June 28, 2019

Environmental Protection Agency
David Ross, Assistant Administrator for Water
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

Submitted electronically at: https://www.regulations.gov/comment?D=EPA-HQ-OW-2019-0174-0001

RE: INPUT ON DEVELOPMENT OF THE DRAFT NATIONAL WATER REUSE ACTION PLAN

Dear Administrator Ross:

As members of WaterNow Alliance and the National League of Cities (NLC), we write to support the Environmental Protection Agency's development of a National Water Reuse Action Plan (WRAP) and appreciate this opportunity to provide our input on the WRAP's ongoing development. WaterNow Alliance is a nonprofit forum for local water leaders dedicated to sustainable, affordable, and climate resilient water strategies. The NLC is the voice of America's cities, towns and villages, representing more than 200 million people. Our comments provided, and suggestions highlighted in blue, below are based on EPA's Discussion Framework for a Water Reuse Action Plan (Framework)[1] dated April 18, 2019, and cover these topics:

- Additional examples of existing onsite non-potable reuse systems
- Expressly addressing technological improvements for how monitoring and sensoring is conducted for onsite non-potable reuse systems
- Expressly addressing regulatory and policy aspects applicable to distributed, onsite reuse systems as compared to centralized systems
- Expressly addressing how federal and state funding opportunities can more readily apply to distributed, onsite reuse.

Comment on Framework Section III: Use Cases – Possible Examples of Types and Fit-for-Purpose Applications of Water Reuse
Section III of the Framework includes illustrative examples of opportunities and water reuse applications, including for onsite non-potable reuse. This section cites only two onsite reuse applications, the "Alaska Water and Sewer Challenge" and Battery Park City, New York. ***There are, however, a growing number of other relevant examples of onsite non-potable reuse in cities throughout the country that we strongly recommend be part of the WRAP***.

[1] Discussion Framework for Development of a Draft Water Reuse Action Plan, available here: https://www.regulations.gov/contentStreamer?documentId=EPA-HQ-OW-2019-0174-0002&contentType=pdf.

These include but are not limited to:

- San Francisco Public Utilities Commission (SFPUC) onsite reuse ordinance[2]
- SFPUC's building that reduced its potable water use by 65%[3]
- Austin Water Forward Plan that provides that community-scale onsite reuse water will come to represent one-third of all additional water supplies that Austin will bring online[4]
- Gillette Stadium, Massachusetts onsite reuse for toilet flushing and groundwater recharge at a football stadium that serves 69,000 people on game day[5]

Onsite systems are cost-effective, and scaling investment in these decentralized solutions is an important way for communities to meet their resilience and sustainability goals. It is vital that EPA and the public consider the full spectrum of onsite non-potable reuse examples in the development of the WRAP.

Comments on Framework Section V: Potential Areas of Focus

Section V of the Framework lists several thematic areas the WRAP may address, including technological improvements, regulatory/policy aspects, financial initiatives, performance metrics, water information use and availability, and public outreach. We provide our input on the technological improvements, regulatory/policy aspects, and financing aspects below.

Technological Improvements

Item b of the listed areas for technological improvements identifies "Monitoring and Sensoring." We agree that this is an area of needed improvement. In addition to the challenges listed in the Framework, we note that implementers and/or potential implementers of onsite non-potable reuse often raise questions about onsite monitoring and sensoring that are different from those that arise around centralized water reuse programs. Accordingly, ***we suggest that the WRAP expressly address the technological improvements needed and how to meet those needs with respect to onsite non-potable reuse separately from centralized reuse***.

Regulatory/Policy Aspects

Item b of the listed regulatory/policy aspects identifies "Regulatory and Policy Incentives, Challenges, Barriers, and Facilitation" and encourages creation of an environment where reuse can be realistically and routinely considered. We agree that reuse should be a standard part of integrated water planning. However, onsite reuse systems often face regulatory and policy challenges that are somewhat different than those that apply to development of conventional centralized recycling systems. Onsite systems may also be implemented by

[2] See SFPUC ordinance guidebook available here: https://sfwater.org/modules/showdocument.aspx?documentid=4962
[3] Description of SFPUC's building available here: https://www.sfwater.org/Modules/ShowDocument.aspx?documentID=7089
[4] See Austin Water's Water Forward Plan summarized here: https://waternow.org/2018/11/30/tapping-into-resilience-austin-waters-innovative-100-year-water-plan-receives-unanimous-city-council-approval/
[5] WateReuse presentation, p. 32, available here: https://watereuse.org/wp-content/uploads/2015/12/WateReuse-10-08-Master-Presentation_20130411.pdf

different departments/agencies, and certain types of consumer incentives are critical to their deployment. Accordingly, ***we suggest that the WRAP expressly address what regulatory, policy incentives, challenges, and barriers apply specifically to onsite non-potable reuse separately from centralized reuse***.

Financing

Item a of the listed financing aspects identifies "Financing and Funding Eligibility" and calls for providing additional funding opportunities and incentives for water reuse and ensuring eligibility for federal and state funding. Onsite water reuse systems face very different funding challenges than conventional centralized recycling facilities. In addition, eligibility criteria do not always make it clear that distributed, onsite reuse systems meet funding requirements. Accordingly, ***we suggest the WRAP expressly address how federal and state funding opportunities and incentives can be applied to distributed, onsite reuse systems and how eligibility criteria can be updated to clarify that onsite systems qualify for funding separately from centralized reuse***.

Conclusion

Localized water infrastructure including specifically onsite water reuse systems enhance our water resources now and for future generations, often more affordably than other alternatives. As detailed above, we encourage EPA to expressly address how decentralized systems fit into the WRAP to ensure local water utilities have increased access to these cost-effective, environmentally friendly solutions.

Thank you for your consideration. We look forward to participating in the ongoing development of the WRAP.

Sincerely yours,