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Ken Kirk

February 25, 2008

The Honorable Barbara Boxer, Chairman
Senate Committee on Environment and Public Works
SD-456 Dirksen Senate Office Building
Washington, D.C. 20510-2602

Dear Chairman Boxer,

The National Association of Clean Water Agencies (NACWA) commends your leadership and your continuing commitment to pass *America's Climate Security Act*, S. 2191, to reduce emissions of green house gases (GHGs) and address global climate change. NACWA represents the nation's publicly owned clean water agencies that serve a majority of the sewered population of the United States and collectively treat and reclaim over eighteen billion gallons of wastewater every day. On behalf of these agencies, NACWA would like to take this opportunity to provide input into S. 2191 and the potential impacts of climate change on water resources.

The discussion on climate change revolves predominantly around air quality impacts and temperature. However, climate change is, fundamentally a water resource management issue that goes far beyond changing temperatures and carries severe consequences for the nation's water resources. Projected increases in air temperature may lead to changes in precipitation and runoff, increases in sea level, accelerated evaporation rates, and extreme weather events causing both flooding and extreme drought conditions. NACWA's public agency members, who are focused on guaranteeing uninterrupted service to rapidly growing populations, are concerned about the challenges posed by climate change. As a result, clean water agencies have outlined a two-pronged approach to tackle climate change. First, they are focusing on ways to mitigate their own GHG emissions, even though methane and nitrous oxide emissions from the industry represent 1 percent of the nation's total GHG emissions. Second, they are looking at strategies for adapting to climate change.

These mitigation strategies include, but are not limited to, energy savings through treatment plant optimization and cogeneration measures (the capture of methane gas to sequentially generate both electricity and useful heat), the capture and sequestration of GHGs through a variety of innovative means, and water reuse methods requiring less energy. Many clean water agencies anticipate achieving emissions reductions through mitigation similar to goals established in S. 2191, many well in advance of deadlines required in the bill.

However, current “early action” provisions included in S. 2191 do not allow clean water agencies to receive credit for their efforts. NACWA asks that you include additional language in S. 2191 to provide credits or allocations to public agencies that undertake qualified and verified early reduction efforts. It is also important to note the substantial difference between NACWA’s treatment facilities and residential septic systems in both the type and quantity of GHG’s emitted and the ability to control them. Less than 25 percent of the U.S. population is on septic systems. However, these systems represent more than 80 percent of the methane emissions from wastewater treatment. These differences should be reflected in any legislation approved by Congress.

Clean water agencies are also looking to enable the water sector to adapt to costly new challenges resulting from climate change, S. 2191 must include language which recognizes emerging adaptation concerns for wastewater systems and sets aside assured funding for adaptation activities. The impacts of climate change on the wastewater sector are forcing clean water agencies to take a renewed look at how they manage their facilities. Examples include increased storage or treatment capacity to prevent Sanitary Sewer Overflows (SSOs) due to severe storms or rising sea level restricting our ability to safely discharge treated effluent. Yet, S. 2191 does not currently address wastewater system impacts and no funding is specifically allocated within the bill’s Adaptation Fund. NACWA asks that clean water agency adaptation programs be eligible for funding under the Adaptation Fund created in S. 2191. This support will help meet the needs of an expanding population and address emerging water quality issues that are becoming increasingly complicated with climate change.

NACWA has an active Air Quality and Climate Change Committee comprised of utility leaders with expertise on these issues. We would be happy to facilitate any discussions with them that you would deem helpful. We look forward to working with your office and all other interested stakeholders to include language on wastewater mitigation programs and adaptation needs in S. 2191 as the bill moves forward. Please contact Byron DeLuke at bdeluke@nacwa.org or 202/833-4655 with any questions you may have, and we would welcome the opportunity to meet and discuss this further.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "K Kirk".

Ken Kirk
Executive Director

Cc: Bettina Poirer; Jeffrey Rosato; Vicki Holleran; Tack Richardson; Cory Gardner; William Sehestedt; Mike DuBois; Tom Lawler; Ann Gavaghan; Clark Peterson; Phil Park; Michael Quiello; Shawn Geddes; Anh Taun Nguyen; Mark Wilson; Arvin ganesan; Jessica Holliday; Jessica Maher; Maggie Beal; Brad Crowell