



June 26, 2025

The Honorable Sam Graves
Chairman
Committee on Transportation & Infrastructure
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Mike Collins
Chairman
Subcommittee on Water Resources & Environment
Committee on Transportation & Infrastructure
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Graves and Chairman Collins:

The California Association of Sanitation Agencies (CASA) writes to express our support and appreciation of the committee's successful mark-up of H.R. 3898's provisions that would modernize the Clean Water Act's NPDES permit term authorities. For several years, CASA and other water sector stakeholders have urged the committee to take action to extend NPDES terms to ten years. As testified in prior years' committee hearings, a ten year term would recognize the realities governing permit term renewals, while preserving the ability for regulatory agencies and the public to reopen a permit based upon new data, information or noncompliance.

CASA agencies take seriously their role as leaders in protecting the public health and the environment. However, today's water quality needs are becoming increasingly challenging and permit requirements, as a result, are becoming increasingly complex. To comply with new water quality permit requirements, clean water agencies are required to implement advanced treatment systems and technologies that can extend project timelines to more than a decade. Extending the NPDES permit term to ten years would better align with the clean water agencies' current project realities and allow public agencies to better plan for future capital investments and allow state regulators' more resources to direct towards nonpoint and watershed-based solutions.

Again, CASA supports this commonsense approach to modernizing the Clean Water Act's permitting authorities. We look forward to House floor consideration. If we can be a resource for you, please do not hesitate to contact me at alink@casaweb.org or (916) 446-0388 or Eric Sapirstein at esap@ensresources.com.

Sincerely,

Adam D. Link
Executive Director