

Top Stories for April 2025

- **Volumetric Annual Reports Due 4/30**
- **Rates Survey Initiative Commencing, Boundary Maps Closing**
- **SWRCB Triennial Review Draft Staff Report due 5/15**
- **CASA Comments on USEPA Risk Assessment**
- **Find out more on the CASA Calendar and Upcoming Events**
- **Read CASA's February and March Regulatory Newsletters**



Regulatory Proceedings

AB 805 System Administrator Hearing and Public Comment Period
On April 17, the State Water Resources Control Board (SWRCB) will hold a public meeting in the evening at 6 PM for implementation of Assembly Bill 805 (AB 805) pertaining to the assignment of a system administrator for the consolidation and extension of sewer service, specifically in East Orosi. Previously on January 22, the SWRCB adopted amendments to their Administrator Handbook (Handbook) to reflect changes for the implementation of AB 805, which was signed with an urgency clause in October 2024 in order for the SWRCB to assign an Administrator to the community of East Orosi. CASA submitted to the SWRCB detailed concerns and comments on January 16, but the process on this proceeding was atypical and included a redlined version of the Handbook agendized for the SWRCB's adoption before a formal stakeholder process to review the amendments. CASA

and others raised concerns that the draft Handbook featured numerous provisions which were inconsistent with the statutory language in AB 805, and the SWRCB's Division of Financial Assistance was responsive and added provisions to the Adopting Resolution limiting the use of the amended Handbook to the assignment of one Administrator and committing to a formal comment period and workshop to further amend the Handbook before it is utilized again in order to address the issues identified by stakeholders. The SWRCB's new webpage is linked here: Sewer System Administrators: Community and Program Information. Please reach out with questions or feedback.

SWRCB Hosting Fourth WWNA Advisory Group Meeting on 4/25

On April 25, the Advisory Group (AG) for the SWRCB's four-year Wastewater Needs Assessment (WWNA) will hold their fourth meeting. A one-pager for WWNA is linked. Previously on March 26 and February 25, the WWNA team held Office Hours to discuss items covered during the Advisory Group's prior meeting on January 24. The SWRCB hosted the third AG meeting which included in-depth discussions about the first draft definitions for "inadequate" and "at risk" sewer systems which the WWNA research team had developed, but which were inconsistent with other definitions in statute and from the definitions used in the AB 805 Administrator Handbook. The WWNA team were appreciative of the feedback and have been actively re-working the next draft definitions in advance of the fourth AG meeting. In addition, the second WWNA meeting was held on October 25 and included discussion of their baseline assessment survey and report, review of data collection efforts, and dialogue on definitions of Individual Sewage Systems (ISS). However, it is unlikely they will be released as expected for discussion at the AG's April meeting. Please reach out to connect with questions, comments, or to be added to our WWNA subgroup.

Wastewater and Recycled Water VARs Due to SWRCB on 4/30

On April 30, local agency submissions to the 2024 Volumetric Annual Report (VAR) module are due. The portal is accessible through the GeoTracker Electronic Submittal of Information (ESI) portal. The SWRCB requires agencies to submit their 2024 data by April 30, 2025. The 2024 survey is the same format as the previous year and requires the entry of volumes in acre-feet per month for influent, effluent, and if applicable, recycled water use. Additional information, including the Help Guide and Webinar training for submitting the Volumetric Annual Report, data, infographics, and interactive map for 2019-2023 data sets can be found on the Volumetric Reporting Webpage. Please reach out to SWRCB staff if you need assistance with your report.

SWRCB ANNUAL WQCC Meeting on May 1 and 2

On May 1 and 2, the SWRCB will host in Sacramento the annual meeting of the Water Quality Coordinating Committee (WQCC). The WQCC is composed of all gubernatorial appointees on the SWRCB and nine Regional Water Quality Control

Boards. This meeting is typically held every October but was postponed in the fall of 2024 to this spring and is a unique occasion for CalEPA's leaders to convene, spotlights various regional issues, and hear about state and federal developments over the prior year. More information will become available on the WQCC program page.

SWRCB Workshop on 5/6 for R9 BPAs with Biological Objectives

On May 6, the SWRCB will host a Board workshop on their Noticed approval of the Region 9 San Diego RWQCB's 2021 basin plan amendments (BPAs) for biological objectives. CASA and CVCWA submitted a comment letter in 2020 to the R9 RWQCB conveying our concerns with these specific BPAs, and in 2021, CASA, Clean Water SoCal, and CVCWA submitted comments to the SWRCB reiterating the same. While it is anticipated the BPAs will only affect municipal stormwater permitees in Region 9, the clean water community is concerned with the potential implementation of these same standards in other watersheds around the state. The SWRCB has informally indicated that it does not intend to apply statewide the approach in Region 9 while still reserving and applying the CSCI score in other watersheds through the Integrated Report and 303(d) List. CASA will continue to monitor and advocate in meetings pertaining to both uses of this scientific tool. Please reach out if you have questions.

