



March 22, 2019

The Honorable David Ross  
Assistant Administrator for Water  
US Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20004

Re: Initial Thoughts on EPA’s Discussion Framework – Water Reuse Action Plan (Draft)

Dear Assistant Administrator Ross:

The Association of Metropolitan Water Agencies (AMWA) appreciates EPA’s engagement of stakeholders as the agency works to develop a reuse action plan. AMWA is happy to provide some initial thoughts for EPA’s consideration as the plan comes together. As an organization of the CEOs and general managers of the largest, publicly owned drinking water utilities around the country, AMWA supports a water utility’s ability to develop a diversified portfolio of water resources options that are most appropriate for the local utility’s unique resource needs, taking into consideration the need for flexibility, affordability and public acceptance. Water reuse, whether as water reclamation, indirect potable reuse or direct potable reuse is often a component of this water resources portfolio. While some utilities may choose to employ direct and indirect reuse methods and treat water to varying degrees, not all communities may wish to take advantage of water reuse or potable uses. Communities and local stakeholders should therefore carefully evaluate potable water reuse proposals and have the flexibility to only select and implement the approaches most suitable for their community.

With this in mind, EPA has a unique opportunity to work with its federal partners, including those identified in its February 27 press release, to better coordinate the efforts currently underway across the federal family. As described in the *Draft Discussion Framework for a Water Reuse Action Plan* (v. 2.1 March 1, 2019), there are many federal agencies that maintain initiatives that address water reuse, but they are not always coordinated or leveraged to maximize benefits. AMWA believes that a more impactful and aspirational approach for the federal government would be for the agencies to work together to develop and pilot new projects within the federal family. The government could promote these projects via case studies to showcase how water reuse can be successfully implemented and advanced at agency facilities.

These case studies would be examples for stakeholders both within the federal family, and outside, to include state, local and utility partners. There are many agencies that EPA could consult or partner with to develop these case studies. For example:

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- EPA could work with GSA in reviewing the federally-owned portfolio of buildings to identify candidates for onsite non-potable water systems, particularly in water-stressed areas.
- The Department of Defense may have examples of new or renovated facilities that have employed water reuse strategies as required per its Unified Facilities Criteria for High Performance and Sustainable Building Requirements that could be shared with federal and other stakeholders.
- EPA could work with NOAA by encouraging the administration to consider using reclaimed water for cooling of its Florida based supercomputers, to help bolster collaboration on reuse in Florida, a state that is pursuing its own reuse regulations.
- EPA could convene the appropriate decisionmakers in the Department of Interior (DOI), US Department of Agriculture (USDA) and Department of Energy to envision ways to advance fit-for-purpose applications of water reuse on federal land or facilities within these organizations' purview.

By leading by example, the federal government will advance the consideration and application of water reuse. This will also positively affect public education, communication and outreach and advance consideration of the feasibility and reliability of water reuse within the water sector and other areas. As more utilities branch out into different aspects of reuse, they will have the backing of the government's largest entities. AMWA urges EPA to fully take advantage of this unique opportunity that is presenting itself with the agency's announcement of an action plan.

AMWA also believes that the federal government should continue to fund research to review the public health implications of indirect and direct potable reuse. DOI and USDA have provided grant funding to advance technological improvements and continued financial support for technological advancement and pilot testing of new technologies and reuse programs is an ongoing need. The deployment of reuse technology is not a one-size-fits all endeavor. At water utilities around the country, indirect potable and direct potable reuse projects will differ due to the source water quality and regulatory framework of the state where the project is being implemented. Reuse for industrial use, military operations or oil and gas production will also have different regulatory frameworks and best practices. It's important for the federal government to continue to promote advances in these technologies and approaches through leveraging current programs and mandates.

AMWA supports EPA's intentions of expanding research and support within the area of direct potable reuse but cautions the agency in pushing this process too far too fast. It is imperative that procedures and policies for implementing direct potable reuse be irrefutable regarding the safety for public health. AMWA believes that this is a scenario in which one failed operation can be disastrous to the goal of the agency and utilities.

In conclusion, important strides have already been made regarding water reuse, but significant work remains to be done. The federal government, and in particular EPA, should focus first on what progress can be made within their own organizations and at their own facilities in order to

inspire action among other stakeholders and industries to consider fit-for-purpose applications of water reuse. Progress in advancing water reclamation and reuse within the federal family would also strengthen the public's trust in reuse practices, which in turn could positively affect utilities considering the expansion of their drinking water resource portfolios via implementation of water reuse applications.

AMWA thanks EPA for the opportunity to provide feedback in the early stages of agency's work to develop a Water Reuse Action Plan and looks forward to working with EPA throughout the development process. If you have any questions, please contact Erica Brown (brown@amwa.net), AMWA's Chief Strategy and Sustainability Officer, or me.

Sincerely,



Diane VanDe Hei  
Chief Executive Officer

Cc: Jeff Lape, OST