



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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FINAL 2025 INTENDED USE PLAN

For the

DRINKING WATER STATE REVOLVING

FUND

April 8, 2025



This information is available in alternate format. Please contact Melixza Esenyie at 617-626-1282 .
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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 Drinking Water State Revolving Fund (DWSRF) program. The DWSRF is a joint federal-state financing program that provides subsidized loans and grants to protect public health, safeguard the drinking water supply, and improve the infrastructure systems in the Commonwealth.

The Massachusetts Clean Water Trust (Trust) is offering \$349.5 million to finance drinking water projects across the Commonwealth (Table 1), with an additional \$1.3 million offered in grants for Asset Management Planning (AMP) (Table 2), subject to the availability of funding. As noted in Table 1, approximately \$123.8 million is being offered to finance 13 new construction projects and approximately \$169.9 million will finance 19 previously approved multi-year projects. Additionally, set-asides include \$5 million for emergency projects, \$39.5 million to finance new Lead Service Line (LSL) Replacement construction and planning loans, and \$10 million to finance other planning projects and PFAS design costs. To encourage communities and Public Water Suppliers to engage in planning activities, MassDEP is accepting [planning loan applications](#) on a rolling basis while funding is available.

Final 2025 Drinking Water SRF IUP Summary	
Total Drinking Water Projects Offered Funding	\$349.5 million
13 New Construction Projects	\$123.8 million
19 Previously Approved Multi-year Projects	\$169.9 million
14 Asset Management Planning Grants	\$1.3 million
SET-ASIDES	
Emergency projects	\$5.0 million
Planning projects and PFAS design	\$10.0 million
Lead Service Line Replacement Construction Project Loans	\$29.5 million
Lead Service Line Replacement Planning Loans	\$10.0 million

The amount of the 2025 Lead Service Line Replacement (LSLR) Grant is not yet known. The United States Environmental Protection Agency (USEPA) is developing a new allotment formula to address concerns raised by the EPA Office of Inspector General over how the reallocation of funds was determined in 2023 and onward. Due to this delay, Massachusetts is unable to fund the Planning Grant program because all available grant funding has been committed through 2024. The DWSRF is offering in this IUP loans for lead service line replacement construction projects and/or planning projects, supported by \$39.5 million in uncommitted funds from previous

grant years. Once the 2025 LSLR Grant information is available, MassDEP will develop a draft IUP amendment to include funds allotted to Massachusetts. The public will be notified of the availability of the draft with a 30-day comment period to follow.

The Trust is offering grants to communities interested in developing Asset Management Plans (AMP) for one or more of their water utilities. In calendar year 2025 fourteen AMP proposals, estimated at approximately \$2.1 million, as shown in Table 2, are being offered grants totaling approximately \$1.3 million. Public water suppliers are eligible to receive 60% of the project cost, up to \$150,000, as a grant from the Massachusetts Clean Water Trust. The remaining costs may be funded by local contributions of cash, or a combination of cash and in-kind services. All or part of the local contribution may be financed by a loan from the Trust at the standard 2% interest rate for a term of up to five years.

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, found in the “Sources and Uses” table in Section V.(A).
- The Infrastructure Investment and Jobs Act (IIJA) established three federal grants through the DWSRF:
 1. Supplemental DWSRF Grant
 2. LSL Replacement Grant
 3. Emerging Contaminants Grant

These grants are being provided annually beginning in 2022 and are expected 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, the Trust 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 these new IIJA federal grants, subject to the availability of funding. Refer to *Section II. (A). Additional Subsidy and Disadvantaged Communities* of 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.

- Some of the key provisions of IIJA include amendments to the Safe Drinking Water Act (DWSRF Program):
 - **American Iron and Steel (AIS)** - IIJA makes the American Iron and Steel (AIS) procurement requirement permanent for DWSRF construction projects.
 - **Build America, Buy America (BABA) Act** – with the inclusion of the BABA Act, IIJA expands domestic sourcing requirements for DWSRF projects that are funded with federal capitalization grants. Additionally, per the USEPA, projects being co-funded by an

SRF loan and a CDS 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.

- IIJA raised the minimum Safe Drinking Water Act requirement for Additional Subsidy to Disadvantaged Communities from 6% to 12%, establishing an additional subsidy range of 12% to 35% for the annual DWSRF Base Grant. Congress also requires that states use 14% of the annual DWSRF grant for additional subsidy. Subsequently, Massachusetts expects to provide additional subsidy of 26% on a Base award in 2025.
- New federal grants created by IIJA contain specific Additional Subsidy requirements primarily directed to disadvantaged communities. *Refer to Section II.(A). Additional Subsidy and Disadvantaged Communities* of this IUP for details.
- The USEPA requires that 15% of total IUP assistance be directed toward small systems that are serving a population fewer than 10,000. The total DWSRF funds expected to be available for 2025 is \$348.2 million. Fifteen percent of that amount is \$52.2 million. The IUP list contains 7 small system projects totaling approximately \$76.3 million, which exceeds the 15% requirement. Therefore, Massachusetts expects to meet this requirement.
- 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, primarily due to addressing the public health considerations of PFAS remediation projects. 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. 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.
- 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 Tier 3. The loan forgiveness applies to the portion of the loan financing the renewable energy component.
- To better address specific state priorities, Section 302 of the 1996 Safe Drinking Water Act Amendments, allows states the flexibility to move funds between the Clean Water State Revolving Fund (CWSRF) and the DWSRF programs. Massachusetts will transfer funds from the CWSRF to the DWSRF program in the amount of 33% of the anticipated 2025 DWSRF

base grant amount, IIJA supplemental grant amount and IIJA Emerging Contaminant grant amount. Massachusetts is transferring these funds to meet the increased demand for Drinking Water projects caused by the increased prevalence of PFAS in drinking water systems that must be remediated. Furthermore, Massachusetts reserves authority of future transfers of supplemental IIJA funds. Further details may be found in *Section V. (A). Sources and Uses Table and Section V. (F). Transfer of Funds Between CWSRF to DWSRF*.

- During the 2025 calendar year, PFAS remediation projects will continue to be eligible to receive additional subsidy in the form of 0% interest rate loans, contingent on the availability of funds.
- To encourage communities and public utilities to engage in planning activities, MassDEP is accepting planning loan applications on a rolling basis, while funding is available.

MassDEP appreciates the efforts that project proponents have invested in the development of applications and recognizes their efforts to enhance and protect the public health of the Commonwealth.

TABLE 1
DRINKING WATER STATE REVOLVING FUND
Calendar Year 2025 DWSRF Final Intended Use Plan

NEW PROJECTS

Rating	Applicant	SRF ID	Project	Project Cost	2025 IUP Cost
530	YARMOUTH (EC)(PF)(BG)	19119	Yarmouth Wells 10 & 11 PFAS Treatment	\$4,996,475	\$4,996,475
530	MASSACHUSETTS WATER RESOURCES AUTHORITY	19059	Cp-2 NEH Improvements	\$21,045,949	\$2,000,000
530	IPSWICH (SG)	19012	Ipswich Water Treatment Plant	\$33,803,000	\$10,000,000
529	NEWBURYPORT (H)(EC)(SG)	19054	Newburyport PFAS Treatment System	\$20,495,200	\$10,000,000
526	FOXBOROUGH (EC)	19121	Oak Street PFAS Water Treatment Upgrades	\$16,500,000	\$10,000,000
526	HANOVER (EC)(SG)	19091	Hanover PFAS Treatment	\$17,330,000	\$10,000,000
524	DRACUT WATER SUPPLY DISTRICT (EC)(PF)	19115	PFAS Water Treatment Plant Expansion	\$19,400,000	\$15,000,000
523	BRIDGEWATER (H)(PF)	19102	Plymouth St. Wells Upgrades and Raw Water Main	\$6,190,103	\$6,190,103
521 *	PEPPERELL (EC)(PF)(SG)	19132	Jersey Street Well Water Treatment Plant	\$13,000,000	\$13,000,000
520 *	GROVELAND (EC)(PF)(SG)	18991	Wells 1, 3 & 4 Water Treatment Plant	\$44,531,076	\$15,000,000
518 *	WEST BROOKFIELD (PF)(BG)	19048	Leland Road Pump Station Upgrade	\$6,240,000	\$6,240,000
515 *	DUDLEY (PF)	19148	Eagle Drive Neighborhood Water Main Extension	\$10,085,000	\$10,085,000
430 *	HADLEY (PF)(BG)	19075	Mount Warner Well Rehabilitation	\$11,350,000	\$11,350,000
TOTAL OF NEW PROJECTS				\$224,966,803	\$123,861,578

(Count: 13)

(Average Rating: 517.08)

