



Andrew Gottlieb
Executive Director

February 24, 2025

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The Honorable Maura Healey, Governor
State House
Boston, MA 02133

RE: 2025 Environmental Bond CWSRF Authorization

Dear Governor Healey:

I am writing on behalf of the Association to Preserve Cape Cod (APCC) to request that your proposed Environmental Bond includes \$500 million to further capitalize the Clean Water State Revolving Fund (SRF). SRF funding capacity shortages revealed in the recent Intended Use Plan (IUP) issued by MassDEP 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 annual borrowing 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 in the IUP is the wrong choice. Because of the significant commitment your administration has made in advancing clean water not just on Cape Cod but statewide, supplementing the SRF with bond funds is the option most consistent with the objectives of the clean water agenda we have worked on together.

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Given that the Massachusetts SRF program leverages capital funds on the bond market up to 3:1, this level of bond funding will increase annual funding capacity by up to \$300 million annually. This infusion of capacity will go a long way toward allowing Cape Cod towns to proceed as required by the watershed permits encouraged by your administration while also supporting clean water projects needed throughout the Commonwealth.

The Cape's projects are big because the problems we are solving are big. SRF funding constraints limiting how much a town project can be financed is the functional equivalent of offering no state financing assistance at all. 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. The proposed change to the reliability of the SRF runs directly counter to the many other thoughtful and beneficial policy initiatives of the Healey-Driscoll administration and makes no sense.

APCC and our members look forward to working with you and the Legislature on this long-term solution to SRF capacity as the Environmental Bond moves forward.

Sincerely,



Andrew Gottlieb
Executive Director

cc: The Honorable Kim Driscoll, Lieutenant Governor
Bonnie Heiple, Commissioner, MassDEP
The Honorable Julian Cyr, State Senator
The Honorable Dylan Fernandes, State Senator
The Honorable Hadley Luddy, State Representative
The Honorable Christopher Flanagan, State Representative
The Honorable Kip Diggs, State Representative
The Honorable David Vieira, State Representative
The Honorable Thomas Moakley, State Representative
The Honorable Steven Xiarhos, State Representative
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Barnstable County Assembly of Delegates
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