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**Ken Kirk**

June 27, 2013

President Barack Obama  
The White House  
1600 Pennsylvania Avenue, NW  
Washington, DC 20500

Dear Mr. President:

The National Association of Clean Water Agencies (NACWA) applauds the Administration for taking a comprehensive approach to addressing the climate challenge and recognizing that communities facing the severe impacts of climate change need support to help build resilient systems that can withstand the ravages of extreme weather events. As the Administration implements its Climate Action Plan (CAP), NACWA urges you to ensure that the wastewater treatment sector is a full partner.

Climate change poses one of the most significant challenges to America's wastewater sector and, as such, is a priority concern for the nearly 300 clean water agency members of our Association. Not only are clean water agencies large consumers of energy, they are on the front lines in dealing with extreme weather events which threaten the vital environmental and public health services our wastewater utilities provide on a daily basis.

### Adapting to the Effects of Climate Change and Improving Utility Resilience

In many ways, climate change is all about water – either there will be too much in wetter regions or not enough in dry regions, which is forcing our wastewater managers to become key first responders to climate-related events. As we witnessed with Hurricanes Katrina, Irene, and Sandy, flooding, sea level rise, and storm surges can lead to severe service disruptions at wastewater treatment plants and billions of gallons of sewage overflows. In the southwest, where drought conditions threaten to dry up many water supplies, communities are reclaiming wastewater to meet demand.

Improving the resilience of wastewater treatment plants in wet weather areas will involve raising pump stations, developing alternative treatment systems, having backup power generation capacity, building additional storage capacity, and potentially relocating treatment facilities above floodplains. In regions where

extreme drought conditions persist, wastewater reuse and recycling operations will need to be expanded and improved. Warmer water conditions may cause water quality degradation which may lead to more stringent and more costly treatment standards for wastewater discharges. Such actions to mitigate or adapt to changing weather patterns will be very expensive for local ratepayers and a 2009 [report](#) released by NACWA and the Association of Metropolitan Water Agencies estimates these costs could reach between \$448 billion and \$944 billion by mid-century.

As the Administration works to integrate considerations of climate change impacts and adaptive measures into water-related infrastructure investment programs such as the Clean Water State Revolving Fund (CWSRF), NACWA urges you to consider the expertise our sector can provide in identifying how best to target these investments. We also support the establishment of a State, Local, and Tribal Leaders Task Force on Climate Preparedness, and urge that a representative from the wastewater sector be included in this task force to advise on how best the federal government can support local preparedness and resilience-building efforts.

## Reducing Greenhouse Gas Emissions, Promoting Energy Efficiency and Achieving Energy Independence

The wastewater sector stands ready to become partners with the Administration in its call for targeted investments in renewable energy sources that reduce greenhouse gas emissions, promote energy efficiency, and help lead our country toward energy independence.

Wastewater utilities are one of the largest consumers of power. According to the U.S. Environmental Protection Agency (EPA), four percent of national electricity consumption is used to provide water and wastewater services each year. For local municipalities, water and wastewater utilities are typically the largest consumers of energy, often accounting for 30 to 40 percent of total energy consumed at the municipal level. Making our wastewater systems more energy efficient and less reliant on traditional fossil fuels is a critical step towards reducing operating costs and reducing our carbon footprint.

Motivated by hefty energy costs and a desire to become more resilient, many of NACWA's clean water agency members are generating their own renewable energy from biogas and biosolids produced during the municipal wastewater treatment process. This is indicative of a shift we are seeing among utilities as they transform from basic providers of wastewater services to full blown resource recovery agents, generating renewable energy from biosolids and liquids, capturing waste heat and energy, and reclaiming and reusing water.

Despite this transition, the energy generating potential at wastewater treatment plants is still much greater than current levels of production. For instance, combined heat and power systems, which generate onsite power for utilities using biogas produced by anaerobic digestion, are underutilized. EPA reports that out of the 1,500 utilities that use anaerobic digesters around the country, only 104 are fitted with combined heat and power (CHP) systems. If the remaining 1,351 utilities were to produce onsite renewable energy using CHP systems, it would displace more than three million metric tons of CO<sub>2</sub> - the equivalent to taking 600,000 cars off the road - and making a significant contribution toward the Administration's goal of reducing U.S. greenhouse gas emissions in the range of 17 percent below 2005 levels by 2020. As the

Administration is targeting investments in new renewable energy sources, we urge you to target them toward developing locally-grown energy from the wastewater treatment process.

We also encourage the Administration to look toward the renewable energy wastewater can provide as it attempts to achieve a goal of generating 20 percent of federal agencies' energy needs through renewable energy sources by 2020. Energy from wastewater can provide federal agencies with a reliable and clean energy source for many of its installations and buildings and we encourage the Administration to consider this resource as it works to achieve the 2020 goal.

Wastewater utilities play a critical role in helping our nation adapt to climate change. As the Administration implements the CAP, NACWA looks forward to working with you to ensure that the wastewater sector is fully engaged in this effort. Please do not hesitate to contact me or Cynthia Finley, NACWA's Director of Regulatory Affairs, to discuss these ideas further.

Sincerely,

A handwritten signature in black ink, appearing to read "K Kirk". The signature is stylized with a large "K" and a cursive "Kirk".

Ken Kirk  
Executive Director