SWRCB Releasing 2024 Triennial Review Staff Report on 5/15

On May 15, the SWRCB will release the draft Staff Report on their 2024 Triennial Review of State Plans and Policies. On July 1, the SWRCB will host a board workshop on the draft Staff Report and 2024 Triennial Review, with its adoption scheduled at the SWRCB's meeting on January 21, 2026. Last year, the SWRCB commenced their review of all state water quality control plans and state policies for water quality control. From November 22 to December 23, 2024, the SWRCB conducted an online survey to gather initial feedback. Staff currently are considering the initial feedback to help identify and prioritize potential changes or additions to state plans and policies, along with ongoing rulemaking projects, in order to prepare their Draft Staff Report and Work Plan for the 2024 Review of State Plans and Policies. Please reach out with questions or comments.

SWRCB Hosts Workshop on 2026 303(d) List

On March 18, the SWRCB hosted a board workshop during which SWRCB members, staff, and the stakeholders engaged in a robust discussion about the staff decision to list benthic communities as Category 5 in the draft staff report, despite of SWRCB members approving those listings in 2024 as Category 3. Stakeholders effectively explained the different legal obligations associated with both Categories and reasonable preference for keeping them at Category 3 for the reasons explained in California's 2024 Integrated Report itself. Staff shared that due to USEPA's partial disapproval of the report, they had listed them as Category 5. While a final USEPA determination on the 2024 report is pending, a

decision will be made after further guidance is provided. Previously, on February 11, staff from the State Water Resources Control Board (SWRCB) hosted a workshop on the draft 2026 Integrated Report, 303(d) List, and Staff Report (2026 Draft IR). The SWRCB staff presentation on the 2026 Draft Integrated Report showed approximately 275 new listings and 50 de-listings in Region 1 (North Coast), Region 6 (Lahontan), Region 7 (Colorado River), and Region 5-S (San Joaquin Valley). The 2026 Draft IR covers several precedential matters which could prospectively impact many coastal agencies in California in the 2028 and 2030 listing cycles. In addition, the 2026 Draft IR newly proposes a TMDL prioritization framework in Appendix L, and the 2026 Draft IR includes a more detailed approach for assessing ocean acidification and hypoxia (OAH) than the 2024 Integrated Report, which was briefly discussed during the Board workshop on 3/18 but not at the staff workshop on 2/11. While the 2026 Draft IR refrains from listing waters as impaired for OAH due to the absence of biological information that definitively ascertains whether severe dissolution of shelled species occurred, the 2026 Draft IR reserves assessing those water bodies for OAH if biological data were to become available, and it was provided in accordance with the submission guidelines in the data solicitation notice and met all quality assurance requirements in the Listing Policy. Finally, the 2026 Draft IR references CASA's effort with the National Water Research Institute (NWRI) to collaborate with the modeling team and regulators on an independent expert evaluation of the model, observing that work as part of the peer review and validation processes necessary to be completed regarding the model, after which the SWRCB may then rely upon it for additional metrics and data sources for OAH assessments in future listing cycles that will utilize biological data. Please reach out with feedback or to join our Integrated Report subgroup.

SWRCB Agenda Roundup

Here are the recent SWRCB agendas: March 4 (2025 Strategic Priorities), March 18, and April 2. The Executive Director Reports March and April are available, and they feature a link to the SWRCB's current statewide and regional policies calendar.

Clean Water Summit Partner Initiatives

Summit Partners Launching Rates Survey this Month

Later in April, CASA and the Clean Water Summit Partners (BACWA, CASA, Clean Water SoCal, CVCWA, and CWEA)(Summit Partners) expect to launch the 2025 Rates Survey in order to backfill agencies missing rate information that the SWRCB previously collected but stopped after 2018; the existing data is available here, and also linked are the SWRCB's prior surveys. Over the winter, CASA's Regulatory Workgroup launched a new Rates subgroup and worked with Erin Martin, CASA's Civic Spark Fellow, to develop a streamlined survey

instrument. Individual agencies piloting the survey reported it took between 45 and 100 minutes to research, complete, and electronically submit their responses. The Rates subgroup will pilot the survey with a few more agencies over the coming weeks and then formally launch it. If you are interested in being involved in the RWG Rates subgroup, please reach out, and we will add you to its e-mail distribution list.

