2028	\$ 33,999,000
Ottawa	Construct new tertiary filters and UV disinfection structure, portion of new sludge thickener tank, and new digester supernatant chemical structure.	7349	10/1/2029	\$ 33,999,000
Ottawa	Construct new addition sludge digester/waste activated sludge storage tank, and the remainder portion of the new sludge thickner tank.	7350	10/1/2030	\$ 6,368,000
Quincy	Construction of flow restriction structures	7361	10/1/2028	\$ 4,115,000
Sangamon County Water Reclamation District	Improvements to the CSO treatment at Spring Creek WWTP.	7241	11/1/2028	\$ 42,975,480
Sangamon County Water Reclamation District	Storm sewer separation.	7240	11/1/2028	\$ 11,252,120
Spoon Valley Lake SD	Unsewered Subdivisions	7103	4/1/2027	\$ 8,694,864
Shelbyville	Phase 3 of collection system improvements.	6022	10/1/2027	\$ 17,325,000
Troy	Replace and expand treatment facility and upgrade collection system.	5506	2/15/2029	\$ 46,000,000
Villa Park	Washington Street sewer separation-Section 3-construct 5,000 LF of storm sewers.	5667	3/1/2028	\$ 5,000,000
Villa Park	Construct 5,000 LF of separate storm sewers.	5668	6/1/2027	\$ 6,000,000
Warrensburg	Phase 1 - Sewer treatment plant improvements, collection system rehab, and a sewer system evaluation survey.	7551	10/1/2027	\$ 4,468,000
Warrensburg	Phase 2 - Sewer treatment plant and sewer system improvements.	7552	3/15/2028	\$ 11,000,000
Wilmette	Phase 3 - 15,300 LF of sewer lining, manhole rehab, grouting and reinstatement of 323 sewer services.	6141	3/5/2029	\$ 1,640,000
Projects with Construction Start Date After March 31, 2027				
Total				\$ 616,259,479

NOT SCORED PROJECTS: PROJECTS WITHOUT PLANNING APPROVAL AS OF MARCH 31, 2026

Loan Applicant	Project Description	L17#	Estimated Construction Start Date	Projected Loan Amount
Albany	Construction of Aero-Mod package mechanical treatment plant to replace existing WWTF.	7837	4/3/2028	\$ 14,600,000
Belleville	LTCP Phase 6	7595	3/1/2027	\$ 17,000,000
Belleville	Sanitary sewer replacement.	5833	12/1/2026	\$ 750,000
Belleville	Lining of sanitary sewer mains and manholes.	5834	1/1/2027	\$ 3,000,000
Belvidere	WWTP improvements.	7435	3/29/2028	\$ 87,494,000
Bloomington and Normal Water Reclamation District	Wood Street CSO Separation - Installation of approximately 4,000 LF of new storm sewer pipe to separate sanitary sewer.		4/1/2026	\$ 8,500,000
Bloomington and Normal Water Reclamation District	Construction of 4500 LF of new 8" sanitary sewer, new pump station, and septic tank abandonment		4/1/2027	\$ 7,000,000
Bloomington and Normal Water Reclamation District	Installation of interceptor sanitary sewer and force main.	7851	2/1/2027	\$ 23,500,000
Burlington	New WWTP and sanitary sewer system.	6933	4/1/2027	\$ 16,300,000
Bushnell	Conversion of the existing Bushnell West STP Aerated Lagoon to a Covered Aerated Lagoon System with mechanical screening at the existing influent pump station and a Nitrogen Polishing reactor at the lagoon discharge.	7957	4/15/2027	\$ 5,000,000
Campbell Hill	Various WWTP Improvements.	7479	7/1/2027	\$ 1,623,800
Carlock	Construct sanitary sewer collection system and wastewater treatment facility.	8002	4/1/2028	\$ 21,871,855
Chester	WWTP and Collection System Improvements. Renovation of pumpstations 2, 3, and 6. New generators for Lift Stations 3 and 6. New Blowers for WWTP.	3545	6/1/2027	\$ 2,010,225
Chrisman	WWTP Phase II Improvements	7405	9/1/2027	\$ 7,000,000
Colchester	Phase II Water System Improvements.		11/15/2027	\$ 1,737,200
Colfax	Sand filter media replacement, lagoon sludge removal and land application, CIPP sewer rehabilitation, lift station pump replacement.		5/1/2027	\$ 750,000
Coyne Center S.D.	WWTP Improvements		3/31/2027	\$ 1,949,000
Decatur, Sanitary District of	WWTP improvements.		8/1/2027	\$ 86,000,000
Desoto	Install a UV Disinfection System to replace an existing chlorination/de-chlorination pumping system		7/1/2027	\$ 522,200
Dowell	Construct new WWTP.	7751	9/15/2026	\$ 3,476,350
East Moline	Reconstruction of the WWTP.	7626	3/22/2028	\$ 65,000,000
Effingham	Various WWTP Improvements.		8/1/2027	\$ 20,000,000
Elsah	Study wastewater collection and conveyance system to serve unsewered areas	7847	12/31/2027	\$ 12,504,333
Four Rivers Sanitation Authority	Treatment facility improvements	7786	3/1/2027	\$ 29,716,585
Four Rivers Sanitation Authority	Installation of chemical dosing equipment.	7787	2/1/2028	\$ 3,948,700
Four Rivers Sanitation Authority	Installation of sidestream fermentation and selective wasting facilities.	7788	3/1/2030	\$ 26,641,400

