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November 26, 2008

Attn: Docket ID No. EPA-HQ-OAR-2008-0318

Air and Radiation Docket and Information Center

Environmental Protection Agency

1200 Pennsylvania Ave., NW

Washington, DC 20460-0001

Submitted via: www.regulations.gov

Dear Sir or Madam:

These comments are submitted on behalf of the National Association of Clean Water Agencies (NACWA) regarding the Advance Notice of Proposed Rulemaking: Regulating Greenhouse Gas Emissions under the Clean Air Act. NACWA represents the interests of nearly 300 publicly owned wastewater treatment works (POTWs) nationwide, who collectively serve the majority of the sewered population in the United States. Climate change is expected to have major impacts on water resources, and NACWA believes that significant focus should be placed on adapting to these impacts in addition to efforts targeting the mitigation of greenhouse gas emissions. The control of greenhouse gas emissions will be necessary to reduce the human contribution to global climate change and minimize climate change impacts, and wastewater treatment processes used by NACWA members are likely to be directly affected by these controls.

NACWA believes that the Clean Air Act in its current form may not be the best tool for regulating greenhouse gases. While all local and regional efforts to reduce greenhouse gas emissions are important, their effect on climate change will be negated if emissions continue to increase in other areas. The Clean Air Act was meant to address pollutants on a local or regional basis with a focus on improving public health, and its framework cannot account for the global nature of greenhouse gas emissions and climate change. Instead, a new framework for regulating greenhouse gases should be developed that recognizes the strong interrelationship between climate change and water resources which include water supply, stormwater, and wastewater; the unique environmental effects of these emissions; the economic impacts of the regulations; and additional government actions that may be necessary for the nation to deal with climate change, such as increased research on climate change impacts on water resources and adaptation measures. NACWA believes that congressional action will be required to establish this new framework or to sufficiently modify the existing Clean Air Act to independently accommodate the unique aspects of greenhouse gas emissions.

NACWA appreciates the opportunity to comment on this ANPR. If you have any questions, please contact me at 202/296-9836 or cfinley@nacwa.org.

Sincerely,

A handwritten signature in cursive script, reading "Cynthia A. Finley".

Cynthia A. Finley
Director, Regulatory Affairs