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Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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FINAL 2025 INTENDED USE PLAN

For the

CLEAN WATER STATE REVOLVING FUND

April 8, 2025



This information is available in alternate format. Please contact 617-292-5500.

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EXECUTIVE SUMMARY

The Massachusetts Department of Environmental Protection (MassDEP) is pleased to present the Final Calendar Year 2025 Intended Use Plan (IUP). The IUP details the projects, proponents, total project costs, and amount of funding being offered through the Clean Water State Revolving Fund (CWSRF) program. The CWSRF is a joint federal-state financing program that provides subsidized loans and grants to improve and protect water quality and public health in the Commonwealth.

The Massachusetts Clean Water Trust (Trust) is offering \$890.8 million to finance wastewater projects across the Commonwealth, subject to the availability of funding. As noted in Table 1, approximately \$480.8 million is being offered to finance 25 new construction projects, and \$377.3 million is being offered to finance 10 previously approved multi-year projects. Additionally, \$3 million is allocated to the emergency set-aside account, \$4.4 million is allocated for the Sewer Overflow and Stormwater Reuse Municipal Grant Program, \$2 million is allocated to fund emergency PFAS or other emerging contaminants projects that mitigate impacts on drinking water sources, \$5 million is directed to the Community Septic Management Program (CSMP) to remediate failed septic systems in participating communities, and \$13 million is set aside to finance planning projects.

The SRF program is offering two grant programs in 2025 (Table 2):

1. The Asset Management Planning (AMP) grant funds 60% of the project cost, up to \$150,000, as a grant from the Trust, with the remaining project costs to be funded by local contributions of cash, a combination of cash and in-kind services, or an SRF loan. This IUP supports 35 clean water AMP project proposals, totaling \$7.9 million, of which \$4.7 million is grants.
2. The Sewer Overflow and Stormwater Reuse Municipal Grant – also known as the Overflow Stormwater Grant (OSG) – is meant to assist small or disadvantaged communities with mitigation of combined sewer overflows (CSO), sanitary sewer overflows (SSO), and stormwater management. The OSG Program utilizes funds received from the EPA. The grants will be made to eligible communities for planning and/or design projects, with a maximum grant award of \$250,000 per applicant. This IUP supports 3 project proposals, totaling \$561,000 in grants, plus \$4.4 million to support OSG rolling applications.

| Final 2025 Clean Water SRF IUP Summary | |
|--|------------------------|
| | |
| Total Wastewater Projects Offered Funding | \$890.8 million |
| 25 New Construction Projects | \$480.8 million |
| 10 Previously Approved Multi-year Projects | \$377.3 million |
| 35 Asset Management Planning Grant Projects | \$4.7 million |
| 3 Sewer Overflow & Stormwater Reuse Municipal Grants (OSG) | \$.56 million |
| SET-ASIDES | |
| Emergency Projects | \$3.0 million |
| Emergency PFAs or Other Emerging Contaminant | \$2.0 million |
| Planning Projects Rolling Applications | \$13.0 million |
| Community Septic Management Program | \$5.0 million |
| Sewer Overflow & Stormwater Reuse Municipal Grant (OSG) | \$4.4 million |

2025 Highlights

- The Federal Fiscal Year 2025 Appropriations for the Base Grant, which finances the 2025 IUP, are not yet confirmed. Massachusetts is estimating the 2025 Base Grant and it can be found in the “Sources and Uses” table in Section V.(A).
- The Infrastructure Investment Jobs Act (IIJA) established two federal grants through the CWSRF:
 1. Supplemental CWSRF Grant
 2. Emerging Contaminants Grant

These grants are being provided annually beginning in 2022 and are anticipated to continue through 2026. For more details on the Federal Grants available for the 2025 IUP, please see *Section V. (A). Sources and Uses Table*.

Using supplemental funds, Massachusetts anticipates being able to offer additional loan forgiveness for eligible projects on the 2025 IUP. The additional loan forgiveness is anticipated to be consistently applied to the IUPs covered under the IIJA federal grants, subject to the availability of funds. Refer to *Section II. (A) Additional Subsidy and Disadvantaged Communities* in this IUP for more details. MassDEP, in consultation with the Trust, may amend this IUP as necessary given that the USEPA continues to issue guidance to states on the implementation of the SRF program.

- With the influx of supplemental IIJA funding, the Trust and MassDEP have been able to support an increasing number of projects and project costs since 2022. Many of these large project costs have been necessarily phased over several years, leading to an increase in the carryover costs in this and subsequent IUPs.

| Project Carryover Costs | |
|---|-----------------|
| Number of Projects with Carryover Costs | 10 |
| Total Project Costs | \$1,435,920,427 |
| | |
| Total Carryover Costs for Future IUPS | \$1,292,196,405 |
| 2025 | \$377,270,000 |
| 2026 | \$467,673,593 |
| 2027 | \$330,056,464 |
| 2028 | \$117,196,348 |

- The Trust and MassDEP will continue to support these carryover project commitments, for projects programmed in previous IUPs and new projects programmed in this IUP. Applicants

should be aware that subsequent IUPs will review available funding and determine if multi-year project approval for new projects is possible.

- It is critically important for awardees to closely manage and control project costs. Requests for project cost increases may be submitted for consideration after the project has bid. All requests will be evaluated against available funding. The Trust and MassDEP are unable to provide assurances that project cost increases will be funded.

Some of the key provisions of IIJA include amendments to the Clean Water Act (CWSRF Program):

- **American Iron and Steel (AIS)** – The AIS procurement requirement is permanent for CWSRF treatment works projects going forward.
- **Build America, Buy America (BABA) Act** – With the inclusion of the BABA Act, the IIJA expands domestic sourcing requirements for CWSRF projects that are funded with federal capitalization grants. Additionally, per the USEPA, projects being co-funded by an SRF loan and a Congressionally Directed Spending grant are required to comply with the BABA Act. Further details are available at the USEPA [Build America, Buy America \(BABA\)](#) webpage. All projects should anticipate complying with the BABA Act unless otherwise notified by MassDEP.
- The IIJA establishes an additional subsidy range of 10% to 30% for the annual CWSRF Base Grant. Congress also requires that states use 10% of the annual CWSRF Capitalization Grant for additional subsidy. Massachusetts expects to provide additional subsidy of no less than 20% on a Base award of \$27.7 million in 2025. See chart in Section II. (A).

Additional subsidy will be provided in the form of loan forgiveness for disadvantaged communities that might otherwise be unable to afford to undertake a project. MassDEP and the Trust will continue to provide loan forgiveness as a percentage of principal. Further details may be found in Section II. (A) of this IUP. Information about the Trust's Annual Affordability Calculation may be found on the following webpage: [The Disadvantaged Community Program](#).

- The Trust is offering Tier 1 loan forgiveness for projects with a renewable energy component regardless of Disadvantaged Community status, unless the community is already a Tier 2 or 3.
- To better address specific state priorities, Section 302 of the 1996 Safe Drinking Water Act Amendments, allow states the flexibility to move funds between the CWSRF and the Drinking Water State Revolving Fund (DWSRF) programs. Massachusetts will transfer funds from the CWSRF to the DWSRF program in the amount of 33% of the anticipated 2025 DWSRF base and IIJA grant amounts. *Refer to the "Sources and Uses" table in Section V. (A).* Massachusetts is transferring these funds to meet the increased demand for Drinking Water projects caused by the increasing prevalence of PFAS in drinking water systems that must

be remediated. Furthermore, Massachusetts reserves authority of future transfers of supplemental IIJA funds.

- To encourage communities and public utilities to engage in planning activities, MassDEP is accepting planning loan applications on a rolling basis, subject to the availability of funds.
- Using \$4.4 million of the OSG Grant, MassDEP is implementing a rolling grant application process, subject to the availability of funds, for new planning and/or design projects in addition to the projects listed in Table 2. Project priority will be focused on rural communities (populations of 10,000 or less) or disadvantaged communities. The OSG program is intended to address infrastructure needs for combined sewer overflows (CSO), sanitary sewer overflows (SSO), stormwater management and subsurface water drainage. Eligible communities may apply for a grant of up to \$250,000 to implement planning and/or design activities by submitting an on line grant application at <https://www.mass.gov/lists/state-revolving-fund-applications-forms>. MassDEP may cap project costs based on the scope of the project and the availability of funds. All federal fund grant recipients must comply with the Uniform Grant Guidance, including the procurement provisions, as outlined here: <https://www.mass.gov/doc/additional-subsidy-as-a-grant-guidance/download>. MassDEP reserves the right to monitor project proposal costs and cap project costs based on the availability of funds.

MassDEP appreciates the efforts that all project proponents have invested in the development of project proposals and recognizes their intent to enhance and protect the quality of water ways in the Commonwealth.

TABLE 1
CLEAN WATER STATE REVOLVING FUND
Calendar Year 2025 CWSRF Intended Use Plan

NEW PROJECTS

| Rating | Applicant | SRF ID | Project | Project Cost | 2025 IUP Cost |
|------------------------------|----------------------|--------|--|----------------------|----------------------|
| 556 | HULL #(PF) | 19112 | Secondary Clarifiers, Grit, and Building Upgrades | \$9,630,000 | \$9,630,000 |
| 556 | FITCHBURG #(PF)(SG) | 19049 | CSO 045, 083 Separation/Rehabilitation | \$29,926,400 | \$29,926,400 |
| 554 | CHATHAM (BG) | 18980 | Chatham Sewer Extension Phase 1F | \$31,190,000 | \$31,190,000 |
| 551 | ORLEANS (H)# (SG) | 19118 | Lakes and Ponds Area Collection System and PS | \$34,670,000 | \$34,670,000 |
| 549 | NEW BEDFORD #(PF) | 19143 | Phase 1 Deane Street Sewer Separation | \$83,810,000 | \$2,310,000 |
| 548 | ROCKLAND #(PF)(BG) | 19007 | Wastewater Treatment Plant Upgrades | \$32,510,000 | \$32,510,000 |
| 547 | NEW BEDFORD #(PF) | 19146 | Wamsutta Street Pumping Station Improvements | \$6,815,000 | \$6,815,000 |
| 544 | PROVINCETOWN (H)# | 19076 | Provincetown Satellite Treatment Facility | \$25,000,000 | \$25,000,000 |
| 544 | LOWELL (H)#(PF) | 19108 | Phase 3A Sewer System Separation Project | \$49,500,000 | \$5,000,000 |
| 543 | FALL RIVER #(PF)(SG) | 19125 | Mothers Brook Sewer Improvements | \$21,020,000 | \$21,020,000 |
| 543 | HAVERHILL #(PF) | 18993 | Locke Street Sewer Separation - Phase 2 | \$14,667,000 | \$14,667,000 |
| 543 | FALL RIVER #(PF)(SG) | 19009 | Stafford Square Flood Mitigation | \$29,386,600 | \$28,980,000 |
| 543 | LOWELL (H)#(PF) | 19109 | Phase 2A Centralville Sewer Separation Project | \$37,900,000 | \$4,500,000 |
| 543 | NEW BEDFORD #(PF) | 19144 | Phase I Sewer System Rehabilitation | \$10,875,000 | \$10,875,000 |
| 543 | REVERE (H)#(PF) | 19086 | Phase 16 Construction - I/I & Capacity Improvement | \$12,905,000 | \$12,905,000 |
| 542 | LOWELL (H)#(PF) | 19130 | Downtown Area and Interceptor Sewer Improvements | \$6,000,000 | \$6,000,000 |
| 542 | FALMOUTH (PF) | 19136 | Falmouth TASA Phase 1 Collection and Recharge | \$60,000,000 | \$50,000,000 |
| 541 | HULL #(PF) | 19127 | Collection System Improvements Phase 2 | \$16,660,000 | \$16,660,000 |
| 540 | EASTHAM (H)(PF) | 18984 | Eastham Wastewater Phase 1 | \$170,028,400 | \$50,000,000 |
| 540 | BARNSTABLE (H)(PF) | 19003 | Phinney's Lane Neighborhoods Sewer Expansion | \$45,070,464 | \$10,000,000 |
| 540 | MASHPEE (PF)(SG) | 19097 | Mashpee-Wakeby Watershed Wastewater System | \$17,230,000 | \$17,230,000 |
| 539 | HARWICH (PF)(SG) | 19044 | Harwich Great Sand Lakes Sewer Extension | \$31,130,000 | \$31,130,000 |
| 539 | NANTUCKET (H)# | 19046 | Phase 2 Surfside WWTF Improvements | \$16,500,000 | \$16,500,000 |
| 538 | BARNSTABLE (H)(PF) | 19085 | Centerville Village Sewer Expansion - South Phase | \$15,000,000 | \$10,000,000 |
| 538 | SWAMPSCOTT (H)# | 18976 | Sewer Rehabilitation in Phase 2B Area | \$3,283,000 | \$3,283,000 |
| TOTAL OF NEW PROJECTS | | | | \$810,706,864 | \$480,801,400 |

(Count: 25)

(Average Rating: 544.24)

(BG) - Base Capitalization Grant

(D) - Dropped by Applicant

(H) - Housing Choice Communities

(PF) - Affordability Criteria applicable, eligible for Principal Forgiveness

(RE) - Potential Renewable Energy Projects

(SG) - BIL CWSRF General Supplemental Grant

- Projects contains Energy Efficiency, Renewable Energy and/or meets EPA's definition of a Green Project (<https://www.epa.gov/greeningepa/energy-and-emissions-epa>)

