



# CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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Federal Legislative Advocate  
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PH: (202) 466-3755  
esap@ensresources.com

*Via facsimile (415) 956-6701  
Please Forward to D.C. Office*

May 7, 2007

The Honorable Barbara Boxer  
U.S. Senate  
Washington, D.C. 20515

Dear Ms. Boxer:

The California Association of Sanitation Agencies (CASA) is a non-profit, statewide organization representing 115 public agencies that provide wastewater collection, treatment, disposal, water reclamation, and biosolids management services to over 90 percent of the sewered population in California. On behalf of CASA, I write on a matter of importance affecting the State's publicly owned wastewater treatment agencies' ability to ensure that the State's receiving waters receive the highest level of water quality protection. Specifically, CASA agencies are seeking your assistance to direct the U.S. Environmental Protection Agency (EPA) to allocate adequate resources to ensure the proper management of biosolids. CASA is requesting your assistance in assuring that EPA's fiscal year 2008 budget directs the allocation of two additional full time equivalent positions to Region IX with the express purpose of augmenting federal oversight of the Region's biosolids management program.

Biosolids are the nutrient-rich, organic material that is generated from the wastewater treatment process. Once digested and dewatered, biosolids can be beneficially recycled in compliance with strict federal and state standards that ensure the protection of human health and the environment. Biosolids products are used throughout the nation to enhance landscaping and agricultural needs. Negative public perception related to biosolids recycling can be most successfully addressed if EPA is adequately staffed to proactively help ensure that Federal biosolids regulations are complied with uniformly throughout the four states, the Pacific Islands, and the 140 Tribal Nations for which Region IX has enforcement responsibility. Within Region IX, the State of California is experiencing substantial challenges to maintaining the continued viability of management options for over three million tons biosolids that are generated each and every year, and the huge expanse of Region IX's responsibilities (a region spanning eight time zones) makes effective oversight and enforcement extremely difficult.

*Ensuring Clean Water for California*

Without access to viable biosolids management options, wastewater agencies in California will be unable to manage its wastewater treatment systems effectively. This circumstance jeopardizes our agencies' abilities to comply with the Clean Water Act, as well as to implement other federal and state priorities such as maximizing reuse and recycling. The current challenge involves EPA's commitment to dedicate appropriate resources to manage the biosolids program in California. Under existing program priorities, Region IX has only 1.25 full-time equivalents (FTEs) to address the entire biosolids management regulatory program in Region IX. By comparison, for example, the State of Wisconsin, with delegated enforcement responsibility from EPA and less than 10% of the population of Region 9's area, has a staff of 12 FTEs dedicated to biosolids issues. EPA's inadequate staffing level sometimes delays program management decisions, including permitting approvals. This creates uncertainty for CASA agencies and, moreover, undermines public confidence that there is an effective and environmentally protective biosolids regulatory program in place.

We are hopeful that you and your colleagues on the Committee on Appropriations will work to include language in EPA's budget addressing Region IX's urgent programming need for these modest additional resources. As noted above, the commitment of not more than two additional FTEs in fiscal year 2008 would create a level of resources in Region IX that would ensure that the vital federal role in overseeing biosolids management activities throughout the Region can be enhanced.

Thank you very much for your assistance with this matter. If you have questions or wish to discuss this matter further, please contact CASA Federal Legislative Advocate Eric Sapirstein at (202) 466-3755.

Most sincerely,



Catherine Smith  
Executive Director



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esap@ensresources.com

*Via facsimile: (202) 228-3954*

May 7, 2007

The Honorable Dianne Feinstein  
U.S. Senate  
Washington, D.C. 20515

Dear Ms. Feinstein:

The California Association of Sanitation Agencies (CASA) is a non-profit, statewide organization representing 115 public agencies that provide wastewater collection, treatment, disposal, water reclamation, and biosolids management services to over 90 percent of the sewered population in California. On behalf of CASA, I write on a matter of importance affecting the State's publicly owned wastewater treatment agencies' ability to ensure that the State's receiving waters receive the highest level of water quality protection. Specifically, CASA agencies are seeking your assistance to direct the U.S. Environmental Protection Agency (EPA) to allocate adequate resources to ensure the proper management of biosolids. CASA is requesting your assistance in assuring that EPA's fiscal year 2008 budget directs the allocation of two additional full time equivalent positions to Region IX with the express purpose of augmenting federal oversight of the Region's biosolids management program.