* - Small System

(BG) - Base Capitalization Grant

(D) - Dropped by Applicant

(EC) - BIL DWSRF Emerging Contaminants Grant

(H) - Housing Choice Communities

(LR) - BIL DWSRF Lead Service Line Replacement Grant

(PF) - Disadvantaged Community, eligible for Principal Forgiveness

(RE) - Potential Renewable Energy Projects

(SG) - BIL DWSRF 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>)

MassDEP PRIORITY PROJECTS

Applicant	SRF ID	Project	Project Cost	2025 IUP Cost
EMERGENCY SRF SET-ASIDE	2978		\$5,000,000	\$5,000,000
LEAD SERVICE LINE REPLACEMENT SRF SET- ASIDE	16595		\$39,500,000	\$39,500,000
PLANNING SRF SET-ASIDE	13574		\$10,000,000	\$10,000,000
TOTAL OF MassDEP PRIORITY PROJECTS			\$54,500,000	\$54,500,000

(Count: 3)

MULTI-YEAR CARRYOVER AND STATUTORY PROJECTS

Applicant	SRF ID	Project	Project Cost	2025 IUP Cost
ATTLEBORO (PF)(EC)(BG)	16764	Wading River Water Treatment Plant	\$35,181,000	\$15,000,000
BARNSTABLE (H)(PF)(EC)(SG)	16849	Straightway & Hyannisport PFAS Treatment Facility	\$45,295,767	\$7,500,000
BELLINGHAM (H)(PF)(EC)(SG)	16813	PFAS Treatment at Hartford Avenue WTP	\$36,500,000	\$15,000,000
BRAINTREE #(RE)(PF)(EC)	7258	Tri-Town Regional Water Treatment Plant	\$55,212,683	\$10,000,000
CHELMSFORD WATER DISTRICT (H)(EC)	16698	Chelmsford WD PFAS Treatment	\$43,000,000	\$15,000,000
FRANKLIN (H)(RE)(EC)	16730	Franklin Hayward St. WTP Improvements	\$25,696,000	\$10,696,000
GRAFTON WATER DISTRICT (H)(EC)(BG)	16765	East St. and Worcester St. PFAS Treatment Upgrades	\$23,000,000	\$8,000,000
HOLBROOK #(RE)(PF)(EC)	7259	Tri-Town Regional Water Treatment Plant	\$19,904,296	\$3,200,000
MASSACHUSETTS WATER RESOURCES AUTHORITY	6691	Northern Intermediate High Section 89 Replacement	\$32,680,976	\$11,344,056
MASSACHUSETTS WATER RESOURCES AUTHORITY	7218	Section 23, 24, 47 Water Mains Rehab	\$28,963,060	\$1,655,944
MIDDLEBOROUGH (H)(PF)(EC)	16735	East Grove Street Water Treatment Plant	\$34,153,700	\$7,500,000
PLAINVILLE (H)(EC)(BG)	16848	Turnpike Lake PFAS Water Treatment Plant	\$25,600,000	\$10,600,000
RANDOLPH #(RE)(PF)(EC)	7260	Tri-Town Regional Water Treatment Plant	\$39,780,862	\$6,800,000
SCITUATE (H)	7348	Surface Water Treatment Plant	\$67,213,348	\$15,000,000
SHARON (RE)	12443	Wells 2 & 4 Water Treatment Plant	\$31,444,944	\$6,444,944
SHREWSBURY (H)(EC)	16836	Home Farm WTP PFAS Treatment Upgrades	\$18,500,000	\$3,500,000
UXBRIDGE (PF)(EC)	16738	Blackstone Water Treatment Plant	\$19,500,000	\$4,600,000
WEBSTER (PF)(EC)	10380	PFAS Water Treatment Plants	\$35,120,000	\$10,120,000
WESTFORD (H)(EC)(SG)	16749	Forge Village&Nutting Road PFAS Treatment Upgrades	\$23,000,000	\$8,000,000
TOTAL OF MULTI-YEAR CARRYOVER AND STATUTORY PROJECTS			\$639,746,636	\$169,960,944

(Count: 19)

TOTAL OF FINAL INTENDED USE PLAN**\$919,213,439 \$348,322,522**

TABLE 2
DRINKING WATER STATE REVOLVING FUND
Calendar Year 2025 DWSRF ASSET MANAGEMENT PLANNING PROJECTS

ASSET MANAGEMENT PLANNING PROJECTS

Rating	Applicant	SRF ID	Project	Project Cost	Grant Amount
88 *	WARE	19021	Ware Drinking Water Asset Management Plan	\$225,000	\$135,000
86 *	HINSDALE	19069	WTP Asset Management Plan	\$186,240	\$111,744
84 *	ERVING	19080	Erving Water Asset Management Project	\$117,460	\$70,476
82 *	EGREMONT	19087	Egremont Water Asset Management	\$124,960	\$74,976
79 *	CHESHIRE	18978	Cheshire Water Asset Management Plan	\$110,520	\$66,312
69	WEST SPRINGFIELD	18983	West Springfield Water Asset Management Project	\$159,100	\$95,460
64	PEMBROKE	19072	Pembroke Water Asset Management Plan	\$250,000	\$150,000
57 *	SHIRLEY WATER DISTRICT	19029	Water System Asset Management Plan	\$139,100	\$83,460
55	SWANSEA WATER DISTRICT	19045	Water System Asset Management Plan	\$181,500	\$108,900
54	WINCHESTER	19083	Winchester Asset Management Grant	\$200,000	\$120,000
52 *	WILLIAMSTOWN	19103	Williamstown Water System Asset Management Plan	\$114,400	\$68,640
51	ATHOL	19017	Water System Asset Management Plan	\$152,200	\$91,320
44	SHARON	19094	Sharon Asset Management Plan	\$136,300	\$70,740
41	ANDOVER	19088	Andover Water Distribution AMP	\$35,500	\$21,300
TOTAL OF ASSET MANAGEMENT PLANNING PROJECTS				\$2,132,280	\$1,268,328

(Count: 14)

TOTAL OF PROJECT PRIORITY LIST	\$2,132,280	\$1,268,328
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* - small systems

BACKGROUND

The Federal Safe Drinking Water Act Amendments of 1996 authorized the award of Base Capitalization Grants for states to create individual DWSRF loan programs. These programs provide state-administered subsidized loans to finance publicly and privately owned community water supply projects. Under the DWSRF program, states provide a 20% match to the federal Base Capitalization Grant to create the loan fund. Projects to be financed are selected using a priority ranking system that prioritizes protection of public health and improved compliance together with affordability.

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

Application Process

In May 2024, MassDEP launched the annual SRF project solicitation for new construction projects and Asset Management Planning 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. [DWSRF PEF Construction Ranking System](#)

In addition to the annual project solicitation period, MassDEP accepts loan applications on a rolling basis, subject to the availability of funding, for planning projects and LSL replacement construction projects.

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 Safe Drinking Water Act Amendments of 1996, Chapter 78 of the Acts of 1998, and 310 CMR 45.00, MassDEP has developed its Calendar Year 2025 Intended Use Plan/Project Priority List (IUP/PPL), with its attendant ranking of drinking water projects, as noted in Table 3. A project must appear on the PPL and the IUP Project Listing to receive financial assistance under the DWSRF program.

This IUP details approximately \$363.8 million in financing and describes Massachusetts' intended uses for all funds available in the DWSRF program for 2025. *Refer to Section V. (A).*

Sources and Uses Table. It includes the projects that Massachusetts expects to provide financial assistance to and an overview of how the Commonwealth will comply with federally mandated requirements. To ensure communities continue to protect the health of our residents while maintaining low costs for consumers, the Commonwealth is pleased to offer subsidized financing to our water suppliers for projects in this IUP that remove PFAS from drinking water. In doing so, the Commonwealth reserves its rights to assert claims and causes of action to recover funds from third parties, including product manufacturers, otherwise responsible for the PFAS contamination impacting the Commonwealth's drinking water, groundwater, surface waters or environment in any manner.

Loan Interest Rates

All new projects receiving financial assistance from the DWSRF will be eligible for 2% interest rate loans or, in certain instances, 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 lead service line replacement or PFAS remediation, 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. 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 a financing term in excess of 20 years receive a slightly higher interest rate based on market rates at the time of loan closing. The interest rate for a 30-year loan has been 2.2% for the last four financings.

Communities that have earned the [Housing Choice](#) designation at the time of the SRF project solicitation are eligible to have their 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). Additional Subsidy and Disadvantaged Communities.*

2025 DWSRF 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 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 funding, 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.

