

EXECUTIVE COMMITTEE
PRESIDENT

Christopher M. Westhoff

Assistant City Attorney

Public Works General Counsel

City of Los Angeles

Los Angeles, CA

VICE PRESIDENT

Marian Orfeo

Director of Planning

& Coordination

Massachusetts Water

Resources Authority

Boston, MA

TREASURER

Kevin L. Shafer

Executive Director

Milwaukee Metropolitan

Sewerage District

Milwaukee, WI

SECRETARY

Jeff Theerman

Executive Director

Metropolitan St. Louis

Sewer District

Saint Louis, MO

PAST PRESIDENT

Dick Champion, Jr.

Director

Independence Water Pollution

Control Department

Independence, MO

EXECUTIVE DIRECTOR

Ken Kirk

May 16, 2008

The Honorable Barbara Boxer, Chair
Committee on Environment and Public Works
U.S. Senate
Washington, D.C. 20510-2602

Dear Chairwoman Boxer,

The National Association of Clean Water Agencies (NACWA) commends your ongoing leadership and commitment to pass legislation to reduce emissions of greenhouse gases (GHGs) and address global climate change. NACWA represents the nation's publicly owned wastewater treatment agencies that serve a majority of the sewer population of the United States and collectively treat and reclaim over eighteen billion gallons of wastewater every day. Most of the critical impacts of global climate change will manifest themselves through the hydrologic system and could have severe impacts on both water quality and quantity. Significant federal support is needed to ensure that the nation's wastewater treatment agencies can adapt to the potential impacts of climate change while continuing to provide a vital public service. NACWA asks that Congress provide clearly designated federal funding to help the nation's wastewater treatment agencies:

- Adapt to the impacts of climate change and address the potential new environmental and public health risks that could result from changes to the hydrologic environment;
- Implement proactive climate change mitigation projects to reduce GHG emissions when feasible; and
- Advance the creation and application of wastewater industry GHG offsets and/or credits achieved through mitigation efforts as part of any allocation or GHG "cap and trade" program.

Implications of Climate Change for Clean Water Agencies

The discussion on climate change has revolved predominantly around air emissions and temperature. However, climate change is fundamentally a water resource management issue that goes far beyond changing temperatures and could carry severe consequences for the nation's clean water agencies. Climate change is predicted to manifest itself in changing precipitation patterns and rising sea levels, which will directly affect the ability of clean water agencies to provide high-quality, essential services to rapidly growing populations. In some cases, climate change will directly exacerbate some forms of water pollution.

The expected changes in precipitation patterns include more intense storms and longer periods of drought. Wastewater utilities may need to increase their infrastructure capacity to prevent overflows from greater amounts of stormwater. Increased runoff will result in higher pollutant loads reaching our waterways and periods of increased drought will reduce stream flows, further complicating efforts to predict pollution impacts. Decreased flows may necessitate more advanced treatment at wastewater utilities to ensure water quality standards can be met and changes in water concentration and flow will impact existing infrastructure that was designed and built based on particular water chemistry and flow characteristics. Meanwhile, climate change could also increase the temperature of wastewater, leading to decreased effectiveness of certain treatment methods and also restricting a wastewater utility's ability to discharge effluent. Sea level rise could also impact coastal clean water agencies through increased pumping requirements at discharge locations and the relocation of critical infrastructure.

Adaptation and Mitigation

Significant capital will need to be spent on the nation's wastewater infrastructure to maintain current levels of service. Federal climate change legislation should provide explicit and significant funding to support the adaptation efforts of clean water agencies and ensure consistency among federal, state, and local regulatory programs dealing with climate change. *America's Climate Security Act of 2007*, S. 2191, introduced by Senator Joseph Lieberman (I-Conn.) and scheduled for consideration by the full Senate in June, does not provide any direct funding to address wastewater treatment system impacts due to climate change. Federal support must be provided to the nation's clean water agencies for adaptation so that they can respond adequately to the effects of climate change on wastewater systems. The nation's existing clean water infrastructure is already in need of significant investment – between \$300 and \$500 billion – just to maintain present levels of service. Climate change only exacerbates the need for additional resources.

Federal climate change legislation should also provide recognition for clean water agencies that have taken a proactive approach to mitigate their own GHG emissions specifically methane and nitrous oxide, even though these represent only 1 percent of the nation's total GHG emissions. These mitigation strategies include, but are not limited to, methane capture and reuse, reductions in energy use by utilizing solar heating for digesters, more energy efficient motors, reductions in process GHG emissions, the production of renewable energy, recycled water production, and land application of biosolids and composted biosolids. These public agencies are an important part of the solution to climate change and NACWA supports the inclusion of their mitigation projects in any offset market created for GHG emissions. Funds generated through a cap-and-trade market would be useful for the development of further mitigation projects, as well as research.

The nation's clean water agencies are among the principal actors dealing with the challenges that climate change will force upon our communities. It is critical that Congress consider water resources as a key element in any climate change legislation and provide adequate funding to ensure that wastewater utilities have the tools and resources necessary to continue providing this essential public service. We look forward to working with you and your colleagues in the Senate to identify specific legislative support that will aid the nation's clean water agencies in continuing to provide this essential public service.

Thank you for your consideration,



Ken Kirk
Executive Director