MULTI-YEAR CARRYOVER AND STATUTORY PROJECTS

| Applicant | SRF ID | Project | Project Cost | 2025 IUP Cost |
|---|--------|---|---------------|---------------|
| BARNSTABLE (H)(PF) | 16683 | Route 28 West Sewer Expansion Project | \$56,600,000 | \$10,000,000 |
| BARNSTABLE (PF)(SG) | 16677 | Nitrogen Removal Improv. & New Headworks Facility | \$109,330,000 | \$20,000,000 |
| BOSTON WATER AND SEWER COMMISSION (H)# | 16690 | East Boston Sewer Separation Phase IV | \$143,936,993 | \$50,000,000 |
| DENNIS (PF) | 16676 | Phase 1 - WRRF and Collection System | \$196,315,000 | \$50,000,000 |
| GLOUCESTER (H)(PF)(SG) | 16775 | WPCF Secondary Treatment and Facility Upgrades | \$205,972,280 | \$50,000,000 |
| LOWELL | 16760 | Centralville Sewer Separation Program – Phase 1 | \$57,500,000 | \$34,500,000 |
| MASHPEE (PF)(BG) | 16791 | Phase 2 Mashpee Treatment and Collection System | \$96,100,000 | \$32,770,000 |
| MASSACHUSETTS WATER RESOURCES AUTHORITY | 6822 | DITP Clarifier #2 | \$289,359,690 | \$50,000,000 |
| NEW BEDFORD (PF)# | 16873 | Wastewater Collection System Improvements | \$74,965,000 | \$30,000,000 |
| YARMOUTH (PF) | 8349 | Phase I - WRRF and Collection System | \$205,841,464 | \$50,000,000 |

| | | | | |
|---|--|--|------------------------|----------------------|
| TOTAL OF MULTI-YEAR CARRYOVER AND STATUTORY PROJECTS | | | \$1,435,920,427 | \$377,270,000 |
|---|--|--|------------------------|----------------------|

(Count: 10)

MassDEP PRIORITY PROJECTS

| Applicant | SRF ID | Project | Project Cost | 2025 IUP Cost |
|---|--------|-------------------------------------|--------------|---------------|
| COMMUNITY SEPTIC MANAGEMENT | 3850 | Community Septic Management Program | \$5,000,000 | \$5,000,000 |
| EMERGENCY PFAS REMEDIATION SET-ASIDE | 18911 | | \$2,000,000 | \$2,000,000 |
| EMERGENCY SRF SET-ASIDE | 2977 | | \$3,000,000 | \$3,000,000 |
| PLANNING SRF SET-ASIDE | 13575 | | \$13,000,000 | \$13,000,000 |
| SEWER OVERFLOW AND STORMWATER REUSE SET-ASIDE | 18972 | | \$4,400,000 | \$4,400,000 |

| | | | | |
|---|--|--|---------------------|---------------------|
| TOTAL OF MassDEP PRIORITY PROJECTS | | | \$27,400,000 | \$27,400,000 |
|---|--|--|---------------------|---------------------|

(Count: 5)

PLANNING PROJECTS

| Applicant | SRF ID | Project | Project Cost | 2025 IUP Cost |
|-------------------|--------|--|--------------|---------------|
| BARNSTABLE COUNTY | 19149 | Barnstable County: MFTF PFAS Remediation | \$1,140,489 | \$1,140,489 |

| | | | | |
|-----------------------------------|--|--|--------------------|--------------------|
| TOTAL OF PLANNING PROJECTS | | | \$1,140,489 | \$1,140,489 |
|-----------------------------------|--|--|--------------------|--------------------|

(Count: 1)

| | | | | |
|-----------------------------------|--|--|------------------------|----------------------|
| TOTAL OF INTENDED USE PLAN | | | \$2,275,167,780 | \$886,611,889 |
|-----------------------------------|--|--|------------------------|----------------------|

TABLE 2
CLEAN WATER STATE REVOLVING FUND
Calendar Year 2025 CWSRF ASSET MANAGEMENT & OSG PLANNING PROJECTS

ASSET MANAGEMENT PLANNING PROJECTS

| Rating | Applicant | SRF ID | Project | Project Cost | Grant Amount |
|---------------|---------------------------------|---------------|---|---------------------|---------------------|
| 83 * | OXFORD-ROCHDALE SEWER DISTRICT | 19011 | Collection System Asset Management Plan | \$219,839 | \$131,903 |
| 78 | WESTFIELD | 19041 | Westfield Sewer Asset Management Project | \$130,805 | \$78,483 |
| 77 | WAYLAND | 19074 | Wayland Stormwater Asset Management Plan | \$206,950 | \$124,170 |
| 77 * | LEICESTER WATER SUPPLY DISTRICT | 19022 | WWTP Asset Management Plan | \$245,280 | \$147,168 |
| 77 * | GROVELAND | 19084 | Groveland Asset Management Inventory and Planning | \$115,838 | \$69,488 |
| 75 * | DOVER | 19098 | Dover Phase 2 Stormwater Asset Management Program | \$174,225 | \$104,535 |
| 74 * | LEE | 19026 | WWTP Asset Management Plan | \$175,706 | \$105,424 |
| 72 | FAIRHAVEN | 19051 | Fairhaven Stormwater Asset Management Project | \$250,000 | \$150,000 |
| 72 | METHUEN | 19122 | Methuen Stormwater System EAMS Implementation | \$250,000 | \$150,000 |
| 71 | AUBURN | 18977 | Town of Auburn - Asset Management Plan | \$250,000 | \$150,000 |
| 70 * | MENDON | 19061 | Mendon Stormwater AMP | \$200,000 | \$120,000 |
| 69 | DARTMOUTH | 19057 | Dartmouth Stormwater & Wastewater AMP | \$250,000 | \$150,000 |
| 69 | OXFORD | 19145 | Oxford Culvert Asset Management Plan | \$164,500 | \$98,000 |
| 66 * | GREAT BARRINGTON | 19055 | Collection System Asset Management Plan (Year 5) | \$245,120 | \$147,072 |
| 65 | WESTON | 19047 | Weston Stormwater Asset Management Project | \$224,040 | \$134,424 |
| 65 * | TYNGSBOROUGH | 19101 | Tyngsborough Wastewater: Asset Management Plan | \$248,000 | \$148,800 |
| 64 | LAWRENCE | 18979 | Lawrence Stormwater Asset Management Plan Update | \$240,000 | \$144,000 |
| 63 | LOWELL | 19139 | LRWWU Stormwater AMP Phase 1 | \$250,000 | \$150,000 |
| 63 * | LENOX | 19028 | Collection System Asset Management Plan (Year 3) | \$243,736 | \$146,242 |
| 61 | WAKEFIELD | 19020 | Town of Wakefield Culvert Asset Management | \$250,000 | \$150,000 |
| 61 | HAVERHILL | 19093 | Haverhill Stormwater Asset Management Plan | \$250,000 | \$150,000 |
| 59 | FRANKLIN | 19052 | Franklin Stormwater Asset Management Evaluation | \$250,000 | \$150,000 |
| 58 | WHITMAN | 18975 | Water and Sewer Asset Management Plan | \$297,255 | \$150,000 |
| 56 * | COHASSET | 19089 | Cohasset Sewer Asset Management Services | \$200,000 | \$120,000 |
| 53 | LEXINGTON | 18998 | Lexington Stormwater Asset Management Plan | \$250,000 | \$150,000 |
| 52 | SUDBURY | 19099 | Sudbury Stormwater Asset Management Plan Phase II | \$250,000 | \$150,000 |
| 52 | NEWTON | 19110 | City of Newton Stormwater Asset Management Plan | \$250,000 | \$150,000 |
| 52 | LUNENBURG | 19120 | Lunenburg Asset Management Inventory and Planning | \$99,335 | \$59,565 |

| | | | | | |
|--|--------------------|-------|---|--------------------|--------------------|
| 51 | NEEDHAM | 19135 | Stormwater System Mapping | \$239,300 | \$143,580 |
| 50 | MILTON | 19133 | Milton Asset Management Services | \$250,000 | \$150,000 |
| 49 | MEDWAY | 19095 | Medway Stormwater Asset Management Plan | \$250,000 | \$150,000 |
| 48 | FALL RIVER | 19092 | Fall River Stormwater Asset Management Plan | \$250,000 | \$150,000 |
| 43 | MILFORD | 19096 | Milford Stormwater Asset Management Plan | \$250,000 | \$150,000 |
| 42 | NORTH ATTLEBOROUGH | 19062 | Stormwater Assent Management Plan | \$250,000 | \$150,000 |
| 37 | NORTHBOROUGH | 19100 | Northborough Water/Stormwater AMP | \$236,000 | \$141,600 |
| TOTAL OF ASSET MANAGEMENT PLANNING PROJECTS | | | | \$7,905,929 | \$4,714,454 |

(Count: 35)

OSG PLANNING PROJECTS

| Rating | Applicant | SRF ID | Project | Project Cost | Grant Amount |
|--|-----------|--------|--|------------------|------------------|
| 62 | CHICOPEE | 19027 | Downtown Sewer Separation Project | \$250,000 | \$250,000 |
| 59 | HOLYOKE | 19013 | Final EIR for Holyoke's CSO Long Term Control Plan | \$250,000 | \$250,000 |
| 46 | MARION | 19008 | 290 Delano Road Drainage Improvements-Design | \$61,000 | \$61,000 |
| TOTAL OF ASSET MANAGEMENT PLANNING PROJECTS | | | | \$561,000 | \$561,000 |

(Count: 3)

| | | |
|---------------------------------------|--------------------|--------------------|
| TOTAL OF PROJECT PRIORITY LIST | \$8,466,929 | \$5,275,454 |
|---------------------------------------|--------------------|--------------------|

* - small systems

BACKGROUND

In 1987, Congress established a program of Base Capitalization Grants for states to create the CWSRF loan programs. These programs provide state-administered subsidized loans to finance the construction of publicly owned water pollution abatement projects. Under the CWSRF program, states provide a 20% match to the federal Base Capitalization Grant to create loan funds. Projects to be financed are selected using a priority ranking system based upon the public health and environmental protection benefits of the proposed projects and improved compliance.

The CWSRF is jointly administered by MassDEP and the Trust. MassDEP manages the technical aspects of the project development, while the Trust manages the disbursement of funds and the sale of bonds to provide additional capital to the program.

Application Process

In May 2024, MassDEP launched the annual SRF project solicitation for new construction projects, Asset Management Planning Grants, and Sewer Overflow and Stormwater Reuse Municipal Grants, for the 2025 calendar year's financing cycle. [2025 IUP Project Solicitation Notification](#) The applications, called Project Evaluation Forms (PEF), along with supporting documentation, were due by the end of July. The information provided in the PEF allowed MassDEP to evaluate and rank projects based upon the severity of the public health or environmental problem that is being addressed and the effectiveness of the proposed solution. [CWSRF PEF Construction Ranking System](#)

In addition to the annual project solicitation period, MassDEP accepts applications on a rolling basis, subject to the availability of funds, for planning projects, the Community Management Septic Program, and OSG planning/design grants.

MassDEP accepts applications online through the use of an electronic system called the [eSRF portal](#). For those wishing to submit a project or loan application, please contact the SRF support team by email at SRFMADEP@mass.gov for access to the portal.

The Intended Use Plan/Project Priority List

Pursuant to the applicable provisions of the Federal Water Pollution Control Act of 1972, as amended, Chapter 21 of the General Laws, and 310 CMR 44.00, MassDEP has developed its Calendar Year 2025 Intended Use Plan/Project Priority List (IUP/PPL), with its attendant ranking of water pollution abatement projects as noted in Table 3. A project must appear on the PPL and the IUP Project Listing to receive financial assistance under the CWSRF program.

This IUP details approximately \$931.7 million in financing and describes Massachusetts' intended uses for all funds available in the CWSRF program for 2025. *Refer to the "Sources and Uses" table in Section V. (A)* It includes the projects that Massachusetts expects to provide financial assistance to and an overview on how the Commonwealth will comply with federally mandated requirements.

Loan Interest Rates

All new projects receiving financial assistance from the CWSRF will be eligible for 2% interest

rate loans or, in certain instances, an interest rate below 2%. The Commonwealth subsidizes these loans, funding the spread between market interest rates and the awarded loan interest rates. Certain priority projects, such as PFAS remediation, or those with the primary purpose of nutrient enrichment reduction, may be eligible for 0% interest rate loans. A determination by MassDEP will be made as to the eligibility for 0% interest rate loans before the loan is permanently financed and put into repayment status. The standard term for construction loans is 20 years; however, loans with a demonstrated useful life can be financed up to a 30-year term. Loans with financing terms longer than 20 years receive a slightly higher interest rate based on market rates at the time of closing. The interest rate for 30-year loans has been 2.20% for the last four financing cycles.

Communities that have earned the [Housing Choice](#) designation at the time of the SRF project solicitation are eligible to have its loan's interest rate reduced by 0.5% (for example from 2% to 1.5% for a standard term loan). However, under no circumstance can the interest rate fall below 0%. For example, if a community qualifies for a 0% interest rate loan for a nutrient reduction project, it cannot receive an added discount through the Housing Choice designation. Housing Choice initiative communities must also certify to the enterprise fund requirements noted in Section II. (A).

Additionally, communities that implement Community Septic Management Program (CSMP) loans and offer an interest rate reduction to homeowners earning below the area median income (AMI) threshold, may be eligible for a 0% interest rate on the portion of the CSMP loan issued to eligible homeowners. Eligibility for the loan is subject to review by MassDEP and an affirmative vote by Trust's Board of Trustees.

2025 CWSRF Program Deadlines

To be considered for financing priority, communities must have appropriated the necessary local project funds or have committed to a schedule to obtain those funds by **June 30, 2025**.

Completed loan applications must be submitted to MassDEP at the earliest possible time, but not later than October 3, 2025. A complete application must contain the local debt authorization and the required supporting documentation. Any project not meeting these deadlines will be removed from the IUP Project Listing. A project on the IUP Project Listing may be bypassed if MassDEP determines that the project will not be ready to proceed during the financing period. Subject to the availability of funds, project(s) bypassed may be replaced by the highest ranked priority project(s) on the PPL that are ready to proceed. Following receipt of a complete loan application package, MassDEP must issue a Project Approval Certificate to the Trust, no later than **December 31, 2025**, certifying the total costs of the project determined to be eligible for financial assistance. The Trust then proceeds to execute loan commitments.

CWSRF Information and Resources

All SRF related documents, including this IUP, the [priority ranking system](#), loan application forms, regulations, and IUPs from the previous year, may be found on the MassDEP website at: [State Revolving Fund \(SRF\) Loan Program](#).

I. CALENDAR YEAR 2025 PROJECT FINANCING

In calendar year 2025, MassDEP expects to finance 25 new construction projects and 10 previously approved multiyear projects totaling \$858.1 million, subject to the availability of funding. Included in this amount is a \$3 million emergency reserve to finance unanticipated problems of acute public health concern that may arise during the year, and \$2 million is allocated to fund emergency PFAS or other emerging contaminants projects that mitigate impacts on drinking water sources. Additionally, \$5 million is allocated to the Community Septic Management Program (CSMP), and \$13 million to finance planning projects.