NOT SCORED PROJECTS: PROJECTS WITHOUT PLANNING APPROVAL AS OF MARCH 31, 2026

Loan Applicant	Project Description	L17#	Estimated Construction Start Date	Projected Loan Amount
Fox River Water Reclamation District	Electrical equipment improvements at the Albin D. Pagorski (ADP) Plant and North Plant.	7616	3/15/2027	\$ 44,000,000
Freeport	Replace anaerobic digesters, wastewater solids thickening and dewatering equipment, and supporting facilities. A new solids digestion and processing facility will be constructed	7822	10/1/2027	\$ 47,030,000
Freeport	Phase 1- Stormwater management improvements.	6927	10/1/2026	\$ 1,800,000
Freeport	Phase 2- Stormwater management improvements.	6928	7/1/2027	\$ 850,000
Freeport	Phase 3- Stormwater management improvements.	6929	7/1/2027	\$ 1,000,000
Freeport	Phase 4- Stormwater management improvements.	6930	7/1/2028	\$ 3,500,000
Freeport	Phase 5- Stormwater management improvements.	6931	7/1/2029	\$ 1,600,000
Freeport	Phase 6- Stormwater management improvements.	7119	7/1/2030	\$ 1,500,000
Geneva	Solids handling and disinfection improvements.	6226	4/1/2027	\$ 61,000,000
Gibson City	A new headworks building, a new excess flow concrete tank, a new screw press, an upgraded CSO structure, construction of a new sewer line, and relocation of a firing range.	7838	2/1/2027	\$ 20,738,000
Glen Carbon	Replacement and extension of Interceptor Sanitary Sewer and construction of an overflow basin for wet weather events.	7955	12/15/2028	\$ 15,000,000
Grand Prairie Sanitary Dist.	Construction of a new WWTP, lift stations and collection system to serve the district service area.		5/1/2027	\$ 11,000,000
Grand Ridge	Construct a new sanitary sewer collection System and wastewater treatment plant to serve an unsewered community.	7443	5/1/2027	\$ 8,017,000
Grayville	Lift station, lagoon, aeration system improvements.		7/1/2027	\$ 188,400
Greenville	WWTP proposed improvements include an influent screen, drying beds, and nutrient removal equipment		10/30/2027	\$ 3,370,000
Homer Glen	Various WWTP improvements, installation of a new lift station along Gougar Road.	7782	1/1/2028	\$ 15,968,320
Hudson	Construction of gravity sewer system.		11/1/2027	\$ 21,192,850
Kincaid	Phase 3: Improvements to the southwestern part of the Village	5981	3/15/2027	\$ 1,400,000
Kincaid	Phase 2: Improvements to the central part of the Village	5980	7/15/2027	\$ 2,800,000
Kingston	New WWTF.	7328	3/31/2027	\$ 6,193,000
Lake County Department of Public Works	Antioch Township Sewerage (Phase 1)		3/1/2027	\$ 5,800,000

