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July 30, 2012

ICLEI USA

436 14th Street, Suite 1520

Oakland, CA 94612

Submitted via email: iclei-usa@iclei.org

Re: NACWA Comments on ICLEI USA *Community-Scale Greenhouse Gas Emissions Accounting and Reporting Protocol*

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the draft ICLEI USA *Community-Scale Greenhouse Gas Emissions Accounting and Reporting Protocol (Protocol)*. NACWA represents the interests of nearly 300 publicly owned wastewater treatment agencies nationwide, serving the majority of the sewered population in the U.S. Many NACWA members provide wastewater treatment services to communities that are members of ICLEI USA and are therefore interested in the greenhouse gas (GHG) emissions accounting methods presented in the *Protocol*.

NACWA and its members have reviewed the *Protocol* and have found it to be detailed and thorough. NACWA agrees with the statement included in the *Protocol* that "Regardless of community size, demographics or economic status, wastewater generation is unavoidable and these wastes must be treated before water is returned to the environment. The wastewater treatment protects watersheds and prevents the spread of waterborne diseases. The practice of wastewater treatment thus provides a non-discretionary service to society." Communities working to estimate and reduce their GHG emissions must understand this non-discretionary nature of wastewater treatment.

Communities should also understand that wastewater utilities may provide opportunities to offset GHG emissions from other sources. Utilities may generate renewable power from the biogas and/or biosolids produced from wastewater treatment, reducing reliance on other nonrenewable fuel sources. Utilities may also have the opportunity to recover nutrients during wastewater treatment or to use biosolids as fertilizer, reducing greenhouse gas emissions from the production of synthetic fertilizers. Each wastewater utility is unique and will have its own site-specific opportunities and challenges related to offsetting GHG emissions.

While the *Protocol* is very thorough, NACWA and its members have several concerns. The level of detail is often too complex and time-consuming to navigate, creating an unnecessary burden for local governments that are struggling to provide essential services in these challenging economic times. In addition, there are many uncertainties and limitations in the methods used to calculate wastewater treatment GHG emissions, as outlined in the *Protocol*. These uncertainties are likely to be lost in the final analysis of a community's GHG emissions. A similar degree of uncertainty could be achieved with a simpler calculation method that would still provide communities with an adequate GHG estimate. A clear and understandable calculation method is especially important for the wastewater treatment category, since it provides a "non-discretionary service to society" as discussed above. ICLEI USA should provide a simplified method for estimating wastewater treatment GHG emissions, while still providing the more complicated method currently in the *Protocol* as an option for any communities that would like to perform a more detailed analysis.

The *Protocol* encourages comparisons between communities, but these comparisons should not be encouraged for wastewater treatment GHG emissions. Each treatment facility is unique, with different influent characteristics and different discharge permit requirements. The treatment methods required at each facility will vary based on these characteristics as well as other characteristics, such as geography and climate, resulting in different magnitudes of GHG emissions. It is more useful and accurate for a community to analyze its own emissions annually rather than make unrealistic comparisons with vastly different communities.

Thank you for consideration of these comments on the draft *Protocol*. Please contact me at 202-533-1836 or cfinley@nacwa.org if you have any questions about NACWA's comments.

Sincerely,

A handwritten signature in dark ink, reading "Cynthia A. Finley". The signature is fluid and cursive, with the first name being the most prominent.

Cynthia A. Finley
Director, Regulatory Affairs