



November 16, 2020

Mr. David Olson
Regulatory Program Manager
U.S. Army Corps of Engineers
441 G Street NW,
Washington, DC 20314-1000

Re: Comments on Proposal by the U.S. Army Corps of Engineers to Reissue and Modify
Nationwide Permits (Docket ID No. COE-2020-0002)

Dear Mr. Olson:

On behalf of the WateReuse Association, I am pleased to submit our comments regarding the Army Corps of Engineers' reissuance and modification of its nationwide permits, and in particular, the proposal to establish a nationwide permit related to water reuse.

WateReuse is a not-for-profit trade association for water utilities, businesses, industrial and commercial enterprises, non-profit organizations, and research entities that engage in and on water reuse. WateReuse and its state and regional sections represent nearly 250 water utilities serving over 60 million customers, and over 300 businesses and organizations across the country. The WateReuse Association's mission is to engage its 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 WateReuse Association supports the creation of a nationwide permit for the discharge of dredged or fill material associated with the construction, expansion, and/or maintenance of water reclamation and reuse facilities (new NWP E).

While some water recycling projects will qualify as attendant features under existing nationwide permits, as detailed in the federal register notice, others may not. Moreover, even when activities do qualify under Nationwide Permits 29, 39, 40, or 42, project sponsors are sometimes unaware that this is the case. We believe that creation of NWP E will add needed clarity, thus simplifying and increasing the efficiency of the permitting process. For these reasons, the WateReuse Association supports the creation of NWP E.

Thank you for your consideration of our comments.

Sincerely,

Patricia Sinicropi
Executive Director

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Gilbert Trejo
El Paso Water, TX

Vice President
Craig Lichty
Black & Veatch, CA

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