



The Town of Barnstable

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March 3, 2025

Robin McNamara, Acting Director
MassDEP, Bureau of Water Resources, Division of Municipal Services – 2025 Draft IUP
Testimony
100 Cambridge St, Suite 900
Boston MA 02114

RE: 2025 Draft IUP Testimony

Dear Director McNamara:

Please accept this letter as written testimony expressing concerns regarding the draft 2025 Intended Use Plan. Barnstable is requesting that the proposed changes to the 2025 draft IUP regarding the cap of \$50 million each year with no carryover costs in subsequent years and that projects needing carryover should reapply as a new project in future years be rescinded and that the terms and conditions of financing revert to those that have been discussed in prior years with the Department of Environmental Protection and the Clean Water Trust.

On January 30, 2024 the Town of Barnstable received notice from the Department of Environmental Protection of the release of the 2025 Draft Intended Use Plans (IUPs) for the Clean Water (CW) and the Drinking Water (DW) State Revolving Fund (SRF) programs. The draft IUP proposes to cap applicants to \$50 million annually 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 proposed changes deviate from past practices and undermine financial planning performed at the local, regional and State levels to create financial assumptions that maximize use of the State Revolving Funds and in doing so impede towns' ability to secure Cape Cod & Island Wastewater Trust Fund (CCIWTF) principal subsidies that have been essential in allowing towns to advance wastewater projects. I cannot emphasize enough the importance of being listed in the IUP as eligible for funding as this is the mechanism to receive a 25% principal subsidy from CCIWTF.

Barnstable understands that the State Revolving Fund has received a significant increase in capital requests and to address the increases modifications will be required to ensure that the SRF remains a reliable source of project financing. For years the local, regional, and State entities have come together to strategize on how to maximize our collective financial ability to achieve successful implementation of each community's

approved Comprehensive Wastewater Management Plans. The issuance of this draft IUP departs from that approach in a manner that negatively impacts the town's ability to secure a principal subsidy and erodes our financial ability to achieve our approved CWMP implementation plan.

Each Cape town proposing projects for the 2025 funding cycle did so assuming that the terms of financing would be what they have been in prior years because that is what we collectively discussed and agreed upon. Please proceed with the 2025 IUP as in prior years and convene discussions with communities on a long-term strategy to maintain the viability of this critical funding mechanism.

Barnstable stands ready to work with you and the Clean Water Trust on viable long-term solutions to address SRF capacity challenges. I am available at your convenience to further discuss this matter.

Respectfully,

A handwritten signature in black ink, appearing to read 'M. S. Ells', written in a cursive style.

Mark S. Ells
Barnstable Town Manager

cc. Bonnie Heiple, Commissioner DEP
Craig Tamash, Barnstable Town Council President