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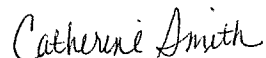
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Most sincerely,



Catherine Smith  
Executive Director



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*Via facsimile: (202) 225-8259*

May 7, 2007

The Honorable Nancy Pelosi  
Speaker of the U.S. House of Representatives  
Washington, D.C. 20515

Dear Ms. Pelosi:

The California Association of Sanitation Agencies (CASA) is a non-profit, statewide organization representing 115 public agencies that provide wastewater collection, treatment, disposal, water reclamation, and biosolids management services to over 90 percent of the sewered population in California. On behalf of CASA, I write on a matter of importance affecting the State's publicly owned wastewater treatment agencies' ability to ensure that the State's receiving waters receive the highest level of water quality protection. Specifically, CASA agencies are seeking your assistance to direct the U.S. Environmental Protection Agency (EPA) to allocate adequate resources to ensure the proper management of biosolids. CASA is requesting your assistance in assuring that EPA's fiscal year 2008 budget directs the allocation of two additional full time equivalent positions to Region IX with the express purpose of augmenting federal oversight of the Region's biosolids management program.

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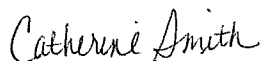
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Most sincerely,



Catherine Smith  
Executive Director



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*Via facsimile: (202) 225-6498*

May 7, 2007

The Honorable Jerry Lewis  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Mr. Lewis:

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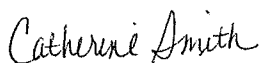
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Most sincerely,



Catherine Smith  
Executive Director





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*Via facsimile: (202) 225-5609*

May 7, 2007

The Honorable George Miller  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Mr. Miller:

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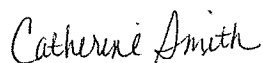
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*Via facsimile: (202) 226-0350*

May 7, 2007

The Honorable Lucille Roybal-Allard  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Ms. Roybal-Allard:

The California Association of Sanitation Agencies (CASA) is a non-profit, statewide organization representing 115 public agencies that provide wastewater collection, treatment, disposal, water reclamation, and biosolids management services to over 90 percent of the sewerred population in California. On behalf of CASA, I write on a matter of importance affecting the State's publicly owned wastewater treatment agencies' ability to ensure that the State's receiving waters receive the highest level of water quality protection. Specifically, CASA agencies are seeking your assistance to direct the U.S. Environmental Protection Agency (EPA) to allocate adequate resources to ensure the proper management of biosolids. CASA is requesting your assistance in assuring that EPA's fiscal year 2008 budget directs the allocation of two additional full time equivalent positions to Region IX with the express purpose of augmenting federal oversight of the Region's biosolids management program.

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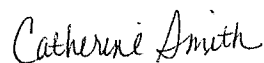
*Ensuring Clean Water for California*

Without access to viable biosolids management options, wastewater agencies in California will be unable to manage its wastewater treatment systems effectively. This circumstance jeopardizes our agencies' abilities to comply with the Clean Water Act, as well as to implement other federal and state priorities such as maximizing reuse and recycling. The current challenge involves EPA's commitment to dedicate appropriate resources to manage the biosolids program in California. Under existing program priorities, Region IX has only 1.25 full-time equivalents (FTEs) to address the entire biosolids management regulatory program in Region IX. By comparison, for example, the State of Wisconsin, with delegated enforcement responsibility from EPA and less than 10% of the population of Region 9's area, has a staff of 12 FTEs dedicated to biosolids issues. EPA's inadequate staffing level sometimes delays program management decisions, including permitting approvals. This creates uncertainty for CASA agencies and, moreover, undermines public confidence that there is an effective and environmentally protective biosolids regulatory program in place.

We are hopeful that you and your colleagues on the Committee on Appropriations will work to include language in EPA's budget addressing Region IX's urgent programming need for these modest additional resources. As noted above, the commitment of not more than two additional FTEs in fiscal year 2008 would create a level of resources in Region IX that would ensure that the vital federal role in overseeing biosolids management activities throughout the Region can be enhanced.

Thank you very much for your assistance with this matter. If you have questions or wish to discuss this matter further, please contact CASA Federal Legislative Advocate Eric Sapirstein at (202) 466-3755.

Most sincerely,



Catherine Smith  
Executive Director