SSS WDR Webinar on May 29 by the Summit Partners and SWRCB

On May 29, the Summit Partners will host a free virtual webinar from 1-4 PM in conjunction with the SWRCB about the latest developments and deadlines under the re-issued SSS WDR which became effective in June 2023. The SWRCB will lead the presentations to address and provide guidance on the upcoming service area boundary map requirement, as well as the use of the Change Log for Sewer System Management Plans (SSMPs). We anticipate the Office of Enforcement also will discuss compliance expectations, especially when agencies are updating their SSMPs, to clarify and explain how SSMP's are as much an enforceable document as the re-issued SSS WDR. Other presentations will address reporting requirements and documentation, data management and tracking, emergency response coordination, and more substantial changes agencies will pursue under Elements 8 and 9 of their SSMP. Please save the date for now, reach out in the meantime with questions, and keep an eye out for more details later this month!

Boundary Map Progress Report – Remaining Submissions due this month

Last autumn, the Summit Partners launched an initiative to collect member agencies' sewershed boundary maps. We had an amazing response to our formal boundary maps request with about 250 different agencies to date uploading their file to the secure FTP. We have begun reaching back out directly to our remaining members, as well as other agencies which have not yet provided the map. We are requesting agencies to submit them by the end of April. For most agencies, your sewershed boundary maps already are required to be submitted to the SWRCB in July 2025 under the re-issued SSS WDR. Numerous CASA members have been able to produce a map that will meet the listed specifications, and we are hopeful that the remaining agencies will be able to elevate this item this month. These maps will support both the Wastewater Needs Assessment (SWRCB) and the SB 1157 water conservation studies (DWR). Please reach out with any questions or for more details.

BACWA & CVCWA Annual Meetings on 5/2 and 5/14

BACWA will host their annual meeting 9:00 AM - 3:30 PM on Friday, May 2, in Berkeley at the David Bower Center. The program page is here. CVCWA will host their annual meeting 9:00 AM – 4:00 PM on Tuesday, May 14 at the Sacramento Area Sewer District. Reach out to Lorien or Debbie for further information!



CASA Comments on USEPA Risk Assessment with Expert Review

On April 2, CASA submitted a comment letter to USEPA. The focus of the letter and expert reviews were to demonstrate the need for a comprehensive revision of the risk assessment to include a risk management component and to build a representative model based on field-based research and existing regulations. In its current form, the Draft Risk Assessment model fails to capture a remotely applicable scenario of land applied biosolids, and CASA extended our assistance in helping to bolster this model. As was seen with the USEPA Part 503 Biosolids regulation, numerous comment letters were submitted on behalf of biosolids programs across the nation calling for necessary revisions for a protective and sustainable national regulation. CASA greatly appreciates the W-5170 research scientists for offering their specialized knowledge in reviewing this draft risk assessment. Their suggestions will be incredibly valuable to biosolids programs and helpful in building a more robust risk assessment model. CASA aims to synthesize some of their key comments to add to our PFAS Talking Points document for your reference. If you have not already, please consider sending in comment letters on behalf of your utilities, organizations, and communities so that a clear voice is heard for responsible biosolids management. Comment letters are due to USEPA by **April 16, 2025**, and a template letter is attached here for you to utilize. Reach out for guidance, with questions, or to connect on this pressing matter.

CalRecycle Hosts Zero Waste Listening Sessions

In March, CalRecycle held listening sessions requesting input on their Zero Waste Plan's Draft Recommendations and Pathways with 22 proposed recommendations. CASA participated in the listening session on March 17, 2025, offering comments on section B2 of the plan: Policy and Regulation 2) Adopt a state-wide strategy and associated policies to address influx of sources of high volume and/or valuable waste, or materials of concern. CASA comments focused on the how utilities serve as a critical infrastructure point producing clean, renewable energy and circular water resources like biosolids. Highlighting how California leads the nation in annual biosolids dry ton production, how these regulated solids are a local and renewable resource to mitigate climate change and represent a non-fossil carbon and nutrients to replenish working and disturbed lands. Comment letters are also being accepted through April 9, 2025. View the CalRecycle Zero Waste Plan Listening Session Discussion Document here.

Biosolids Associations Letter to USEPA Administrator Lee Zeldin

On March 10, regional biosolids organizations sent a letter to Administrator Zeldin drawing attention to the January 15, 2025 release of the USEPA Draft Sewage Sludge Risk Assessment for PFOA and PFOS. The letter requests that the USEPA consider the impacts this draft model could have on essential service providers and their communities. View the letter here.

