



President
Kumar Kishinchand
Water Commissioner
Philadelphia Water Department
Philadelphia, PA

Association of
Metropolitan
Sewerage Agencies

Vice President
William L. Pugh
Public Works Director
City of Tacoma
Public Works Department
Tacoma, WA

January 28, 2000

Treasurer
Gurnie C. Gunter
Director
Kansas City Water
Services Department
Kansas City, MO

Carol M. Browner
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building (W1200), 1200 Pennsylvania Avenue, NW
Washington, DC 20460

Secretary
Paul Pinault
Executive Director
Narragansett Bay Water
Quality Management
District Commission
Providence, RI

Dear Administrator Browner:

Executive Director
Ken Kirk

The Association of Metropolitan Sewerage Agencies (AMSA) applauds EPA for outlining a holistic approach for reducing nonpoint source loads in impaired waters through the Total Maximum Daily Load (TMDL) program. In that regard, I am pleased to forward copies of the AMSA's January 20, 2000 letter to Congress in support of including all sources of impairment to water bodies in the TMDL draft rule. The letter encourages each Member of Congress to express, both to you personally and the appropriate House and Senate oversight committees, their support for including both point and nonpoint source controls in a final rule. We have also encouraged our 240 member agencies to write similar letters of support to their Members of Congress.

Enforceable controls on nonpoint sources of pollution must be part of any successful TMDL program. Point sources simply cannot single-handedly clean up the remaining impairments. AMSA is committed to working with Congress and EPA to ensure that any TMDL program remains true to the ultimate objective of minimizing *all* sources of pollution in an impaired watershed. Please feel free to contact me directly at 202/833-4653 if you have any questions.

Sincerely,

Ken Kirk
Executive Director

cc: Chuck Fox, Assistant Administrator for Water

ATTACHMENTS

1816 Jefferson Place, NW, Washington, DC 20036-2505 • 202.833.2672 • 202.833.4657 FAX
info@amsa-cleanwater.org • <http://www.amsa-cleanwater.org>





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Ken Kirk

January 20, 2000

The Honorable Richard Gephardt
Minority Leader
U.S. House of Representatives
204 Capitol Building
Washington, DC 20515

**RE: NONPOINT SOURCE CONTROL CRITICAL TO MEET GOALS OF
CLEAN WATER ACT**

Dear Representative Gephardt:

On behalf of the Association of Metropolitan Sewerage Agencies (AMSA), which represents the nation's publicly-owned wastewater treatment plants, I encourage you to support the U.S. Environmental Protection Agency (EPA) in establishing a framework for stronger controls on nonpoint source pollution under the Clean Water Act. AMSA believes that without strong Federal and State controls on nonpoint sources under the Clean Water Act, we will fail to achieve significant progress towards cleaning up our polluted streams, rivers and lakes. Therefore, we encourage you to inform the House Water Resources Subcommittee and Agriculture Committee that EPA's plan to expand the regulation of nonpoint sources through the Total Maximum Daily Load (TMDL) program is absolutely critical to the success of the Clean Water Act. We also urge you to express to EPA Administrator Carol M. Browner your support for the Agency's plan to regulate nonpoint sources through the TMDL program.

This much is certain – our country cannot expect our municipalities, and industry, to single-handedly address remaining water pollution problems. Despite the impressive achievements in water quality from municipal and industrial wastewater treatment (i.e., point sources) in the last 28 years, EPA now believes that 40 percent of the nation's water bodies are still impaired, mostly from nonpoint pollution sources (polluted runoff from farms, mining and timber operations). In fact, EPA estimates that agriculture alone is responsible for 60 percent of the impaired river miles and half of the impaired lake acreage. The mix of voluntary, incentive-based programs to reduce nonpoint source



pollution have not shown the type of results that are desperately needed to resurrect our waters as envisioned under the Clean Water Act. For AMSA, and others in the point source community, these figures are not surprising. As one of the leading advocates of the Clean Water Act over the past 30 years, AMSA has consistently asserted the need to impose more stringent controls on largely unchecked nonpoint source runoff.

At the dawn of the new millennium, we need to set a new course for water pollution control. EPA's proposed TMDL program defines an appropriate method for accounting for the pollutant loadings from nonpoint sources in an impaired watershed. The TMDL program would require States to reduce all sources of pollutants – both point and nonpoint – within impaired water bodies. The TMDL program is a huge endeavor, described by EPA as “one of the most ambitious proposals to protect water quality in our nation's history.” The program has the potential to finally place point and nonpoint source pollution on an equal footing. And yet, this new program is actually a return to the roots of the Clean Water Act, the realization of Congress' vision in the early 1970s for controlling nonpoint sources using a TMDL approach.

While AMSA has concerns with the mechanics of the draft TMDL regulations, our member agencies wholeheartedly support EPA's proposal to impose equitable controls on both point and nonpoint sources in impaired watersheds. At the same time, we recognize the concerns of the nonpoint source community with respect to implementation, and we fully support the need for flexible, cost-effective and reliable management practices, and funding assistance for nonpoint sources. But, we cannot afford to delay serious controls on nonpoint sources any further.

AMSA would be happy to work with Congress in the upcoming session on any hearings or briefings on the TMDL program. For your further information, I have attached AMSA's recent publication on nonpoint sources, *Clean Water ... We've Got the Point - Now Let's Get to the Nonpoint*.

Please feel free to contact me directly to discuss these issues, or how AMSA can be of any assistance, at 202/833-4653. Thank you for your consideration.

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January 20, 2000

The Honorable Trent Lott
Majority Leader
U.S. Senate
230 Capitol Building
Washington, DC 20510

**RE: NONPOINT SOURCE CONTROL CRITICAL TO MEET GOALS OF
CLEAN WATER ACT**

Dear Senator Lott:

On behalf of the Association of Metropolitan Sewerage Agencies (AMSA), which represents the nation's publicly-owned wastewater treatment plants, I encourage you to support the U.S. Environmental Protection Agency (EPA) in establishing a framework for stronger controls on nonpoint source pollution under the Clean Water Act. AMSA believes that without strong Federal and State controls on nonpoint sources under the Clean Water Act, we will fail to achieve significant progress towards cleaning up our polluted streams, rivers and lakes. Therefore, we encourage you to inform the Senate Environment & Public Works Committee and Agriculture, Nutrition & Forestry Committee that EPA's plan to expand the regulation of nonpoint sources through the Total Maximum Daily Load (TMDL) program is absolutely critical to the success of the Clean Water Act. We also urge you to express to EPA Administrator Carol M. Browner your support for the Agency's plan to regulate nonpoint sources through the TMDL program.

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January 20, 2000

The Honorable Richard Arme
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Majority Leader
U.S. House of Representatives
327A Capitol Building
Washington, DC 20515

**RE: NONPOINT SOURCE CONTROL CRITICAL TO MEET GOALS OF
CLEAN WATER ACT**

Dear Representative Arme
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The Honorable Thomas Daschle
Minority Leader
U.S. Senate
221 Capitol Building
Washington, DC 20510

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