DWSRF Information and Resources

All SRF related documents, including this IUP, [the priority rating 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 13 new construction projects and 20 carryover projects totaling approximately \$349.5 million, subject to the availability of funding. Included in this amount is a \$5 million emergency reserve to finance unanticipated problems of acute public health concern that may arise during the year, an additional \$10 million to finance planning projects and PFAS design costs, and \$39.5 million to finance LSL replacement projects.

This IUP also supports 14 AMP project proposals, totaling \$2.1 million. Communities may receive 60% of the project cost, up to \$150,000, as a grant from the Trust, totaling \$1.3 million. The remaining project costs are to be funded by local contributions of cash, a combination of cash and in-kind services, or an SRF loan at 2% interest rate with a term of up to five years.

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, primarily due to addressing the public health considerations of PFAS remediation projects. 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. For the Trust and MassDEP to continue to support these carryover project commitments, it is necessary to limit the new project offering in this IUP to \$123.8 million.

The following guidelines are proposed to ensure the IUP meets the grant requirements for the small systems and disadvantaged communities, while also providing financing opportunities to the applicants with the highest priority project ranking:

- There is an IUP cap of \$15 million per applicant
- 2025 new projects in non-disadvantaged communities are capped at \$10 million

- The Trust and MassDEP will continue to support the 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.

Project Carryover Costs	
Number of Projects with Carryover Costs	20
Total Project Costs	\$852,877,806
Total Carryover Costs for Future IUPS	\$510,437,995
2025	\$169,960,944
2026	\$209,956,741
2027	\$97,389,140
2028	\$33,131,170

Table 1 is the list of projects being offered financing for calendar year 2025 and Table 3 is the extended PPL. Table 2 list the projects that have been selected to receive grants from the Trust for their AMP projects.

Lead Service Line Replacement (LSLR) Program – The amount of the LSLR Grant for 2025 is not yet known. USEPA is developing a new allotment formula to address concerns raised by the EPA Office of Inspector General over how the reallocation of funds was determined in 2023 and onward. Due to this delay, Massachusetts is unable to fund the Planning Grant program because all available funding has been committed through grant year 2024. The DWSRF is offering in this IUP loans for lead service line (LSL) replacement construction projects and/or planning projects, supported by \$39.5 million in uncommitted funds from previous grant years.

- LSL replacement construction projects will be eligible to receive additional subsidy in the form of 0% interest rate loans contingent on the availability of funds. Using \$29.5 million of the LSL Replacement Grant, MassDEP is implementing a rolling loan application process for new LSL replacement construction projects. This program supports the PWS' (public water suppliers), efforts to expedite implementation of MassDEP-approved LSL replacement programs. Projects must include inventory and replacement of public and private LSLs in compliance with the Lead and Copper Rule Revisions and all SRF

program requirements. Priority for financing will be given to systems with documented lead levels, particularly those exceeding the 90th percentile, and the PWS serving Disadvantaged Communities or small systems. MassDEP will review applications monthly while funding is available.

- Massachusetts is offering \$10 million in 0% interest rate loans for planning activities that assist the PWS to complete LSL inventories, including verification of unknowns, and to develop LSL replacement programs. *(Note: Verifications funded with a planning loan may include potholing but may not include activity that is disruptive to the inspection area, requiring heavy equipment or restoration work. In this case, the verification will only be considered for funding as part of a construction loan.)* MassDEP is accepting loan applications for LSL planning activities on a rolling basis while funding is available.

II. DWSRF PROGRAM COMPONENTS AND REQUIREMENTS

A. Additional Subsidy and Disadvantaged Communities

The Infrastructure Investment and Job Act (IIJA) raised the minimum Safe Drinking Water Act requirement for Additional Subsidy to Disadvantaged Communities from 6% to 12%, establishing an additional subsidy range of 12% to 35% for the annual DWSRF Base Grant. In addition, Congress requires that states use 14% of the annual Base Grant for additional subsidy. Massachusetts, therefore, Massachusetts expects to provide additional subsidy of 26% on the Base Grant in 2025. IIJA also added three grants to fund DW projects, each with required additional subsidy as follows:

Grant	Types of Projects Eligible for Additional Subsidy	Percent of Grant for Additional Subsidy
DW SRF Base Grant	DW Construction Projects	12% - 35% IIJA 14% Congress (*)
DW SRF Supplemental Grant	DW Construction Projects	49%
DW Emerging Contaminants Grant	Emerging Contaminant Construction Projects	100%
DW Lead Service Line Replacement Grant	Lead Service Line Replacement Construction projects	49%

(*) IIJA establishes an additional subsidy range of 12% to 35% for the annual DWSRF Base Grant. Congress also requires that states use 14% of the annual DWSRF Capitalization Grant for additional subsidy. These percentages are added, resulting in a minimum subsidy of 26%.

Eligible construction projects in [Disadvantaged Communities](#) will receive additional subsidy, subject to the availability of funding, 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](#)

Non-PFAS Projects in Disadvantaged Communities Loan Forgiveness		
Tier	Percent of State APCI	Minimum Loan Forgiveness
1	80% or greater, but less than 100%	6.6%
2	60% or greater, but less than 80%	13.2%
3	Less than 60%	19.8%

For PFAS projects in Disadvantaged Communities appearing on the 2025 IUP, the loan forgiveness percentages will be set as listed below. The change in the loan forgiveness percentages is due to the increased demand for PFAS projects coupled with increasing costs associated with those projects. PFAS projects will continue to receive 0% interest rate loans, which equates to a 20% subsidy when compared to the SRF's standard 2% interest rate loan.

PFAS Projects in Disadvantaged Communities Loan Forgiveness		
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.

For purposes of the IIJA, Massachusetts is expanding the Trust's existing three-tiered affordability based Disadvantaged Community program for the DWSRF to include "Environmentally Disadvantaged Community" designation for eligible projects, as determined by MassDEP, under the following criteria:

- An Environmentally Disadvantaged Community is a public water supplier that has lead in the water supply and/or lead service lines in the system.
- The designation as an Environmentally Disadvantaged Community for a particular year will confer eligibility for additional subsidy provided only with funds made available by the IIJA for eligible projects on that year's IUP that MassDEP has identified as mitigating the environmental factors detailed above. This designation will not confer eligibility for additional subsidy on any other projects by such Environmentally Disadvantaged Community.
- An Environmentally Disadvantaged Community is not eligible to receive loan forgiveness through the Disadvantaged Community tiered designation described above in addition to the Environmental Disadvantaged Community designation.

Projects that have a renewable energy component will qualify for Tier 1 loan forgiveness for the portion of the loan that is financing the renewable energy component, regardless of Disadvantaged Community status, unless 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 or PFAS design are not eligible for loan forgiveness.

In addition to meeting the [Affordability Criteria](#), under 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 5 years to fund the community's general operating budget.

B. Small Systems

Congress requires that 15% of the total amount of DWSRF funds be dedicated to Small Systems, i.e., drinking water systems serving fewer than 10,000 customers. The total DWSRF funds expected to be available for 2025 is \$348.2 million. Fifteen percent of that amount is \$52.2 million. The IUP list contains 7 small system projects totaling approximately \$76.3 million, which exceeds the 15% requirement. Therefore, Massachusetts expects to meet this requirement.

C. Set-Aside Activities

Congress allows states to apply set-asides from the DWSRF Capitalization and IIJA Supplemental DWSRF grants to provide management of the program and technical assistance to PWS. MassDEP's objectives for DWSRF set-aside activities are included as Appendix A. For FY 2025, these set-aside activities include funds that will be earmarked for issues involving small water supply systems, local assistance for wellhead protection, capacity implementation, and

program management and administration. Appendix A details how MassDEP intends to utilize these set-aside funds to implement the federal Safe Drinking Water Act.

III. SHORT- AND LONG-TERM GOALS

The following are the goals that Massachusetts has set for its DWSRF:

Short-Term Goals

- Solicit projects and prioritize projects that assist the Commonwealth in maximizing the utilization of IIJA grant funds.
- Increase flexibility for proactive planning with a rolling application process for planning projects.
- Assist PWS with complying with the Lead and Copper Rule Revisions.
- Safeguard public health by prioritizing and incentivizing projects that remediate PFAS or lead in drinking water.
- Finance eligible projects addressing unanticipated problems of acute public health concern that arise during the year and constitute an imminent public health threat.
- Implement assistance programs for small and very small private PWS that may need additional assistance with complying with the requirements of the Safe Drinking Water Act.
- 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.

