



Andrew Gottlieb  
Executive Director

February 18, 2025

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Bonnie Heiple, Commissioner  
Massachusetts Department of Environmental Protection  
100 Cambridge St.  
Boston, MA 02133

**RE: 2025 CWSRF Intended Use Plan**

Dear Commissioner Heiple:

I am writing on behalf of the Association to Preserve Cape Cod (APCC) to express exceptional concern about provisions included in the Clean Water State Revolving Fund Intended Use Plan (CWSRF IUP) that have the potential to stop dead in its tracks all progress being made on wastewater management on Cape Cod.

With no advance public notice, the draft 2025 IUP caps applicants to \$50 million each and provides no carryover costs for new projects in subsequent years. The IUP states that projects that need additional financing should reapply for future IUPs. These two rule changes undermine years of work done at the local, regional and state levels to create a financing approach that provided certainty to towns working to advance multi-year and expensive projects. This IUP, without notice and adequate forethought, destroys a hard-earned consensus on how towns can finance and advance wastewater management on Cape Cod.

While understanding that the SRF is oversubscribed and that changes are required to ensure it remains a reliable source of project financing, the proposed response is the wrong choice. A major change in the financing rules, such as those being proposed, should have been discussed and vetted prior to issuance of the funding round being advertised so that the impact could be assessed and understood prior to towns investing in the effort to make the application.

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The towns proposing projects for the 2025 funding cycle did so assuming that the terms of financing would be what they have been in prior years. The simple fact is that few, if any, towns proposing projects that require multi-year financing will be able to obtain voter approval of the entire debt for a project with uncertainty about SRF funding past year one. The impact of this policy change is amplified on Cape Cod because access to 25 percent principal forgiveness from the Cape and Islands Water Protection Fund is contingent on SRF financing. Few town meetings will proceed with funding a large multi-year project lacking clarity on the debt and subsidy structure of the financing. The multi-year nature and magnitude of most Cape wastewater projects means that this policy change, if implemented, will bring progress on wastewater management on Cape Cod to a halt.

The limiting of funding to individual towns will have a similar chilling effect on the ability of towns to proceed. The Cape projects are big because the problems we are solving are big. Arbitrary limits on how much a town project can be financed are the functional equivalent of not offering financing at all. The proposal puts towns in the position of having to seek blended financing with less subsidy, higher interest rates and greater complexity. This imposition of increased costs on tax levy financing will increase local taxpayer costs at a time when we are all working to make Cape Cod more affordable to year-round residents. This change to the UIP runs directly counter to the many other thoughtful and beneficial policy initiatives of the Healey administration and makes no sense.

APCC believes that the changes to the 2025 IUP discussed above must be rescinded and that the terms and conditions of financing revert to those that have been historically in place. If that decision has implications on the future of IUPs—and we know that it will—those impacts should be estimated by the Clean Water Trust and shared publicly so that a proper response can be developed. Supplementing future SRF capacity through the upcoming Environmental Bond should be given serious consideration.

We look forward to working with you and the Clean Water Trust on longer-term solutions to SRF capacity, but we strongly believe that the direction you have chosen is wrong for Cape Cod and Massachusetts and must be reversed.

Sincerely,



Andrew Gottlieb  
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