



1199 North Fairfax St, Suite 900 • Alexandria, VA 22314

President

Paul Jones, II

Eastern Municipal Water
District, CA

Vice President

Gilbert Trejo

El Paso Water Utilities, TX

Treasurer

Diane Taniguchi-Dennis

Clean Water Services, OR

Secretary

Craig Lichty

Black & Veatch, CA

Past President

Guy Carpenter

Stanley Consultants, AZ

December 16, 2019

The Honorable David Ross
Assistant Administrator for Water
U.S. Environmental Protection Agency
1200 N. Pennsylvania Avenue, N.W.
Washington, D.C. 20460

**Re: Comments on Draft National Water Reuse Action Plan, Docket No.
EPA-HQ-OW-2019-0174-0058**

Dear Assistant Administrator Ross:

Thank you for the opportunity to comment on the Draft National Water Reuse Action Plan (WRAP). We strongly support the U.S. Environmental Protection Agency's (EPA) effort to develop the Plan, and we look forward to working with you to implement it.

The WateReuse Association is a not-for-profit trade association for water utilities, business, industrial and commercial enterprises, non-profit organizations, and research entities that engage in facilitating the adoption of water recycling practices. WateReuse and its state and regional sections represent more than 250 water utilities serving over 60 million customers, and over 250 businesses, research institutions, and organizations across the country. Our mission is to engage our members in a movement for safe and sustainable water supplies, to promote acceptance and support of recycled water, and to advocate for policies and funding that increase water reuse.

The WRAP presents a unique opportunity for the water sector, policy-makers, and the broader public to collaborate on a set of specific activities that collectively can result in significant progress toward advancing the adoption of water recycling practices across the U.S. The WateReuse Association was pleased that the Administration rolled-out the draft WRAP during our Annual Symposium this past September, and we look forward to the Administration's roll-out of the final document early next year. Our members are pleased that the draft plan reflects many concepts they recommended during an initial public comment phase, and our members stand ready to help ensure the successful implementation of the WRAP's overall goals.

We are pleased to transmit our comments on the draft WRAP which, in addition to outlining specific actions the WateReuse Association is prepared to undertake, provides additional suggestions that we believe would strengthen the overall effort.

Of the 46 actions proposed in the draft Action Plan, there are 24 that the WateReuse Association can help implement in some capacity. We offer to lead or co-lead on the following 11 actions.

Action 2.1.2: Prepare Case Studies of Successful Applications of Water Reuse Within an Integrated Water Resources Management Framework

Integrated water resources management may be the most important water management paradigm of the 21st century. In order to effectively and efficiently address both longstanding and emerging challenges, water managers will need to think holistically about the water resources of their community, state, or region; and water recycling can be a centerpiece of that effort.

WaterReuse Commitment: The WaterReuse Association will work through our membership and with our partners to compile and communicate case studies and success stories, including examples of watershed-scale planning. We can look to our international members as well as our domestic members for examples. To the extent possible, case studies will include information regarding permitting, financing, and performance.

Action 2.2.1: Compile State Policies and Approaches to Implement Water Reuse Programs

Communities across the country are incorporating water reuse into their water management strategies as a proven method for ensuring a safe, reliable, locally controlled water supply. In many cases, states have established enabling policies and regulations to provide guidance and structure to reuse practitioners. Florida and Colorado, for example, are currently finalizing frameworks to guide the development of state regulations to enable potable reuse. California has had enabling policy on the books for years.

In other states, policies and regulations explicitly prohibit certain forms of reuse. For example, less than half of U.S. states and territories allow the irrigation of food crops with recycled water. States that do not have enabling policies and regulations for particular reuse applications can learn from those that do. It is also important to account for and understand the range of *disabling* policies and regulations across the states. While each state faces its own unique considerations and will need to craft its own unique provisions, they can draw from each other.

WaterReuse Commitment: The WaterReuse Association will develop a searchable database and map of state-level policies and regulations across the country and make it available on our website for general public use. We intend to work with our members and partners to gather information in order to populate the database and keep it up to date.