The SRF program is offering two grant programs in 2025:

1. The Asset Management Planning (AMP) grant funds 60% of the project cost, up to \$150,000, as a grant from the Trust, with the remaining project costs to be funded by local contributions of cash, a combination of cash and in-kind services, or an SRF loan. This IUP supports 35 clean water AMP project proposals, totaling \$7.9 million, of which \$4.7 million is grants.
2. The Sewer Overflow and Stormwater Reuse Municipal Grant – also known as the Overflow Stormwater Grant (OSG) – is meant to assist small or disadvantaged communities with mitigation of combined sewer overflows (CSO), sanitary sewer overflows (SSO), and stormwater management. The OSG Program utilizes funds received from the EPA and the grants will be made to eligible communities for planning and/or design projects. The maximum grant award will be \$250,000 per applicant. This IUP supports 3 project proposals, totaling \$561,000 in grants, plus \$4.4 million to support OSG rolling applications

Table 1 is the list of projects recommended for financing for 2025. Table 3 is the extended PPL. Tables 2 lists the projects that have been selected to receive AMP or OSG grants.

II. CWSRF PROGRAM COMPONENTS AND REQUIREMENTS

A. Additional Subsidy and Disadvantaged Communities

Federal law applicable to the 2025 CWSRF Base Grant requires that a minimum of 20% of the grant amount, but no more than 30%, be provided as additional subsidy to Disadvantaged Communities based on the affordability tier system, provided eligible applicants exist. The Infrastructure Investment and Jobs Act (IIJA) added two grants to fund CW projects, each with required additional subsidy:

| Grant | Types of Projects Eligible for Additional Subsidy | Minimum Percent of Grant for Additional Subsidy |
|--------------------------------|--|---|
| CW SRF Base Grant | CW Construction Projects | 10% - 30% IIJA 10% Congress (*) |
| CW SRF Supplemental Grant | CW Construction Projects | 49% |
| CW Emerging Contaminants Grant | Emerging Contaminant Projects Construction Projects | 100% |

(*) IIJA establishes an additional subsidy range of 10% to 30% for the annual CWSRF Base Grant. Congress also requires that states use 10% of the annual CWSRF Capitalization Grant for additional subsidy. These percentages are added, resulting in a minimum subsidy of 20%.

Eligible construction projects in [Disadvantaged Communities](#) will receive additional subsidy, subject to the availability of funds, in the form of loan forgiveness. Massachusetts has established affordability criteria to identify Disadvantaged Communities, which serves as the basis of the distribution of loan forgiveness. The assignment of communities to an affordability tier is based on an adjusted per capita income (APCI) calculation. Tier rankings are calculated annually by comparing a community's APCI as a percentage of the Commonwealth's APCI. See the following table for the tier breakdown.

Information about the Trust's Annual Affordability Calculation may be found on the following webpage: [The Disadvantaged Community Program](#)

| Tier | Percent of State APCI | Minimum Loan Forgiveness |
|------|------------------------------------|--------------------------|
| 1 | 80% or greater, but less than 100% | 3.3% |
| 2 | 60% or greater, but less than 80% | 6.6% |
| 3 | Less than 60% | 9.9% |

IIJA funding may increase the amount of loan forgiveness to Disadvantaged Communities beyond these standard offerings.

Projects that have a renewable energy component will qualify as a Tier 1 community and receive loan forgiveness for the portion of the loan that is financing the renewable energy component, except where the community is already a Tier 2 or 3.

Loan forgiveness will be awarded to construction contracts that are executed by June 30, 2026, and may be limited to the lesser of the executed contracts or the IUP cost. Planning projects are not eligible for loan forgiveness.

In addition to meeting the [Affordability Criteria](#), under Massachusetts General Law Chapter 259 of the Acts of 2014, *An Act Improving Drinking Water and Wastewater Infrastructure*, applicants for additional subsidy are required to:

- establish water enterprise funds (or equivalent separate restricted accounts); and,

- not have made any transfers from such enterprise fund in the last five years to fund the community's general operating budget.

B. Green Infrastructure

Congress requires that at least 10% of the federal CWSRF Base and IJJA Supplemental CWSRF grants be dedicated to Green Infrastructure projects, or components, as defined by the USEPA. For Massachusetts, this may require that approximately \$13.8 million be allocated towards Green Infrastructure projects that minimize greenhouse gas emissions and energy use. For 2025, MassDEP will work to determine the value of the Green projects or portions of projects that qualify as Green. The total value of green components of those projects will be determined when detailed project applications are submitted. MassDEP expects to meet the minimum \$13.8 million that USEPA requires to be allocated towards Green Infrastructure projects.

C. Fiscal Sustainability Planning

For treatment works proposed for repair, replacement, or expansion, the USEPA requires that borrowers develop and implement a fiscal sustainability plan (FSP) that includes:

- an inventory of critical assets that are a part of the treatment works;
- an evaluation of the condition and performance of inventoried assets or asset groupings;
- a certification that the recipient has evaluated and will be implementing water and energy conservation efforts as part of the plan; and
- a plan for maintaining, repairing, and, as necessary, replacing the treatment works, and a plan for funding such activities; or
- a certification that the borrower has developed and implemented a plan that meets these requirements.

At project completion, MassDEP requires certification from the borrower's Project Engineer stating that an FSP has been developed and implemented.

D. Cost and Effectiveness

USEPA requires a certification that the borrower:

- has studied and evaluated the cost and effectiveness of the processes, materials, techniques, and technologies for carrying out the proposed project; and
- has selected, to the maximum extent practicable, a project that maximizes the potential for efficient water use, reuse, recapture, conservation, and energy conservation, considering:
 - the cost of constructing the project,
 - the cost of operating and maintaining the project over its life; and
 - the cost of replacing the project.

MassDEP expects that applicants will have evaluated the cost of their project, as well as the effectiveness of the solution, in the required planning element such as a Comprehensive Wastewater Management Plan or a Project Evaluation Report. These reports typically evaluate alternatives and compare their various life cycle costs. The only additional work is to evaluate that the project maximizes the potential for efficient water use and energy conservation. This evaluation, if not already complete, can be appended to the planning document.

A Cost and Effectiveness Certification form is required to be submitted with each Loan Application package.

E. Architectural and Engineering (A/E) Services Procurement

The USEPA requires that A/E services that are paid with federal funds be procured using the qualifications-based selection process under 40 U.S. Code § 11 or an equivalent state qualifications-based requirement.

There are two Massachusetts statutes for procuring A/E services: Chapter 149 for vertical construction; and Chapter 30B for horizontal construction. Chapter 149 appears to meet the qualifications-based selection requirement while Chapter 30B does not.

Rather than add a third method of procurement or forcing communities into using a different method of procurement for horizontal construction and/or owner's project manager services, the Trust has chosen to not use federal funds for any A/E services. SRF federal funds will still be available for construction services. However, on projects that receive federal funds for construction, the A/E services may be split out into a separate loan using non-federal funds.

F. Project Accounting

The USEPA requires that project accounts be maintained in accordance with the most recent applicable standard. The current standard is Governmental Accounting Standards Board (GASB) Statement No. 34, which was issued in June 1999 and details governmental reporting requirements including standards for reporting infrastructure assets.

E. Set-Aside Activities

Amendments to the Clean Water Act through the IIJA allows states to use 2% of the CWSRF Base and IIJA Supplemental grants for technical assistance. MassDEP and the Trust have contracted with a qualified organization to provide technical assistance to small, rural, and tribal publicly owned treatment works, particularly in Disadvantaged Communities, for the purpose of encouraging participation in the CWSRF program. The [CWSRF technical assistance](#) program will include aiding eligible communities with the preparation of Project Evaluation Forms (PEFs), SRF loan applications, and other relevant documents.

III. SHORT- AND LONG-TERM GOALS

The following are the goals that Massachusetts has set for its CWSRF.

Short-Term Goals

- Solicit projects and prioritize projects that assist the Commonwealth in maximizing the utilization of the IIJA grant funds.
- Increase flexibility for proactive planning with a rolling application process for planning projects.
- Prioritize projects that promote nutrient removal in Nitrogen Sensitive Areas.
- Prioritize projects that eliminate or abate Combined Sewer Overflow discharges.
- Allocate at least 10% of the annual Base and Supplemental CWSRF annual federal grants to Green Infrastructure projects, or components.
- Ensure that wastewater treatment projects financed through the SRF fully consider cost-effective energy efficiency measures and/or renewable energy strategies.
- Finance eligible projects addressing unanticipated problems of acute public health concern that arise during the year and constitute an imminent public health threat.
- Utilize CWSRF set-aside grant funds to ensure that small and rural communities can participate in the SRF program by providing additional assistance.
- Assist small or disadvantaged communities manage wastewater or stormwater by making OSG planning/design grants available on a rolling application basis.
- Provide targeted outreach and engage with communities across the Commonwealth about SRF program benefits, priorities, and opportunities to improve water quality, reduce project costs, and enhance resiliency and cybersecurity.

Long-Term Goals

- Efficiently allocate and distribute the IIJA funds.
- Identify and prioritize additional subsidy for projects in the IUP that serve Disadvantaged Communities.
- Assist stormwater and wastewater treatment plant operators to finance projects to address the impact of climate change and resiliency as indicated in the Commonwealth's [Hazard Mitigation and Climate Adaptation Plan](#), by encouraging resiliency and climate adaptation in the design and construction of water infrastructure.
- Promote systematic asset management planning for water, wastewater, and stormwater utilities to achieve long-term sustainability, implementable climate change mitigation and resiliency measures, and deliver consistent service in a cost-efficient manner by awarding additional points in the ranking system.
- Promote public engagement and program transparency by publishing informative and readily accessible program materials and reports.
- Encourage regionalization and partnerships by awarding additional points in the ranking system for multi-community or regional approach to addressing environmental or public health problem.

IV. ALLOCATION OF FUNDS

A. Criteria and Method for Distribution of Funds

Massachusetts seeks to finance projects that mitigate documented threats to public health and/or impacts to the environment, and for which proponents have completed comprehensive planning and alternatives analysis. Details supplied through the PEFs help MassDEP determine the extent to which projects meet the goals of the program. Once all project proposals have been reviewed and ranked utilizing the [CWSRF PEF Construction Ranking System](#), the PPL is developed (Table 3). With input from the Trust, MassDEP identifies all the sources of funds and spending limits and develops the IUP Project Listing as shown in Table 1.

To be considered eligible for financing, projects must meet state and federal eligibility requirements, must be ready to proceed during the financing period, have appropriated local funds necessary to finance the entire project, and have a MassDEP approved planning element. An approvable planning element can be a Project Evaluation Report, Comprehensive Water Resources Management Plan, Long-term Combined Sewer Overflow (CSO) Strategy, Stormwater Management Plan, or other MassDEP sanctioned planning document. Eligibility includes consistency with the assurances described in this document and the requirements contained within MassDEP's financial assistance regulations: [310 CMR 44.00: The Clean Water State Revolving Fund | Mass.gov](#). Projects on Cape Cod are required to be consistent with the Cape Cod Area-Wide Section 208 Water Quality Management Plan (Cape Cod 208 Plan). Nine Cape Cod communities: Barnstable, Dennis, Falmouth, Harwich, Mashpee, Provincetown, Chatham, Orleans and Yarmouth have proposals on this IUP; the Cape Cod Commission has determined that these projects are consistent with the Cape Cod 208 Plan.

MassDEP reserves the right to increase the amount allocated to any project appearing on this IUP, should additional federal or state funding or program loan capacity become available.

B. Applicant Cap

The Massachusetts SRF regulations (310 CMR 44) place a limit on any one proponent receiving any more than 33% of the available financing each year. Because of the shortfall of available funds relative to the number of worthwhile projects, and to extend financial assistance to as many highly ranked projects as possible, MassDEP is implementing an applicant cap of \$50 million for the 2025 financing period. MassDEP however, reserves the right to waive the applicant cap limitation if MassDEP and the Trust determines that one or more projects on the IUP Project Listing are not ready to proceed. If the applicant cap is waived, communities may see an increase in financing for projects not fully financed on the IUP listing.

C. Project Bypass Procedure

A project on the IUP Project Listing may be bypassed if MassDEP determines that the bypassed project will not be ready to proceed during the financing period. Subject to the availability of funds, projects bypassed may be replaced by the highest ranked priority projects on the PPL that are ready to proceed. **Complete project applications not received by MassDEP by October 3, 2025, will be automatically considered for bypassing.**

The Trust and MassDEP will not add projects to the PPL/IUP beyond those that may qualify for financing as emergency assistance, CSMP, planning projects, or OSG planning/design projects. MassDEP, considering any material program change that would require amendments to this IUP, will provide public notice and an appropriate comment period before issuing an amended IUP.

D. Types of Projects to be Financed

For an eligible borrower's water pollution abatement project to receive financial assistance from the Trust, the project must meet eligibility guidelines. Such eligible projects include, but are not limited to:

- Wastewater Treatment Projects, as defined in 310 CMR 44.03;
- Infiltration Inflow (I/I) Projects, as defined in 310 CMR 44.03;
- Collection System Projects, as defined in 310 CMR 44.03. However, 85% of the expected wastewater flow into the proposed collection system must be for wastewater flows in existence as of July 1, 1995;
- Nonpoint Source Projects, as defined in 310 CMR 44.03;
- Nutrient Management Projects, as defined in 310 CMR 44.03 and evaluated in accordance with 310 CMR 44.04(2);
- Stormwater Projects;
- Green Infrastructure Projects; and,
- The planning or design for any project in one of the categories identified above.

Costs of construction that MassDEP determines as being necessary for the completion of the project are eligible for financing through the loan and can receive a subsidy under the loan, subject to the applicant cap. Costs for planning projects are eligible for financing during the 2025 financing period. Although costs for design are eligible under SRF regulations, only PFAS design and OSG project design will be funded during this financing period. MassDEP may limit the SRF loan for PFAS design to 10% of the total estimated cost of the PFAS mitigation construction project.

