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October 31, 2017

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Washington, DC 20460

Via [www.regulations.gov](http://www.regulations.gov)

**RE: DRAFT FY 2018-2022 EPA Strategic Plan, Docket ID No. EPA-HQ-OA-2017-0533**

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the U.S. Environmental Protection Agency's (EPA) Draft FY 2018-2022 Strategic Plan (*Draft Plan*). NACWA represents the interests of public wastewater treatment and stormwater management utilities across the country. Our clean water agency members treat most of the wastewater generated in the United States and together are responsible for much of the nation's water quality improvement over the last four decades.

NACWA is encouraged by many elements of the *Draft Plan*, including an increased focus on compliance assistance instead of immediate enforcement and discussion of local governments as partners in achieving environmental protection. NACWA strongly supports the elements of the *Draft Plan* highlighted below and looks forward to engaging with the administration as it works to implement the plan over the next four years.

- Increasing the percentage of water infrastructure projects funded through EPA grants, loans and/or public-private partnerships – included in the *Draft Plan* as an Agency Priority Goal (p. 4) – is a critically-important objective that must remain a focus for EPA. NACWA appreciates the discussion throughout the *Draft Plan* on the need to invest in the nation's drinking water and clean water infrastructure and the Agency's commitment to work with the water sector on addressing this growing challenge.
- Recognizing that some of the population, including low-income communities, may be disproportionately impacted by environmental challenges and working to ensure that these impacts are fully considered

(p. 5, 22-23) is an essential duty for the nation's clean water utilities and NACWA appreciates that EPA is embracing this issue in the *Draft Plan*. The challenge of providing clean and sustainable water services to the nation is a top priority for NACWA and more must be done to ensure that these services are affordable for low-income and other disadvantaged communities.

- Addressing the water quality challenges associated with nutrient loadings and nonpoint sources (p. 11) is a priority for NACWA as well and we look forward to sharing some of the work our members are already doing on this front, including in partnership with agriculture interests at the local level.
- The Agency's desire to remove barriers to, and create incentives for, new and innovative technologies and solutions (p. 11) is also a focus of NACWA's work to enable the Water Resources Utility of the Future. NACWA looks forward to working with the Agency to address obstacles to greater resource recovery and use of advanced monitoring technologies.
- The *Draft Plan's* recognition that "[l]ocal governments also have a unique relationship with EPA as partners and often as innovative problem solvers" (p. 20) reflects a top principle for NACWA and its members – that EPA should increasingly look to the municipal clean water community as co-regulators, working to protect and improve the environment as it has done now for decades.
- Creating "consistency and certainty for the regulated community" (p. 25) is essential and NACWA is pleased to hear that EPA will be establishing a "national network to ensure consistent implementation of policy across all regions" (p. 30), an area that has needed improvement for some time.

NACWA looks forward to reviewing the final *Strategic Plan* and to working with the administration on these and other issues over the next four years to continue to improve the quality of the nation's waters.

Sincerely,



Chris Hornback  
Chief Technical Officer