

To: owdocket@epa.gov

Subject: EPA-HQ-OW-2011-0943

RE: WEF Comments on EPA Draft National Water Program Strategy: Response to Climate Change

Submitted via email on May 15, 2012

The Water Environment Federation [WEF] is pleased to have the opportunity to submit comments on EPA's "National Water Program 2012 Strategy: Response to Climate Change" public comment draft dated March 2012. Formed in 1928, WEF is a not-for-profit technical and educational organization with 36,000 individual members and 75 affiliated Member Associations representing water quality professionals around the world. WEF members, Member Associations, and staff proudly work to achieve our mission to provide bold leadership, champion innovation, connect water professionals, and leverage knowledge to support clean and safe water worldwide.

WEF commends EPA's national Water Program for developing such a comprehensive strategy to address climate change in the context of our nation's clean water programs. This 2012 strategy admirably builds on and expands the first climate change strategy for water programs issued in 2008. The National Goal, EPA Vision and the programmatic strategic actions are appropriate and necessary.

WEF was pleased to be able to directly participate in and contribute to the Climate Ready Water Utilities [CRWU] workgroup formed by EPA among relevant stakeholders to look at the potential impacts of climate change on water, wastewater and stormwater infrastructure and to develop approaches to respond to these impacts. The Infrastructure element of this 2012 climate change strategy reflects the excellent work done by the CRWU workgroup which WEF fully supports. We commend EPA for undertaking the CRWU effort and incorporating its results into their 2012 strategy.

In 2010, the WEF Board of Trustees adopted a position statement on "Protecting Water Resources and Infrastructure from the Impacts of Climate Change" [see: <http://www.wef.org/GovernmentAffairs/PolicyPositionStatement/ProtectingWRClimateChange/>].

In this position, WEF pledged to work with all stakeholders to better understand the global implications of climate change on water resources, aid in mitigating future impacts, and adapt the nation's infrastructure to meet supply challenges. WEF called on all levels of government, including Federal agencies, to work with water quality professionals and water, wastewater, stormwater and water resource utility managers to:

1. Address major contributions to climate change by making the Water Sector more energy efficient and minimizing greenhouse gas emissions;
2. Optimize reuse and recycling of biosolids, biogas and water;
3. Plan innovative strategies and build "green infrastructure," which is both adaptive to climatic changes and sustainable;

4. Encourage adaptation by developing strategies to minimize environmental, economic, and public health risks that will result from climatic changes in the environment; and
5. Create a global research network to identify the uncertainties in scientific knowledge and clarify probabilities of climate change.

WEF believes that EPA's 2012 Climate Change Strategy is consistent with our WEF position and does help advance the basic principles WEF supports to address the water resource and infrastructure impacts from climate change. WEF stands ready to work with our members to help the water sector anticipate and adapt to climate change, including working with EPA as they implement the activities and initiatives proposed in their strategy.

WEF appreciates the opportunity to provide these comments and hopes they will be helpful to EPA.

Submitted by Carl Myers, Assistant Director, WEF Public Policy, cmyers@wef.org