



**ASSOCIATION OF
METROPOLITAN
WATER AGENCIES**

LEADERS IN WATER

1620 I Street NW, Suite 500
Washington, DC 20006

P 202.505.1565
amwa.net

April 10, 2023

Matthew Tejada
Deputy Assistant Administrator for Environmental Justice
Office of Environmental Justice and External Civil Rights (OEJECR)
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Docket number EPA-HQ-OEJECR-2023-0023-0023; Request for Information on the Environmental and Climate Justice Block Grant Program

Dear Dr. Matthew Tejada:

The Association of Metropolitan Water Agencies (AMWA) is pleased to have the opportunity to respond to this Request for Information (RFI) on the Environmental and Climate Justice Block Grant Program (ECJBG). AMWA is an organization representing the largest publicly owned drinking water utilities in the United States, and collectively its membership serves more than 160 million people. Members serve communities of more than 100,000 people, and most utilities serve segments, some small and some large, of disadvantaged and otherwise vulnerable populations.

AMWA utilities have long been at the forefront of climate adaptation and have prioritized climate change mitigation, adaptation, and resilience in their utility operations and capital planning. Additionally, many AMWA members have developed strategies to prioritize the needs of customers in disadvantaged communities through assistance programs, targeted infrastructure planning, and more. AMWA is pleased to see EPA develop a program that can marry these two efforts and is pleased to provide feedback and examples from exemplary work conducted by our members that could inspire eligible projects under this program.

As EPA further develops the program, AMWA is eager to provide feedback from water utility leaders. AMWA encourages EPA to convene associations representing the public utility sector to discuss projects and partnerships water utilities can implement to advance environmental justice in their communities. AMWA believes there are abundant opportunities for water utilities to partner with community organizations to advance environmental justice through this program. Our comments are presented by section and question identified in the RFI.

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Eligible Projects Question 1. *What types of projects should EPA focus on and prioritize under the five eligible funding categories in CAA Section 138(b)(2)? Please also describe how the projects you identify would benefit disadvantaged communities.*

EPA should prioritize projects that advance climate and environmental equity by increasing the availability of affordable water services, promoting community resilience to climate risks, and ensuring communities have access to procedural justice in their local communities. These kinds of projects could include assistance in improving services for disadvantaged communities, such as outreach in languages other than English, enrollment in low-income assistance services, or similar programs. Programs also could include, but are not limited to the development of:

- Capital projects addressing climate resilience in disadvantaged communities through infrastructure construction or upgrades;
- Climate and equity plans;
- Administration of task forces related to these programs; and
- Ambassador programs that allow community members to have greater collaboration with their local utilities.

Many AMWA member utilities have created these kinds of task forces and ambassador programs that seek to benefit or otherwise provide targeted assistance to disadvantaged communities in their service areas. For example, the Disadvantaged Communities Infrastructure Task Force of Coachella Valley Water District is the kind of project that could be eligible for the program with necessary modifications. The task force plans, coordinates, and identifies opportunities for drinking water and sewer infrastructure projects in disadvantaged communities; identifies funding opportunities; progress reports; and discusses potential barriers to helping disadvantaged communities receive grant funding for infrastructure projects. The task force includes representatives from various local government and elected positions, environmental justice organizations, and local community member representatives. With federal funding available to stand up such a task force, more utilities and community-based nonprofit organizations may be able to create these kinds of programs and prioritize the input and needs of disadvantaged communities in their service areas.

Question 2. *With respect to the workforce development activities:*

- a. *Please describe what you perceive as the most significant challenges and barriers to connecting residents of disadvantaged, underserved, and under-represented communities to workforce opportunities related to addressing environmental justice and climate change, and what programs, services, and partnerships are needed to address these challenges and barriers.*

AMWA encourages EPA to consider funding partnerships that prioritize connecting residents of disadvantaged, underserved, and under-represented communities to workforce opportunities in

their local government's infrastructure and utility sectors, including the water sector. The challenges of increasing the number of underrepresented groups in the water workforce are complex, and, therefore, the programs, services, and partnerships will require significant local knowledge and networks and the necessary funding to tap into and implement programs developed with that knowledge.

b. What types of jobs and career pathways should EPA prioritize to support environmental justice and climate priorities?

