



December 16, 2019

David P. Ross  
Assistant Administrator, Office of Water  
U.S. Environmental Protection Agency (EPA)  
1200 Pennsylvania Ave. NW.  
Washington, DC 20460

**Subject: EPA Draft National Water Reuse Action Plan (Docket # EPA-HQ-OW-0174)**

Dear Assistant Administrator Ross:

The California Association of Sanitation Agencies (CASA) and the Bay Area Clean Water Agencies (BACWA) appreciate the opportunity to comment on the Draft National Water Reuse Action Plan (Draft Plan). CASA is an association of over 125 public agencies engaged in advancing the recycling of wastewater into usable water, as well as providing wastewater collection, treatment, and resource recovery for the generation and beneficial reuse of renewable energy, biosolids, and other valuable resources. BACWA is a joint powers agency whose members own and operate publicly-owned treatment works (POTWs) and sanitary sewer systems that collectively provide sanitary services to over 7.1 million people in the nine-county San Francisco Bay Area. BACWA members are public agencies, governed by elected officials and managed by professionals who protect the environment and public health. BACWA supports a Recycled Water Committee with participants from both the water and wastewater sectors, who are interested in increasing recycled water in our Region.

CASA and BACWA support the Draft Plan and most of its proposed Actions. In California, the primary barriers to increased water recycling are shortfall of available funds for large infrastructure, as well as the challenges associated with implementing interagency agreements where the recycled water producer and distributor or water agency are different entities. The Draft Plan recognizes this first hurdle and proposes actions to address the funding gap in section 2.6, *Facilitate Financial Support for Water Reuse*. The challenge of interagency coordination is touched upon, but not directly addressed, in Section 2.2, *Coordinate and Integrate Federal, State, Tribal, and Local Water Reuse Programs and Policies*. CASA and BACWA recommend

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that EPA add a new Action to Section 2.2 that would aim to incentivize or encourage the collaboration of water and wastewater agencies to develop recycled water projects.

With respect to Action 2.2.13, *Enhance Combined Sewer Overflow/Sanitary Sewer Overflow Abatement Strategies*, the nexus with water reuse is not apparent. Prevention of sewer overflows, while a laudable goal, does not directly impact recycled water. Action 2.1.3, *Incorporate Water Reuse and Capture Concepts into Integrated Planning Efforts at the Local Level* captures the importance of stormwater as a new water source whose quality could be impacted by sewer overflows. If this is the connection that is envisioned by Action 2.2.13, it should be clarified. Otherwise, CASA and BACWA recommend that the Action be removed from the Draft Plan.

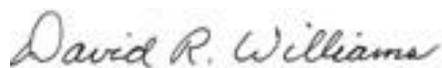
There are other examples of interdisciplinary impacts that could be acknowledged in the Draft Plan. Our member agencies' experience with low influent flows during the recent California drought highlighted the necessity of planning for the impacts of one part of the water system on other parts. Water conservation is often thought of as a "free" means to augment potable water supplies. However, in 2012 through 2016, low flows resulting from conservation and low groundwater tables led to process impacts at wastewater treatment plants as water in collection systems stagnated and became anaerobic. Low flows also meant that water reuse programs had less feed water available for producing recycled water. These unintended consequences of low flows are captured in the Public Policy Institute of California's report, *Managing Wastewater in a Changing Climate*<sup>1</sup>, and illustrate the importance of considering the water system as a whole.

We appreciate your consideration of our comments, and look forward to the finalization and implementation of this Draft Plan.

Respectfully Submitted,



Roberta Larson  
California Association of Sanitation Agencies



David R. Williams  
Executive Director

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<sup>1</sup> *Managing Wastewater in a Changing Climate* full report available at: <https://www.ppic.org/wp-content/uploads/managing-wastewater-in-a-changing-climate.pdf>

CASA and BACWA Regulation Comments on EPA Draft National Water Reuse Action Plan (Docket #  
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cc: BACWA Executive Board  
Stefanie Olson, BACWA Recycled Water Committee Co-Chair  
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Adam Link, BACWA Director of Operations  
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