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December 16, 2019

**Jeff Lape**  
Deputy Director  
Office of Science and Technology  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

***Re: Comments on EPA Draft Water Reuse Action Plan (WRAP) (EPA-HQ-OW-2019-0174)***

Dear Mr. Lape:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to review and provide comments on EPA's draft Water Reuse Action Plan (WRAP). NACWA represents the interests of over 300 public clean water utilities of all sizes and geographic regions, many of which are not only local and national leaders in water recycling and reuse initiatives but also provide the essential service of managing billions of gallons of wastewater every day to ensure the continued protection of public health and the environment.

NACWA, along with the Water Environment Federation (WEF), American Water Works Association (AWWA), Association of Metropolitan Water Agencies (AMWA), the Water Research Foundation (WRF), and WaterReuse Association, formed a water sector coalition to help define and develop proposed actions where EPA could be most helpful and targeted in its effort to draft policy recommendations for water reuse. This group provided EPA with comments on July 2, 2019. In addition, NACWA and our Arid State and Water Reuse Workgroup submitted comments on February 22, 2019 as EPA was in its early stages of developing its initial "discussion framework" that would later become the draft WRAP. NACWA thanks EPA for its serious consideration of these comments in the draft WRAP, including the inclusion of many NACWA recommendations.

As water quantity issues continue to pose both challenges and opportunities for communities across the country, perhaps most acutely in arid and semi-arid areas as well as in the southeastern United States, NACWA appreciates EPA's interest in strengthening the broader support for greater water reuse and recycling efforts in these regions as well as nationally. This federal support is particularly relevant as communities look to better include water reuse options in developing integrated planning and one water frameworks.

NACWA does have some additional comments on the draft WRAP. The draft document proposes 46 Actions with the goal of obtaining stakeholder commitments to drive each. While NACWA and other stakeholders are more than willing to help move the WRAP forward, it is imperative that the EPA—along with other relevant federal agencies—be the ultimate leaders to implement the WRAP. Part of this commitment to implementation

must involve a careful balance between water reuse and recycling efforts that have traditionally been driven by state policy and regulated by state regulatory authorities and federal assistance to advance water recycling initiatives. As not to be duplicative of efforts already underway by many states, the federal role in advancing the draft WRAP should build upon existing state efforts and successes in a complementary fashion and highlight these accomplishments at the national level.

A helpful step would be for the Agency to prioritize achievable short-term actions that have the greatest benefit. Less is often more, and 46 individual action items can be a daunting challenge. It is critical for the WRAP's success to have a short-list of prioritized actions that can result in new information and make progress in addressing the actual challenges communities face with beginning or furthering their water reuse journey.

In addition, it is unclear in the draft WRAP how EPA, other federal agencies, or stakeholders will measure success. A set of metrics to determine progress could be helpful.

A shorter, prioritized list with defined, clear metrics of success will provide the Agency and stakeholders with a more meaningful approach to advance the WRAP and ensure that the most important items receive the attention and resources they demand. EPA should also consider how progress of the plan will be continuously updated and communicated to the public.

NACWA appreciates the opportunity to provide these comments and participate in furthering water reuse initiatives within our membership and the broader water reuse community and water sector. If you have any questions or would like to discuss further, please contact me by phone at 202/533-1839 or by email at [eremmel@nacwa.org](mailto:eremmel@nacwa.org).

Sincerely,

A handwritten signature in cursive script, appearing to read "Emily Rimmel".

Emily Rimmel  
Director, Regulatory Affairs