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July 15, 2011

Interagency Climate Change Adaptation Task Force

Council on Environmental Quality

Executive Office of the President

1600 Pennsylvania Avenue, NW

Washington, DC 20500

Via email: mclarsen@usgs.gov

Re: National Action Plan: Priorities for Managing Freshwater Resources in a Changing Climate

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the report by the Interagency Climate Change Adaptation Task Force of the Council on Environmental Quality (CEQ), *National Action Plan: Priorities for Managing Freshwater Resources in a Changing Climate*.

NACWA's public wastewater treatment agency members treat and reclaim a majority of the wastewater generated each day nationwide, providing an essential service that protects public health and the environment.

Wastewater utilities will be affected by several specific climate change impacts. Changing precipitation patterns will result in many utilities needing to increase their storage and/or treatment capacity to deal with more frequent and more intense storms, while other utilities will have decreased flows and an increased demand for water reused due to droughts. Sea level rise may inundate coastal utilities, and more frequent flooding may affect inland utilities, which are usually located in low-lying areas. Temperature and chemical changes to water bodies that receive wastewater effluent may result in new treatment requirements for wastewater utilities.

NACWA is pleased that CEQ recognizes the importance of climate change to water resources and the impacts on wastewater utilities. NACWA offers the following comments on specific aspects of the report.

Recommendation #3: Strengthen Assessment of Vulnerability of Water Resources to Climate Change

NACWA agrees that improved data is needed for wastewater treatment agencies to adapt to climate change impacts. It is currently difficult for agencies to include climate change impacts in long-term planning due to the uncertainties regarding

changing temperatures, precipitation patterns, and sea level rise. Supporting Action 8, publishing a long-term plan for federal “downscaling” of modeled projections of changes in water resource conditions, is especially important for utilities. Regional models do not provide utilities with the site-specific data that they need to make decisions about their facilities that may cost millions of dollars.

Recommendation #5: Support Integrated Water Resources Management

NACWA agrees that integrated water resources management is crucial to dealing with climate change impacts. NACWA believes that the best way to accomplish this is through a holistic, watershed-based approach that allows local decisions about the best ways to adapt to climate change and improve water quality. Although significant progress has been made in improving water quality under the Clean Water Act through control of point sources, the goals of the Act have not been fully achieved because nonpoint sources of pollution are not addressed in the Act. With the water quantity and quality problems that are expected to be exacerbated by climate change, controlling all sources of pollution will become even more important. The best way to do this is for pollution reduction and climate change adaptation needs to be determined locally for each watershed, with an emphasis on prioritization of the actions that will maximize environmental benefits. When considering the environmental benefits of actions, the physical, chemical, and biological aspects of watershed health must all be considered, along with the addition or mitigation of greenhouse gas emissions.

Adaptive management is an important aspect of a holistic watershed approach, which will require continuous evaluation of the demands on water quantity and the measures undertaken to improve water quality. Supporting Action 20, developing benchmarks for incorporating adaptive management into water project designs, operational procedures, and planning strategies, should be expanded to include a comprehensive evaluation of Clean Water Act regulations and other water regulations and how they can be revised or better implemented to allow for adaptive management of all pollution sources and demands on water supplies.

In addition, integrated water resources management should recognize wastewater as an important resource, not simply a waste product, particularly in areas of increased drought where water reuse will become increasingly important. EPA and other federal agencies should review regulations and policies that provide barriers to effective water reuse. The biosolids produced by the wastewater treatment process are another important resource, since they can be land-applied as fertilizer or used as a renewable fuel source. EPA and the Department of Energy should examine their regulations and policies and promote the inclusion of biosolids as a renewable fuel wherever it is excluded or opposed.

Thank you for your consideration of our comments on the *National Action Plan*. Please contact me at 202/296-9836 or cfinley@nacwa.org if you have any questions about NACWA’s comments.

Sincerely,



Cynthia A. Finley
Director, Regulatory Affairs