

June 13, 2003

The Honorable Christine Todd Whitman
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Ms. Whitman:

On May 14-15, 2003, the National Drinking Water Advisory Council (NDWAC) held its spring meeting in Washington, D.C. The Council discussed a range of issues at that meeting and we will forward you complete meeting minutes and the Council's full recommendations in the near future. However, the Council had several time-sensitive recommendations related to the Agency's new Strategic Plan. Because the Council wanted to make sure that their comments were received for consideration in a timely fashion, I am separately transmitting to you the Council's recommendations related to the plan.

The National Drinking Water Advisory Council made the following comments and recommendations for consideration as the Agency moves towards finalizing its *2003 Strategic Plan*.

- First, members of the National Drinking Water Advisory Council support and recommend that U.S. EPA retain the Clean Water Act and Safe Drinking Water Act Integration Measures included under Objective 1 of Goal 2 in the draft Strategic Plan. The 1996 Amendments to the Safe Drinking Water Act promote a multi-barrier approach to assuring safe drinking water. This includes protecting the quality of water used as a source of drinking water. The Integration Measures outlined in the Strategic Plan recognize that many of today's most common threats to sources of drinking water are most effectively dealt with using Clean Water Act tools.
- Secondly, the Council strongly encourages USEPA to provide a much greater recognition to the importance of ground water in the Strategic Plan. Approximately 90% of all public water systems, which meet the drinking water needs of over half the Nation's population, rely on ground water for all or part of their water supply needs. Clearly, it is not possible to achieve the goal of ensuring safe drinking water and the objective of protecting human health without providing greater emphasis on characterizing and protecting the quality of our ground water resources. The Council also notes protecting ground water, and recognizing its interconnection

with surface water, is essential to achieving the objective of protecting water quality under Goal 2 of the Strategic Plan.

- Finally, the Council is concerned that, by focusing strictly on environmental outcomes as measures of effectiveness, the Strategic Plan understates the importance of pollution prevention activities as well as efforts to further define baseline conditions needed for future decision making. For example, focusing strictly on measurable environmental outcomes does not address the need to better define ground water quality conditions, nor does it recognize the difficulty of measuring program effectiveness when pollution never occurs, or when source waters are never contaminated. The Strategic Plan should allow for the measurement and reporting of program outputs in these instances.

As I noted before, additional formal recommendations of the Council will be forwarded to you as soon as possible. The NDWAC is still deliberating on specific recommendations related to the report of its Affordability work group since Council members could not reach consensus during the May 14-15 meeting.

Sincerely,

Brenda P. Johnson /s/
Designated Federal Officer
National Drinking Water Advisory Council

Enclosure

cc: Linda Fisher, Deputy Administrator
G. Tracy Mehan III, Assistant Administrator for Water
Cynthia C. Dougherty, Director, Office of Ground Water and Drinking Water
David Spath, Chair, NDWAC