Long-Term Goals

- Efficiently allocate and distribute IIJA funds.
- Identify and prioritize additional subsidy for projects in the IUP that serve Disadvantaged Communities.
- Provide and promote assistance to PWS with complying with Lead and Copper Rule Revisions.
- Ensure that water treatment projects financed through the SRF fully consider cost-effective energy efficiency measures and/or renewable energy strategies.
- Assist public water suppliers to finance projects to address the impact of climate change and resiliency concerns on the safe and continuous operation of the utility. Through its [Hazard Mitigation and Climate Adaptation Plan](#), the Commonwealth is encouraging resiliency and climate adaptation in the design and construction of water infrastructure.
- Promote systematic Asset Management Planning for drinking water utilities to achieve long-term sustainability, implementable climate change mitigation and resiliency measures, including cybersecurity, and deliver consistent service in a cost-efficient manner.

- Ensure that small PWS can participate in the SRF program by providing additional assistance.
- 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. 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 [DWSRF 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 for financing, projects must meet state and federal eligibility requirements, 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, Integrated Water Resource Management Plan, or other MassDEP sanctioned planning document. Projects proposing to replace LSLs must ensure that lines will be replaced to the users' meters to preserve priority ranking. Furthermore, no community can receive financial assistance unless it can demonstrate that it has adequate technical, financial, and managerial capacity, as approved by MassDEP. Eligibility includes consistency with the assurances described in this document and the requirements contained within MassDEP's financial assistance regulations. [310 CMR 45.00: The Drinking Water State Revolving Fund](#)

B. Applicant Cap

The Massachusetts SRF regulations (310 CMR 45) place a limit on any one proponent receiving any more than 25% of the available financing each year. Due to the limited amount 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 \$15 million for the 2025 financing period, applied to the total of new and carryover projects. MassDEP reserves the right to waive the applicant cap limitation if MassDEP and the Trust determine 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, or if certain projects in disadvantaged communities or as a small system will need to be advanced to meet federal grant requirements. Subject to the availability of funding, project(s) bypassed may be replaced by the highest ranked priority project(s) on the PPL that are ready to proceed. **Complete loan 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 emergency assistance, planning, PFAS design, or LSL replacement 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 or grant recipient's drinking water project to receive financial assistance from the Trust, the project must meet eligibility guidelines. Such eligible projects include, but are not limited to:

- Projects to address or prevent violation of public health standards, including projects to come into or maintain compliance.
- Projects to replace aging infrastructure, if such projects are needed to maintain compliance or further public health goals and requirements, including projects to rehabilitate or develop sources to replace contaminated sources, install or upgrade treatment or storage facilities, and install or replace transmission and distribution pipes to prevent contamination or improve water pressure to safe levels.
- Projects to consolidate and/or restructure a public water system.
- 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 in 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 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. Source and Uses Table

The sources of funds available to the Massachusetts DWSRF include the federal Base grant, IIJA Supplemental grant, IIJA Emerging Contaminant (PFAS) grant, and IIJA LSL grant, 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 \$348.3 million of DWSRF eligible projects, and \$1.3 in grants. This total is reflected below by adding project loans and grants plus the minimum loan forgiveness.

Final 2025 Drinking Water IUP Sources & Uses	
Sources	
Base Capitalization Grant	\$ 23,953,172
IIJA Supplemental Grant	53,457,000
IIJA PFAS Grant	16,404,000
Transfer from CWSRF	30,958,677
State Matching Funds	15,482,034
BIL LSL Available Prior Grant	39,466,704
Leveraged Bond Funds	170,000,000
Other Program Funds	14,106,849
Total Sources	363,828,436
Uses	
Project Loans and Grants	284,652,596
Minimum Loan Forgiveness	64,938,254
Administrative Costs	3,096,407
Set Aside Funding	11,141,179
Total Uses	\$ 363,828,436

B. Source of State Match

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

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 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 issuances. All fee income is DWSRF program income. The Trust's Administrative Account is expected to fund the 10% state management set-aside for the DWSRF Base Grant. Use of those funds is detailed in the attached Set-Aside plan in Appendix A.

D. Program Administration

The Commonwealth intends to use the full 4% of the federal Base and IIJA Supplemental Grant funds for administrative support of activities related to the DWSRF. Use of those funds is detailed in the DWSRF Grant Application that the Trust files each year with the USEPA and in the attached Set-Aside plan in Appendix A.

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 amount, IIJA supplemental grant amount and IIJA Emerging Contaminant grant.

G. Additional Subsidy Amounts

In the 2025 DWSRF IUP, Massachusetts intends to award a minimum of 26% of the Base Grant in additional subsidy to eligible projects. In addition, Massachusetts will provide the required additional subsidies for each of the anticipated 2025 IIJA grants as detailed below.

Grant	Types of Projects Eligible for Additional Subsidy	Percent of Grant for Additional Subsidy	Eligible Recipients for Additional Subsidy	Amount
DWSRF Base Grant	DW Construction Projects	26%	Disadvantaged Communities	\$8,283,007
DWSRF IIJA Supplemental	DW Construction Projects	49%	Disadvantaged Communities	\$34,837,927
DWSRF IIJA Emerging Contaminant	DW PFAs and other Emerging Contaminant Construction Projects	100%	25% must be Disadvantaged Communities	\$21,817,320
DWSRF IIJA LSL Replacement	LSL Replacement Construction projects	49%	Environmentally Disadvantaged Communities ¹	\$19,338,685

¹ Environmentally Disadvantaged Community is defined in Section II. (A).

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 DWSRF.

Title XIV of the Federal Safe Drinking Water Act Amendments of 1996 and subsequent regulations and guidance require that the Commonwealth certify compliance with or acceptance of a number of conditions. These include compliance with the applicable provisions of s. 1452, State Revolving Loan Fund, as follows:

- **Environmental Reviews:** DWSRF borrowers are required to meet the standards of the National Environmental Policy Act (NEPA) or [the State Environmental Review Process](#). Some projects, owing to their relatively minor environmental impacts, if any, do not trip the threshold of the Massachusetts Environmental Policy Act (MEPA) and are therefore not subject to the rigorous environmental review process set forth in MEPA. The Commonwealth reasons that these projects are categorically exempt from the NEPA review process as well. A planning level review of each of the eligible projects concludes that since these projects almost uniformly are the upgrade or rehabilitation of existing infrastructure, most will not usually require MEPA review. A final determination of project relevancy under MEPA cannot be made until the preliminary design phase of work is complete on each project.
- **Binding Commitments:** The DWSRF will enter binding commitments for 120 percent of each quarterly grant payment within one year of receipt of the payment.
- **Expeditious and Timely Expenditures:** The DWSRF will expend all funds in the DWSRF in a timely manner.
- **Set-Aside Programs.** The Commonwealth will conduct set-aside activities consistent with the plan provided as Appendix A to this document.

B. Federal Requirements

A number of federal requirements apply to DWSRF 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).
- 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.
- American Iron and Steel (all construction projects)
- Build America, Buy America (BABA) Act (group of projects)

MassDEP and the Trust will identify 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.

In addition, the Safe Drinking Water Act requires that states meet specific mandates or risk losing a portion of their federal grant. Failure to implement a Capacity Development Program and/or Operator Certification Program that are at least as stringent as the federal guidelines will result in a state losing up to 20% of their Base Grant each year. MassDEP will comply with the capacity development authority, capacity development strategy, and operator certification program provisions.

C. Davis-Bacon Wage Rates

The USEPA’s appropriation bill requires the application of Davis-Bacon prevailing wage rates to all drinking water projects funded in whole or in part by the DWSRF. 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 requirements permanent for all DWSRF construction projects going forward. Furthermore, with the inclusion of the Build America, Buy America Act (BABA), the IIJA extends the domestic sourcing requirements to DWSRF construction projects funded with

federal capitalization grants going forward. 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. 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: 2/20/2025
Commenter: Jason Federico, Water Superintendent, Town of Norwell
Subject: DW 19053 Washington Street WTP
Comment Summary: If project were to be reranked based on most recent PFAS results it should be rated greater than 523 points and eligible to receive funding.
MassDEP's Response: This project's PEF score was reviewed and there is no change.

Date: 2/28/2025
Commenter: Jason Federico, Water Superintendent, Town of Norwell
Subject: DW 19053 Washington Street WTP
Comment Summary: Letter from Patrick M. O'Connor, State Senator, in support of the Washington Street Water Treatment Plant and advocate for necessary funding.
MassDEP's Response: This project's PEF score was reviewed and there is no change.

Date: 2/28/2025
Commenter: Jason Federico, Water Superintendent, Town of Norwell
Subject: DW 19053 Washington Street WTP
Comment Summary: Letter from Darleen L. Sullivan, Town Administrator, in support of the Washington Street Water Treatment Plant and advocate for necessary funding.
MassDEP's Response: This project's PEF score was reviewed and there is no change.