V. FINANCIAL MANAGEMENT

A. Sources and Uses Table

The sources of funds available to the Massachusetts CWSRF include the federal Base Grant, the federal supplemental IIJA grants, state matching funds, and borrower loan repayments. The Trust may leverage these funds up to three times. Under this authority, the Trust will offer to finance approximately \$885.5 million of CWSRF eligible projects, and \$5.26 million in grants. This total is reflected below by adding project loans and grants plus the minimum loan forgiveness.

| Final 2025 Clean Water IUP Sources & Uses | |
|---|--------------------|
| Sources | |
| Base Capitalization Grant | \$ 54,491,000 |
| IIJA Supplemental Grant | 83,639,000 |
| IIJA Emerging Contaminant Grant | 7,220,000 |
| Sewer Overflow & Stormwater Municipal Reuse Grant (OSG) | 5,000,000 |
| State Matching Funds | 28,626,000 |
| Leveraged Bond Funds | 500,000,000 |
| Other Program Funds | 252,693,731 |
| Total Sources | 931,669,731 |
| | |
| Uses | Amount |
| Project Loans and Grants | \$ 851,722,770 |
| Minimum Loan Forgiveness | 43,463,084 |
| Transfer to DWSRF | 30,958,677 |
| Administrative Costs | 5,525,200 |
| Total Uses | 931,669,731 |

B. Source of State Match

Based on the anticipated 2025 CWSRF Base and IIJA grants, the state matching funds in the amount listed above are provided to the Trust from the Commonwealth's Capital Plan by the end of June 2025.

C. Fee Income

Recipients of SRF loans are charged an annual administrative fee of 0.15% (15 basis points) against the outstanding loan principal to fund salaries and expenses of the Trust and MassDEP related to SRF project development and loan management. As of September 30, 2024, the Trust has a balance of approximately \$48.9 million in its Administrative Account. Additionally, the Trust may charge an amount not to exceed \$5.50 per \$1,000 as a loan origination fee to offset the costs incurred during its bond issuance. All fee income is CWSRF program income.

D. Program Administration

The Commonwealth of Massachusetts intends to use the full 4% of the federal Base Grant and the CWSRF IIJA Supplemental Grant funds for administrative support of activities related to the CWSRF. Use of those funds is detailed in the CWSRF Grant Application that the Trust files each year with the USEPA.

E. Anticipated Cash Draw Ratio

Massachusetts will draw 100% of the state match funds before drawing federal grant funds.

F. Transfer of Funds Between CWSRF and DWSRF

Section 302 of the 1996 Safe Drinking Water Act Amendments allows states the flexibility to move funds between the Clean and the Drinking Water SRF programs to better address specific state priorities. The USEPA allows an equivalent of up to 33% of the DWSRF Base grant to be transferred between the CWSRF and DWSRF Base Grant. The CWSRF IUP capacity frequently allows Massachusetts to finance all the priority projects each year accounting for about two thirds of the proposed construction projects. Generally, over half of requested DWSRF construction projects go unfinanced. The level of federal grant funding of the DWSRF is insufficient to meet the need for project financing. Transferring a limited amount of funds from the CWSRF to the DWSRF this year and in the future will help increase the overall capacity of the DWSRF and reduce the number of unfinanced projects with minimal impacts to the CWSRF IUP. Massachusetts will transfer funds from the CWSRF to the DWSRF program in the amount of 33% of the anticipated 2025 DWSRF base grant, IIJA supplemental grant amount, and the Emerging Contaminant grant. This transfer will not adversely impact CWSRF project financing in this IUP. Furthermore, Massachusetts reserves authority of future transfers of Supplemental IIJA funds.

G. Additional Subsidy Amounts

In the 2025 CWSRF IUP, Massachusetts intends to award between 20% and 30% of the \$54.5 million Base Grant in additional subsidy to eligible projects. In addition, the Supplemental Grant of \$83.64 million, is required to provide 49%, or \$41 million as additional subsidy. The Emerging Contaminant Grant requires 100% of the grant to be provided as additional subsidy for eligible projects.

VI. Program Management

A. Assurances and Special Conditions

MassDEP and the Trust have provided the required assurances and certifications as part of the Operating Agreement (OA) between Massachusetts and the USEPA. The OA describes the mutual obligations among USEPA, MassDEP, and the Trust. The purpose of the OA is to provide a framework of procedures to be followed in the management and administration of the CWSRF.

The OA addresses the commitment to key CWSRF requirements, including:

- Section 602(a) Environmental Reviews: The CWSRF will conduct environmental reviews according to the [State Environmental Review Process](#) developed for the SRF.

- Section 603(b) (3) Binding Commitments: The CWSRF will enter binding commitments for 120 percent of each quarterly grant payment within one year of receipt of the payment.
- Section 602(b) (4) Expeditious and Timely Expenditures: The CWSRF will expend all funds in the CWSRF in a timely manner.
- Consistency with Planning. The Commonwealth agrees that it will not provide assistance to any project unless that project is consistent with plans developed under Section 205(j), 208, 303(e), 319, or 320.

B. Federal Requirements

A number of federal requirements apply to CWSRF projects in an amount equal to the Base Grant and IIJA Grants including:

- Single Audit Act (2 CFR 200 Subpart F)
- Federal Funding Accountability and Transparency Act (FFATA) reporting
- Federal environmental crosscutters (all projects)
- Project signage to enhance the public awareness of EPA assistance (“[Guidelines for Enhancing Public Awareness of SRF Assistance Agreements](#),” June 3, 2015).
- American Iron and Steel (all treatment works projects, regardless of funding source)
- Build America, Buy America (BABA) Act (group of projects)
- Ineligible Costs: any costs that are prohibited including but not limited to: 2 CFR 200.216, Prohibition on Certain Telecommunications and Video Surveillance Services or Equipment.

All projects should anticipate adhering to all Federal Requirements listed above. MassDEP and the Trust will identify and notify eligible borrowers that will comprise the group of projects (projects receiving federal grants and reported in FFATA), that must comply with these requirements in the USEPA grant applications. Frequently, the group of projects changes as projects move towards construction, usually due to attrition. If changes are made to the group of projects, appropriate amendments to the grant application will be made.

C. Davis-Bacon Wage Rates

The amendments to the Clean Water Act, as part of the Water Resources Reform and Development Act, apply the Davis-Bacon Act requirements to all treatment works projects going forward. The Davis-Bacon requirements do not apply to nonpoint source or decentralized wastewater treatment projects. MassDEP ensures that the required Davis-Bacon language is included in contracts and conducts field verifications of project compliance with the wage rate requirements.

D. American Iron and Steel and the Build America, Buy America Act

On November 15, 2021, the Infrastructure Investment and Jobs Act (IIJA) made the AIS procurement requirement permanent for all treatment works projects. Furthermore, with the

inclusion of the Build America, Buy America (BABA), the IIJA expands domestic sourcing requirements to CWSRF projects funded with federal capitalization grants going forward. Additionally, per the USEPA, projects being co-funded by the SRF loan and Congressional Directed Spending grant are required to comply with the BABA Act. Additional details are available at the USEPA [Build America, Buy America \(BABA\)](#) webpage.

E. Audits and Annual Reports

MassDEP and the Trust will comply with all the auditing and reporting requirements of the USEPA. A single audit is conducted annually and reporting to the USEPA is done through the Office of Water State Revolving Fund (OWSRF) data system (with data updated quarterly), the Annual Report, and FFATA reporting; for details visit the Trust's [Investor Resources page](#).

F. The MBTA Communities Act

The receipt of state funding is contingent upon the awardee being able to certify that it will comply with the Massachusetts General Laws, including G.L. c. 40A, § 3A, the MBTA Communities Act. Compliance with the MBTA Communities Act is determined by the Executive Office of Housing and Livable Communities.

VII. Public Review and Comment

Notice of the availability of the Draft Calendar Year 2025 IUP/PPL and upcoming public hearing was made on January 30, 2025. The [2025 Draft SRF Intended Use Plans and Public Hearing Notice](#) was published in the Boston Globe, on the Commonwealth's website, Mass.gov, and on social media. Additionally, the notice was sent out via email to municipalities, water utilities, and the environmental consultants who have assisted SRF project proponents.

MassDEP accepted written testimony and held a virtual public hearing to receive oral testimony on March 3, 2025. Please see the following summary of comments and a transcript of the oral comments.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/18/2025
Commenter: Ann Frechette
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/18/2025
Commenter: Andrew Haber
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/18/2025
Commenter: Robert Clinton
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/20/2025
Commenter: Mark S. Ells, Barnstable Town Manager
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: George and Susan Oleyer
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Melissa Fischer and Mark Schleinitz
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management. (Uxbridge and Eastham)
MassDEP's Response: Comment considered in development of final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/21/2025
Commenter: Marie P. Fehlig and Bob Staake
Subject: CW 2025 CWSRF IUP
Comment Summary: In agreement with 2/18/2025 letter from Andrew Gottlieb - APCC. The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: A De Marco
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Leonard DiLorenzo
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Marilyn H. Blaustein
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Marceline H. Colton
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Anne and Garry Wyckoff
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/21/2025
Commenter: Cindy Babaian
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Eileen O'Connell
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Pat Hughes
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Lili Flanders
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Marlene Clapp
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Lisa Zuar
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/21/2025
Commenter: Jolanda Ferguson
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Marc Blesoff
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Sharon MacDonald
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Louis Zicht
Subject: CW 2025 CWSRF IUP
Comment Summary: In support of the efforts of the APCC and agree the proposed changes in long term project funding are detrimental to our efforts to pursue projects to protect our Environment. (Cape Cod).
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Andrew Haber
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/21/2025
Commenter: Patricia Marchant
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management.
MassDEP's Response: Comment considered in development of final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/21/2025
Commenter: Lawrence Carr and Paula Gulbicki
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Lynne Montague
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Laura Gill
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: William H. Swift, PG, CHMM
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Marisa Picone-Devine
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: William Benjamin
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/21/2025
Commenter: Ward Ghory
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Paula Tredeau
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Kim Pulsford
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Laurie Hutton-Corr
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Kim Pulsford
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Christine Nolan
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/21/2025
Commenter: Dr. Lindsley Boiney
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Maribeth Khedmaty
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: Rev. Jennifer Valentine
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/21/2025
Commenter: James Garb, M.D.
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/22/2025
Commenter: Marilyn Lucht
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/22/2025
Commenter: Rev. Dr. Bonnie Scott
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/22/2025
Commenter: Francine Hagopian
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/22/2025
Commenter: Lisa Stefkovich
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/22/2025
Commenter: Beth Stein
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/22/2025
Commenter: Jeff Schwartz
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/22/2025
Commenter: Nancy Davison
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/22/2025
Commenter: Craig Maser
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/22/2025
Commenter: Lauren Richmond and Bruce Deely
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/22/2025
Commenter: Sari J Rotter, MD
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/22/2025
Commenter: Susan Evans
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/22/2025
Commenter: John Boiney
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/22/2025
Commenter: Paula Koppel
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/22/2025
Commenter: Robert Garritt
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/22/2025
Commenter: Colin Zick
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/22/2025
Commenter: Nancy Minnigerode
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/22/2025
Commenter: Marvin Menzin
Subject: CW 2025 CWSRF IUP
Comment Summary: In support of the APCC letter for Cape Cod water quality. The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/23/2025
Commenter: Marianne Driskill
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/23/2025
Commenter: David Driskill
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/23/2025
Commenter: Katherine Crandell
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/23/2025
Commenter: John Warshaw
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/23/2025
Commenter: John Warshaw
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/23/2025
Commenter: Hans Stahlschmidt and Patricia Stahlschmidt Hart
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/23/2025
Commenter: Dr. Carmela Abraham
Subject: CW 2025 CWSRF IUP
Comment Summary: In support of the APCC letter for Cape Cod water supply. The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/23/2025
Commenter: Pamela G. Latimer, DC
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/23/2025
Commenter: Elizabeth Perkins
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/23/2025
Commenter: David Cochrane
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/23/2025
Commenter: Michael Brown
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod. (Chatham)
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/23/2025
Commenter: Anca Vlasopolos
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/23/2025
Commenter: Les and Linda VanDine
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/23/2025
Commenter: Dave Langan
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management. (Dennis)
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/23/2025
Commenter: Elizabeth Sears
Subject: CW 2025 CWSRF IUP
Comment Summary: In support of the APCC letter for Cape Cod water quality. The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/24/2025
Commenter: Steven Koppel
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/24/2025
Commenter: Kevin and Lorraine Blute
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/24/2025
Commenter: Dave and Amy Swords
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/24/2025
Commenter: Christina Wiseman
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/24/2025
Commenter: Andrew Haber
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/24/2025
Commenter: Carol Dyer
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: Letter received by mail in support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/24/2025
Commenter: Kevin Heffernan
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod and all of Coastal MA.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/25/2025
Commenter: Jim Teague
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/25/2025
Commenter: Ernie and Patty Judson
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/25/2025
Commenter: James L. Bast
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/25/2025
Commenter: Richard J. Tredeau, MD
Subject: CW 2025 CWSRF IUP
Comment Summary: In support of the APCC letter for Cape Cod water quality. The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/25/2025
Commenter: Bernadette Sullivan Ericson
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management.
MassDEP's Response: Comment considered in development of final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/26/2025
Commenter: Erin Perry, Deputy Director, Cape Cod Commission
Subject: CW 2025 CWSRF IUP
Comment Summary: Letter regarding the Draft 2025 Clean Water Intended Use Plan from the Executive Committee of the Cape Cod and Islands Water Protection Fund Management Board. The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape C
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/26/2025
Commenter: Julian Cyr, State Senator, Cape and Islands District
Subject: CW 2025 CWSRF IUP
Comment Summary: Letter regarding the 2025 draft Intended Use Plan of the Clean Water State Revolving Fund. The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod, Martha's Vineyard, and Nantucket.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/26/2025
Commenter: MaryAlice Florio, Executive Assistant to the Town Administrator, Town of Yarmouth
Subject: CWSRF-19063 and CWSRF-8349 2025 CWSRF IUP and Phase 1 WRRF and Collection System
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management in the Town of Yarmouth.
MassDEP's Response: Consolidated with existing project.