Action 2.2.2: Enhance State Collaboration on Water Reuse

As discussed above, while each state faces its own unique considerations when it comes to enabling water recycling, they can learn from each other's experiences. Because water reuse is largely regulated at the state level, it is critically important that regulators are able to communicate both amongst themselves, and also with researchers, utilities, and private sector entities. The WaterReuse Association is committed to working with our partners to create forums where this dialogue can occur.



WaterReuse Commitment: In 2019, the state regulator associations held the first ever state regulator summit on water reuse at the 34th Annual Water Reuse Symposium in San Diego, California. The WaterReuse Association will continue to offer a venue for state regulators to convene at this annual Symposium. We also stand ready to explore ways to expand participation to additional states, and to create opportunities for state and federal regulators to interact with researchers, treatment professionals, and others.

Action 2.3.3: Convene Experts to Address Challenges Related to Stormwater Capture and Reuse

Stormwater capture and use is an exciting and challenging area of growth within water resources management. According to the National Academy of Sciences, neighborhood- and regional-scale stormwater reuse projects can contribute significantly to urban water supplies. While some states and localities have enacted policies to guide non-potable reuse of stormwater, those policies and regulations are fragmented from state-to-state and largely depend on water availability and permissible uses.

As outlined in our July 1 comments on the development of the WRAP, there are a number of outstanding barriers and unknowns that must be addressed to facilitate the expansion of the practice across the country. For example, in order to craft appropriate management plans, communities need both macro- and project-level information regarding the constituents of runoff and the potential impact of constituent occurrence on reuse treatment design, as well as the implications of stormwater recycling on achieving in-stream values. We can help address these challenges by drawing on the expertise and experiences of our members and by acting as a co-convenor for this action.

WaterReuse Commitment: The WaterReuse Association offers to co-lead this action with EPA and other water sector associations who have an interest and expertise in this topic.

Action 2.6.1: Compile Existing Federal Funding Sources for Water Reuse; and

Action 2.6.4: Compile and Promote Existing U.S. Department of Agriculture (USDA) Funding and Resources for Rural Communities

In our work to advance water reuse around the country, the WaterReuse Association is regularly asked for information regarding federal funding opportunities that can support water recycling projects. We believe that stakeholders across reuse applications would benefit from a compendium of information about federal tools and resources, including information about program eligibility, cost-share requirements, and more. This guide should pertain to both centralized and on-site water recycling systems.

WaterReuse Commitment: We offer to work with EPA, USDA, and other federal agencies to develop and distribute a guide to federal funding and resources that can be used to support water reuse.



Action 2.6.5: Support Development of Tools to Assist Effective Integration of Onsite Water Reuse Systems in Communities

Onsite non-potable water systems (ONWS) can collect and treat blackwater, graywater, stormwater, and rainwater for reuse in buildings, campuses, and districts for non-potable needs. The use of ONWS originally began as a response to drought-driven conservation needs, as these systems can decrease potable water consumption up to 70 percent. However, integrating ONWS with centralized infrastructure is becoming increasingly prevalent as an element of community-specific integrated water resources management planning.

WaterReuse Commitment: The National Blue Ribbon Commission for Onsite Non-potable Water Systems (the Commission) has been the national leader on work related to ONWS. We therefore recommend that the Commission lead this action. The WaterReuse Association administers the Commission, and will assist in identifying resources to support its work on this action.

To that end, we strongly urge EPA to provide financial support to several high-priority research projects, as described below, which will underpin this work:

- **Operator Certificate Program:** Research is needed to develop an operator certificate program for operators of onsite water treatment systems to ensure proper functioning of treatment processes and the protection of public health.
- **Enteric Bacteria Controls:** Research is needed to define appropriate methods to quantify enteric bacterial log removal credits for commonly used treatment processes in onsite water systems.
- Research is needed to define pathogen log removal credits for natural treatment systems.

In addition to these projects, EPA's Office of Research & Development, with an independent expert panel to be convened through the CA Division of Drinking Water, will lead an effort to expand the risk-based framework developed in the report titled *Risk-Based Framework for the Development of Public Health Guidance for Decentralized Non-potable Water Systems*. The expanded framework will address new alternate water sources and end uses. New alternate water sources include foundation drainage and condensate. New end uses include decorative fountains, vehicle washing, and cooling tower make-up.

