



# Ask Me Anything: What is Environmental Reporting?

May 7, 2025



# About Us

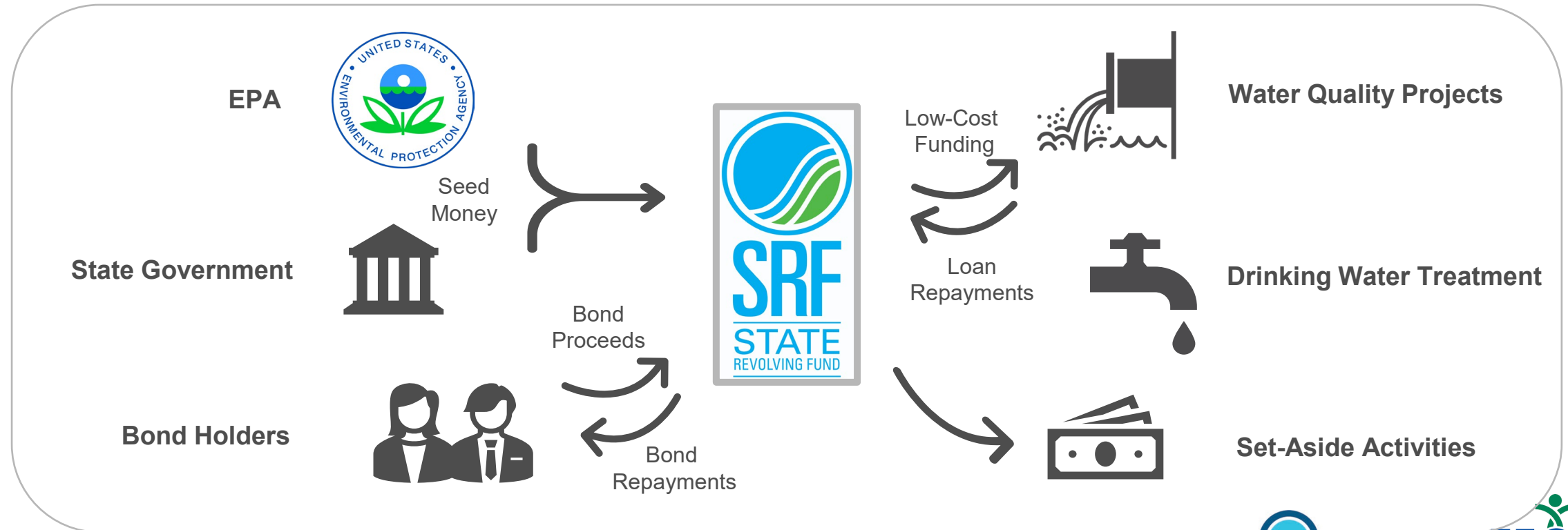
The **Environmental Finance Center Network (EFCN)** is a university- and non-profit-based organization creating innovative solutions to the difficult how-to-pay issues of environmental protection and water infrastructure.

The EFCN works collectively and as individual centers to address these issues across the entire U.S, including the 5 territories and the Navajo Nation. The EFCN aims to assist public and private sectors through training, direct professional assistance, production of durable resources, and innovative policy ideas.



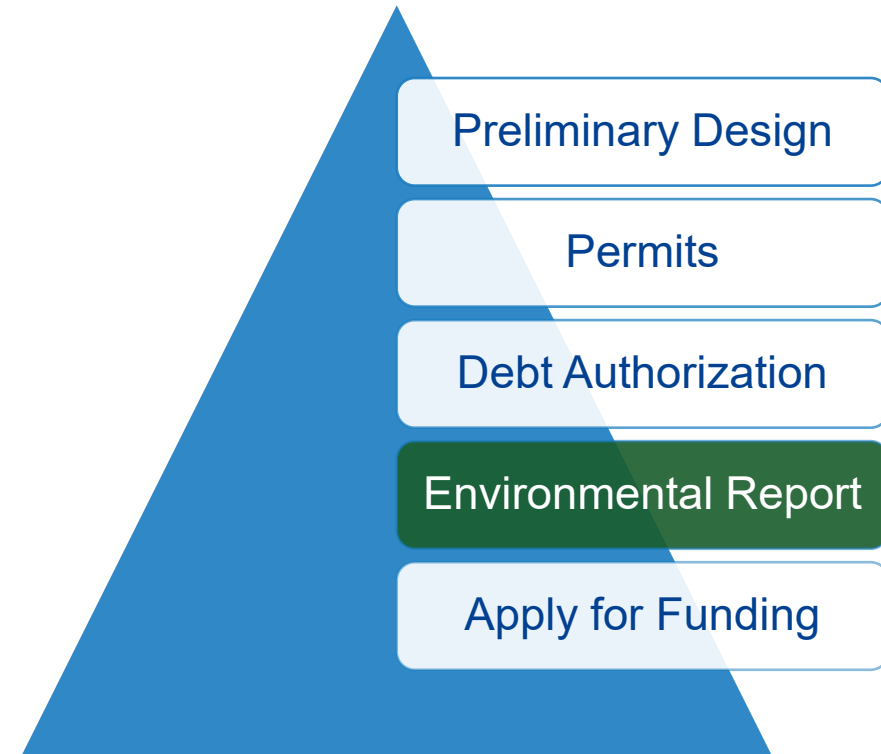
# What are the SRFs?

