



May 26, 2020

The Honorable David P. Ross
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Assistant Administrator Ross,

The Association of Clean Water Administrators (ACWA) is the national voice of state, interstate, and territorial (hereafter, “states”) officials responsible for the daily implementation of programs that protect surface waters across the nation.

In recent weeks, as the COVID-19 pandemic has spread, every aspect of life has been impacted – including Clean Water Act (CWA) programs. States appreciate the support federal agencies have shown to date, such as facilitating the delivery of PPE to water and wastewater facilities, supporting wastewater epidemiology efforts as a potential tool to quantify the virus’ prevalence in communities, and providing clarity to the most urgent regulatory compliance and science questions that require cross-regulator coordination.

The emergence of this virus and others, such as the Ebola outbreak of 2015/2016, has highlighted immediate and longer-term CWA program challenges, from requests for technical clarity related to pathogen management in wastewater and surface waters, to transitioning programs to a remote or telework environment to keep normal operations going. As CWA program implementation continues in the COVID-19 context, additional questions and concerns about potential impacts have been raised. As the states work to address them, we see an opportunity for enhanced coordination with Office of Water to ensure states and EPA are prepared for continued challenges posed by this virus, as well as the next pathogen-driven public health crisis.

We write today to request an opportunity to discuss these concerns with you regarding our immediate challenges and lessons learned, and request that we develop a corresponding strategy for collaboration to facilitate coordinated response to COVID-19 and future disease outbreaks. Such preparations will build upon the recent experiences of states and EPA to strengthen our collective actions and optimize resources used to confront virus-related needs. Such a strategy will enable both the Office of Water and states to leverage their capabilities and capacities to help develop appropriate responses now and in the future.

We would like to note our thanks to your leadership and staff in Office of Water for their efforts to maintain existing programming while pivoting to address the urgent needs posed by COVID-19. They have been important resources and partners as the recent changes to our operating environments have unfolded, and we look forward to their continued engagement and support.

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Thank you for your consideration of our requests, and we look forward to the opportunity to discuss them with you. Please contact ACWA's Executive Director, Julia Anastasio at janastasio@acwa-us.org or (202) 756-0600, with any questions regarding the contents of this letter or to discuss options for moving forward.

Sincerely,

A handwritten signature in blue ink that reads "Melanie D. Davenport". The signature is written in a cursive style.

Melanie Davenport
ACWA President
Water Permitting Division Director
Virginia Department of Environmental Quality

Cc: Deborah Nagle, Director, Office of Science and Technology, EPA
Andrew Sawyers, Director, Office of Wastewater Management, EPA
John Goodin, Director, Office of Wetlands, Oceans and Watersheds, EPA