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: Liz Pereira, Wright-Pierce, Funding Specialist
Subject: DW 18988 Weston Water Storage Tank Replacement
Comment Summary: On behalf of the Town of Weston, Wright-Pierce is requesting the Massachusetts Department of Environmental Protection (MassDEP) consider reviewing the Weston Water Storage Tank Replacement on the basis of merit as the existing tiered scoring system only r
MassDEP's Response: This project's PEF score was reviewed and there is no change.

Date: 3/3/2025
Commenter: Jennifer A. Pederson, Executive Director, Massachusetts Water Works Association
Subject: DW 2025 DWSRF IUP
Comment Summary: Testimony provides comments on the Massachusetts Department of Environmental Protection's (MassDEP) Draft 2025 Intended Use Plan (IUP) for the Drinking Water State Revolving Loan Fund (DWSRF).
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: 3/3/2025
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.

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.

Date: 3/3/2025
Commenter: Bryan J. Weiner, PE, Senior Project Manager, Tighe & Bond
Subject: DW 19121 Oak Street PFAS Water Treatment Upgrades
Comment Summary: Testimony presenting information for consideration and would appreciate a reevaluation of the project scoring and priority ranking.
MassDEP's Response: This project has been rescored.

Date: 3/3/2025
Commenter: Robert E. Ward, DPW Director
Subject: DW 19004 Radial Collector Well
Comment Summary: In support of the CY2025 DWSRF-19004 Radial Collector Well project for the City of Haverhill which was not selected in the initial IUP and requests a review of why this project merits funding in CY2025.
MassDEP's Response: This project's PEF score was reviewed and there is no change.

Date: 3/3/2025
Commenter: Paul Brinkman, DPW Business Manager
Subject: DW 19132 Jersey Street Well Water Treatment Plant
Comment Summary: Requesting an increase in the project amount.
MassDEP's Response: IUP cost based on PEF submittal.

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 assurance 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
DRINKING WATER STATE REVOLVING FUND
Calendar Year 2025 DWSRF Project Priority List

NEW PROJECTS

Rating	Applicant	PWSID	Pop.	SRF ID	Project	Project Cost
530	MASSACHUSETTS WATER RESOURCES AUTHORITY	6000000	2660000	19059	Cp-2 NEH Improvements	\$21,045,949
530	YARMOUTH (EC)(PF)(BG)	4351000	38900	19119	Yarmouth Wells 10 & 11 PFAS Treatment	\$4,996,475
530	IPSWICH (SG)	3144000	13809	19012	Ipswich Water Treatment Plant	\$33,803,000
529	NEWBURYPORT (H)(EC)(SG)	3206000	20335	19054	Newburyport PFAS Treatment System	\$20,495,200
526	HANOVER (EC)(SG)	4122000	14893	19091	Hanover PFAS Treatment	\$17,330,000
526	FOXBOROUGH (EC)	4099000	18383	19121	Oak Street PFAS Water Treatment Upgrades	\$16,500,000
524	DRACUT WATER SUPPLY DISTRICT (EC)(PF)	3079000	25361	19115	PFAS Water Treatment Plant Expansion	\$19,400,000
523	BRIDGEWATER (H)(PF)	4042000	28633	19102	Plymouth St. Wells Upgrades and Raw Water Main	\$6,190,103
522	HOPKINTON (H)(EC)	2139000	12493	18982	Hopkinton/Southborough Interconnection	\$33,494,371
521	NORWELL (EC)	4219000	11495	19053	Washington Street WTP	\$17,850,000
521	CONCORD	3067000	18156	19078	Nagog Pond Water Treatment Plant	\$58,167,000
521 *	PEPPERELL (EC)(PF)(SG)	2232000	9180	19132	Jersey Street Well Water Treatment Plant	\$13,000,000
520 *	GROVELAND (EC)(PF)(SG)	3116000	6400	18991	Wells 1, 3 & 4 Water Treatment Plant	\$44,531,076
518 *	WEST BROOKFIELD (PF)(BG)	2323000	2477	19048	Leland Road Pump Station Upgrade	\$6,240,000
515 *	DUDLEY (PF)	2080000	5515	19148	Eagle Drive Neighborhood Water Main Extension	\$10,085,000
456	BROCKTON (H)(PF)	4044000	105643	19034	Aquaria Desalination Plant Purchase	\$55,000,000
441	BROCKTON (H)(PF)	4044000	105643	19107	Silver Lake WTP Upgrade	\$3,000,000
437	LOWELL (H)(PF)	3160000	113600	19038	Finished Water Redundancy & Electrical Upgrades	\$17,282,600
431	HAVERHILL (PF)	3128000	61896	19004	Radial Collector Well	\$24,955,000
431	NEWBURYPORT (H)	3206000	20335	19056	Raw Water Pipeline to Lower Artichoke Pump Station	\$7,200,000
430 *	HADLEY (PF)(BG)	1117002	4979	19075	Mount Warner Well Rehabilitation	\$11,350,000
429	GRAFTON WATER DISTRICT (H)	2110000	10925	18987	Trinity Avenue Water Treatment Plant (WTP)	\$33,928,000
428	MANSFIELD (H)	4167000	23189	19117	Albertini PFAS Treatment and Wells	\$16,100,000
427	WESTON	3333000	10479	18988	Weston Water Storage Tank Replacement	\$39,832,000
427	AUBURN WATER DISTRICT (PF)	2017000	12255	19005	Two PFAS Removal Treatment Facilities	\$16,740,000
426 *	WEST BRIDGEWATER (PF)	4322000	7668	18992	Cyr Street Norman Ave PFAS Treatment	\$2,717,000

424	ANDOVER (H)	3009000	36569	18999	Phase 2 Water Transmission Main Improvements	\$11,122,800
423	DUXBURY	4082000	16445	19042	Depot and Tremont Water Treatment Facility	\$38,847,000
422	BRIDGEWATER (H)(PF)	4042000	28633	19073	Bridgewater Well 5R & Well 9R Installation	\$1,764,600
420	WINTHROP (PF)	3346000	19316	19106	Faun Bar Avenue Water Storage Tank Rehabilitation	\$3,611,875
418 *	BLANDFORD (PF)	1033000	442	19018	Comprehensive Water Distribution System Upgrades	\$11,434,044
326	PEMBROKE (PF)	4231000	18328	18990	Well 2 and Well 3 Water Treatment Plant	\$18,956,000
325	HOLDEN	2134000	17626	19067	Holden Water System Improvements	\$14,000,000
316	BARNSTABLE (H)(PF)	4020004	35000	19068	Longview Drive Area Pipe Replacement Project	\$3,758,997
313	AGAWAM (PF)	1005000	28692	19141	Northeast Area Water Main Replacement	\$6,632,085
313	AGAWAM (PF)	1005000	28692	19142	Belvidere & Brookline Water Main Replacement	\$2,211,411
233	MASSACHUSETTS WATER RESOURCES AUTHORITY	6000000	2660000	19111	Sections 68, 84 and Valve 53-1-A Improvements	\$15,000,000
227	FALL RIVER (PF)	4095000	94000	19129	Jefferson Street Water Main Replacement Project	\$1,668,903
226	QUINCY (H)(PF)	3243000	101636	19030	FY26 Water Infrastructure Improvements	\$3,000,000
225	FRANKLIN (H)	2110000	10925	18985	Hillside Tanks No. 1 and No. 2 Replacement	\$8,257,000
218	BURLINGTON (H)	3048000	26581	19010	Phase 2B Water Main Replacement	\$9,485,000
214	LONGMEADOW	1159000	15853	18986	Western Drive Neighborhood Water Main Improvements	\$6,210,000
211	BILLERICA (H)(PF)	3031000	42119	19113	Fox Hill Booster Pump Station Upgrades	\$805,000
TOTAL OF NEW PROJECTS						\$707,997,489

(Count: 43)

(Average Rating: 415.65)

* - Small System

(BG) - Base Capitalization Grant

(D) - Dropped by Applicant

(EC) - BIL DWSRF Emerging Contaminants Grant

(H) - Housing Choice Communities

(LR) - BIL DWSRF Lead Service Line Replacement Grant

(PF) - Disadvantaged Community, eligible for Principal Forgiveness

(RE) - Potential Renewable Energy Projects

(SG) - BIL DWSRF 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, and those identified with * as in Table 1, 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.