Action 2.8.1: Compile and Develop Water Reuse Program Outreach and Communication Materials

Promoting acceptance and support of recycled water is essential toward building a movement for greater water reuse adoption, and is a key function of the WaterReuse Association. Whether water recycling is adopted for irrigating farm fields, or for use in manufacturing facilities, confidence must first be established among the customers — and policy-makers being called on to support public investment — that recycled water is safe and appropriate for its end uses.



WaterReuse Commitment: The WaterReuse Association has been doing this work for many years and will continue to do so. We have a multi-year plan to develop new outreach and communications materials, and would like to partner with EPA and others to enhance and improve distribution.

Action 2.8.3: Pursue a National Branding Campaign for Water Reuse

We view this action as part of the larger effort to build trust in recycled water through a robust education and outreach campaign. To begin with, it is important to assess baseline understanding and levels of acceptance across the country, ideally at the regional scale. Our association is interested in exploring opportunities for partnership with EPA to more thoroughly assess public opinion and increase awareness.

WaterReuse Commitment: Over the course of the next 2-3 years, WaterReuse plans to work with our members and networks to conduct an assessment of needs and levels of understanding about the value and potential of water reuse. In order to enhance this effort, we would support a partnership with EPA. The assessment of needs, understanding, and acceptance can help inform the development of branding and informational materials.

Action 2.9.2: Support Opportunities to Promote a Skilled Workforce of Practitioners Across Various Water Reuse Sectors

The water sector already faces significant staff shortages, a problem that will increase over time without significant interventions. Water recycling is an important area of growth for the sector, and can be leveraged to help build the water workforce. Young professionals increasingly interested in water recycling as a tool for increasing resilience; and at the same time, more and more communities are looking to water recycling to deal with a range of issues, from environmental restoration to water supply augmentation. As a core component of the “one water” paradigm, water recycling will play a critical role in water workforce development.

WaterReuse Commitment: The WaterReuse Association offers to work with the Water Research Foundation and other partners to provide one or more web seminars to promote training and certification resources related to potable reuse as well as onsite systems; we can offer *sessions at the 2020 WaterReuse Symposium on workforce and operational skills for water reuse; and we can promote reuse operator training opportunities through newsletters and other materials. We also refer you back to our comments on Action 2.6.5 regarding research to support the development of an operator certificate program for operators of onsite water treatment systems.*

Action 2.10.2: Establish Goals for Extent and Types of Water Reuse in the United States

WaterReuse Commitment: If this action moves forward, the WaterReuse Association should play a leading role in helping to determine appropriate goals that represent the diverse applications of water reuse in the U.S.



In addition to the actions listed above, we offer to play a supporting role in implementing actions 2.2.4, 2.2.5, 2.2.13, 2.3.1, 2.4.2, 2.6.2, 2.7.2, 2.7.3, 2.9.1, and 2.9.3.

Finally, we believe that Action 2.8.2 (Develop a Community of Practice Around Water Reuse) should not be included in the final Action Plan, as it is duplicative of the work of our Association and the online community practice which already exists.

As important as the commitments the WaterReuse Association and other non-federal actors will lead, equally important are the commitments by EPA and its Federal partners. Federal agencies have significant resources that, when effectively focused and leveraged, can drive greater adoption of water recycling practices across many different media. Over the course of many months working with partners and members, it is clear that federal leadership will be critical in helping to leverage non-federal resources to realize the full potential envisioned by the WRAP. We recommend that the plan include more specific and quantifiable federal agency actions and metrics with timelines and resources to improve implementation and expand water reuse.

The WaterReuse Association is uniquely positioned to invest time and resources to help ensure the success of the National Water Reuse Action Plan. Where feasible, we will continue to act as a convener and facilitator to support partnerships between water sector associations, municipal agencies, private sector entities, and non-government organizations. To assist the stakeholder community and ensure effective collaboration, we recommend EPA consider a convening mechanism whereby EPA, its federal partners, and the stakeholder communication can effectively work together as the WRAP is implemented, similar to the convening mechanisms EPA has in place for advancing initiatives related to source water protection, green infrastructure and workforce development.

Again, the WaterReuse Association commends EPA for leading this critical effort, and we look forward to working with you and other federal agencies to successfully implement the Water Reuse Action Plan. Thank you for considering our views.

Sincerely,



Patricia Sinicropi
Executive Director

