



Local governments working together for a better metropolitan region

September 30, 2008

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**Adjunct member*

Ms. Nancy Floreen
Councilmember, Chair
Montgomery County
Climate Change Steering Committee

Dear Madam Chair:

I am writing to provide comments from the Chesapeake Bay and Water Resources Policy Committee (CBPC) on COG's *National Capital Region Climate Change Report (Review Draft, July 9, 2008)*. These comments were developed with the input of the Water Resources Technical Committee (WRTC), which provides technical support and recommendations to the CBPC on water quality, wastewater, and stormwater issues.

We commend the Climate Change Steering Committee for its efforts to address this critical topic and to develop recommendations for the region.

Our comments (see attachment) are organized according to the key charges made to the Steering Committee (noted in boldface type in the attachment). In each case, they first provide context and then specific recommendations either for inclusion in the report or to help guide future actions to reduce greenhouse gasses.

Thank you for this opportunity to provide our comments on the draft climate change report. We look forward to working with you over the next few years to address this important issue.

Sincerely,

Martin E. Nohe, Chair
Chesapeake Bay and Water Resources Policy Committee

Cc: Members, Chesapeake Bay and Water Resources Policy Committee
Members, Water Resources Technical Committee

Attachment: CBPC Comments

**Chesapeake Bay Policy Committee Comments (9/30/08) on
National Capital Region Climate Change Report (Review Draft, July 9, 2008)
Attachment**

- **Prepare regional inventory of greenhouse gases (GHGs)**
 - Improve the robustness of the current inventory and better quantify future reductions from wastewater and drinking water treatment plants in the region (which are large energy users).

CBPC Recommendation:

Make a formal request to wastewater and drinking water (WW/DW) treatment agencies/organizations in the region to provide data and participate in the inventory of current as well as future energy demands and planned offsets.

- **Identify best practices and policies**
 - Expand the range of best practices and policies to include those being developed by the region's WW/DW plants.

CBPC Recommendation:

Work with the region's WW/DW agencies/organizations as well as national organizations to develop standard protocols for calculating GHGs for WW/DW plants, as well as to quantify potential reductions/offsets from these facilities.

- **Examine climate change impacts**
 - Evaluate potential impacts to stormwater BMP effectiveness due to changes in precipitation versus design/performance assumptions, and on wastewater influent flows.

CBPC Recommendation:

Work with the region's stormwater management programs, other regional organizations, and WW/DW plants to quantify the potential impacts of these precipitation changes and to identify what mitigation or adaptation actions might be needed. COG should host regional workshops on this topic.

- **Recommend regional greenhouse gas reduction goal(s)**
 - Utilize the above information and identify the potential for GHG reductions from WW/DW plants to meet the approved goals.

CBPC Recommendation:

Work with the region's WW/DW facilities to identify potential reductions and/or offsets; and incorporate "life cycle" analysis to evaluate "net" environmental impacts.

- **Recommend governance structure for climate change initiative**
 - There is a need to define roles/responsibilities of local DW/WW plants to achieving the regional goals when the plants are managed by separate authorities rather than local governments.

CBPC Recommendation:

The Steering Committee should articulate a role for these authorities as part of this regional effort.

- **Propose advocacy positions**
 - There is proposed national legislation that would convert GHG reduction goals to regulations for WW/DW plants. There are other potential legislative and/or regulatory requirements that could negatively impact the regions' stormwater management programs. The net result of some of these initiatives would make it more

**CBPC Comments to Climate Change Steering Committee on
National Capital Region – Climate Change Report (Review Draft, July 9, 2008)
Attachment**

difficult for the facilities and programs to work towards achieving the region's goals by constraining their ability to meet competing environmental objectives.

CBPC Recommendation:

The CBPC will solicit input from the WRTC and respond to proposed legislation and/or regulatory initiatives; as appropriate, it will provide comments or recommendations to the COG Board regarding such initiatives.

• **Prepare report to COG Board**

- There is a need to better quantify the specific plans and efforts by WW/DW facilities to address GHG emissions and related efforts in the Climate Change report; as well as a need to acknowledge that local governments as well as WW/DW plants will need to balance all of these increased requirements with limited staff and financial resources. There is also a need to acknowledge the potential policy implications of competing environmental goals (e.g., competition for roof space on buildings to install green roofs to reduce stormwater runoff versus installing solar panels to reduce/offset GHG emissions).

CBPC Recommendation:

COG staff should work with the WRTC as well as local WW/DW authorities to develop specific language to address these points and the other recommendations for inclusion in the final report.