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May 13, 2008

Attention: National Water Program Draft Climate Change Strategy
U.S. EPA, Office of Water
1200 Pennsylvania Avenue, NW
Mail Code: 4101M
Washington, DC 20460

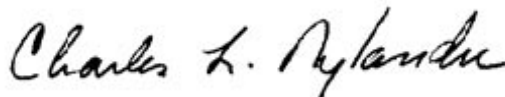
Dear Mr. Grumbles:

The Western Coalition of Arid States (WESTCAS) is pleased to provide comments on the public review draft of the "National Water Program Strategy: Response to Climate Change".

WESTCAS is a coalition of approximately 125 water and wastewater districts, cities, towns, and professional organizations focused on water quality and water quantity issues in the States of Arizona, California, Colorado, Idaho, Nevada, New Mexico, Oregon, and Texas. Our mission is to work with Federal, State, and Regional water quality and quantity agencies to promote scientifically-sound laws, regulations, appropriations, and policies that protect public health and the environment in the arid West.

Over the past decade, the population of the Western states has grown 19.7 percent—greater than any other region of the United States. The demand for water has increased just as dramatically. Aging infrastructure, increasing environmental mandates, serious forest fires, and prolonged drought conditions have added to this demand, threatening the very communities and economies established throughout the West. Our comments reflect the issues of concern to providers of water and wastewater services in the arid West.

Sincerely,



Charles Nylander
WESTCAS President

The Voice of Water Quality in the Arid West

P.O. Box 50081 • Sparks, NV 89435
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The Western Coalition of Arid States

W E S T C A S

WESTCAS comments on public review draft of the “National Water Program Strategy: Response to Climate Change” (March 2008)

Comment 1: Executive Summary, Goal 2

This goal does not recognize that conservation and reuse will have an increasing impact on receiving waters as less water is returned as effluent. This strategy should recognize and prepare for decreases in flows due to decreased discharges as well as to decreases attributable to warmer, drier climate conditions. Additionally, this goal does not recognize the importance of planning in adapting to climate change. Municipalities and other local governments must have planning documents to support changes to their Capital Improvement Programs. The importance of “up front” planning should be recognized in this strategy.

Comment 2: Section II, Subsection 2.C, first bullet and Key Action 25

The acceptance of expanding the list of impaired waters that require a TMDL to accommodate impairments due to climate change should have a more inventive approach. Funding spent on TMDLs that address conditions beyond control is not tenable. Acknowledging water quality impacts that occur as a result of climate change has to start at the beginning of the process by modifying water quality standards. It should not be at the end of the process with long lists of impaired waters and ineffective TMDLs.

Comment 3: Section III, Key Action 1

In order to encourage the use of energy efficient or energy recovery processes, EPA should prepare and publish a cost/benefit analysis that demonstrates the economic benefits to changing technology. Additionally, EPA should consider a national recognition system for treatment plants that reduce energy use.

Comment 4: Section III, Key Action 3

This is a critical key action for municipalities and other entities that have to provide water and wastewater services. The action statement “explore opportunities” is underwhelming at best. EPA should promote and provide funding for integrated planning, which explicitly recognizes the links between water supply, wastewater treatment, and reuse. This action should also address regionalization of water and wastewater systems as a way to improve water, wastewater, and reuse management.

Comment 5: Section III, Key Action 14

As noted in Comment 2, there has to be a new approach to basic water quality standards to accommodate the impacts of climate change. The Use Attainability Analysis is not a cost-effective mechanism for managing changes on the scale of climate change predictions. This key action should not be limited to sedimentation, but should be aimed at developing new approaches to designating uses and developing criteria.

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Comment 6: Section III, Key Action 16

The development and refinement of ecological and landscape models is an important action, but it seems that EPA should recognize and take advantage of the advances in this area already made by Federal land management agencies. To limit this effort to the Office of Research and Development and the Office of Air and Radiation does not build on what is already existing and is likely to end up as duplicative.

Comment 7: Section III, Key Action 20

The concept of nationwide assessments has merit, but does not allow for detailed data collection and analysis that site-specific studies would provide. EPA should establish ecological regional sites to establish baseline conditions and to monitor the effects of climate change. The twenty-six Long-Term Ecological Research Sites established by the National Science Foundation would be excellent sites for this type of research, considering the wealth of baseline data already compiled. These detailed site studies could be a comparative check with the nationwide assessment data.

Comment 8: Section III, Key Action 25

In order for this key action to produce useful information on the impacts of non point sources due to climate change, the eligible activities under the 319 program must be expanded to allow more of the funding to be spent on monitoring. The current limitation of how much of the 319 funding can be spent on monitoring is hampering the demonstration of non point source pollution prevention.

Comment 9: Key Action 26

Effluent standards are discussed on pages 42 and 43, associated with Key Action 17, but Key Action 26 (on page 47) addresses NPDES permitting. These two issues should be considered holistically in one subsection.

Comment 10: Key Action 31:

This action is focused on the State Revolving Loan funds. The needs assessments that the State Revolving Loan allocations are based on have to be modified to include adaptations to climate change. The needs assessments should include collaborative efforts to do integrated planning and regionalization of water and wastewater systems which are reflected in the current methods of needs assessments.

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