To address environmental justice and climate priorities, AMWA believes EPA should consider promoting career pathways in the water sector. The water sector faces a unique challenge in recruiting and maintaining a diverse workforce and, therefore, could benefit from EPA prioritizing such programs.

In 2018, Brookings Institute analyzed Bureau of Labor Occupational Employment Statistics and Current Population Survey (CPS) data and documented demographic, wage, and educational requirements information on the water workforce.¹ The report documented that the water workforce leans older, especially in particular occupations. Additionally, about two-thirds of the water workforce is white, with Black and Asian representing only 11.5 percent of the water workforce, compared to 18 percent of those employed in all occupations nationally.¹

Furthermore, at the time of the Brookings report, women represented only 14.9 percent of the water workforce, compared to 46.8 percent of the national workforce.¹ Even though every major city requires a large water workforce to maintain necessary construction and operations, many utility leaders worry about the lack of recruitment of a younger and more gender, racially, and ethnically diverse workforce.

Promoting jobs and careers in water promotes environmental justice by providing accessible, well-paying jobs having an important mission. Water utilities offer a range of workforce opportunities accessible to individuals who cannot or will not attend four-year universities with targeted technical training.² To make these opportunities apparent and welcoming to a younger, more diverse generation, utilities could greatly benefit from grants, partnerships with community-based organizations, vocational programs, community colleges, and other similar institutions.

Additionally, water utilities' operations and projects are critical for their cities' resilience to climate change. Water utilities maintain a sustainable, safe drinking water supply, eliminate and treat wastewater, and ensure communities are not threatened or burdened by stormwater and

¹ Joseph Kane and Adie Tomer, "Renewing the water workforce: Improving water infrastructure and creating a pipeline to opportunity" (Brookings, June, 2018).

² Joseph Kane and Robert Puentes, "Expanding Opportunity through Infrastructure Jobs" (Brookings, May 7, 2015).

flooding. As climate change continues to stress the infrastructure responsible for performing these functions, it is critical that water utilities receive support to do this work.

Question 4. *What are your thoughts on EPA sponsoring on-line forums or webinars to facilitate potential applicants' ability to develop partnerships with other organizations and communities to submit applications for ECJ Program grants? How else can EPA be helpful in facilitating these partnerships?*

As stated in AMWA's environmental justice [policy resolution](#), federal, state, and local levels of government must work together to address long-standing injustices in environmental and water policies and believes EPA's support of facilitating partnerships aligns with this vision. EPA could encourage states, cities, and counties to host online or in-person forums and webinars between utilities and community-based nonprofit organizations interested in environmental and utility-level justice. These locally led meetings could facilitate partnerships between community-based nonprofit organizations interested in specific issues, such as affordability concerns, and the local government entities that can address them, such as water utilities and assistance programs.

Eligible Recipients Question 1.b. *What is and how should EPA define a "partnership" between a community-based nonprofit organization and an Indian tribe, local government, or institution of higher education for purposes of implementing ECJ Program funding?*

AMWA represents publicly owned drinking water utilities and believes that all publicly owned utilities, whether housed within city or county governments or as independent authorities, should be eligible recipients if they demonstrate a partnership with a community-based nonprofit organization.

Conclusion

AMWA sincerely thanks EPA for the opportunity to provide feedback on the development of the Environmental and Climate Justice Block Grant program and appreciates the agency's efforts towards advancing environmental and climate justice for the nation's most vulnerable communities. If you have any questions, please contact Jessica Evans (evans@amwa.net), AMWA's Manager of Government Affairs and Sustainability Policy.

Sincerely,



Thomas Dobbins
Chief Executive Officer

Dr. Matthew Tejada

April 10, 2023

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cc: ECJRFI@epa.gov

Bruce Binder, OEJECR

Larissa Mark, OPPPD, OEJECR