Support Letters Sent for Jessica Kramer to US Senate

On March 11, CRROPS and Northwest Biosolids sent letters of support for the nomination of Ms. Jessica Kramer to the as the next Assistant Administrator for the Office of Water for the U.S. Environmental Protection Agency. These letters were addressed to Chairwoman, Honorable Shelley Moore Capito and Ranking Member, Honorable Sheldon Whitehouse. Please see the letter here.

WRF Research on PFAS Reduction from Conventional Drying

On March 7, The Water Research Foundation released results on a project that demonstrate conventional drying methods reduce the total PFAS concentration in biosolids and alters the PFAS profile. The research also recognizes that 'it is essential to recognize that the reduction in concentration of PFAS in biosolids during drying might result in air-borne PFAS associated with water droplets. Additional studies are needed to assess the fate of PFAS to assist the industry and regulators in establishing appropriate management and treatment protocols.

Pesticides Research Released from Study on Occurrence in Biosolids

On March 15, a research study was released that found that the contribution of pesticides via land application is not a significant pathway of pesticides to the environment. Dr. Tom Young, University of California, Davis, worked alongside representatives from the California Department of Pesticide Regulation and the U.S. Geological Survey. 17 California wastewater facilities were sampled in May 2020. You can see which agencies participated in the Acknowledgements section. Reach out with comments or to discuss the study's conclusions.

Univ. of Arizona National Collaborative PFAS Study Update

Recently, the National Collaborative PFAS Study led by the University of Arizona finalized their Phase 1 research evaluating the incidence and mobility of PFAS to groundwater following land application of biosolids. Study results found that 'potential for significant leaching of PFAS and subsequent groundwater contamination is low at most land application sites across the country,' due to low soil PFAS concentrations following land application and the significant attenuation of these PFAS concentrations in the top 6 feet of soil. Read the Phase 1 report released on January 17.

The National Academies Webinars on April 3 and April 10

On April 3 and April 10, The National Academies will continue their webinar series, Committee on Assistance to the U.S. Department of Agriculture in Building

a Framework for Addressing PFAS on Agricultural Land. The April 3 webinar will feature speakers from the Natural Resources Conservation Service and the Farm Service Agency. April 10 will include speakers from the National Academies of Sciences, Engineering, and Medicine and the U.S. Department of Agriculture-Farm Service Agency.

NW Biosolids March Resource Library - Restoration

The Northwest Biosolids Resource Library's March edition was released and is focused on the **role of biosolids in restoration**. You could say that biosolids and disturbed soils are a perfect pairing given the benefits demonstrated to this day in applications from the 1980's. This month's collection of papers looks at the use of biosolids to speed up the recovery of degraded soils and the related ecosystems that rely on this foundation, by boosting sand oil organic carbon plant-available nutrients present in biosolids and binding metals in soil, not contributing them. If you don't have time to read the full library and related articles, the pictures and graphs alone illustrate the point. Thanks to Northwest Biosolids and Dr. Sally Brown for sharing this resource with our CASA members.



CARB Postpones Hearing on AB 1594 SLGA Fleet Requirements

At the end of March, CARB planned to release formal draft regulatory revisions addressing AB 1594 in the SLGA Fleet Requirements for public review and comment, with the Public Hearing scheduled for May 22nd. CASA was provided a "preview" of the draft regulatory revisions which provide public agencies early access to the Daily Usage and ZEV Purchase exemptions and CASA support the most recent of those proposed revisions. CARB staff then shared they need to postpone the Public Hearing to a future (unknown) date to assess the possibility to amend the emergency vehicle exemption following the wildfires in southern California. They are working to collect data on vehicle uses. We will continue to keep you apprised of next steps.

USEPA Pursues Repealing Endangerment Finding to Regulate GHG

In February, EPA Administrator Lee Zeldin urged the White House to repeal the 2009 endangerment finding which serves as the basis for regulating greenhouse gases (GHG) under the Clean Air Act by concluding those gases pose a threat to public health and welfare. The Obama and Biden administrations used it to require inventorying and reporting these emissions from specific sources, as well as to set limits on GHG emissions from power plants and cars. If this repeal of the endangerment finding occurs, it could be the first step toward rolling back other federal climate regulations and funding initiatives. At the same time,

Administrator Zeldin sent three of California's clean vehicle rules to Congress to be subject to the Congressional Review Act (CRA), a mechanism that allows Congress to overturn rules passed within the last six months of the previous administration, but Congress must act within 60 days of reopening a rule under the CRA. The Senate has only 7 days to act and the House only 6 days before April recess. In defense of their regulations, CARB has issued a response to EPA summarizing claims versus facts of the clean vehicle regulations. CASA will continue to track these developments.

