



THE ADMINISTRATIVE WATCH

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EPA Begins to Address Climate Change Issues Through the National Water Program

EPA recently announced that it will begin to address climate change issues through the National Water Program. In a March 28, 2008 memorandum to interested parties, Assistant Administrator Ben Grumbles solicited comments on a "Draft National Water Program Strategy: Response to Climate Change." The Draft Strategy represents a major shift by EPA to employ a multi-media approach to climate change, which may result in significant impacts to drinking water facilities and point/nonpoint dischargers. EPA is accepting comments on the Draft Strategy until May 27, 2008. Copies of Assistant Administrator Grumbles' memorandum and the Draft Strategy are available at <http://www.epa.gov/water/climatechange/>

The Draft Strategy was developed by a workgroup of senior water program managers and senior managers from the Office of Air and Radiation and the Office of Research and Development. It begins by stating that "[a] long-term, international investment in scientific study of the Earth's climate is now resulting in a scientific consensus concerning climate change and its impact on water resources." It then moves on to discuss five major strategy goals and 46 "Key Actions" that the National Water Program intends to address over the next few years. The Draft Strategy notes that the Key Actions were developed assuming "level funding" - i.e., no new funding for climate change actions. Presumably, EPA will develop additional Key Actions if funding levels are increased. The five major strategy goals are:

1. Water Program Mitigation of Greenhouse Gases
2. Water Program Adaptation to Climate Change
3. Climate Change Research Related to Water
4. Water Program Education on Climate Change
5. Water Program Management of Climate Change

Of particular note to drinking water facilities and point/nonpoint dischargers, the Draft Strategy suggests that permitting and other water program decisions should begin to expressly include "climate change" factors. For example, the Draft Strategy discusses evaluating energy concerns when developing "effluent limitations guidelines" and one of the Key Actions is to "review nonpoint pollution guidelines and methods in light of climate change and revise them as needed."

For additional information on the Draft Strategy, please contact Don Bluedorn at (412) 394-5450. If you have other questions about climate change, please contact Mike Winek at (412) 394-6538 or another member of BCCZ's Climate Change Group.

TWO GATEWAY CENTER
PITTSBURGH, PA 15222
412.394.5400
WWW.BCCZ.COM

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