September 3, 2020

Michael Goralczyk
Office of Water
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460


Dear Mr. Goralczyk,

On behalf of the California Association of Sanitation Agencies (CASA), thank you for the opportunity to provide comments on the U.S. Environmental Protection Agency’s (EPA) request for information on the proposed state formula allocations for sewer overflows. CASA represents more than 125 public agencies and municipalities in California that engage in wastewater collection, treatment, recycling, and resource recovery. Across California, our members are committed to the protection of public health and the environment through effective wastewater treatment and recycling.

Our comments mostly align with those provided by the National Association of Clean Water Agencies (NACWA). CASA greatly appreciates EPA’s work to stand up the grant program to get this much needed money out the door, including EPA’s efforts in proposing an updated and revised allocation formula. We support the proposed allocation formula and believe it will be an effective, equitable way to distribute funds from this important but underutilized grant program. In addition to using the Clean Watershed Needs Survey (CWNS), this formula also includes additional factors such as total state population and urban population when considering appropriating funds, which are important to determining the appropriate allocation of funds.

Unfortunately, the data in the CWNS is nearly a decade old and should be updated to reflect contemporaneous needs so the program is optimized for the future. Although the CWNS is written into § 516 of the Clean Water Act, to date it has served as an informational tool for members of Congress and the public on clean water needs, but has never been used for specific funding allocations. The data collected by the CWNS historically has varied in consistency, in part because there is no funding set aside for states and EPA to collect the data, and in part because there are significant gaps in the data given the standard four-year reporting timeframe has slipped. Given that the CWNS is the most significant component of the proposed funding allocation for the Sewer Overflow and Stormwater Municipal Reuse Grants Program, it is critical that the CWNS be based on the most accurate and complete data available. Insufficient or inconsistent data and delays in reporting will only hinder this opportunity to help many municipalities around the country that are in serious need of grant dollars for critical infrastructure investment. CASA strongly encourages EPA to redouble its efforts to gather the most accurate and timely data for the CWNS and to prioritize getting the next CWNS published as soon as possible.

In closing, we reiterate our appreciation to EPA for the opportunity to provide comments. CASA supports NACWA’s commitment to working with Congress to secure additional funding for EPA and the states to assist in collecting the needed data to ensure the CWNS is published with the most accurate information. If there any questions about these comments, please do not hesitate to reach me at (916) 446-0388 or jvoskuhl@casaweb.org.

Thank you,

Jared Voskuhl
Manager of Regulatory Affairs