Date: 2/26/2025
Commenter: Christopher DeFronzo
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/26/2025
Commenter: Dorothy Obrien
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: Why not just treat the pond or wait until the home sells to require hook-up?
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/26/2025
Commenter: Dorothy Obrien
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: The Cranberry Valley Golf Course (town owned) abuts John Joseph Pond.
MassDEP's Response: This project is funded on the draft and final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/27/2025
Commenter: Christina Hagopian and Paul Angelini
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/27/2025
Commenter: Shawna Sullivan, Commissioner of Public Works, City of Newton
Subject: CW 19039 PCP Structural Stormwater Control Implementation
Comment Summary: Letter from Mayor Ruthanne Fuller regarding the MassDEP 2025 Draft Intended Use Plan (IUP) for Clean Water SRF rating for Newton's PCP Structural Stormwater Control Implementation for construction of several projects.
MassDEP's Response: This project's PEF score was reviewed and there is no change.

Date: 2/27/2025
Commenter:
Subject: CWSRF-19063 and CWSRF-8349 2025 CWSRF IUP and Phase 1 WRRF and Collection System
Comment Summary: Letter received by mail from the Town of Yarmouth. The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management in the Town of Yarmouth.
MassDEP's Response: Consolidated with existing project.

Date: 2/27/2025
Commenter: Erin Perry, Deputy Director, Cape Cod Commission
Subject: CW 2025 CWSRF IUP
Comment Summary: Letter from Cape Cod Commission Executive Director Kristy Senatori on the Draft 2025 Clean Water IUP. The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/28/2025
Commenter: Chair Sheila Lyons, Board of Regional Commissioners and Speaker Randi Potash, Assembly of Delegates
Subject: CW 2025 CWSRF IUP
Comment Summary: Letter from the Barnstable County Commissioners and the Barnstable County Assembly of Delegates on the Draft 2025 Clean Water IUP. The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 2/28/2025
Commenter: Kristine Nasinnyk
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management.
MassDEP's Response: Comment considered in development of final IUP.

Date: 2/28/2025
Commenter: Susan Cyr, President, Harwich Ponds Coalition
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 2/28/2025
Commenter: Jacquelyn Tupper
Subject: CW 18984 Eastham Wastewater Phase 1
Comment Summary: Letter requesting reconsideration of PEF application for funding along with shared files.
MassDEP's Response: This project has been rescored.

Date: 3/1/2025
Commenter: Barbara and Jack Levitz
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 3/1/2025
Commenter: Christian H. Sears
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management. I fully support the comments previously submitted by The Association of Preserve Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 3/1/2025
Commenter: Lolly and Tom Gerhardstein
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod. We staunchly support the initiatives by APCC.
MassDEP's Response: Comment considered in development of final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 3/1/2025
Commenter: Sandra DeRosa
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod.
MassDEP's Response: Comment considered in development of final IUP.

Date: 3/2/2025
Commenter: Betsy Smith
Subject: CW 2025 CWSRF IUP
Comment Summary: Wastewater management has long been an issue that concerns all of us on the Cape. It is clear that the changes to the 2025 IUP related to limits on town borrowing and the elimination of carry over projects must be rescinded and that the terms and conditions
MassDEP's Response: Comment considered in development of final IUP.

Date: 3/2/2025
Commenter: Diana Preston
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 3/3/2025
Commenter: Tamara Gray, Administrative Assistant, Office of the Town Manager, Assistant Town Manager & Select Board
Subject: CW 2025 CWSRF IUP
Comment Summary: Letter from Mashpee Town Manager, Rodney C. Collins, on the Draft 2025 Clean Water IUP. The changes to the 2025 CWSRF IUP will make advancing clean water projects in Mashpee much more difficult.
MassDEP's Response: Comment considered in development of final IUP.

Date: 3/3/2025
Commenter: Liz Pereira, Wright-Pierce, Funding Specialist
Subject: CW 19006 Sewer Collection System Repair & Replacement 2025
Comment Summary: On behalf of the Town of Nahant, Wright-Pierce is requesting the Massachusetts Department of Environmental Protection (MassDEP) review the Supplemental Rating Criteria for this project, since the draft project rating was reduced by 21 points from the score
MassDEP's Response: This project's PEF score was reviewed and there is no change.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 3/3/2025
Commenter: Mark K. Malloy, Esq., Cascade Strategies, LLC
Subject: CW and DW 2025 CWSRF and DWSRF IUP
Comment Summary: Letter from Joseph F. Nolan, Executive Director, Utility Contractors Association of New England (UCANE). Due to reduced funding allocation overall, lack of the ability to carry over costs to subsequent related new projects or the project cap of \$50 mill
MassDEP's Response: Comment considered in development of final IUP.

Date: 3/3/2025
Commenter: Keith Germain, Wright-Pierce
Subject: CW 19134 Route 6 Corridor Sewer Collection System
Comment Summary: Link for attachment referenced in written testimony for the Town of Swansea Route 6 Corridor Sewer Collection System project.
MassDEP's Response: Consolidated with existing project

Date: 3/3/2025
Commenter: Keith Germain, Wright-Pierce
Subject: CW 19134 Route 6 Corridor Sewer Collection System
Comment Summary: On behalf of the Town of Swansea, Wright-Pierce is requesting the Massachusetts Department of Environmental Protection (MassDEP) reconsider the Supplemental Rating Criteria for this project.
MassDEP's Response: Consolidated with existing project

Date: 3/3/2025
Commenter: Robert L. Brennan, Esq. Chief Legal Officer, Housing Assistance
Subject: CW 2025 CWSRF IUP
Comment Summary: Letter from from Housing to Protect Cape Cod (HPCC)members: Housing Assistance Corporation, Cape Cod Chamber of Commerce and theHome Builders & Remodelers Association of Cape Cod expressing concerns regarding specific provisionsthat may adversely impac
MassDEP's Response: Comment considered in development of final IUP.

Date: 3/3/2025
Commenter:
Subject: CW 19136 Falmouth TASA Phase 1 Collection and Recharge
Comment Summary: Letter received by mail from The Town of Falmouth Select Board on the Draft 2025 Clean Water IUP. The changes to the 2025 CWSRF IUP may impact ongoing wastewater projects in Falmouth.
MassDEP's Response: Comment considered in development of final IUP.

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

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| Date: | 3/3/2025 |
| Commenter: | Mark Ells, Barnstable Town Manager |
| Subject: | CW 2025 CWSRF IUP |
| Comment Summary: | The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod. |
| MassDEP's Response: | Comment considered in development of final IUP. |

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| Date: | 3/3/2025 |
| Commenter: | Christine Bennett, Research & Policy Analyst, MWRA Advisory Board |
| Subject: | CW and DW 2025 CWSRF and DWSRF IUP |
| Comment Summary: | Testimony notes certain changes in the IUP for CWSRF and DWSRF from 2024 to 2025 that raised concerns. |
| MassDEP's Response: | Comment considered in development of final IUP. |

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| Date: | 3/3/2025 |
| Commenter: | Susan Dangel |
| Subject: | CW 2025 CWSRF IUP |
| Comment Summary: | The changes to the 2025 CWSRF IUP threaten continued progress on wastewater management on Cape Cod. (Mashpee) |
| MassDEP's Response: | Comment considered in development of final IUP. |

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| Date: | 3/3/2025 |
| Commenter: | Celestina Rodrigues, DPW Administrative Assistant II |
| Subject: | DW 19034, CW 19032, CW 19031 Aquaria Desalination Plant Purchase, Cashman Road Sewer, Sewer System Rehabilitation Phase 5 |
| Comment Summary: | Three letters from Patrick Hill, Commissioner of Public Works, regarding request for reconsideration of funding on 2025 IUP. |
| MassDEP's Response: | This projects' PEF scores were reviewed and there is no change. |

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| Date: | 3/3/2025 |
| Commenter: | Delaney Campbell, Administrative Assistant, Town of Dennis |
| Subject: | CW 2025 CWSRF IUP |
| Comment Summary: | Letter from the Dennis Select Board, Christopher Lambton, Chairman, on the Draft 2025 Clean Water IUP. The changes to the 2025 CWSRF IUP may prevent Dennis from completing its critical Wastewater Phase 1 project, currently under construction. |
| MassDEP's Response: | Consolidated with existing project. |

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| Date: | 3/3/2025 |
| Commenter: | Audrey R. Starbard, PE, Project Manager, Tighe & Bond |
| Subject: | CW 19148 Eagle Drive Neighborhood Water Main Extension |
| Comment Summary: | Testimony (letter from Jeffrey A. Faulkner, PE Vice President, Tighe & Bond) presenting information for consideration and would appreciate a reevaluation of the project scoring by shifting it back to the DWSRF IUP. |
| MassDEP's Response: | This project has been restored as DW-13706. |

**Summary of Responses to Testimonies Received via Email and Correspondence for the
2025 Draft Intended Use Plan**

Date: 3/3/2025
Commenter: Mike Renshaw, ICMA-CM, MPA, Town Manager, Town of Falmouth
Subject: CW 19136 Falmouth TASA Phase 1 Collection and Recharge
Comment Summary: Letter from The Town of Falmouth Select Board on the Draft 2025 Clean Water IUP. The changes to the 2025 CWSRF IUP may impact ongoing wastewater projects in Falmouth.
MassDEP's Response: Comment considered in development of final IUP.

Date: 3/3/2025
Commenter: Kurt and Lynne Bimmler
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 3/3/2025
Commenter: John and Donna Connolly
Subject: CW 19044 Harwich Great Sand Lakes Sewer Extension
Comment Summary: In support for SRF funding for the Harwich Great Sand Lakes Sewer Extension project and concerned about the drinking wells to the immediate south.
MassDEP's Response: This project is funded on the draft and final IUP.

Date: 3/3/2025
Commenter: Robert Harding
Subject: CW 2025 CWSRF IUP
Comment Summary: The changes to the 2025 CWSRF IUP and the negative impact on the future cost of financing for local projects.
MassDEP's Response: Comment considered in development of final IUP.

Transcript of the 2025 Draft Intended Use Plans Public Hearing for Clean Water and Drinking Water State Revolving Funds, Held Virtually via Zoom on Monday, March 3, 2025, at 1:00 PM

Public Hearing Officer: Robin McNamara, Acting Director of Division of Municipal Services, Mass DEP

Assistant to Public Hearing Officer: Gregory Devine, Environmental Engineer, Mass DEP

Commentors:

3:15 Andrew Gottlieb, Executive Director of the Association to Preserve Cape Cod

6:51 Jennifer Peterson, Executive Director of Massachusetts Waterworks Association

15:04 Mark Ells, Town Manager of Barnstable

18:36 Jeff Faulkner, Engineer, Tighe and Bond

21:21 Anne Frechette, Water Quality Committee Chair for the Great Sand Lakes Association of Harwich

24:20 Bryan Weiner, Engineer and Senior Manager, Tighe and Bond

27:18 Amy Lowell, Wastewater Superintendent, Town of Falmouth

31:13 Michaela Wyman-Colombo, Select Board, Town of Mashpee

33:52 Jacqueline Beebe, Town of Eastham

36:01 Patrick Hill, Commissioner of Public Works, City of Brockton

40:49 Erin Perry, Deputy Director, Cape Cod Commission

0:00

Before we begin, I will give you a brief overview on how the hearing will proceed. To minimize the background noise, the host has muted all participants. We ask that everyone remain muted until it's your chance to speak. If you have joined online and would like to provide oral testimony, please enter your full name and affiliation in the chat box located in the Zoom control panel. If you are on the phone, we will unmute callers one at a time to ask for this information and provide you an opportunity for testimony. If you are facing technical difficulties, please alert us through the chat function. We do ask that you do not use the chat function, however, to provide testimony. Assisting me today is **Gregory Devine**, also of Mass DEP, he will be calling on individuals who have indicated in the chat that they would like to provide testimony.

1:12

I will now begin the actual hearing.

1:16

This is a public hearing for the Commonwealth of Massachusetts Department of Environmental Protection. My name is **Robin McNamara** and I'm the Acting Director of the Division of Municipal Services at Mass DEP and the hearing officer on this matter. You are reminded that this hearing is being recorded. We are here today at 1:00 PM on Monday, March 3rd, 2025 on a virtual public hearing to accept testimony concerning the 2025 Draft Intended use plans for both the Clean Water and Drinking Water State Revolving funds.

On January 30th, 2025, Mass DEP published the draft IUPs and provided notice of their availability in compliance with the Massachusetts General Laws Chapter 30 A. The public hearing notice was published in the Boston Globe and on Mass DEP's website. Outreach was also conducted by social media and e-mail. The draft Intended Use Plan lists by priority ranking those projects that Mass DEP is

recommending for financing. Please note that Mass DEP will not be responding to testimony. All testimony received during the public comment period will be taken into consideration before finalizing the intended use plan. The public comment period closes at the conclusion of this hearing. In a moment, we will begin to unmute those who have identified themselves as wishing to provide oral testimony. We will also prompt the phone participants to identify those who wish to testify. Please speak clearly and distinctly. And I will now open the oral testimony. Greg.

3:15

OK. We first go to **Andrew Gottlieb**.

3:21

I thank you for the opportunity to testify. My name is Andrew Gottlieb, the executive director of the Association to Preserve Cape Cod. As many of you know, Cape has been working diligently for decades now with Mass DEP through various state administrations, all towards the goal of coming up with affordable means to address the nutrient pollution that has degraded Cape Cod's estuaries. Working with legislature and DP, combining the 0-interest loan program with funding from the Cape and Islands Water Protection Trust Fund, the SRF program has become an integral keystone part of any financing for Cape Cod. And in fact, the variety of tools that have been generated over the last several years have resulted in a sea change in the rate of wastewater management projects being proposed on Cape Cod. The IUP provisions that put the borrowing limit and on individual communities and perhaps even more significantly eliminate the provision of multi-year financing commitments for projects commencing in 2025 has the potential and the real likelihood of bringing progress on wastewater management on Cape Cod to a standstill. We understand that there are capacity issues that are confronting the SRF program. It's always been oversubscribed and that the unique nature of the multiple years of carryover projects is constraining your projected capacity in future years while recognizing that to be a legitimate issue and concern. The proposed solution as embodied in the 2025 IUP. Eliminating future multi-year projects from consideration frankly is the wrong answer to that very real and significant public policy question. If you want to stop progress on wastewater on the Cape dead in its tracks, this change to the IEP will do that. What we're requesting is simple. So go back to the rules as they existed in the 2024 and prior IUPs as it relates to borrowing limits and multi-year projects. And then we work collectively with you, everybody who has an interest in the SRF, come up with another method of addressing your capacity concerns that will provide towns on Cape Cod and elsewhere with the assurances they need. On what that they can rely on the SRF program to fund these multi-year expensive projects because the program as it's outlined in this IUP won't allow that important progress to continue. It's inconsistent with the watershed permit approach that we've collectively worked on you with on you and the IT runs counter to the objectives of the Title 5 revisions and really undercuts any progress you want to make Commonwealth wants to make on housing. So, we'd ask that you consider removing the limit to borrowing as it was laid out and to restore multi-year financing. And thank you for the time to talk to you about this today.

