June 24, 2008

Mr. Stephen L. Johnson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington D. C. 20460

Dear Administrator Johnson:

In the last several months there has been a heightened focus on total water management to ensure stewardship of our water resources for the greatest good of our communities and the environment.

Population growth, increasing competition for our limited water resources, and the ever apparent implications of climate change have created new demands for proactive and innovative initiatives to address our future water needs.

In June, the National Drinking Water Advisory Council (NDWAC) met to discuss these issues. The Council was also briefed on the draft Office of Water Climate Change Strategy and activities being taken by the Agency, states, and water utilities to plan for and undertake efficient use of the nation’s water resources. The Council believes that EPA needs to play a leadership role on these issues and recommends the following:

- EPA should continue source water protection efforts to minimize the potential contamination of our water resources.
- EPA should recognize that the ongoing need for safe and reliable drinking water must be considered when evaluating all initiatives addressing climate change mitigation and adaptation (e.g., geologic sequestration, biofuels development)
- EPA should enhance agency-wide coordination and collaboration into the consideration of alternative
supplies of water which may be needed to meet future needs (e.g., reclaimed water, desalination, etc.). This would include identifying and removing barriers to the potential use of alternative supplies, and expanding the public health research agenda to better understand the potential health implications of utilizing these alternative sources of water.

- EPA should enhance its collaboration with other federal agencies to ensure that these challenging issues are addressed in a coordinated manner. The Council believes that EPA and other federal agencies that have significant roles on water resource issues must work together to clearly define roles and responsibilities. Failure to do so could waste resources and generate confusion or conflict for stakeholders who may have to respond to multiple agency initiatives.

On a related issue, the NDWAC is requesting that the Agency conduct a conference call with Council members to discuss the details of its proposed regulation for geologic sequestration of carbon dioxide after it is published in the Federal Register. The Council has previously communicated its concern to you about the need to carefully consider potential impacts the practice of geologic sequestration could have on underground sources of drinking water. While we understand the need to proceed with this rule-making in a timely manner, we believe it is important that the Agency have sufficient information before it makes important risk management decisions.

Thank you for considering the recommendations of the Council. Members look forward to continuing discussion on these important issues and working with EPA on future initiatives to address them. If you have any questions, please contact Veronica Blette, Designated Federal Officer for the NDWAC, at (202) 564-4094.

Sincerely,

Gregg Grunenfelder
Chairman
National Drinking Water Advisory Council

cc:
Benjamin H. Grumbles, Assistant Administrator for Water
Michael Shapiro, Deputy Assistant Administrator for Water
Cynthia C. Dougherty, Director, Office of Ground Water and Drinking Water