

**Public comments received during 45-day public comment period on EPA draft report:
“Climate Change Vulnerability Assessments: Four Case Studies of Water Utility Practices”
Prepared by Eastern Research Group - December 17, 2010**

Comment Excerpt/Summary

Author Response

However, the document's usefulness would increase significantly if the four utilities featured within the document were to describe not only the actions that they took, but also any insights gained from their experiences or lessons learned during the adaptation planning process. The document should contain reflections on which actions taken were useful and which were not, and moreover, it should include a discussion by each utility of what it would do differently if it were given the opportunity. Further, it would be very helpful to readers if the document contained a summary of those actions or methods that might be universally important for consideration during utility climate change planning.

The authors agree this is an interesting question, however, this requires a more evaluative approach and information not currently available in publically available documents, which is outside the scope of the current effort.

It would be helpful if the report were to further explore the issue of worst case scenario planning. Moreover, it may be desirable for the utilities in the case study - and others around the country - at least to consider the possibility that the extreme scenario may occur and to have a back-up plan in place.

The authors agree this is an interesting question, however, the report was intended to describe current vulnerability assessments and actions.

We would like to see DEP elaborate a bit further on how they determined certain adaptation solutions were "no regrets" strategies so that others might learn from this approach.

The authors agree this is an interesting question, however, the report was intended to describe vulnerability assessments and actions.

It would be useful for the intended audience of this report if SPU were to include a discussion of what considerations went into this decision - specifically, whether any of the non-climate benefits of the alternative adaptation measures were considered.

The authors agree this is an interesting question, however, the report was intended to describe current vulnerability assessments and actions.

In theory, most of Spartanburg's adaptation strategies seem to be "no regrets" solutions because they were already needed in light of ongoing droughts and other water management problems. As discussed above, the report would benefit from some additional elaboration on this topic.

The authors agree this is an interesting question, however, this requires a more evaluative approach and information not currently available in publically available documents, which is outside the scope of the current effort.

We request that EBMUD describe whether it intends to compare the range of benefits, climate and non-climate related, of these various strategies before it implements them.

The authors agree this is an interesting question, however, the report was intended to describe current vulnerability assessments and actions.

As these risk trade-offs carry significant implications for adaptation strategy decision-making, it would be beneficial to the report's readers if EBMUD and SPU could elaborate on how they plan to deal with these situations. Moreover, we request that NYC DEP and Spartanburg Water also include a description of trade-offs they have encountered, if any.

The authors agree this is an interesting question, however, the report was intended to describe vulnerability assessments and actions.

While these references to additional resources needed are scattered throughout the report, it would be useful if the report authors could compile an appendix or list documenting all of the requests for resources and data that the four utilities have expressed. Moreover, if the four utilities have any resource needs that they have not expressed in this draft, they should make those needs known as soon as possible.

The authors agree such a list could be useful, however, this was not a focus of the report, and a list of resources would not be comprehensive

It is noted that several groups along with EPA are working to develop vulnerability and risk assessment tools to conduct climate change analysis. It is suggested that the risk assessment could then be implemented into asset management tools to determine capital and operational costs of the water supply infrastructure associated with climate change.

n/a (this comment is not specific to the report itself)

Beyond assessment of supply and demand, the overall effect on safe yield of a source as a result of the combined factors of temperature and precipitation should be addressed. New safe yield studies will be needed to ensure a sufficient margin of safety.

n/a (this comment is not specific to the report itself)

Perhaps these studies can address whether they investigated the impact of sea level rise on groundwater sources. Also please indicate whether potential for infiltration of seawater into drinking water aquifers has been investigated.

The case studies in this report are based on publically available information about approaches taken to assess vulnerability to climate change. Information on sea level rise and salt water intrusion were not available.

In the absence of any proposed specific strategic plan aimed at guiding adaptation efforts, ACWA will refrain from commenting on the specific actions taken by the four utilities featured in the Draft Report. Rather, we would prefer that the Agency refer to our Climate Change Principles (see the provided link above). We commend the Agency, as well as the utilities that participated, for their efforts to showcase their respective adaptation efforts and approaches.

Comment. No response required.