MassDEP PRIORITY PROJECTS

Applicant	SRF ID	Project	Project Cost
EMERGENCY SRF SET-ASIDE	2978		\$5,000,000
LEAD SERVICE LINE REPLACEMENT SRF SET- ASIDE	16595		\$39,500,000
PLANNING SRF SET-ASIDE	13574		\$10,000,000
TOTAL OF MassDEP PRIORITY PROJECTS			\$54,500,000

(Count: 3)

MULTI-YEAR CARRYOVER AND STATUTORY PROJECTS

Applicant	PWSID	Pop.	SRF ID	Project	Project Cost
ATTLEBORO (PF)(EC)(BG)	4016000	46461	16764	Wading River Water Treatment Plant	\$35,181,000
BARNSTABLE (H)(PF)(EC)(SG)	4020004	35000	16849	Straightway & Hyannisport PFAS Treatment Facility	\$45,295,767
BELLINGHAM (H)(PF)(EC)(SG)	2025000	16628	16813	PFAS Treatment at Hartford Avenue WTP	\$36,500,000
BRAINTREE #(RE)(PF)(EC)	4040002	25	7258	Tri-Town Regional Water Treatment Plant	\$55,212,683
CHELMSFORD WATER DISTRICT (H)(EC)	3056000	28750	16698	Chelmsford WD PFAS Treatment	\$43,000,000
FRANKLIN (H)(RE)(EC)	2101000	33723	16730	Franklin Hayward St. WTP Improvements	\$25,696,000
GRAFTON WATER DISTRICT (H)(EC)(BG)	2110000	10925	16765	East St. and Worcester St. PFAS Treatment Upgrades	\$23,000,000
HOLBROOK #(RE)(PF)(EC)	4040002	25	7259	Tri-Town Regional Water Treatment Plant	\$19,904,296
MASSACHUSETTS WATER RESOURCES AUTHORITY	6000000	2550000	6691	Northern Intermediate High Section 89 Replacement	\$32,680,976
MASSACHUSETTS WATER RESOURCES AUTHORITY	6000000	2550000	7218	Section 23, 24, 47 Water Mains Rehab	\$28,963,060
MIDDLEBOROUGH (H)(PF)(EC)	4182000	16900	16735	East Grove Street Water Treatment Plant	\$34,153,700
PLAINVILLE (H)(EC)(BG)	4238000	8894	16848	Turnpike Lake PFAS Water Treatment Plant	\$25,600,000
RANDOLPH #(RE)(PF)(EC)	4040002	25	7260	Tri-Town Regional Water Treatment Plant	\$39,780,862
SCITUATE (H)	4264000	19760	7348	Surface Water Treatment Plant	\$67,213,348
SHARON (RE)	4266000	16262	12443	Wells 2 & 4 Water Treatment Plant	\$31,444,944
SHREWSBURY (H)(EC)	2271000	38325	16836	Home Farm WTP PFAS Treatment Upgrades	\$18,500,000
UXBRIDGE (PF)(EC)	2304000	11254	16738	Blackstone Water Treatment Plant	\$19,500,000
WEBSTER (PF)(EC)	2316000	17776	10380	PFAS Water Treatment Plants	\$35,120,000
WESTFORD (H)(EC)(SG)	3330000	18112	16749	Forge Village&Nutting Road PFAS Treatment Upgrades	\$23,000,000
TOTAL OF MULTI-YEAR CARRYOVER AND STATUTORY PROJECTS					\$639,746,636

(Count: 19)

TOTAL OF PROJECT PRIORITY LIST**\$1,402,244,125**

TABLE 4
DRINKING WATER STATE REVOLVING FUND
Calendar Year 2025 DWSRF ASSET MANAGEMENT PLANNING PROJECTS

ASSET MANAGEMENT PLANNING PROJECTS

Rating	Applicant	SRF ID	Project	Project Cost
88 *	WARE	19021	Ware Drinking Water Asset Management Plan	\$225,000
86 *	HINSDALE	19069	WTP Asset Management Plan	\$186,240
84 *	ERVING	19080	Erving Water Asset Management Project	\$117,460
82 *	EGREMONT	19087	Egremont Water Asset Management	\$124,960
79 *	CHESHIRE	18978	Cheshire Water Asset Management Plan	\$110,520
69	WEST SPRINGFIELD	18983	West Springfield Water Asset Management Project	\$159,100
64	PEMBROKE	19072	Pembroke Water Asset Management Plan	\$250,000
57 *	SHIRLEY WATER DISTRICT	19029	Water System Asset Management Plan	\$139,100
55	SWANSEA WATER DISTRICT	19045	Water System Asset Management Plan	\$181,500
54	WINCHESTER	19083	Winchester Asset Management Grant	\$200,000
52 *	WILLIAMSTOWN	19103	Williamstown Water System Asset Management Plan	\$114,400
51	ATHOL	19017	Water System Asset Management Plan	\$152,200
44	SHARON	19094	Sharon Asset Management Plan	\$136,300
41	ANDOVER	19088	Andover Water Distribution AMP	\$35,500

TOTAL OF ASSET MANAGEMENT PLANNING PROJECTS

\$2,132,280

(Count: 14)

TOTAL OF PROJECT PRIORITY LIST

\$2,132,280

* - small systems

APPENDIX A

Drinking Water Set-Asides for the Base, Supplemental, and Lead Service Line Grants

Information on Set-asides - Base Grant

The Commonwealth of Massachusetts plans to set aside an estimated \$5,030,166 of the Base Capitalization Grant for various non-construction related activities that are authorized in the Safe Drinking Water Act Amendments of 1996. These activities are often vital to water systems so that they can develop and maintain the financial, technical, and managerial capacity to run their system effectively. A portion of the set-aside money will be used to develop and implement programs within state government necessary to implement the DWSRF and the SDWA Amendments of 1996.

The SDWA provides guidance for a variety of uses of the set-aside money. The set-aside money will be placed in separate accounts outside the Project Fund. The SDWA allows for transfers between the set-aside accounts and are the current best estimates of the funds required to complete the programs and projects described in the IUP. Transfers of funds between accounts and projects in accordance with EPA requirements will be made as necessary to accomplish the programs and projects described and efficiently and effectively use the available funds. The SDWA limits the percentage of the capitalization grant that can be used in each of these set-asides and whether the set-aside funds can be “banked” or reserved for future use. In cases where it is allowed, MassDEP reserves its authority to bank the balance of funds so they may be used in the future.

I. 4% DWSRF ADMINISTRATION – 2 FTEs

MassDEP anticipates applying for an estimated \$958,127 from the 2025 DWSRF Base Grant for DWSRF Program Administration. These funds will be combined with any remaining prior year funds to provide comprehensive DWSRF program assistance. Duties will include (but not be limited to):

- A. MANAGE DWSRF COORDINATION** of projects and liaison with the Massachusetts Clean Water Trust.
- B. OVERSEE ADMINISTRATION AND MANAGEMENT** of the DWSRF Priority List/Intended Use Plan process and fiscal administration aspects of the set-asides, such as grant application and fiscal reporting, and coordinate with the Drinking Water Program regarding set-asides.
- C. SUPPORT, CONDUCT, AND ANALYZE SRF PROJECT APPLICATIONS AND PROJECT REVIEWS**

4% Set-Aside Deliverables

Coordination of all DWP Source Protection and Technical Services Activities, Set-Asides, IUP, and Work Plan Sections that Reflect Drinking Water Program Needs and Priorities, Oversight of DWSRF Loans and Grants

4% Set-Aside Measures of Success

Drinking Water Source Protection and Technical Services Section activities that support Drinking Water Program goals and priorities and are coordinated with the DWSRF Set-Aside activities to achieve stated deliverables and measures of success that are consistent with Drinking Water Program objectives. Award of loans and grants in a timely manner.

II. 2% FOR SMALL SYSTEMS SET-ASIDE- 1 FTE

MassDEP anticipates applying for an estimated \$479,063 from the 2025 DWSRF Base Grant for

small systems technical assistance. These funds will be dedicated to staffing the support of the SDWA compliance and in providing technical assistance in support of Small System Capacity Development. FTEs will continue to be provided in the region to follow up with individual small systems on specific compliance issues and other system operation issues.

2% Set-Aside Deliverables

- On-site training and support to Public Water Suppliers.
- Perform TNC compliance assistance sanitary surveys and provide Groundwater Under the Influence evaluations.
- Technical assistance given to targeted systems that have specific SDWA treatment compliance issues
- Technical assistance to public water systems on the Ground Water Rule.
- Reviews of technical reports related to water supply technology and analysis.
- Technical reviews of state initiatives such as disinfection byproduct treatment or groundwater disinfection.
- Supervision of technical staff and training programs for suppliers.
- Technical reviews of major water quality projects and public health data.
- Information for the public and for water suppliers on major water quality problems.
- Trainings on SDWA Topics.
- Training sessions (with credits) for Certified Operators.