6:51

We will now go to **Jen Peterson**.

7:02

I thank you. My name is Jennifer Peterson. I'm the Executive Director of Massachusetts Waterworks Association. Our non-profit represents over 1500 drinking water professionals throughout the state, and we're pleased to provide comments on this year's intended use plan for drinking water State revolving loan fund. During a December Clean Water Trust Executive Committee meeting, Mass Waterworks learned that the existing funding obligations and limited capacity available for the 2025 IUP. And while we recognize the challenge of balancing financial constraints, we're deeply concerned

that only 11 projects will receive funding this year, despite mounting regulatory obligations and clear evidence of greater need. Everyone is aware that MAST EP established its own standards for PFAS in October of 2020, setting the maximum contaminant level of 20 parts per trillion and approximately 170 public water systems have exceeded this limit. In 2024, the USEPA adopted more stringent standards lowering the MCL to four parts per trillion for PFOA and PFOS, a change that's projected to impact approximately 181 community and non-transient non community public water systems. PFAS treatment is expensive, and many projects funded in recent IUPs have been PFAS related. Given the high cost in the \$15 million cap per project, many of these projects required multi-year funding. Additionally, the newly finalized Lead and Copper Rule improvements requires compliance in 2027 and includes a mandate that all lead service lines be replaced within a decade. Both of these new regulatory demands impose significant financial burdens on public water systems and ratepayers who are already grappling with aged infrastructure. Therefore, greater federal and state financial support is needed, or we risk non-compliance with the Safe Drinking Water Act. While the Bipartisan Infrastructure Law has provided an influx of additional funding, these funds are time limited and insufficient. The EPA estimates that Massachusetts public water systems need 15.2 billion in investment over the next 20 years, excluding compliant costs for new PFAS standards. Yet BIL funds cover just 3% of the need. We support the transfer as proposed from the Clean Water SRF to the Drinking Water SRF to increase capacity, but we recognize clean water needs are just as great. As the Commonwealth prepares its fiscal 2026 budget, Mass Waterworks strongly urges Mass DEP and the Clean Water Trust to request additional state funding for the SRF and to advocate for additional federal support through the state's congressional delegation. We are concerned of five components with the 2025 IUP. I have submitted these comments in writing, but I know that I was a little bit late. Hopefully you will consider them, but we are concerned about the 0% interest loans for PFAS treatment being sort of in question. DEP says that they're going to receive subsidy in the form of 0% contingent on availability of funds. But then later in the IUP, it says a determination by DEP will be made as to eligibility for 0% rate loans before the loan is permanently financed. So we do appreciate the 0% for PFAS remediation projects. These zero interest loans help communities sell these projects to their ratepayers. We urge DEP to commit to the 0% when the IUP is finalized. We are also concerned that given the capacity constraints, DEP may start differentiating components that are PFAS related versus just regular treatment components. And out of fairness and equity for all public water systems addressing PFAS contamination, we urge DEP and the Clean Water Trust to continue offering 0% for the entirety of the projects that incorporate PFAS treatment. In terms of carryover funding for priority projects, as the previous speaker indicated, we too are concerned the DEP states that they'll be no carryover costs for any of the 2025 new projects in future IUPs. This is a substantial policy shift, which creates great uncertainty for our applicants. Our public water systems are working within strict regulatory deadlines and need assurances their projects will receive full funding and subsequent years. To go out and secure alternate funding can take upwards of 18 months, and they'll delay these critical infrastructure projects. So, we too are recommending that you issue the 2025 IUP with carryover certainty for priority projects and convene a stakeholder group to assess the feasibility of implementing partial funding commitments in future IUPs. We are concerned about the project cap. In comments submitted prior IUPS, Mass Waterworks had advocated that the \$15 million project cap needed to be revisited. We suggested that rather than a fixed dollar cap that you should consider looking at funding a percentage of the overall project cost. But DEP never move forward with that suggestion and now we're concerned that not even 15,000,000 is available for certain project proponents as the IUP limits the cap to 10 million for non-disadvantaged communities. So, we would suggest that if you're going to keep a cap, it should be 15,000,000 for all project proponents. In terms of lead service line planning projects, the drinking water program is aggressively pushing public water systems to comply early with the lead and copper rule improvements. Part of this and what Mass DEP is pushing is the two point validation requirement. Mass DEP had suspended the lead planning grant program, and we understood, but there'd be more details in the IUP. The IUP just talks about the continued uncertainty of the lead federal grant. But regardless, Mass DP is pushing systems to do these two-point validations which will require potholing. And since this is investigatory work

needed for compliance with LCRI, we do strongly urge DEP to reconstitute that planning grant and allow that potholing to be an eligible expense. Finally, asset management planning grants have been very important for our communities in 2020. In the fall of 2024, Mass Waterworks met with Mass DP to express concerns regarding the eligibility or ineligibility of certain asset management planning grant projects. Some public water systems were approved on a prior IUP and had secured local authorization for their projects but were later informed that certain components were ineligible for funding, leaving them without sufficient SRF support. So, we would ask that Mass DEP make sure that the eligibility requirements are clear on whatever, whatever projects they put forward in this IUP and make that eligibility guidance very clear to public water systems before they seek that local authorization to avoid project funding shortfalls. So given the significant regulatory mandates and financial burdens on public water systems, we're urging Mass DP and the Clean Water Trust to maintain the 0% interest loans for PFAS remediation projects to ensure that needed and equitable financial support is available. Provide carryover certainty for projects priority projects in the 2025 IUP and engage with stakeholders to evaluate future policy changes expeditiously reinstate the lead planning grants and clarify eligibility criteria for asset management planning grants before public water systems seek local funding authorization. We appreciate that mass DEP and the Clean Water Trust have a capacity constraint, but we really do urge you to work with the state to identify that additional funding and to engage in engage with the congressional delegation to secure further federal support. So, thank you for your attention. And again, we've submitted these in written form. Thank you.

14:59

Next, we'll go to **Mark Ells, Town of Barnstable.**

15:04

Good afternoon, Mark Ells, Town Manager of Barnstable. First, thank you Director and your staff for the good work you do in putting forward this opportunity for all of us to participate in a in a vitally needed source of financing for these infrastructure projects. I've submitted written and now oral testimony expressing concern regarding the draft 2025 intended use plan. Specifically, like other speakers, Barnstable is requesting that the proposed changes to the draft 2025 IUP specifically regarding the no carryover of costs related to identified projects, listed projects and you know also, you know, projects needing that money in our case to be able to secure outside funding sources. I'll identify that in a minute as I go through. We're requesting that you're you not proceed with this and that for at least draft 2025 IUP that you revert to those assumptions that we've discussed in prior years with both the Department of Environmental Protection and the Clean Water Trust. These proposed changes deviate from past practice and undermine our financial planning performed by local, regional and state level entities to create financial assumptions that maximize the use of state revolving funds. And in doing so, it also impedes the town's ability to secure Cape Cod and Islands Wastewater Trust Fund principal subsidies that have been so essential in allowing towns on Cape Cod to advance wastewater projects. I cannot emphasize enough the importance of being listed on the IUP as eligible for funding, as this is the mechanism so that we can receive 25% principal subsidies from the Cape and Islands Wastewater Trust Fund. Bumping this into future years and having to reapply will completely undermine that opportunity for all of us. Each Cape Town proposing projects for the 2025 funding cycle did so assuming that the terms of the financing would be what they had spoken of in prior years because that's what we collectively discussed and agreed upon at the local, county and state level. Please, please proceed with the 2025 IUP as in prior years and convene discussions with the communities on long term strategies to maintain the viability of critical funding mechanisms like the state revolving fund. We're available to work with you, DEP and the Clean Water Trust on this and we look forward to that opportunity. Thank you.

18:36

Next is **Jeff Faulkner, Tighe and Bond.**

18:37 Hi Jeff Faulkner from Tighe and Bond here to speak on behalf of the Town of Dudley. The Town of Dudley submitted a PEF in July of 2024 as a DWSRF project #13706. During the review process, Mass DP moved this project to the CWSRF list and scored it at a score of 506. We believe the 506 is below the funded cut line and the on the draft IUP. This project is for extending a water main due to contamination of private wells related to PFAS. Based on the drinking water scoring system, we estimate that the project would have received a score of 545 points, which would have scored it higher than any other drinking water SRF project that is on the draft IUP list. The reason for this project is the Town of Dudley is under a IRAA Immediate Response action through the Mass DP Bureau of Waste Site Cleanup. All involved parties indicate that the solution to this problem is a water main extension in lieu of permanent point of use entry treatment systems being implemented in perpetuity. Mass DEP worked with the Town of Dudley to receive an Emerging Contaminants EC Grant for design and that design is beginning. The Town of Dudley is a small water system serving less than 10,000 people. The Town of Dudley is a Tier 3 disadvantaged community, which is considered the most disadvantaged. The Town of Dudley water system has ABMP practice with an approved asset management plan in place through the SRF program. The Town of Dudley has a water system that is funded via an Enterprise Fund. With that consideration, we respectfully request that Mass TP review this project as a drinking water project and consider the project having more points, potentially making the final IUP on the drinking water side. Thank you.

21:21

Next is **Anne Frechette.**

21:32

Yes, hello, there's my video. Wonderful. Hello, everybody, and thank you for giving me the opportunity to present to you. My name is Anne Frechette, and I am the Chair of the Water Quality Committee for the Great Sand Lakes Association in Harwich. And I am here to speak about our project, the Great Sand Lake Sewer Extension, which is the numbered SRF 19044. And we are ranked #539 in the draft IUP. I understand that many of the members of our Neighborhood Association have submitted written testimony, but I also wanted to speak about the importance of this project to our neighborhood and to Harwich more generally. So, of the project would fund the construction of sewer connection points along Queen Anne Rd. which is just to the north of the Great Sand Lakes. There are 4 lakes, or kettle ponds as you will, that will be affected by the project. From our perspective, this would be an incredible development for our neighborhood because we have seen significant degradation in the water quality of our kettle ponds over the past at least 10 years from excess nutrients from the septic systems. And we welcome the chance to fund the construction of sewers along Queen Anne Rd. so that the excess metal content can be removed. Obviously, it's not going to remove it from what's already there but will prevent additional excess nutrient content from entering our lakes. The additional point about the importance of this project for Harwich and for our neighborhood is that to our immediate south are drinking water wells for the town of Harwich and water in this section of the Cape flows from north to south. So, what is happening in our ponds could potentially have an effect further south of us. And so, we urge you to ensure that this project end up in the finalized plan for, for funding for the intended use plan. So, if you would like further information about our Neighborhood Association and our lakes, we do have a website for the for GSLA Great Sand Lakes Association in Harwich. And I encourage anybody to take a look at our website to see what we're all about. Thank you so much for your time today.

24:16

Next is **Bryan Weiner, Tighe and Bond.**

24:20

Hi, good, good afternoon. Thank you for having us speak today. Bryan Weiner, engineer and senior Manager with Tighe and Bond on behalf of the town of Foxborough. The town has been working diligently to meet compliance for PFAs regulations and meet the compliance deadline. We're specifically in front of you today. We submitted written testimony earlier today for the Oak St. PFAS water treatment upgrades. This is PEF number DW-13803 DWSRF number 19121. We believe that the 2025 DWSRF Draft IEP rating score of 426 is not representative of the project. We've since reviewed the scoring and provided our written testimony with supplemental information. Specifically, we exceed the 10 PPT level for P56 on multiple occasions. We've noted 2021 levels of 11 and as recently as 2024 levels 10.716 point 313.5, which exceed 10 in the average annual for 2024 is 10.2. So, we're respectfully requesting that the scoring be reconsidered for the project here. We've also submitted other information to request a change with the revised scoring for climate change resilience and adaptation, which would be an additional point. Further, we submitted information from the Town Asset Management Plan which requests additional scoring of four points, and in total, we believe that the project should meet a revised score of 531 for your consideration. We believe this is a critical PFAS infrastructure project that should be moved up on the 2025 draft IEP list with a higher score for funding. We appreciate your time and consideration. Thank you.

27:14

Amy Lowell, Town of Falmouth.

27:18

Hi, as you said, Amy Lowell, Town of Falmouth wastewater Superintendent. Thank you very much for listening to us today, giving us the chance to speak. The Town of Falmouth has a 20-year plan for wastewater infrastructure implementation in order to meet the total maximum daily loads for the Town's coastal ponds and also to prepare and comply with the watershed permit requirements under the new Watershed permit regulations. And that capital plan relies heavily on the SRF program and the historic availability of that and the for these projects and those in particular the 0% interest loans which we've been so fortunate to be able to take advantage of. So, we were very surprised this year when the IUP rules changed. And we are quite concerned that if in particular the two issues that a couple of other folks have brought up, the \$50 million cap and the elimination of the carryover for projects that are already selected for the IUP. The Select Board of the Town of Falmouth has submitted a letter, a comment letter on this on this issue. The Select Board expressed grave concerns that the proposed changes in the 2025 IUP i.e., capping funding at \$50 million annually and eliminating the carryover provisions, would impact the Town's implementation of its critical Grape Pond Phase One sewer project as well as the next planned clean water projects, including the Great Pond Phase Two project and the outfall for discharge of all treated wastewater, future treated wastewater in Falmouth. The Great Pond Phase One project on the Town Meeting warrant for this April is included on the 2025 IUP for \$50 million, but it's actually a \$60 million project that the Town is relying on to be fully covered between the 2025 and the 2026 IUP. Based on the current and previous policy of the of the DEP under the DE PS new policy, it sounds like the Town cannot count on SRF funding for the remaining \$10 million in project cost and is working to ensure that we have the backup funding planned in case the remainder of this project is not covered. This is not the way the Town wishes to plan or execute this major capital project. Similarly, the Town's next water quality improvement projects, a Great Pond Phase Two project and the Outfall project, are estimated to be \$70 million and \$80 million, respectively. The Town cannot initiate these large projects without being certain that the financing will be available for the entire project. For this reason, the Town is requesting that the DEP rescind the funding cap per applicant of \$50 million and rescind the language requiring applicants with multi-year

carryover projects to reapply for future IUPs, as this creates uncertainty regarding the total project financing. Thank you for the ability to comment today and for providing this important, this essential funding source for municipal projects.

