



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:

The WaterReuse Association (WaterReuse), National Association of Clean Water Agencies (NACWA), Water Environment Federation (WEF), Association of Metropolitan Water Agencies (AMWA), American Water Works Association (AWWA), and Water Research Foundation (WRF) thank you for the opportunity to comment on the Draft National Water Reuse Action Plan (WRAP). We strongly support EPA's effort to develop the Plan, and we look forward to working with you to implement it.

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 United States.

When EPA announced the planned development of the WRAP, our organizations, recognizing the importance of water reuse as part of the concept of integrated water resource management, organized a broad-based effort to inform the development of policy recommendations to include in it. The comments that we submitted in July 2019 were the product of this effort, and we appreciate that EPA incorporated many of our recommendations into the draft WRAP, as published in September.

While each of our organizations may submit comments on the draft WRAP independently, we jointly recommend that EPA work with external stakeholders to establish a partnership or collaborative to support effective and efficient implementation of the WRAP, facilitate the evolution of the WRAP over time, and ensure that the WRAP is a useful tool for advancing water reuse across the country. Through the collaborative, partners, EPA, and other federal agencies can facilitate cooperation, collaboration, coordination, and effective communication among organizations, the federal family, and other stakeholders. A formalized structure will allow stakeholders to discuss progress made in implementing

action items, identify challenges and develop solutions to address those challenges, identify additional actions to be undertaken, and determine effective ways to synergize and leverage resources.

In addition to recommending the creation of a collaborative or partnership, we strongly urge EPA and its federal agency partners to commit to lead on at least one major action respectively in the final WRAP. 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 our members, it is clear that leadership by the federal family will be critical in helping to leverage and inspire action by non-federal actors.

Again, the undersigned organizations commend EPA for leading this critical effort, and we look forward to working with you to successfully implement the National Water Reuse Action Plan. Thank you for considering our views.

Sincerely,

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