2% Set-Aside Measures of Success

- Compliance issues are successfully addressed in the targeted systems.
- Completion of planned capacity sanitary survey visits.
- Effective technical assistance given as scheduled.
- Each training will be followed by an evaluation form to be filled out by participants to assess the efficacy of the training. Evaluation of the results will be considered as part of the contract assistance, and provided to the MassDEP staff responsible for implementing training initiatives and reporting on Capacity Development, for their assessment and future planning. Evaluation of all training and assistance will consider the success of recruiting recalcitrant and high-priority systems.
- Reports reviewed as scheduled.

III. 10% FOR STATE PROGRAM MANAGEMENT

MassDEP anticipates utilizing the 10% set-aside to fund project loans.

IV. 15% -SOURCE WATER PROTECTION AND CAPACITY DEVELOPMENT –8 FTEs

MassDEP anticipates applying for an estimated \$3,592,976 from the 2025 DWSRF Base Grant for Source Water Protection and Capacity Development. The authorized activities under this set-aside can include: land acquisition and conservation easement program, source water protection, wellhead protection, and technical and financial capacity implementation.

A. WELLHEAD PROTECTION AND CAPACITY IMPLEMENTATION- 8 FTEs

- Assist with source protection program activities related to groundwater sources, as well as operation of the UIC program (a.k.a. “Underground Source Water Protection Program”). Ensure consistency of this work among regions; coordinate with GIS and web-based programs; coordinate with other MassDEP programs; investigate available data for usefulness to groundwater protection; and develop relevant policies and procedures.
- Develop and maintain spatial data related to public water sources and potential contamination threats. Work with regional staff and resources to locate regulated facilities including locating information in files and making site visits to collect location information. Assist with GIS management.
- Assist in Zone II delineation (and re-delineation as needed) and other wellhead protection-related work.
- Provide technical assistance on source protection to public water suppliers and local officials, and assist with the source water assessment program and with protection of groundwater sources from contamination by septic systems. This includes providing system-specific protection recommendations.
- In accordance with the Capacity Strategy, provide technical assistance in implementing capacity development, including the ability to provide adequate quantities of source water.
- Provide assistance, primarily with protection of groundwater sources.

15% Set-Aside Deliverables

- UIC program operating under State Primacy
- Spatial data, maps.
- Zone II Reviews
- On-Site training and support to water suppliers
- UIC tracking and reports
- Outreach materials, technical assistance meetings, training for regions, and bylaw reviews
- Implementation of water conservation capacity improvement grant program.
- Implementation of Capacity Development program.
- Implementation of the Source Water Protection program.
- Implementation of the Lead and Copper Rule Revisions (LCRR) and the Lead and Copper Rule Improvements (LCRI)

15% Set-Aside Measures of Success

- Improved source protection for ground water sources at state and local levels
- GIS databases are properly reviewed and maintained
- Reviews are conducted in a timely manner
- Contract oversight is effective
- Technical Assistance is appropriate and timely and leads to improved source and aquifer protection in the systems visited
- Methods to assure capacity to deliver adequate quantities of drinking water are developed
- Program goals meet MassDEP objectives
- Improved protection at the local level

2025 IUP – Drinking Water Base Grant Set-Asides Budget

Grant Amount – \$23,953,172

	Set-Asides				
	4% Admin.	2% Small System	10% State Program	15% Local Asst.	Total Set Asides
Salary	\$954,127	\$478,563	\$0	\$3,589,776	\$5,022,466
Travel	\$4,000	\$500	\$0	\$2,500	\$7,000
Supplies			\$0	\$700	\$700
	\$958,127	\$479,063	\$0	\$3,592,976	\$5,030,166

Information on Set-asides - Supplemental Grant

The Commonwealth of Massachusetts plans to set aside an estimated \$9,207,420 of the Supplemental DWSRF Grant for various non-construction related activities that are authorized in the Safe Drinking Water Act Amendments of 1996.

I. 4% DWSRF ADMINISTRATION – 8.5 FTEs

MassDEP anticipates applying for an estimated \$2,138,280 from the 2025 DWSRF Supplement Grant for DWSRF Program Administration. These funds will be combined with any remaining prior yearfunds to provide comprehensive DWSRF program assistance.

Duties may include (but not be limited to):

A. MANAGE DWSRF COORDINATION of projects and liaison with the Massachusetts Clean Water Trust

B. OVERSEE ADMINISTRATION AND MANAGEMENT of the DWSRF Priority List/Intended Use Plan process and fiscal administrative aspects of the set-asides, such as grant application and fiscal reporting, and coordinate with the Drinking Water Program regarding the set-asides.

C. SUPPORT, CONDUCT, AND ANALYZE DWSRF PROJECT APPLICATIONS AND PROJECT REVIEWS

4% Set-Aside Deliverables

- Coordination of all DWP Source Protection and Technical Services Activities
- Set-Aside IUP and Work Plan Sections that Reflect Drinking Water Program Needs and Priorities Oversight of DWSRF Loans and Grants

4% Set-Aside Measures of Success

- Drinking Water Source Protection and Technical Services Section activities that support

- Drinking Water Program goals and priorities and are coordinated with the DWSRF
- Set-Aside activities achieve stated deliverables and measures of success that are consistent with Drinking Water Program objectives.
- Award of loans and grants in a timely manner

II. 2% FOR SMALL SYSTEMS SET-ASIDE- 2 FTEs

MassDEP anticipates applying for an estimated \$1,069,140 from the 2025 DWSRF Supplemental Grant for small systems technical assistance. These funds will be combined with any remaining prior year funds to provide comprehensive technical assistance to small public water systems.

Duties may include (but not limited to):

A. STAFFING TO SUPPORT SAFE DRINKING WATER ACT COMPLIANCE

In providing technical assistance in support of Small System Capacity Development. FTEs will continue to be provided in the region to follow up with individual small systems on specific compliance issues and other system operation issues.

B. CONTRACTED SERVICES - Technical Assistance and Training

MassDEP will fund a contractor(s) to provide a variety of direct technical, financial, and managerial assistance to small drinking water system. Priority given to disadvantaged communities. Activities will focus on the Safe Drinking Water Act requirements and Massachusetts Drinking Water Regulations and creating an environment of transparency with the Drinking Water Program Data. The proposed activities may include (but not be limited to): Asset management planning, engineering assistance and evaluations, lead service line replacement planning, loan application assistance, emergency response, cybersecurity, leak detection, and well identification. Trainings may include Very Small System Operator Training, Cybersecurity, Annual Statistical Reporting, Lead and Copper Regulations Compliance, Emerging Contaminants, Cross Connection Control, Opening and Closing a Seasonal System, Regulatory Updates, pump and motor maintenance, rate setting, disinfection, sampling, and exam review. Trainings must meet the requirements established by Division of Licensure (DOL) and can include classroom, self-guided and online training.

C. CONTRACTED SERVICES - Assistance for Small Community Water Systems and Non-Transient, Non-Community Systems – Cybersecurity Planning Program

MassDEP will use these set-aside funds to contract with a qualified technical assistance provider to complete the following eligible cybersecurity projects working with the PWS:

- Sanitary survey support and technical training: Assist in the cybersecurity component of sanitary surveys at public water systems (for example, review of emergency response plans, cybersecurity assessment reports, and development of Cybersecurity Corrective Action Plan) and conduct technical trainings, as needed.
- Cybersecurity assessment implementation: Assist public water systems implement recommendations from an approved cybersecurity assessment.

MassDEP's technical assistance program will support the goal of supporting the cybersecurity of public water systems. This program will be managed and operated by MassDEP's Drinking Water Program. All activities are subject to change and are dependent upon the availability of funding.

