



MEMORANDUM

TO: Mid-Hudson Municipalities
FROM: Ryan Corbett, Water Resources Manager, Hudson Valley Regional Council Inc.
DATE: February 3, 2025
SUBJECT: Public Comment Period for Proposed Revisions to the Clean Water State Revolving Fund Scoring Criteria

HVRC has created a summary of the current [Scoring Criteria](#) and the [proposed revisions](#), both available on the EFC [website](#). The EFC states that proposed changes to the scoring system seek to further incentivize municipalities to address the following:

- **Enhancing resiliency, mitigating the impacts of climate change**, and advancing the state's goal of strengthening water infrastructure and protecting New Yorkers from flooding and other impacts of extreme weather.
- **Strengthening cybersecurity**, addressing the urgent need to safeguard the water sector's IT infrastructure from increased cyber threats that have the potential to disrupt critical services and impose significant costs on affected communities.
- **Taking septic tanks out of service** in favor of environmentally effective systems.
- **Adopting asset management plans**, a process that supports effective management of infrastructure investments including defined procedures to inventory, assess, and track infrastructure throughout its lifecycle, improving its longevity, and supporting municipal planning.

Below is an outline and general summary of the proposed revisions broken down by Project Category, prepared by HVRC. Modified sections will be highlighted in bold.

Proposed Revisions by Category

- A. Existing Pollutant
- B. Water Quality
- C. Consistency with Management Plans
- D. Project Need
- E. Financial Need
- F. Resiliency
- G. Tie Breaking

Proposed Revisions Outline

A. Existing Pollutant Criterion

1. Factor heading “A critical source of pollution” changed to **“Waterbody not attaining water quality standards”** (50 points)
 - a. Refence to Priority Waterbody List (PWL) switched to **Clean Water Act, section 303(d) List of Impaired Waters**
 - b. “Precluded” was dropped from description leaving only “impaired”
2. Factor heading “A significant source of pollution” changed to **“Waterbody currently attaining water quality standards with potential impacts to water quality”** (25 points)
 - a. “Threatened” dropped from description leaving only “stressed”
3. Factor heading “A potential source of pollution” changed to **“Waterbody attaining water quality standards or unassessed”** (10 points)
 - a. Criteria changed to **“A waterbody’s best use(s) is unassessed or assessed as “fully supporting” as documented in the assessment for the waterbody.”**
4. Factor heading “Other” (5 points)

No changes
5. Factor heading “None of the Above” (0 points)

No changes

B. Water Quality Criterion (WQC) changed from Water Quality Improvement Criterion (WQIC)

WQC = Classification Points Factor (CPF) x Assessment Status (AS) changed from Classification Points Factor (CPF) x Impairment Factor (IF) x Potential Improvement Factor (PIF)

1. All Class A waterbodies now receive 8 points. All B, SB, C(T), and C(TS) waterbodies receive 6 points, an increase from 4.
2. Assessment Status (AS) combines the former Impairment Factor (IF) and Potential Improvement Factor (PIF) sections, for a decrease in total points from 10 to 6. This also combines former divisions of Precluded (6), Impaired (4), Stressed (2), and None (1) to Impaired/Restricted (6), Stressed/Impacted (3), and None (1).

C. Consistency With Management Plan Criterion

1. Factor Category (15 points). A project:
 - a. “following management plans” list changed to **“approved Clean Water Plan developed pursuant to the Clean Water Act, sections 303, 319, of 320”**
 - b. *No change*
2. Factor Category (10 points). A project:
 - a. “following management plans” list changed to **“solution identified in a department-accepted plan or report funding through a water program, or a department action agenda”**
 - b. *No change*
3. Factor Category (5 points)

No change

4. Factor Category (0 points)

No change

D. **Project Needs Criterion** changed from Intergovernmental Needs Criterion

1. **Compliance** changed from Intergovernmental Needs changed

- a. *No change* (25 points)
- b. In addition to SPDES compliance, the criteria now include “**or to replace existing residential and small businesses on-site wastewater treatment systems with sanity sewers.**” (10 points)
- c. *No change* (5 points)
- d. *No change* (0 points)

2. **Asset Management** changed from Construction Start (5 points)

- a. Factor description: A project that includes assets identified in the capital improvement plan of a final Publicly Owned Treatment Works (POTW) asset management program that was developed in accordance with the department’s POTW Asset Management Guide.

E. Financial Need Criterion (municipal projects only) (10 points)

Changes include a consolidated statement

F. **Resilience Criteria (**New Category**)** changed from Economic Need Criterion

1. **Factor A: Climate and Security Adaptation (5 points)**

Points allocated to projects that involve:

- a. Resiliency and climate adaptation
- b. Mitigation
- c. Cybersecurity improvement

2. **Factor 2: Green Projects (5 points)**

Points allocated to projects that in in part:

- a. Green infrastructure
- b. Water or energy efficiency at a Publicly Own Treatment Works project

G. Tie Breaking

No significant changes