31:13

Next is **Michaela Wyman-Colombo, Town of Mashpee.**

31:23

Hello, Michaela Wyman-Colombo. As you mentioned, Mashpee Select Board. I'd like to thank you first for all that you do and thank you for the opportunity to speak today. The Mashpee Town Manager has also submitted written testimony earlier today. I want to echo my support for the positions of previous speakers who expressed grave concerns for the financing changes to the 2025 draft IUP. Like many other Cape towns, Mashpee are like all Cape towns. Mashpee is mandated by the DEP to address nitrogen pollution. We've already committed \$162 million for two centralized wastewater projects and the driver for these projects to be approved at Town Meeting with 0% financing for the total amount of these projects. As the Barnstable Town Manager previously explained, Cape Cod towns that are listed on the IUP are also eligible for 25% principal forgiveness through the Cape and Islands Water Protection Fund. The financing guidelines on the draft 2025 IUP also put this forgiveness in jeopardy. I think it's important to say that I know neither of Mashpee's wastewater projects would likely have been approved at Town Meeting without the assurity of 0% financing for the entire cost of the project, the \$50 million project cap and elimination of the carryover provision on the 2025 draft. IUP will threaten all future wastewater projects in Mashpee and the rest of the cake at a great, great cost to our water quality. I fully understand that there are capacity issues, and I encourage you to work with experts across the state to find a solution to the financing issues. Capping projects at \$50 million and eliminating multi-year financing is not the answer. We're requesting that you return the IUP funding guidelines to those of 2024 with no cap and projects and with multi-year 0% financing. I thank you for your consideration and your time.

33:48

Next is **Jacqueline Beebe, Town of Eastham.**

33:52

Thank you so much for this opportunity to speak. As the previous speakers, I represent Eastham with Cape town, and I agree with the previous remarks of other Cape leaders such as Mr. Ells. Eastham has submitted comments in writing for our specific project with supplemental documentation and I am formally requesting that you consider this material before making a final decision on our application. We've been moving forward with the design and development and permitting of our one and only wastewater project, which is roughly \$170 million. Because of the DEP regulatory priorities and the new regulations, we've been, like other Cape towns, trying to comply and SRF funding is essential to moving forward with our wastewater project and complying with your regulations. We have been, we have been a lucky recipient for the past 10 years of funding on the waterside and have \$130 million project in water that's currently in debt service. So, this money, this funding is essential to us in every way. It will postpone this project for many, many years. So, we've always been partners with you. And I echo the sense that I would love to see us move forward over the next year and try and be partners with you and continuing to figure out how we can make a better plan for long term funding of this very, very essential projects. Thank you.

35:45

Patrick Hill, City of Brockton

36:01

Thank you, everybody. Thank you for taking the time to hear about a very important project here and the potential significant impact to the water supply and the public health here in southeastern Massachusetts. I'm Patrick Hill, I'm the Commissioner of Public Works here with the City of Brockton and the project I'll be speaking about the purchase of the Aquaria Desalination plant, DWSRF 19034. I would like to discuss the purchase of the desal plant. It's a forward-thinking initiative that addresses multiple water related challenges in our region. This project is not only a critical step in protecting public health, but it's a cost effective and environmentally responsible solution. We consider this a regional PFAS solution. You know, as many people today have talked about, a lot of our neighboring communities such as Raynham, Easton, West Bridgewater, Avon, Halifax have recently detected PFAS in their finished water. PFAS contamination has raised significant concerns about the safety of our drinking water and our goal is to provide a sustainable solution. Through the purchase of the Aquaria Desal Plant, the City of Brockton could offer safe and reliable drinking water source to these communities. Based on a recent study that we've been involved with the Old Colony Planning Councils. Communities like Avon, East Bridgewater, Halifax and Dighton have expressed strong interest in purchasing water from us. If we were able to purchase the Aquaria plant, this is a clear indication of a regional need for an alternative water source that is free of PFAS. The project is also a unique opportunity for us to address ongoing water quality and supply challenges at Silver Lake, which is our primary drinking water source. The demand for water at Silver Lake has been increasing and this in turn has exasperated existing ecological and water quality issues with the lake. By purchasing the Aquaria Desal Plant, we can significantly reduce the demand placed on Silver Lake and help mitigate the environmental concerns. Importantly, this move will help the city stay in compliance with its administrative consent order, which was put on us by DEP as well to have a secondary water source. The city's current contract with ANEMA, which is the company that owns the aquaria plant, currently cost the city an annual fee of \$8.9 million. That's a fixed fee with not without taking any water. It's a significant part of our water budget and is having a huge detriment to the City of Brockton. By acquiring the Desalination plant, the city can realize significant cost savings and it will allow us to make improvements within the city's water infrastructure in the city. In conclusion, the desal plant represents a strategic investment in the future. It will help Regional Water supply solution for the Southeast of Mass, addressing water scarcity and water quality issues in the region. It'll provide an alternative water source to protect public health, addressing PFAS with some of our neighboring communities. It will assist in compliance with both federal and safe drinking water standards, offering reliable secondary water source to the city. And the pipeline that is installed from the Desalination plant also has direct connection points to some of these communities that are suffering from PFAS. So, we could, we could offer them water almost immediately. We're committed obviously to working collaboratively with the state. Our initial ask was for 55 million in, you know, I don't know. You know the reality of a of an ask like this, but the city would be willing to do anything if it's waived the whole theory of principal forgiveness or anything we could do to just get into that 1 1/2 percent program would be a significant help. The project risk scored 456 points, which places it 6 projects below the funding line. So, any additional consideration the state would give us, we'd greatly appreciate it. Thank you.

40:44

We have **Erin Perry, Cape Cod Commission.**

40:49

Good afternoon. As I said, Erin Perry, Deputy Director at the Cape Cod Commission and I wanted to thank you for the opportunity to comment. These comments are specifically on the draft 2025 clean water intended use plan. And you know, the SRF program has been critically important for Cape Cod communities as I think you've heard this afternoon already, who are working to rapidly advance

wastewater and water quality projects consistent with the region's 208 plan, which is our area wide water quality management plan and the state's regulatory framework. Limiting applicants to the \$50 million at cap and requiring that large scale projects that need additional financing reapply for listing in future years undermines the years of collaborative work at the local, regional and state levels to create this finance financing approach that provides certainty to towns and encourages local voter approval and support for these large and expensive projects. It has the potential to halt progress on water quality challenges Cape wide and the impact of these changes is really amplified on Cape Cod because access to the 25% subsidy from the Cape Cod and Islands Water Protection Fund is contingent on SRF financing. The Cape Cod Commission provides administrative and Technical Support to the Funds Management Board, and since it was established in 2019, that board has awarded approximately \$200 million in subsidies to Cape wastewater and water quality projects. Access to the SRF financing and then the subsequent Water Protection Fund subsidy has resulted in substantial local progress to improve the water quality issues that we are all working so hard to address. And so, I understand as many have identified that the SRF program is oversubscribed and that there are changes that are required to ensure that it remains that reliable source of project financing. But I would urge you to rescind the proposed changes to the 2025 draft, revert to the terms and conditions that towns anticipated when they applied for financing and collaborate with stakeholders to develop a solution that will support the continued success of that program moving forward. Thank you very much.

43:02

Hi, excuse me. Has everyone presented oral testimony? Who wishes to do so today? We do have a few more minutes in the hearing, so we will continue to have the Zoom meeting open if anyone joins us. But for those of you who are here and may choose to leave, I would thank you very much for participating in this process and taking the time to come and give your testimony today. For those of you who are participants and who have sent in your testimony, thank you to you as well, and we will be here for another 15 minutes.

57:27

So I'll do just one more round if there's anyone that cares to add to their testimony or anyone who would like to testify for the first time. If not, we will close the public hearing. I don't see anybody. OK, well I thank you all for attending this virtual hearing. The testimony from this hearing and the written testimony will be considered before Mass DEP finalizes the intended use plans. The final intended use plans will be posted on Mass DEP's website when they are released.

58:08

There being no further testimony, I hereby close this virtual public hearing at 2:00 PM on Monday, March 3rd, 2025 and the recording will stop. Thank you.

TABLE 3
CLEAN WATER STATE REVOLVING FUND
Calendar Year 2025 CWSRF Project Priority List

NEW PROJECTS

| Rating | Applicant | NPDES/PERMIT | SRF ID | Project | Project Cost |
|--------|----------------------|----------------|--------|--|---------------|
| 556 | HULL #(PF) | MAG590037 | 19112 | Secondary Clarifiers, Grit, and Building Upgrades | \$9,630,000 |
| 556 | FITCHBURG #(PF)(SG) | MA0100986 | 19049 | CSO 045, 083 Separation/Rehabilitation | \$29,926,400 |
| 554 | CHATHAM (BG) | Ground Water | 18980 | Chatham Sewer Extension Phase 1F | \$31,190,000 |
| 551 | ORLEANS (H)# (SG) | Ground Water | 19118 | Lakes and Ponds Area Collection System and PS | \$34,670,000 |
| 549 | NEW BEDFORD #(PF) | MA0100781 | 19143 | Phase 1 Deane Street Sewer Separation | \$83,810,000 |
| 548 | ROCKLAND #(PF)(BG) | MAG590038 | 19007 | Wastewater Treatment Plant Upgrades | \$32,510,000 |
| 547 | NEW BEDFORD #(PF) | MA0100781 | 19146 | Wamsutta Street Pumping Station Improvements | \$6,815,000 |
| 544 | LOWELL (H)#(PF) | MA0100633 | 19108 | Phase 3A Sewer System Separation Project | \$49,500,000 |
| 544 | PROVINCETOWN (H)# | Ground Water | 19076 | Provincetown Satellite Treatment Facility | \$25,000,000 |
| 543 | NEW BEDFORD #(PF) | Not Applicable | 19144 | Phase I Sewer System Rehabilitation | \$10,875,000 |
| 543 | FALL RIVER #(PF)(SG) | MA0100382 | 19125 | Mothers Brook Sewer Improvements | \$21,020,000 |
| 543 | LOWELL (H)#(PF) | MA0100633 | 19109 | Phase 2A Centralville Sewer Separation Project | \$37,900,000 |
| 543 | REVERE (H)#(PF) | Not Applicable | 19086 | Phase 16 Construction - I/I & Capacity Improvement | \$12,905,000 |
| 543 | HAVERHILL #(PF) | MA0101621 | 18993 | Locke Street Sewer Separation - Phase 2 | \$14,667,000 |
| 543 | FALL RIVER #(PF)(SG) | Not Applicable | 19009 | Stafford Square Flood Mitigation | \$29,386,600 |
| 542 | FALMOUTH (PF) | Ground Water | 19136 | Falmouth TASA Phase 1 Collection and Recharge | \$60,000,000 |
| 542 | YARMOUTH (PF)(D) | Not Applicable | 19063 | Phase I - WRRF and Collection System | \$35,543,000 |
| 542 | LOWELL (H)#(PF) | MA0100633 | 19130 | Downtown Area and Interceptor Sewer Improvements | \$6,000,000 |
| 541 | HULL #(PF) | MAG590037 | 19127 | Collection System Improvements Phase 2 | \$16,660,000 |
| 540 | EASTHAM (H)(PF) | Not Applicable | 18984 | Eastham Wastewater Phase 1 | \$170,028,400 |
| 540 | BARNSTABLE (H)(PF) | Not Applicable | 19003 | Phinney's Lane Neighborhoods Sewer Expansion | \$45,070,464 |
| 540 | MASHPEE (PF)(SG) | Not Applicable | 19097 | Mashpee-Wakeby Watershed Wastewater System | \$17,230,000 |
| 539 | HARWICH (PF)(SG) | Ground Water | 19044 | Harwich Great Sand Lakes Sewer Extension | \$31,130,000 |
| 539 | NANTUCKET (H)# | Ground Water | 19046 | Phase 2 Surfside WWTF Improvements | \$16,500,000 |
| 538 | SWAMPSCOTT (H)# | Not Applicable | 18976 | Sewer Rehabilitation in Phase 2B Area | \$3,283,000 |
| 538 | BARNSTABLE (H)(PF) | Not Applicable | 19085 | Centerville Village Sewer Expansion - South Phase | \$15,000,000 |
| 536 | EASTON (H)(RE)# | MAG590043 | 19037 | Five Corners Needs Area - Secondary Pump Station | \$5,026,000 |
| 536 | PROVINCETOWN (H)# | Ground Water | 19077 | Provincetown Phase 6C West End Expansion | \$999,900 |
| 535 | DENNIS (PF)(D) | Ground Water | 19019 | Phase 1 - WRRF and Collection System | \$140,606,250 |

