



August 22, 2019

Mr. Edward A Boling  
Associate Director for NEPA  
Council on Environmental Quality  
730 Jackson Place NW  
Washington, DC 20240

Re: Docket No. CEQ-2019-0002, Draft National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions

Dear Associate Director Boling,

The Association of Metropolitan Water Agencies (AMWA) welcomes the opportunity to comment on the Council on Environmental Quality’s (CEQ) proposed guidance for federal agencies considering greenhouse gas emissions (GHG emissions) in their NEPA assessments. AMWA represents the largest metropolitan, publicly owned drinking water systems in the nation and collectively our members serve more than 130 million people. AMWA members are often applicants for or involved in projects that require NEPA reviews, such as those for water supply and delivery. In light of potential impacts of climate change on our water resources, it is important that policies and guidelines related to GHG emissions not only address the impact of these emissions on the environment but also facilitate climate adaptation planning. In the case of drinking water utilities, this includes projects developed to mitigate threats to water supplies and, by extension, the life-sustaining critical infrastructure sector that they represent.

AMWA is concerned about CEQ’s draft guidance because it only addresses accounting for GHG emissions as an environmental impact. Unlike the 2016 CEQ guidance it replaces, this draft does not acknowledge that some infrastructure projects might be undertaken for the purposes of climate resilience – i.e., constructing adaptive measures in response to the negative environmental impact of heightened levels of GHG emissions in the atmosphere. AMWA is concerned that this omission could prevent NEPA assessments from considering scenarios where climate resilience benefits could outweigh the impacts of a project’s GHG emissions.

AMWA appreciates CEQ’s intention for this guidance to serve to standardize how GHG emissions are assessed. AMWA also supports the inclusion of a list of existing GHG accounting tools in the guidance. However, we are concerned that the guidance’s silence on projects performed for the purpose of climate resilience may inadvertently stifle necessary discussions about potential tradeoffs for adaptation projects subject to NEPA reviews. AMWA urges CEQ to

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ensure that any new guidance discusses the importance of both assessing potential environmental impacts of GHG emissions and recognizing the need to facilitate adaptation to current and future effects of climate change.

In light of potential impacts of climate change on our nation's water resources, it is important that NEPA policies and guidelines explicitly recognize the value of adaptation projects. Accounting for such scenarios may include developing formal language that recognizes this tradeoff and allows for scenarios where certain projects may be conducted despite their own contributions to climate change. Such language could mirror that of the 2016 guidance, which stated "[a]gencies should discuss relevant approved federal, regional, state, tribal, or local plans, policies, or laws for GHG emission reductions or climate adaptation to make clear whether a proposed project's GHG emissions are consistent with such plans or laws" (28-29). The previous guidance also clearly acknowledged that "[a]gency decisions are aided when there are reasonable alternatives that allow for comparing GHG emissions and carbon sequestration potential, trade-offs with other environmental values, and the risk from – and resilience to – climate change inherent in a proposed action and its design" (15). Providing such clarity in this new guidance would give agencies the flexibility to account for both the short- and long-term benefits of adaptation projects while still adequately accounting for scenarios where the potential GHG emissions would outweigh the benefits.

Climate change impacts are already affecting our members and the people they serve, and therefore in order to adequately discuss the necessity and potential effectiveness of adaptation measures, it is also essential to explicitly discuss the hazard which drives the need for such measures. AMWA is concerned that because the current draft guidance only refers to climate once, and does not mention climate change at all, it may obfuscate the true consequences of increased GHG emissions. This could prevent a fully informed discussion of both climate change itself and of how potential actions may mitigate risks associated with it. Without explicitly defining the underlying problem or threat, it is impossible to adequately consider the need for, or potential effects of, proposed adaptation projects.

AMWA thanks CEQ for the opportunity to comment. We believe it is important to evaluate current policies in order to increase their effectiveness, and therefore encourage CEQ to revise the draft guidance without overlooking the significance of GHG emissions or impeding necessary climate adaptation projects. If you have any questions about our comments, please contact Erica Brown ([brown@amwa.net](mailto:brown@amwa.net)), AMWA's Chief Strategy and Sustainability Officer.

Sincerely,



Diane VanDe Hei  
CEO