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September 29, 2011

Jim Horne

U.S. Environmental Protection Agency

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1200 Pennsylvania Ave., N.W. Mail Code: 4204M

Washington, DC 20460-0001

Via Electronic Mail: horne.jim@epa.gov

Re: Comments on "Planning for Sustainability: A Handbook for Water and Wastewater Utilities"

Dear Jim,

NACWA appreciates the opportunity to comment on the U.S. Environmental Protection Agency's (EPA) draft guidance, *Planning for Sustainability: A Handbook for Water and Wastewater Utilities*. NACWA and its public agency members understand the importance of sustainable utility operations and management and support EPA's efforts to provide guidance to the clean water community in these areas. Current pressures on utilities to meet regulatory obligations, manage economic realities, and deal with aging infrastructure, however, mean that the clean water community needs tools and information that will continue to help them build on their record of constantly improving utility management efforts.

The draft guidance is described as providing a pathway for integrating sustainable elements into existing planning to "enhance current planning", but in reality the document describes an entirely new planning process that entails the establishment of sustainability goals and objectives for the utility. Many of the suggestions and case studies in the document will provide useful information to utilities. However, as described in more detail below, the current document should be revised to improve its organization and to better describe its purpose.

The current document presumes that all utility actions can be made in the context of sustainability. There is increasing understanding of the interplay between ecology and economics/cost and the long-term implications for society as whole, but current Clean Water Act mandates provide little flexibility to consider these important factors. NACWA is encouraged to see EPA exploring new policies in response to the Association's Money Matters™ campaign and work by the U.S.

Conference of Mayors that will allow utilities to prioritize investments and we look forward to an ongoing dialogue in this area. The type of planning that is envisioned in the draft guidance, however, overlooks the current regulatory and asset management burdens that utilities face. Until these developing policies take root around the country, there will likely be little buy-in on the suggested sustainability practices in the draft guidance.

General Comments

- Sustainability is not defined and the document uses phrases such as “sustainability considerations” throughout, leaving it up to the reader to determine what these are.
- The document details an entirely new planning process – one that entails the establishment of sustainability goals and objectives for the utility. Most of the examples provided are new efforts, identified to improve sustainability, rather than existing, compliance-driven projects where sustainability considerations are incorporated. EPA should ensure the document is described accurately as outlining a new planning process, not one that merely enhances current efforts.
- A more explicit definition of “Goals”, “Objectives”, and “Strategies” would be helpful. It becomes confusing trying to distinguish between the three.
- The case study examples throughout, though overly focused on very small utilities, are the highlight of the document. They do not, however, always match the points the document is trying to illustrate. The examples include a disproportionate number from communities in New Mexico and there are few, if any, examples from special wastewater districts. Evaluating and assessing community level sustainability goals and objectives for a special district that may serve dozens of communities would be extremely difficult.
- Full-cost accounting for a new effort that can be planned from the start is something that is being done now. The real issue is how to incorporate sustainable thinking and financing for a project that is compliance driven, must be completed in a certain timeframe, and cannot be scaled back if the financing cannot be sustained.
- The Financial Strategy section (Element 4) downplays the complexities of utility financing and the political dynamics that affect rates. As a result, the document erroneously suggests that poor financial strategies employed by utilities in the past have resulted in the current funding gap.
- The current document describes all of the elements in chronological order, suggesting that each element has equal importance and that each would take place for a particular project. In reality, as discussed below, the goal and objective-setting process would more appropriately take place in a strategic planning-level effort, while alternatives analysis would take place on a project-by-project basis.

