



EPA NATIONAL DRINKING WATER ADVISORY COUNCIL

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January 11, 2011

Ms. Lisa Perez Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington D. C. 20460

Dear Administrator Jackson:

On behalf of the National Drinking Water Advisory Council (NDWAC), I am pleased to submit the Climate Ready Water Utilities report containing recommendations that will assist drinking water, wastewater, and stormwater systems across the nation to increase their resilience to climate change impacts. Although previous national forums on climate change and its effects on water systems have focused on achieving a common understanding of the problem and general steps forward, this report contains many practical steps which the water sector could undertake to become more climate ready, and as such, it represents an important advance in our nation's efforts to adapt to and mitigate climate change. The report also recognizes that the responsibility for becoming climate ready lies not only within the water utility sector, but with federal, state, and local governments, in addition to interdependent sectors (e.g., energy) that through their regulations or actions can impede or facilitate a water system's striving for climate readiness.

We applaud the fact that Taking Action on Climate Change is one of your highest priorities. The Council believes that our recommendations will assist in advancing this important priority with respect to the water sector, especially in those communities that are disadvantaged and underserved. It is important to note that the recommendations in this report often do not represent additional program costs for the U.S. Environmental Protection Agency (EPA or Agency), but instead emphasize the need for EPA's leadership to integrate climate change considerations into

existing activities to more efficiently and effectively lead the utility sector towards climate readiness.

The NDWAC recognizes the economic, social, and political challenges associated with the nation's efforts to emerge from an unprecedented severe economic recession. The Council urges that such concerns serve to guide a more efficient, coordinated response to climate change for the water sector rather than forestall or preempt immediate, appropriate action. The Council maintains that the human health, quality of life, and economic costs of *inaction* can be readily underestimated. NDWAC calls on EPA to accelerate and support efforts to estimate the national and local costs of inaction to inform and motivate water utilities as well as key decision makers at the federal, state, and local levels to take appropriate actions.

One important but historically neglected cost to consider relates to the potential for climate change to exacerbate already existing health inequities and environmental/economic injustices. This statement might become evident in wealthier countries such as the United States during natural disasters, the frequency and intensity of which could increase as a result of global warming. For example, the weaker resilience of infrastructure and inadequate preparedness planning in some poor communities could translate into a lack of access to transport during mass evacuations. Consequently, EPA should develop policies and tools for climate change adaptation and mitigation that focus attention on underserved and disadvantaged communities. The NDWAC wants to emphasize that the recommendations in this report fundamentally address the need for EPA and others to enhance their approach for addressing the environmental, public health, and social challenges often associated with disadvantaged communities. As stated in the report, climate ready water utility initiatives require the meaningful and timely involvement and input from all such affected populations "to better ensure environmental justice concerns are proactively addressed."

The NDWAC would like to commend the working group that prepared this report and underscore that this group reflected a diverse cross-section of the water sector including small, large, public and investor-owned utilities, state and local governments, and academic, environmental, and other affected organizations. This working group was supported by key federal partners from EPA, the US Army Corps of Engineers (USACE), the Centers for Disease Control and Prevention (CDC), the National Oceanic and Atmospheric Administration (NOAA), and the Federal Emergency Management Agency (FEMA). The fact that this diverse group reached consensus on such a complex and potentially divisive topic, illustrates the extraordinary imperative associated with the need for immediate action to address climate change impacts. The extremely broad-based water sector support evident in the group's consensus implies a critical need for strong, focused leadership and direction. EPA, along with other federal, state, and local entities, is an important steward of the nation's water resources. This report is intended to underscore the pressing need for our stewards to take action against any current or impending threat to our water resources.

In considering the report, we ask that EPA approach its implementation in a holistic, integrated, and sustainable manner. For instance, the report encourages EPA to work collaboratively with federal, state, and local governments to integrate climate change considerations into business-as-usual activities. Instead of creating a separate program with potentially significant resource demands, the Climate Ready approach of the report recognizes that effective programs already exist on the federal, state, and local levels which, if properly leveraged, can provide the most efficient means to adapt to and mitigate climate change impacts. The NDWAC, therefore, recommends that the report's recommendations be implemented through a cross-office effort, linking several important activities already underway within the National Water Program, including water security/preparedness, sustainable infrastructure, and capacity development. A positive example of this approach is Climate Ready Estuaries, which has introduced climate change concepts relating to impacts and adaptation into the long-established National Estuaries Program.

This report has the potential to inform multiple aspects of EPA's climate change efforts, not only the water program. Given this breadth of application, NDWAC also strongly recommends that you share it not only within EPA's National Water Program, but also with other programs where climate change efforts are underway, such as the Office of Air and Radiation, Office of Policy and Environmental Information, and the Office of Research and Development. Also, consistent with the report's call for improved coordination across the federal government, EPA should disseminate the report to other key agencies with climate change programs, most notably NOAA, CDC, USACE, U.S. Department of Agriculture (USDA), and Department of Interior (DOI).

The attachment to this letter provides an overview of the NDWAC's report, which was generated in response to a three-point charge: (1) to develop the attributes of a climate ready water utility, (2) to conduct an assessment of tools, training and assistance necessary to promote climate readiness, and (3) to identify incentives to promote adoption of climate readiness. With respect to the first part of the charge, the NDWAC developed the concept of a Climate Ready Adaptive Response Framework which supports immediate water utility attention to climate challenges and reflects the flexible, practical response strategy that will be required to address climate change impacts. The attachment provides a summary of the other two parts of the charge.

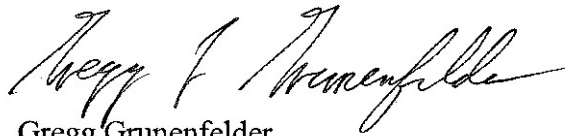
I would like to conclude this letter by highlighting the key recommendations from our report:

1. EPA should develop a well-coordinated program to articulate and support the adoption of climate ready activities by utilities.
2. EPA should build out the concept of "climate ready" utilities based on the Findings and [Climate Ready Water Utilities] CRWU Adaptive Response Framework in this report.
3. Establish for utility staff, a climate change continuing education and training program.
4. Build on and strengthen advanced decision making support models and tools to support utility climate change efforts.

5. Increase interdependent sector knowledge of water sector climate-related challenges and needs.
6. Improve and better integrate watershed planning and management in response to climate uncertainty and impacts.
7. Improve access to and dissemination of easy-to-understand and locally relevant climate information.
8. Better integrate climate change information into existing utility technical assistance initiatives.
9. Develop an adaptive regulatory capacity in response to potential climate change alteration of underlying ecological conditions and systems.
10. Develop a comprehensive water sector, climate change research strategy.
11. Advocate for better coordination of federal agency climate change programs and services.

The NDWAC welcomed the opportunity to provide these recommendations to EPA on so important an issue. We look forward to providing further assistance as EPA considers this report and, hopefully, as the Agency implements a Climate Ready program to improve the resilience of the nation's water sector in the face of climate change.

Sincerely,



Gregg Grunenfelder

Chair

National Drinking Water Advisory Council

Attachment

cc:

Peter Silva, Assistant Administrator for Water

Cynthia C. Dougherty, Director, Office of Ground Water and Drinking Water