NOT SCORED PROJECTS: PROJECTS WITHOUT PLANNING APPROVAL AS OF MARCH 31, 2026

Loan Applicant	Project Description	L17#	Estimated Construction Start Date	Projected Loan Amount
Lake County Department of Public Works	The Antioch Township Sanitary Sewer Project is intended to extend public sanitary sewer service to currently unsewered areas.		3/1/2027	\$ 5,800,000
Lawrenceville	New WWTP to improve treatment efficiency and nutrient removal.		7/1/2028	\$ 23,574,000
Leland	Provide new sanitary collection system and wastewater treatment plant to serve an unsewered community.		10/1/2027	\$ 15,612,000
Lena	Improvements include maintaining the 54" pipe and installing a second 54" pipe parallel to the existing culvert and add two 60" RCP culverts, constructing a 2.5 acre wet retention pond	7031	3/1/2027	\$ 1,750,000
Lena	Improvements include installing a box culvert	7032	3/1/2027	\$ 2,652,255
Lena	Upsizing the Storm Sewer to a 36" RCP and add four stormwater inlet controls	7033	3/1/2027	\$ 1,310,992
Lena	Improvements include upsizing storm sewer pipes to 18" and 24" RCP, and rehab existing stormwater inlets.	7034	3/1/2027	\$ 1,510,890
Lomax	Construct new sanitary collection and treatment system for an unsewered community.		7/1/2027	\$ 7,583,000
Lovington	Various WWTP Improvements at the WWTP.		12/15/2027	\$ 2,500,000
Maple Park	Expansion of existing WWTP with the addition of a new Aeromod treatment system, new raw sewage pump station, UV disinfection system, and sludge storage tank.	7750	9/1/2026	\$ 6,148,900
Metropolitan Water Reclamation District of Greater Chicago	MWRDGC 06-358-2M Gate Control Equipment Upgrade at TARP Control Structures. Kirie WRP.	7863	2/19/2027	\$ 3,000,000
Metropolitan Water Reclamation District of Greater Chicago	MWRDGC Contract No. 24-278-3M Replacement of Tunnel and Reservoir Plan (TARP) Coarse Screen Hoist and Installation of Low-Level Interceptor Screen. Calumet WRP.	7852	1/10/2028	\$ 6,000,000
Millstadt	Remove and replace WWTP blower equipment, air piping, valves, and DO monitors.		8/15/2026	\$ 1,400,000
Mineral	Construct new sanitary sewer collection system for an unsewered community.		7/1/2027	\$ 9,000,000
Murphysboro	Repair and replace sanitary sewer mains		10/1/2027	\$ 380,525
Niantic	Storm sewer improvements.		10/1/2027	\$ 2,857,700
Petersburg	Replace existing STP with a new mechanical plant		10/1/2027	\$ 20,000,000
Pinckneyville	New WWTP and decommissioning of 2 existing WWTPs.	5257	3/1/2028	\$ 35,000,000
Quincy	Phase 3 WWTP Rehabilitation	4138	4/5/2028	\$ 4,000,000
Quincy	Construction of aerated static pile composting system		4/3/2028	\$ 4,200,000
Quincy	Phase 2 WWTP Rehabilitation	4137	1/4/2027	\$ 5,000,000
Raymond	Treatment plant improvements.	7798	9/1/2026	\$ 1,050,000

NOT SCORED PROJECTS: PROJECTS WITHOUT PLANNING APPROVAL AS OF MARCH 31, 2026

Loan Applicant	Project Description	L17#	Estimated Construction Start Date	Projected Loan Amount
Scales Mound	Sanitary sewer improvements.	7449	3/1/2027	\$ 960,000
Shelbyville	Chemical building improvements and additional of 1500 LF of new storm sewer	7993	10/1/2026	\$ 6,098,400
Standard	New collection system.		7/1/2027	\$ 5,500,000
Steeleville - Percy Area Sanitary District	New combined treatment plant, terminal lift station, forcemain.	7888	3/15/2028	\$ 11,000,000
Sterling	Phase 1: Construct a new 3.6 MGD activated sludge wastewater treatment plant.	8025	3/1/2028	\$ 49,660,000
Sterling	Phase 2: Construct a new influent lift station at existing WWTP, convert existing aerated lagoon to excess flow lagoon, construct new lift station and forcemain.	8026	12/1/2028	\$ 23,682,000
Toledo	Add floating cover on existing lagoon cells, add aeration in existing outlet structure.	7857	3/15/2028	\$ 2,226,000
Vandalia	WWTP Improvements.		11/1/2027	\$ 4,627,000
Wauconda	Wastewater treatment plant improvements.	6586	3/1/2028	\$ 18,110,000
Williamson	Construction of a sanitary sewer system to serve an unsewered community.	7213	3/1/2028	\$ 3,000,000
Projects without Planning Approval Total				\$ 1,027,036,880

Funding Reserved	\$ 627,035,579
Funds Exhausted	\$ 1,390,970,635
Construction Start Date	\$ 616,259,479
No Planning Approval	\$ 1,027,036,880
	\$ 3,661,302,573