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City of Tacoma
Public Works Department
Tacoma, WA

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Secretary
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General Manager
Water Works & Sanitary
Sewer Board
Montgomery, AL

Executive Director
Ken Kirk

July 6, 2000

Carol M. Browner
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (1101)
Washington, DC 20460

RE: TMDL Rule Would Revitalize America's Waters

Dear Administrator Browner:

The Association of Metropolitan Sewerage Agencies (AMSA) supports the efforts of the U.S. Environmental Protection Agency (EPA) to finalize the total maximum daily load (TMDL) rule. AMSA members have been at the forefront of the Nation's clean water restoration efforts for the past 30 years and firmly believe that it is imperative to address both point and nonpoint source impairments fairly and equitably. In our view, a final TMDL rule would help bring the country closer than it ever has been to repairing the Nation's impaired waters.

Despite the remarkable improvements in water quality achieved by municipal and industrial point source controls, unchecked nonpoint source runoff will prevent many of America's rivers, streams, and lakes from attaining the fishable and swimmable goals of the Clean Water Act. EPA's water quality assessments have repeatedly found nonpoint sources to be the most significant threat to water quality integrity. It is clear that a new strategy is desperately needed. President Clinton's 1998 *Clean Water Action Plan* envisioned a watershed approach to setting priorities and taking action to clean rivers, lakes, and coastal waters. The TMDL rule provides an initial framework for attacking the remaining water quality problems on a watershed basis and for allocating pollution control responsibilities according to relative contributions.

For the environment and the economy, we must act sooner, rather than later, to stem the flow of nonpoint source pollution into our nation's rivers and streams. We recognize that

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the program will continue to evolve. The revisions to the program made by the draft rule will provide greater clarity concerning the roles and responsibilities of all stakeholders in the TMDL process, and make significant improvements in our efforts to improve America's waters. We understand this program will continue to evolve and we maintain that moving forward with the rule at this time is in the best interests of the nation's water quality.

Sincerely,

A handwritten signature in black ink, appearing to read "K Kirk". The signature is stylized with a large, looped "K" and a cursive "Kirk".

Ken Kirk
Executive Director

cc: The Honorable Jacob J. Lew, Director, Office of Management and Budget
John Podesta, Chief of Staff, The White House
George T. Frampton, Jr., Acting Chair, Council on Environmental Quality