



October 30, 2019

The Honorable David P. Ross
Assistant Administrator
Office of Water
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Docket ID: EPA-HQ-OW-2019-0463, *Notice of Intent to Develop a Policy on the Determination of a Harmful Algal Bloom (HAB) and Hypoxia as an Event of National Significance in Freshwater Systems*

Dear Assistant Administrator Ross,

The Association of Metropolitan Water Agencies (AMWA) appreciates the opportunity to comment on the Environmental Protection Agency’s *Notice of Intent to Develop a Policy on the Determination of a Harmful Algal Bloom (HAB) and Hypoxia as an Event of National Significance in Freshwater Systems*. AMWA is an organization representing the largest publicly owned drinking water utilities in the United States. Harmful algal blooms have been increasingly problematic for drinking water utilities and can impact a system’s ability to provide safe and reliable drinking water to its customers. AMWA offers the following comments for EPA to consider when determining an “event of national significance”.

If a harmful algal bloom has the potential to impact the source water of a drinking water utility, this should automatically make the event a candidate to be considered “nationally significant” and given the highest priority. A community’s access to clean and reliable drinking water is paramount to the day to day life of its citizens. A disruption of these services can have lasting and costly impacts to businesses, local governments, and the public. Any event which may compromise a drinking water utility is a concern for the entire community. When determining how to prioritize a harmful algal bloom event of national significance when multiple have been declared within a short timeframe and limited resources are available, AMWA suggests EPA consider the following:

- The number of drinking water utilities impacted and/or the size of the population served by the affected utilities;
- Whether the impacted water body is the sole or majority source for a drinking water utility or community;
- Whether impacted utilities have the technologies and capabilities to treat, monitor, characterize and test for algal populations and harmful algal toxins; and
- Whether utilities will have to utilize treatment technologies onsite that are not routinely

BOARD OF DIRECTORS

PRESIDENT

Steve Schneider
Saint Paul Regional Water
Services

Jerry Brown
Contra Costa Water District

Shane Chapman
Metropolitan Water District of
Southern California

Rudolph Chow
Baltimore City Department of
Public Works

VICE PRESIDENT

Angela Licata
New York City Department of
Environmental Protection

Robert L. Davis
Cleveland Department of Public
Utilities

Yvonne Forrest
Houston Public Utilities
Division

Kevin Gertig
Fort Collins Utilities

TREASURER

John Entsminger
Las Vegas Valley Water
District

Richard Harasick
Los Angeles Department of
Water and Power

Robert Hunter
Municipal Water District of
Orange County

SECRETARY

Kathryn Sorensen
Phoenix Water Services

Carrie Lewis
Portland Water District

James S. Lochhead
Denver Water

Ron Lovan
Northern Kentucky Water
District

CHIEF EXECUTIVE

OFFICER
Diane VanDe Hei

Sue McCormick
Great Lakes Water Authority

John P. Sullivan, Jr.
Boston Water and Sewer
Commission

Jeffrey Szabo
Suffolk County Water Authority

Douglas Yoder
Miami-Dade Water and Sewer
Department

Assistant Administrator Ross

October 30, 2019

Page 2

operational (i.e. granular activated carbon, membrane technology etc.) as this can be very costly to utilities, particularly if harmful algal blooms are a recurring event.

AMWA also encourages EPA to continue its partnership with USDA and other federal partners in prioritizing source water protection initiatives, particularly in regard to nutrient transport from point sources and non-point sources, as this will help to prevent HABs from occurring in the future. Source water protection is a cornerstone for providing safe, reliable, and affordable drinking water. AMWA thanks EPA for the opportunity to comment and looks forward to working with the agency to protect drinking water sources in the future. If you would like to further discuss our concerns, please call Stephanie Hayes Schlea, Regulatory and Scientific Affairs Manager, at 202-331-2820.

Sincerely,



Diane VanDe Hei
Chief Executive Officer

cc: Eric Burneson, OGWDW
Jennifer McLain, OGWDW
Lesley V. D'Anglada, OW