- Low interest revolving loan program with subsidies for targeted projects and communities
- Money comes from EPA/Federal Government, state match, loan repayments, interest, bond proceeds



# Readiness to Proceed

- States are encouraged to consider readiness to proceed when developing priority lists
  - Preliminary Engineering Report
  - Environmental documentation



# Environmental Review Requirements

CWSRF

Construction of projects that meet the definition of “treatment works”

DWSRF


All DWSRF funded projects and all source water protection funded by the 15% set-aside



# Cross-Cutters

EPA Cross-Cutter Handbook:

<https://www.epa.gov/sites/default/files/2015-08/documents/crosscutterhandbook.pdf>



Requirements that “Cut Across” all federal programs

Many of these requirements are certifications that are part of loan agreements

More later, but can add time and money to projects



# Environmental Review- Cross Cutters

## Natural Environment

- Endangered Species Act
- Bald & Golden Eagle Protection Act
- Migratory Bird Treaty Act
- Fish & Wildlife Coordination Act
- Marine Mammal Protection Act
- Coastal Barrier Resources Act
- Coastal Zone Management Act
- Magnuson-Stevens Fishery Conservation & Management Act
- Clean Water Act
- Clean Air Act
- Protection of Rivers
- River & Harbors Act
- Wild and Scenic Rivers Act



## Human Environment

- Archaeological & Historic Preservation Act
- Archaeological Resources Preservation Act
  - National Historic Preservation Act
- Consultation & Coordination w/ Indian Tribal Governments
- Native American Graves Protection & Repatriation Act
  - Environmental Justice
- Farmlands Protection Policy
  - Floodplain Management
  - Safe Drinking Water Act

# What about Flood Risk?

~~EO 14030 Federal Flood Risk Management Standard~~

~~Reinstates EO 13690 Federal Flood Risk Management~~

~~EO 14148 Initial Rescission of Harmful Executive Orders and Actions~~

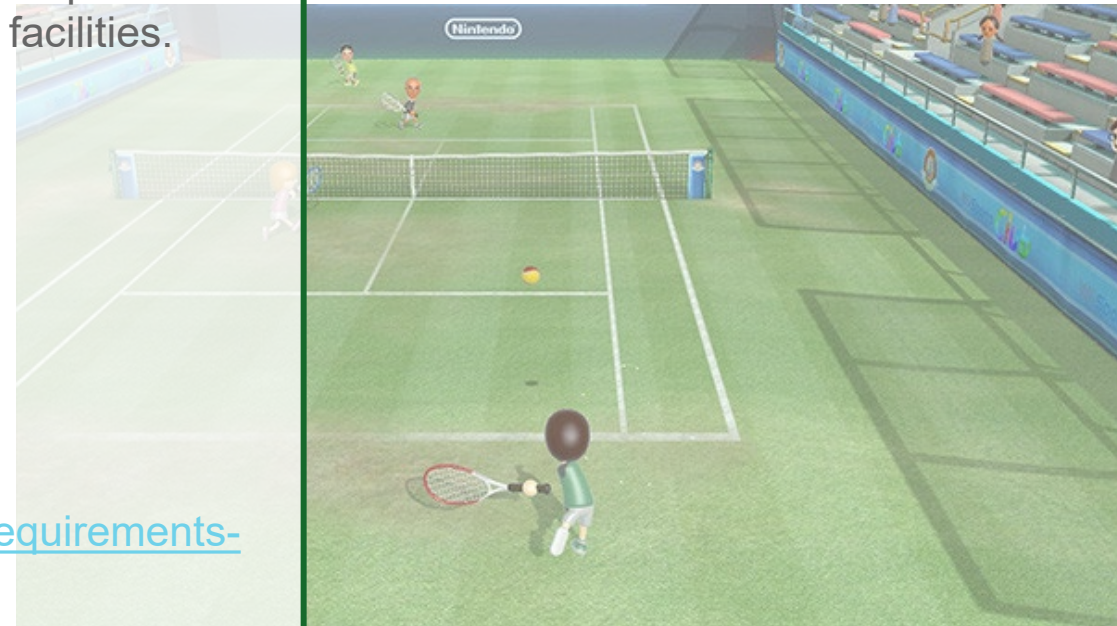
Applies to actions where federal funds are used for new construction, substantial improvement (i.e., projects worth more than 50% of the market value or replacement cost of the facility), or to address substantial damage to structures and facilities.