2% Set-Aside Deliverables

- On-site training and support to Public Water Suppliers
- Perform TNC compliance assistance sanitary surveys and provide Groundwater Under the Influence evaluations
- Technical assistance given to targeted systems that have specific SDWA treatment compliance issues
- Technical assistance to public water systems on cybersecurity
- Training and technical assistance to public water systems on Lead and Copper Rule Improvement, service line inventory assistance, and lead service line replacement planning
- Reviews of technical reports related to water supply technology and analysis
- Technical reviews of state initiatives such as disinfection byproduct treatment or groundwater disinfection
- Supervision of technical staff and training programs for suppliers
- Technical reviews of major water quality projects and public health data
- Information for the public and for water suppliers on major water quality problems
- Trainings on SDWA Topics
- Establishment of an internship program
- Training sessions (with credits) for Certified Operators on topics including, but not limited to, Lead and Copper regulations, PFAS, emergency response, and cybersecurity

2% Set-Aside Measures of Success

- Compliance issues are successfully addressed in the targeted systems
- Completion of planned capacity sanitary survey visit.
- Effective technical assistance given as scheduled
- Each group seminar will be followed by an evaluation form to be filled out by participants to assess the efficacy of the seminar. Evaluation of the results will be considered as part of the contract assistance, and provided to the MassDEP staff responsible for implementing training initiatives and reporting on Capacity Development, for their assessment and future planning. Evaluation of all training and assistance will consider the success of recruiting recalcitrant and high-priority systems.
- Reports reviewed as scheduled

III. 10% FOR STATE PROGRAM MANAGEMENT – 7 FTEs

MassDEP anticipates applying for an estimated \$3,000,000 from the 2025 DWSRF Supplemental Grant for small systems technical assistance. These funds will be combined with any remaining prior year funds to provide comprehensive technical assistance to public water systems. Duties may include (but not limited to):

A. CONTRACTED SERVICES – Information Technology Services

Information Technology (IT) Contract Services will provide a variety of direct technical, financial, and managerial assistance to small drinking water systems. Priority is given to disadvantaged communities. Activities will focus on SDWA requirements and Massachusetts Drinking Water Regulations and creating an environment for transparency with the DWP data. Specific duties

include providing IT support for MassDEP's eDEP reporting system which captures electronic reporting of water quality reports and the Annual Statistical Report (inventory, staffing, source protection, water quantity), analysis and planning for the data system transition from WQTS to the EPA cloud based DE-SFTIES system, and the DWP Source Protection I-Protect System.

B. CONTRACTED SERVICES – Small System Engineering and Design Support

Small System Engineering and Design Support to small public water systems impacted by emerging contaminants who are having challenges securing engineering services. While upfront costs to cover preliminary planning and design are an issue, there is also a lack of engineering firms available to assist. Through this new program, securing services through an RFP/RFQ process and identifying vendors available to provide much needed services to these small disadvantaged systems will enable the systems to move forward and be more competitive for the SRF program and grants, such as the Emerging Contaminant- Small and Disadvantaged Community grant.

C. CONTRACTED SERVICES – Safe Drinking Water Act Technical Assistance

Contract service through a UMass ISA to provide Safe Drinking Water Act Technical Assistance to public water systems for Safe Drinking Water Act (SDWA) programs, including PFAS remediation, and PWS Capacity Development Support. Assistance will include developing technical guidance, procedures, and programs; performing review of system data; and mapping and identifying possible service connections, as well as outreach procedures and programs to ensure compliance with MassDEP technical, financial and managerial drinking water standards, policies and/or guidelines (e.g., permit application support, grant application support).

10% Set-Aside Deliverables

- Capacity building for small and disadvantaged PWS
- IT support for eDEP
- Planning for data system transition from WQTS to EPA's DESFTIES
- Engineering & design plans for small PWS
- PWS remediation planning
- Development of technical guidance
- Identifying and mapping service line connections
- Development of outreach
- Review of system data

10% Set-Aside Measures of Success

- Increase in readiness to proceed with projects for small and disadvantaged PWS
- Increase in EC-SDC funding for small and disadvantaged PWS
- Increase in SRF funding for small and disadvantaged PWS
- Smooth transition and utilization of EPA's DE-SFTIES data system
- Increase in number of lead service line connection identification
- Awareness of MassDEP programs and utilization by small and disadvantaged PWS

IV. 15% -SOURCE WATER PROTECTION AND CAPACITY DEVELOPMENT – 13 FTEs

MassDEP anticipates applying for an estimated \$3,000,000 from the 2025 DWSRF Supplemental Grant for Source Water Protection and Capacity Development. The authorized activities under this set-aside can include land acquisition and conservation easement program, source water protection, wellhead protection and technical and financial capacity implementation. Furthermore, MassDEP reserves its authority to bank the balance of funds so they may be used in the future.

A. WELLHEAD PROTECTION AND CAPACITY IMPLEMENTATION

- Assist with source protection program activities related to groundwater sources, as well as operation of the UIC program (a.k.a. “Underground Source Water Protection Program”). Ensure consistency of this work among regions; coordinate with GIS and Internet programs; coordinate with other MassDEP programs; investigate available data for usefulness to groundwater protection; and develop relevant policies and procedures.
- Develop and maintain spatial data related to public water sources and potential contamination threats. Work with regional staff and resources to locate regulated facilities including locating information in files and making site visits to collect location information. Assist with GIS management.
- Assist in Zone II delineation (and re-delineation as needed) and other wellhead protection-related work.
- Provide technical assistance on source protection to public water suppliers and local officials, and assist with the source water assessment program and with protection of groundwater sources from contamination by septic systems. This includes providing system-specific protection recommendations.
- In accordance with the Capacity Strategy, provide technical assistance in implementing capacity development, including the ability to provide adequate quantities of source water. Provide Capacity Outreach.
- Provide assistance, primarily with protection of groundwater sources.

B. CONTRACTED SERVICES – Statewide Well Location Parcel Matching

MassDEP will fund one or more contractors to conclude work associated with well completion report parcel matching and spatial data improvements to well locations in Massachusetts. Activities will focus on the Safe Drinking Water Act requirements and Massachusetts Drinking Water Regulations in protecting the groundwater quality in the Commonwealth by acquiring as many accurate locations as possible for the remaining 30,000+ wells currently housed in the Well Driller database. All activities are subject to change and are dependent upon the availability of funding.

C. CONTRACTED SERVICES – Hydrogeological Services

MassDEP will fund a contractor(s) to continue work associated with assisting the Drinking Water Program with SDWA source approval/ hydrogeologic reviews. Activities will focus on the Safe Drinking Water Act requirements and Massachusetts Drinking Water Regulations in protecting the groundwater quality and quantity in the Commonwealth by reviewing the hydrogeologic components of New Source Approvals, Zone II delineations, Groundwater Discharge Permits near Public Water Supplies, and potential contamination threats to Public Water Supplies. These services will supplement the increasing workload of the MassDEP regional offices by offering additional

hydrogeologic expertise. All activities are subject to change and are dependent upon the availability of funding.

15% Set-Aside Deliverables

- UIC program operating under State Primacy
- Spatial data, maps.
- Location verification of 165,000 wells
- Mapping of private well locations
- Public awareness of private well locations through a Well Location Viewer
- Zone II Reviews
- On-Site training and support to water suppliers
- UIC tracking and reports
- Outreach materials, technical assistance meetings, training for regions, and bylaw reviews
- Implementation of water conservation capacity improvement grant program
- Implementation of Capacity Development program
- Implementation of the Source Water Protection program
- Plan for implementation of the Lead and Copper Rule Revisions (LCRR)

15% Set-Aside Measures of Success

- Improved source protection for ground water sources at state and local levels
- GIS databases are properly reviewed and maintained
- Number of webpage visits to mapped locations of private wells
- Reviews are conducted in a timely manner
- Contract oversight is effective
- Technical Assistance is appropriate and timely and leads to improved source and aquifer protection in the systems visited
- Methods to assure capacity to deliver adequate quantities of drinking water are developed
- Program goals meet MassDEP objectives
- Improved protection at the local level

2025 IUP – Drinking Water Supplemental Grant Set-Asides Budget

Grant Amount: \$53,457,000

	Set-Asides				
	4% Admin.	2% Small System	10% State Program	15% Local Asst.	Total Set Asides
Salary	\$1,789,297	\$525,343	\$1,358,089	\$2,615,033	\$6,287,762
Travel	\$2,166	\$0	\$7,500	\$7,500	\$17,166
Supplies	\$185	\$19	\$1,411	\$2,468	\$4,083
Contracts	\$346,631	\$543,777	\$1,633,000	\$375,000	\$2,898,408
Total	\$2,138,280	\$1,069,140	\$3,000,000	\$3,000,000	\$9,207,420

Information on Set-asides - Lead Service Line Replacement Grant

The amount of the Lead Service Line Replacement (LSLR) Grant for 2025 is not yet known. USEPA is developing a new allotment formula to address concerns raised by the EPA Office of Inspector General over how the reallocation of funds was determined in 2023 and onward. Due to this delay, Massachusetts is unable to determine the set-aside budget and expenditure plan for the 2025 LSLR Grant. However, the DWSRF is offering in this IUP loans for lead service line replacement construction projects and/or planning projects, supported by \$39.5 million in uncommitted grant funds from previous grant years.

MassDEP will continue to accept lead service line construction and planning applications on a rolling basis, subject to the availability of funds.

Once the 2025 LSLR Grant information is available, MassDEP will develop a draft IUP amendment to include funds allotted to Massachusetts. The public will be notified of the availability of the draft and a 30-day comment period will follow, before issuing a final amended IUP.

With the support of funding from the previous LSLR Grants, the Massachusetts Community and Non-Transient Non-Community Public Water Systems met the October 16, 2024, Service Line Inventory submission deadline with a compliance rate of 99.6%, one of the highest in the country.