

December 9, 2019

Mr. David Ross  
Assistant Administrator for Water  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue N.W.  
Washington, DC 20460

*Submitted electronically*

**RE: INPUT ON THE DRAFT NATIONAL WATER REUSE ACTION PLAN, EPA-HQ-OW-2019-0174-0058**

Dear Assistant Administrator Ross:

As members of WaterNow Alliance and the National League of Cities (NLC), we write to express our strong support for the U.S. Environmental Protection Agency's (EPA) development of a National Water Reuse Action Plan (WRAP or Plan) and appreciate this opportunity to provide input. WaterNow Alliance is a nonprofit network of more than 400 local water leaders supporting sustainable, affordable, and resilient water strategies. The NLC is the voice of America's cities, towns, and villages, representing more than 200 million people nationwide.

These comments on EPA's September 10, 2019, draft WRAP cover specifically (1) how the WRAP can better enhance the ability of local water decision makers to implement onsite water reuse programs; and (2) how our organizations can collaborate with EPA and its federal partners, and others, on community outreach and education to advance acceptance and adoption of water reuse at the local level.

As an initial matter, we applaud the draft WRAP's focus on integrated water management and inclusion of several proposed actions specific to onsite reuse. We urge you to retain these actions in the final Plan. These actions will help move the nation towards a more secure, resilient, and sustainable water future. Successfully implementing and expanding on the identified actions will serve to accelerate implementation of innovative water management and infrastructure.

Cities, towns, and local water utilities are especially poised to lead on making onsite water reuse a key element of water management planning. As the draft recognizes, the Plan presents an important opportunity for EPA to support and partner with these local water leaders as they build on existing programs, research, and successes. We appreciate EPA's commitment to building these partnerships in carrying out the Water Reuse Action Plan.

## **Successfully Implementing Onsite Reuse Proposed Actions.**

The draft WRAP highlights several proposed actions particularly related to onsite reuse systems.<sup>1</sup> Maintaining each of these proposed actions in the final WRAP is crucial to a meaningful national water reuse strategy, given that these decentralized systems offer tremendous potential to build local resilience and enhance our water resources now and for future generations, often more affordably than other alternatives.<sup>2</sup> We recommend strengthening Proposed Actions 2.6.5 and 2.6.2, as described below, to provide concrete ways the final Plan can support successful local implementation paths.

**Proposed Action 2.6.5** establishes that EPA will “Support Development of Tools to Assist Effective Integration of Onsite Water Reuse Systems in Communities” by developing planning approaches, financial models, and decision support tools for implementing onsite systems.<sup>3</sup> This is an excellent start, and to ensure that the resources referenced under this Proposed Action result in successful implementation of onsite reuse systems, we respectfully recommend the following addition to Proposed Action 2.6.5 (in blue highlighted language):

### **2.6.5 Support Development of Tools to Assist Effective Integration of Onsite Water Reuse Systems in Communities**

Develop planning approaches, financial models, and decision support tools to assist appropriate implementation of onsite non-potable reuse projects while maintaining viability of centralized community water systems. *EPA will work to incorporate these tools into existing water management planning guidance, such as the Integrated Municipal Stormwater and Wastewater Planning Approach Framework<sup>4</sup> and the Combined Sewer Overflow Control Policy,<sup>5</sup> to promote locally appropriate implementation of onsite non-potable reuse projects.*

This addition to Proposed Action 2.6.5 will provide clear guidance that onsite reuse systems are key elements of comprehensive, innovative integrated water management plans. Important elements of implementation of this proposed action are developing a suite of performance indicators local water managers can use to measure the effectiveness and impacts of onsite systems, including, e.g., consumptive use resulting from residential onsite systems, and clarifying the definition and scope of “onsite non-potable reuse projects” to establish more consistent use of terms for similar projects across the country.

**Proposed Action 2.6.2** establishes that EPA will “Promote Eligibility of Existing SRF and WIFIA Funding for Water Reuse” by working with states to clarify that water reuse projects are eligible for funding under these federal loan programs.<sup>6</sup> We wholeheartedly agree with this Proposed Action. To ensure that these important programs are available and promote *onsite*,

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<sup>1</sup> See Draft WRAP, Proposed Actions 2.2.6, 2.2.8, 2.2.10, 2.2.11, 2.2.13, 2.3.2, 2.3.3, 2.4.1, 2.4.3, 2.4.4, 2.5.2, 2.6.2, 2.6.3, and 2.6.5.