Designs must incorporate one of three design standards:

- Climate Informed Science Approach
- Freeboard Value Approach
- 500-Year Flood Elevation

So, what now?

<https://www.fema.gov/press-release/20250325/fema-eases-floodplain-requirements-federally-funded-projects-reducing-burden>



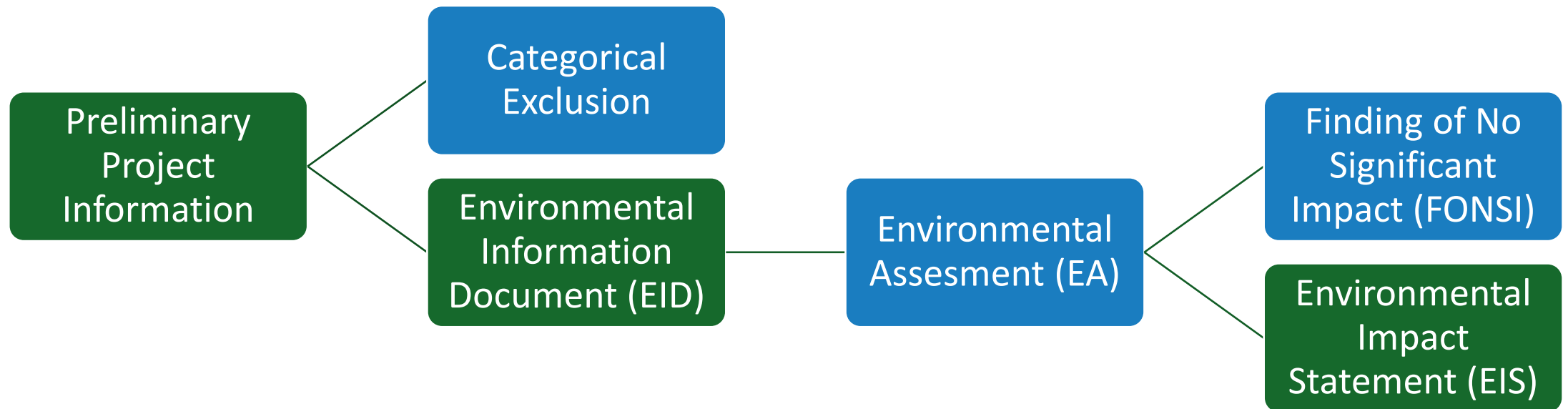


# Project Impacts



# Environmental Review

- There may also be state environmental review procedures to follow (SERP)
- Federally recognized Indian tribe notification: <https://www.bia.gov/service/tribal-leaders-directory/federally-recognized-tribes>



 Produced by State SRF Agency

 Produced by Assistance Recipient

# Environmental Review Documents

- OK - <https://oklahoma.gov/content/dam/ok/en/owrb/documents/financing/forms-and-guidance/funding-agency-coordinating-team/fact-guidelines-for-environmental-information-document.pdf>
- IA - <https://www.iowadnr.gov/media/5361/download?inline>
- VT - <https://dec.vermont.gov/water-investment/water-financing/srf/environmental-review>



# Categorical Exclusion

## Definition:

A class of actions as determined by the review agency that **do not** individually or cumulatively **have a significant effect on the human environment** and for which, therefore, neither an environmental assessment nor an environmental impact statement is normally required.

Use of Categorical Exclusions can save time and reduce paperwork



# CatEx Examples

## EXAMPLE

Cured-in-place  
lining of a  
sewer

Replacement  
of a  
sewer/water  
main within the  
same trench

Replacement  
of treatment  
facility or pump  
station  
equipment with  
no increase in  
station  
capacity

Actions within  
the footprint or  
boundary of an  
existing facility

What is the correct answer to  
any SRF question?

Every state is different.  
It depends.



# Upcoming Trainings

## **\*Is This Right? The Art of Setting User Rates**

May 13, 2025 / 12:00-2:30 pm EST

## **Why Should my Utility Incur Debt?**

May 19, 2025 / 2:00-4:00 pm EST

## **How do I Prepare for a Financial Review?**

June 4, 2025 / 11:00-1:00 pm EST

## **What is the best way to calculate rates?**

June 16, 2025 / 2:00-4:00 pm EST

This training is not part of the 'Ask Me Anything' series. To register, go here:  
<https://efcnetwork.org/event/vt-online-training-is-this-right-the-art-of-setting-user-rates-%ef%bf%bc/>

For more information and to register visit:

<https://efcnetwork.org/event/virtual-office-hours-ask-me-anything-srf-technical-assistance-open-discussion/>

## Community Finance Team

<https://www.quantifiedventures.com/community-finance>



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- Contact me:



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