SWRCB Climate Change Resolution Focus Group Proceedings

On March 6, the State Water Board kicked off development of their 2025 climate change resolution and action plan, which will replace the March 2017 resolution. The March 2017 resolution consisted of actions that target both mitigating and adapting to impacts of climate change – including support for wastewater treatment facilities to receive diverted organic waste from landfills reducing methane emissions from landfills and modifications to permits requiring climate vulnerability assessments, respectively. To inform development of the 2025 draft resolution, the State Water Board convened a small focus group to provide input – CASA is one of those stakeholders. The focus group will meet three times through June 2025, the State Water Board will then provide a draft resolution for review, with the goal of finalizing the resolution and a supporting action plan by the end of 2025.

CASA to Become a Party to CPUC Proceeding on BioMAT Program

In April, CASA will become a party to the CPUC proceeding on the Bioenergy Market Adjusting Tariff (BioMAT) program, which is a feed-in tariff program for small bioenergy renewable generators less than 5 MW in size. The BioMAT program offers up to 250 MW of eligible projects a fixed-price standard contract to export electricity to California's three large investor-owned utilities (IOUs), which counts toward their Renewable Portfolio Standard (RPS) targets. Biogas from wastewater treatment, municipal organic waste diversion, food processing, and co-digestion comprises 110 MW (of the 250 MW) of the targeted procurement. The program is set to conclude at the end of 2025 and CASA will request a 5-year extension of the program, as well as an adjustment to the fixed-price to account for inflation since 2014. Please let us know if you are considering participating in this program and would support our request for an extension.

CASA Submits Comments on Tracking Carbon Sequestration by NBS

In March, CNRA continued to update the Natural and Working Lands Climate Smart Strategy to include AB 1757 requirements that set nature-based solution climate targets, including carbon sequestration targets. In support of this process, CASA participated in a virtual listening session February 21 to provide feedback on Methods for Tracking and Assessing the Effects of Land Management and request that biosolids be listed alongside compost and biochar as a soil

amendment that improves soil health and carbon sequestration. CASA also submitted written comments and provided citations to scientific research quantifying benefits of land applying biosolids to soil March 21. We expect proposed revisions to the Climate Smart Strategy to be available this summer.

CARB LCFS Amendments Disapproved by the OAL

On February 18, the Office of Administrative Law (OAL) formally disapproved of the November 8 Low Carbon Fuel Standard (LCFS) amendments due to lack of clarity in the language, as well as grammatical errors. CARB staff will address the issues raised by OAL and resubmit the amendments to OAL within 120 days of its receipt of OAL's written disapproval. While we do not expect any changes to the intent of the amendments, if any substantive modifications are made, they will be released for public comment. In the meantime, CARB will continue to implement the current version of the LCFS Regulation (effective July 2020).

CWEA SF Bay Section Hosting Climate Change Seminar

On May 7, CWEA's San Francisco Bay Section is hosting an all-day seminar on climate change & sustainability to discuss what water/wastewater agencies are doing to adapt to climate change and the potential impacts to critical infrastructure. Register by April 10 for the early bird rate, and by April 21 to reserve your seat. The seminar will be held at East Bay Municipal Utility District, 8:30 am to 3:15 pm, continental breakfast and lunch included.

CASA Calendar

April 9	CASA Research Collaborative In-Person Meeting (Sacramento)
April 10	CASA ACE Meeting
April 11	CASA SLC Meeting
April 17	CASA Regulatory Workgroup Meeting
May 29	Summit Partners SSS WDR Webinar
July 30 – Aug 1	CASA 70th Annual Conference (San Diego)

Upcoming Events

April 2	SWRCB Comment Deadline on 2026 Integrated Report
April 10	The National Academies Webinar
April 17	AB 805 Administrator Hearing
April 22-25	CWEA Annual Conference (Palm Springs)
April 25	SWRCB WWNA Advisory Group Meeting
April 30	SWRCB 2024 Wastewater and Recycled Water VAR Data Due
May 1 & 2	SWRCB WQCC Meeting (Sacramento)
May 2	BACWA Annual Meeting (Berkeley)
May 6	SWRCB Meeting (Workshop for R9 Basin Plan Amendments)
May 7	CWEA Climate Change & Sustainability Seminar
May 14	CVCWA Annual Conference
May 15	2024 Triennial Review Staff Report Released
May 20	SWRCB Meeting
May 22	CARB Meeting (ACF Regulations)

For more information please reach out to the CASA Regulatory Team:

Jared Voskuhl, Water Quality
Maile Lono-Batura, Biosolids
Sarah Deslauriers, ACE
Spencer Saks, Newsletter

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