<sup>2</sup> Draft WRAP, p. 25.

<sup>3</sup> Draft WRAP, p. 31.

<sup>4</sup> Integrated Municipal Stormwater and Wastewater Planning Approach Framework, available at:

[https://www.epa.gov/sites/production/files/2015-10/documents/integrated\\_planning\\_framework.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/integrated_planning_framework.pdf)

<sup>5</sup> Combined Sewer Overflow Control Policy, available at: <https://www.epa.gov/sites/production/files/2015-10/documents/owm0111.pdf>

<sup>6</sup> Draft WRAP, p. 31.

as well as centralized, water reuse, we respectfully recommend Proposed Action 2.6.2 be revised to include the blue highlighted language below:

**2.6.2 Promote Eligibility of Existing SRF and WIFIA Funding for Water Reuse**

Work with states to promote *both centralized and onsite* water reuse projects' eligibility as expenses under SRFs and clarify which SRFs, clean water or drinking water, apply to various elements of a project. The EPA plans to continue to support the use of WIFIA funds for water reuse projects as was explicitly called out in the 2019 WIFIA Notice of Funding Availability (see Inset 27). *The EPA also supports the use of WIFIA funding for onsite water reuse projects.*

These revisions to Proposed Action 2.6.2 will provide the clarity and guidance needed by cities, towns, and municipal water resource agencies that SRF and WIFIA funds are available for onsite reuse projects. Access to these loan funds will, in turn, ensure successful implementation of the onsite reuse focused actions set out in the remainder of the WRAP, including, in particular, Proposed Action 2.6.5.<sup>7</sup>

**WaterNow and NLC Are Well-Positioned to Develop and Deploy Water Reuse Outreach and Education Programs.**

In response to EPA's interest in securing specific commitments from stakeholders to collaborate on implementation of the Plan's actions,<sup>8</sup> WaterNow and NLC express our commitment to lead and/or collaborate with others on implementing the Proposed Actions related to improving community outreach and communication on water reuse, including, in particular, onsite reuse.<sup>9</sup> Given that the burden of paying for water infrastructure falls disproportionately on local communities, our networks of municipal and water leaders hold the keys to the nation's water future, and we work together to educate, inform, and support these decisionmakers as they navigate the evolving water landscape.

WaterNow and NLC stand ready to harness our expertise and networks to work with EPA and other federal, state, local, and NGO partners to develop and execute outreach strategies designed to engage the full spectrum of utility customers around the safety and benefits of water reuse. These strategies would include: (1) accessing multiple media platforms such as print and online news and social media; (2) organizing community events; and (3) developing easily customizable outreach and education materials and toolkits that can be used by cities, towns, and water agencies across the country. These types of efforts can successfully change public perceptions, educate residents and business owners on the importance of water use efficiency together with reuse, and build support for water reuse.

**Conclusion**

Thank you again for your efforts to develop this Water Reuse Action Plan, which is needed now more than ever. We encourage EPA to expand the implementation and funding

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<sup>7</sup> WaterNow and the NLC are willing to lead and/or collaborate with others to implement Proposed Actions 2.6.2 and 2.6.5 by, for example, coordinating development of needed decision tools and guidance and working with state SRF programs to update eligibility criteria.

<sup>8</sup> Draft WRAP, p. iii.

<sup>9</sup> See Proposed Actions 2.8.1, 2.8.2, and 2.8.3.

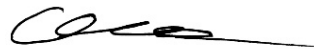
opportunities for onsite water reuse in the final Plan as described above. This will help ensure that local water utilities have substantially increased access to these cost-effective, environmentally friendly solutions.

We appreciate your consideration of our comments, and look forward to working with you. If you have any questions, please do not hesitate to contact our staff: Caroline Koch, WaterNow Alliance (415-360-2999 or cak@waternow.org) and Carolyn Berndt, National League of Cities (202-626-3101 or berndt@nlc.org).

Sincerely,



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Executive Director  
WaterNow Alliance



Clarence E. Anthony  
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[additional individual members here]