Planning Element 1

- The goal-setting process described in Element 1 is an overarching, strategic process that if done properly, would take place outside of the normal project planning process. The first step of the normal planning process would then be to evaluate each project in the context of a utility's overall sustainability goals. The same could be said about objectives (Planning Element 2). The alternatives analysis would then take on the most significance for a particular project, as the utility evaluates whether the various alternatives achieve the objectives and goals.
- The potential sustainability goals on page 11 seem more relevant for a broad planning effort. They identify sustainable actions, not how to build sustainability into projects. The Lenexa, Kansas example is a 'new' planning process. In fact, the example describes an entirely new program to address a sustainability goal, not incorporating new considerations into existing planning. Again, how the document is organized suggests that Element 1 is the first of 4 steps, when it should be a separate planning effort.
- On page 11, "Potential Sustainability Goals", bullet #3, it mentions in parentheses "... (or reduce vulnerability to water supply disruption)". Reducing vulnerability to either natural or manmade disasters is an aspect of sustainability that needs more attention.
 - Suggest adding the words "or contamination," making it read, "reduce vulnerability to water supply disruption or contamination"
 - None of the examples under the arrow sub-bullet address reducing vulnerability. Suggest adding a second arrow sub-bullet that provides examples of reducing vulnerability such as: For example, conduct real-time water quality monitoring, install isolation shutoff valves, and/or provide connections to alternative water supplies.
- Page 15 box: The \$7,000 savings is an unimpressive figure given the fairly extensive nature of these improvements. Is this per year or per month? Suggest removing this example.
- The "Energy Efficiency in New Mexico" illustrative example on page 15 seemed out-of-place under "Planning Element 1: Goal-setting", as the example does not address goal-setting; revise, move or delete this example.
- On page 16, 1st paragraph: missing closed parentheses ")".
- Page 21: This example centers on the City's planning process. Include more specifics about how the utility influenced or responded to that process. What changes in thinking or strategy were needed at the utility that resulted in a LEED certified facility?

Planning Element 2

- There is currently no mention of climate change. Step 3 should explain that when establishing baselines and evaluating future trends, climate change patterns may increase the magnitude of storm events (e.g., flooding), increase temperatures, and exacerbate droughts. Suggest adding a bullet on page 28:
 - Climate change trends and projections to forecast the frequency and magnitude of future stresses and natural disasters (including storm events, flooding, increased temperatures, and droughts).
- Page 25 footer: contains a portion of the main text that should not be there
- Page 27 Box – This is a state plan. There is no discussion of how the utility was involved.

Planning Element 3

- Page 36, Step 2, 1st paragraph: suggest including “climate change adaptation” as a recommended criterion for utilities to consider.
- Page 38, 2nd bullet: both the Louisville and Tualatin Valley references should be in parentheses.
- Page 38, 3rd (and last) bullet, last sentence: “...(See a more detailed case study as a call-out in this section).” This reference is confusing because SPU is not a full case study and the “See” is capitalized, suggesting it might be referring to a different case study. Change the phrase to “(see the call-out box in this section)”.
- Page 39, 1st paragraph, 3rd sentence: “(This kind of approach can be used for several alternatives and several criteria.)” Recommend changing the two words “several” to “multiple.”
- Page 40, 3rd paragraph, 3rd sentence: “Odor control may be considered a more important criteria than the others....” Recommend changing “criteria” (plural) to “criterion” (singular).
- Page 45, the illustrative example for SPU should mention the state.
- Page 35 Bullet Point 2: “specific consideration of natural or green systems” relates to alternatives selection, not the methodology for evaluating alternatives. Suggest adding a bullet point to note that utilities should include such alternatives for consideration and removing the statement from Bullet 2.
- Page 37 box, 2nd sentence: should read “fewer than 10,000 people”
- Page 42 box: this is an excellent example of the value of developing consistent alternatives evaluation

criteria up-front. Suggest incorporating and emphasizing some of these lessons in the main text. In particular, developing a consistent set of criteria for use across all projects AND across water and wastewater (or other) public infrastructure projects can increase transparency, provide better “apples to apples” comparisons of impacts, and, once established, reduce the time and effort required to evaluate alternatives.

Planning Element 4

- On page 51, the text states, “The example below shows a cost analysis from the Quay County, New Mexico “Forty Year Water Plan.”” The example text box is actually to the right of the text.
- On page 57, the illustrative example for Boise State University should mention the state (Idaho).
- On page 62, 3rd paragraph, line 7, “the overall quantity of wet tons to be disposed of”: remove the final “of”

Appendix A

- It is unclear why reference documents are ordered as they are—is it the order these concepts were mentioned in the main document?
- The reference “Implementing Asset Management: A Practical Guide” (listed under *Asset Management*) is a joint publication produced by the Association of Metropolitan Water Agencies, NACWA, and the Water Environment Federation. All three organizations should be listed for this reference.
- Suggest adding another category, “Sustainability Analysis Tools.” This category should include:
 - i. EPA's *Climate Change Indicators in the United States*
 - ii. EPA's Climate Change Vulnerability Assessments: Four Case Studies
 - iii. The Institute for Sustainable Infrastructure <http://sustainableinfrastructure.org/>

NACWA appreciates the fact that EPA had utility and NACWA member input during the development of this document. Clearly, the broader NACWA membership had some additional concerns and comments and we look forward to working with EPA to ensure these comments are incorporated. If you have any questions, please do not hesitate to contact me.

Sincerely,



Chris Hornback

Senior Director, Regulatory Affairs