| | | | | | |
|-----|---|----------------|-------|--|--------------|
| 535 | NEWTON (H) | Storm Water | 19039 | PCP Structural Stormwater Control Implementation | \$16,913,657 |
| 535 | HAVERHILL #(PF) | MA0101621 | 18994 | WWTF and South Mill Street Pump Station Upgrades | \$56,254,753 |
| 532 | BILLERICA (H)(PF) | MA0101711 | 19035 | Sewer Contract 38 | \$25,650,000 |
| 532 | SWANSEA (PF) | Not Applicable | 19134 | Route 6 Corridor Sewer Collection System | \$30,569,297 |
| 531 | NAHANT # | Storm Water | 19006 | Sewer Collection System Repair & Replacement 2025 | \$16,999,000 |
| 531 | BILLERICA (H)(PF) | Not Applicable | 19082 | Sewer Contract 37 | \$40,251,750 |
| 530 | BROCKTON (H)#(PF) | MA0101010 | 19032 | Cashman Road Sewer | \$4,500,000 |
| 530 | WESTPORT (PF) | Not Applicable | 19079 | Route 6 Phase 1A Sewer | \$7,906,220 |
| 529 | CHICOPEE (PF) | MA0101508 | 19090 | Phase 1 Nitrogen Reduction Improvements | \$17,852,000 |
| 528 | SCITUATE (H)# | MAG590041 | 19128 | Sanitary Sewer Rehabilitation – Phase 2 | \$3,720,895 |
| 526 | BROCKTON (H)#(PF) | MA0101010 | 19031 | Sewer System Rehabilitation Phase 5 | \$2,500,000 |
| 526 | QUINCY (H)#(PF) | Not Applicable | 19043 | FY26 Sewer & Drain Improvements | \$3,000,000 |
| 524 | QUINCY (H)(PF) | Storm Water | 19040 | Wollaston Stormwater Capacity Improvements Phase 1 | \$5,775,000 |
| 523 | FRAMINGHAM (H)(PF) | MA0103284 | 18995 | Walnut, Warren, Burdette Sewer Improvements | \$19,100,000 |
| 521 | BOSTON WATER AND SEWER COMMISSION (H)# | Not Applicable | 19065 | Dorchester Interceptor Relief Sewer Construction | \$56,000,000 |
| 517 | LEXINGTON | Storm Water | 19137 | Lexington School Stormwater Control Measure | \$1,792,880 |
| 439 | NEW BEDFORD (PF) | MA0100781 | 19147 | Phase 2 - Buttonwood Brook Improvements | \$4,900,000 |
| 438 | WELLFLEET (H) | Not Applicable | 19105 | Wellfleet Nitrogen Reducing I/A Program | \$987,800 |
| 435 | GREAT BARRINGTON (H)(PF) | MAG590025 | 19060 | WWTF & Avery Lane PS Upgrades | \$33,871,800 |
| 433 | BILLERICA (H)(PF) | MA0101711 | 19126 | Brown Street Force Main Rehabilitation/Replacement | \$15,387,959 |
| 431 | TYNGSBOROUGH (H)(PF) | MA0100633 | 19050 | Phalanx Street Sewer Extension and Pump Station | \$2,111,000 |
| 427 | FRAMINGHAM (H)(PF) | Other | 18997 | Gates St Pump Station and Force Main Replacement | \$9,886,360 |
| 426 | DEERFIELD (PF) | MAG580004 | 19070 | South Deerfield WWTF Effluent Pipe Replacement | \$2,387,100 |
| 422 | NORTHBRIDGE #(PF) | MAG590001 | 19058 | UV Disinfection System Upgrades | \$3,750,000 |
| 341 | PLYMOUTH (H)(RE)(PF) | MAG590040 | 19140 | Camelot Drive Sewer Extension Project | \$13,186,000 |
| 339 | METHUEN (H)#(PF) | MA0100447 | 19001 | West End Sewer System Rehabilitation & Improvement | \$7,938,000 |
| 338 | METHUEN (H)#(PF) | MA0100447 | 19124 | Phase 2 Arlington Neighborhood CSO Reduction | \$38,283,112 |
| 338 | BILLERICA (H)#(PF) | MA0101711 | 19016 | Darby Avenue Pump Station | \$2,040,201 |
| 337 | NANTUCKET (H)# | Ground Water | 18989 | Somerset Needs Area Sewer Extension | \$39,400,000 |
| 337 | GREATER LAWRENCE SANITARY DISTRICT (RE) | MA0100447 | 19123 | Renewable Disinfection System Construction at GLSD | \$12,400,000 |
| 331 | HOOSAC WATER QUALITY DISTRICT # | MA0100510 | 19071 | WWTP Slope Stabilization and Utilities Relocation | \$11,547,400 |
| 331 | BARNSTABLE (H)#(PF) | Not Applicable | 19081 | Mark's Path Pump Station Replacement Project | \$2,740,000 |

| | | | | |
|------------------------------|---|----------------|---|------------------------|
| 330 | HUDSON #(PF) | MAG590029 | 18996 Hudson Wastewater Pump Station Upgrades | \$5,856,000 |
| 330 | MEDFIELD (H)# | MAG590008 | 19024 Medfield Sewer Infrastructure Rehabilitation | \$988,140 |
| 318 | AUBURN #(PF) | Not Applicable | 19002 Goddard Drive Interceptor Rehabilitation | \$1,588,628 |
| 315 | AUBURN #(PF) | Not Applicable | 19000 Sword Street Force Main Rehabilitation | \$4,484,832 |
| 315 | WHITMAN (PF) | MA0101010 | 19023 Auburn St and Commercial St Pump Station Upgrades | \$17,015,700 |
| 235 | BROCKTON (H)(RE)(PF) | MA0101010 | 19033 AWRF Biosolids Management Improvements | \$25,000,000 |
| 227 | MASSACHUSETTS WATER RESOURCES AUTHORITY # | Not Applicable | 19116 Cottage Farm CSO Facility PCB Abatement | \$10,600,000 |
| 227 | MARSHFIELD # | Not Applicable | 19131 Marshfield Sewer Replacement Project | \$9,829,000 |
| 223 | MASSACHUSETTS WATER RESOURCES AUTHORITY | Other | 19114 Inter Ren 7-Malden&Melrose-Const | \$9,400,000 |
| 222 | SHREWSBURY (H) | MA0100412 | 19064 Harvey Place & Jordan Pond Pump Station Upgrades | \$3,840,000 |
| 219 | CONCORD # | MAG590030 | 19036 Concord WWTP Upgrades - Phase 1 | \$3,713,000 |
| 216 | ACTON (H) | Ground Water | 19015 Acton Pump Station Rehabilitation | \$4,550,000 |
| 215 | LONGMEADOW # | MA0101613 | 19014 Western Drive Neighborhood Sewer Improvements | \$2,214,000 |
| TOTAL OF NEW PROJECTS | | | | \$1,601,563,498 |

(Count: 74)

(Average Rating: 455.95)

(BG) - Base Capitalization Grant

(D) - Dropped by Applicant

(H) - Housing Choice Communities

(PF) - Affordability Criteria applicable, eligible for Principal Forgiveness

(RE) - Potential Renewable Energy Projects

(SG) - BIL CWSRF General Supplemental Grant

- Projects contains Energy Efficiency, Renewable Energy and/or meets EPA's definition of a Green Project (<https://www.epa.gov/greeningepa/energy-and-emissions-epa>)

NOTE: Expected Funding Schedule - Projects above the red line are expected to proceed in the 2025 IUP financing cycle. Projects below the red line are not funded in the 2025 IUP financing cycle and are encouraged to apply for SRF funding in future years.

MULTI-YEAR CARRYOVER AND STATUTORY PROJECTS

| Applicant | NPDES/PERMIT | SRF ID | Project | Project Cost |
|---|----------------|--------|---|------------------------|
| BARNSTABLE (H)(PF) | Storm Water | 16683 | Route 28 West Sewer Expansion Project | \$56,600,000 |
| BARNSTABLE (PF)(SG) | Other | 16677 | Nitrogen Removal Improv. & New Headworks Facility | \$109,330,000 |
| BOSTON WATER AND SEWER COMMISSION (H)# | MA0101192 | 16690 | East Boston Sewer Separation Phase IV | \$143,936,993 |
| DENNIS (PF) | Ground Water | 16676 | Phase 1 - WRRF and Collection System | \$196,315,000 |
| GLOUCESTER (H)(PF)(SG) | MA0100625 | 16775 | WPCF Secondary Treatment and Facility Upgrades | \$205,972,280 |
| LOWELL | MA0100633 | 16760 | Centralville Sewer Separation Program – Phase 1 | \$57,500,000 |
| MASHPEE (PF)(BG) | Ground Water | 16791 | Phase 2 Mashpee Treatment and Collection System | \$96,100,000 |
| MASSACHUSETTS WATER RESOURCES AUTHORITY | MA0103284 | 6822 | DITP Clarifier #2 | \$289,359,690 |
| NEW BEDFORD (PF)# | Not Applicable | 16873 | Wastewater Collection System Improvements | \$74,965,000 |
| YARMOUTH (PF) | GW Permit | 8349 | Phase I - WRRF and Collection System | \$205,841,464 |
| TOTAL OF MULTI-YEAR CARRYOVER AND STATUTORY PROJECTS | | | | \$1,435,920,427 |

(Count: 10)

MassDEP PRIORITY PROJECTS

| Applicant | NPDES/PERMIT | SRF ID | Project | Project Cost |
|---|--------------|--------|-------------------------------------|---------------------|
| COMMUNITY SEPTIC MANAGEMENT | N/A | 3850 | Community Septic Management Program | \$5,000,000 |
| EMERGENCY PFAS REMEDIATION SET-ASIDE | | 18911 | | \$2,000,000 |
| EMERGENCY SRF SET-ASIDE | N/A | 2977 | | \$3,000,000 |
| PLANNING SRF SET-ASIDE | | 13575 | | \$13,000,000 |
| SEWER OVERFLOW AND STORMWATER REUSE SET-ASIDE | | 18972 | | \$4,400,000 |
| TOTAL OF MassDEP PRIORITY PROJECTS | | | | \$27,400,000 |

(Count: 5)

PLANNING PROJECTS

| Applicant | SRF ID | Project | Project Cost |
|-----------------------------------|--------|--|--------------------|
| BARNSTABLE COUNTY | 19149 | Barnstable County: MFTF PFAS Remediation | \$1,140,489 |
| TOTAL OF PLANNING PROJECTS | | | \$1,140,489 |

(Count: 1)

TOTAL OF PROJECT PRIORITY LIST**\$3,066,024,414**

TABLE 4
CLEAN WATER STATE REVOLVING FUND
Calendar Year 2025 CWSRF ASSET MANAGEMENT & OSG PLANNING PROJECTS

ASSET MANAGEMENT PLANNING PROJECTS

| Rating | Applicant | SRF ID | Project | Project Cost |
|--------|---------------------------------|--------|---|--------------|
| 83 * | OXFORD-ROCHDALE SEWER DISTRICT | 19011 | Collection System Asset Management Plan | \$219,839 |
| 78 | WESTFIELD | 19041 | Westfield Sewer Asset Management Project | \$130,805 |
| 77 | WAYLAND | 19074 | Wayland Stormwater Asset Management Plan | \$206,950 |
| 77 * | LEICESTER WATER SUPPLY DISTRICT | 19022 | WWTP Asset Management Plan | \$245,280 |
| 77 * | GROVELAND | 19084 | Groveland Asset Management Inventory and Planning | \$115,838 |
| 75 * | DOVER | 19098 | Dover Phase 2 Stormwater Asset Management Program | \$174,225 |
| 74 * | LEE | 19026 | WWTP Asset Management Plan | \$175,706 |
| 72 | FAIRHAVEN | 19051 | Fairhaven Stormwater Asset Management Project | \$250,000 |
| 72 | METHUEN | 19122 | Methuen Stormwater System EAMS Implementation | \$250,000 |
| 71 | AUBURN | 18977 | Town of Auburn - Asset Management Plan | \$250,000 |
| 70 * | MENDON | 19061 | Mendon Stormwater AMP | \$200,000 |
| 69 | DARTMOUTH | 19057 | Dartmouth Stormwater & Wastewater AMP | \$250,000 |
| 69 | OXFORD | 19145 | Oxford Culvert Asset Management Plan | \$164,500 |
| 66 * | GREAT BARRINGTON | 19055 | Collection System Asset Management Plan (Year 5) | \$245,120 |
| 65 | WESTON | 19047 | Weston Stormwater Asset Management Project | \$224,040 |
| 65 * | TYNGSBOROUGH | 19101 | Tyngsborough Wastewater: Asset Management Plan | \$248,000 |
| 64 | LAWRENCE | 18979 | Lawrence Stormwater Asset Management Plan Update | \$240,000 |
| 63 | LOWELL | 19139 | LRWWU Stormwater AMP Phase 1 | \$250,000 |
| 63 * | LENOX | 19028 | Collection System Asset Management Plan (Year 3) | \$243,736 |
| 61 | WAKEFIELD | 19020 | Town of Wakefield Culvert Asset Management | \$250,000 |
| 61 | HAVERHILL | 19093 | Haverhill Stormwater Asset Management Plan | \$250,000 |
| 59 | FRANKLIN | 19052 | Franklin Stormwater Asset Management Evaluation | \$250,000 |
| 58 | WHITMAN | 18975 | Water and Sewer Asset Management Plan | \$297,255 |
| 56 * | COHASSET | 19089 | Cohasset Sewer Asset Management Services | \$200,000 |
| 53 | LEXINGTON | 18998 | Lexington Stormwater Asset Management Plan | \$250,000 |
| 52 | SUDBURY | 19099 | Sudbury Stormwater Asset Management Plan Phase II | \$250,000 |
| 52 | NEWTON | 19110 | City of Newton Stormwater Asset Management Plan | \$250,000 |
| 52 | LUNENBURG | 19120 | Lunenburg Asset Management Inventory and Planning | \$99,335 |

| | | | | |
|--|--------------------|-------|---|--------------------|
| 51 | NEEDHAM | 19135 | Stormwater System Mapping | \$239,300 |
| 50 | MILTON | 19133 | Milton Asset Management Services | \$250,000 |
| 49 | MEDWAY | 19095 | Medway Stormwater Asset Management Plan | \$250,000 |
| 48 | FALL RIVER | 19092 | Fall River Stormwater Asset Management Plan | \$250,000 |
| 43 | MILFORD | 19096 | Milford Stormwater Asset Management Plan | \$250,000 |
| 42 | NORTH ATTLEBOROUGH | 19062 | Stormwater Assent Management Plan | \$250,000 |
| 37 | NORTHBOROUGH | 19100 | Northborough Water/Stormwater AMP | \$236,000 |
| TOTAL OF ASSET MANAGEMENT PLANNING PROJECTS | | | | \$7,905,929 |

(Count: 35)

OSG PLANNING PROJECTS

| Rating | Applicant | SRF ID | Project | Project Cost |
|---------------------------------------|-----------|--------|--|------------------|
| 62 | CHICOPEE | 19027 | Downtown Sewer Separation Project | \$250,000 |
| 59 | HOLYOKE | 19013 | Final EIR for Holyoke's CSO Long Term Control Plan | \$250,000 |
| 46 | MARION | 19008 | 290 Delano Road Drainage Improvements-Design | \$61,000 |
| TOTAL OF OSG PLANNING PROJECTS | | | | \$561,000 |

(Count: 3)

TOTAL OF PROJECT PRIORITY LIST **\$8,466,929**

* - small systems