



June 3, 2022

Mr. Zach Schafer
Senior Advisor to the Assistant Administrator
Office of Water, Environmental Protection Agency
1201 Constitution Ave NW
Washington, DC 20004

Re: Draft EPA Office of Water Climate Change Adaptation Implementation Plan

Dear Zach Schafer,

The Association of Metropolitan Water Agencies (AMWA) is pleased to have the opportunity to comment on the draft EPA Office of Water (OW) Climate Change Adaptation Implementation Plan (Plan). AMWA is an organization of the general managers and CEOs of large publicly owned drinking water utilities, which serve communities of more than 100,000 people. Our members across the United States and Puerto Rico will be affected by the provisions outlined in this plan. The association welcomes the work OW is doing to advance climate adaptation and appreciated the opportunity to attend the OW Climate Adaptation Implementation Plan virtual engagement on May 4, 2022. In response to information shared during the virtual engagement session for the water sector, AMWA is pleased to provide the following feedback for EPA’s consideration.

Our comments are presented in two main sections. First, we continue our responses to questions introduced during the open discussion of the virtual engagement session for the water sector. This includes AMWA’s priorities regarding addressing the impacts of climate change on water resources, and recommendations for OW regarding continued engagement with AMWA and other water sector stakeholders. Second, we provide feedback, questions, and ideas on OW’s proposed actions for the five elements of the draft implementation plan.

Response to Open Discussion Inquiries on Engagement with OW Adaptation Efforts and Priorities Regarding the Impact of Climate Change on Water Resources

First, AMWA would like to emphasize the importance of transparency and collaboration regarding OW’s adaptation efforts. We applaud the efforts to begin to inform and collaborate with water sector stakeholders by hosting virtual engagement sessions introducing

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the plan and inviting stakeholders to provide input on the plan's development and implementation. OW described in the virtual engagement session that they will publish the final climate adaptation implementation plan by the end of summer; however, OW did not share this draft plan online or open it for public comment on the Federal Register. Moving forward, AMWA recommends the final climate adaptation implementation plan be shared online in full in order for stakeholders to have additional information about EPA's vulnerability assessments, priorities, and implementation activities. Additionally, AMWA recognizes that it is necessary for OW to describe in more detail how it plans to execute its strategy in implementing each priority action. AMWA therefore recommends that EPA make this draft plan available online in the interim to ensure continued engagement on OW's plan priorities and activities.

Next, AMWA recommends that EPA describe more clearly how it will engage water sector organizations in the plan's development and implementation years 2022-2026. Specifically, AMWA recommends EPA consider measures to regularly receive the feedback of key water sector (and other) stakeholders. OW could do this in several ways, but here are two possibilities:

1. OW could continue to have regular virtual engagements with interested stakeholder groups and associations and their members, as it did for its May 2022 virtual engagements.
2. OW could conduct quarterly check-ins between representatives of water associations and the OW Assistant Administrator and staff on key initiatives, including the development of this climate adaptation implementation plan. Over a year has passed since the OW Assistant Administrator held a meeting with representatives of the water associations.

In summation, with regard to OW engagement on its plan moving forward, AMWA reiterates the importance of OW providing consistent opportunities for water sector stakeholders to be updated on this plan's implementation.

AMWA has three comments specifying our priorities and concerns regarding the impacts of climate change on water resources:

1. It is important for water utilities to have support for the implementation of integrated and well-developed climate adaptation options. AMWA emphasizes the importance of ensuring utilities have the flexibility and technical support to address climate adaptation through federal grants and programs.
2. OW priorities in this plan should include a commitment to not only gather the scientific data and research needed to inform climate adaptation and mitigation, but also to apply that research and information to the development of tools that are critical to the long-term success of drinking water utilities. This includes but is not limited to scenario-planning and an assessment of the current regulatory framework. It is necessary that OW share important climate projection data in a form that utility managers can easily access and use to inform their own organization's climate adaptation plans.
3. The development and execution of the OW implementation plan is an opportune time for EPA to conduct a systematic assessment of climate change impacts on the water sector's

regulatory landscape and to consider how federal rules and programs can facilitate climate-smart investment and planning. Understanding how climate change will continue to affect water utilities' obligations under federal regulations, such as the Safe Drinking Water Act and Clean Water Act, is important to helping encourage utilities' climate resilience efforts. Further, systematically identifying various federal funding opportunities for climate resilience will help water utilities understand their options for funding long-term climate adaptation projects.

AMWA Recommendations to OW's Proposed Actions in the Five Elements of the Climate Adaptation Plan, Including the Plan's Three Priority Actions

Designation of a Senior Career Leader

AMWA fully supports the designation of a senior career leader to oversee the OW Climate Adaptation Implementation Plan.

Climate Vulnerability Assessment for OW Programs

Regarding OW climate vulnerability assessment for OW programs, AMWA asks for clarity regarding how OW will assess climate vulnerabilities to its programs and address these vulnerabilities. Vulnerabilities of critical water infrastructure have been well documented in the National Climate Assessment and previous reports conducted by EPA through the Climate Resilience Evaluation and Awareness Tool (CREAT). Additionally, AMWA believes that EPA could build on previous work outlined in the National Climate Assessment and work in partnership with the CDC to assess its Waterborne Illness and Water Treatment Needs program vulnerabilities.

AMWA appreciates that EPA included the cross sector vulnerabilities the water sector has with energy and transportation infrastructure in its assessment. However, AMWA would like for clarification in the final plan about how OW will address the vulnerabilities to its critical water infrastructure programs including these cross sector vulnerabilities.

Priority Action Goal 1: Improve the Climate Resilience of America's Water Infrastructure

AMWA welcomes the opportunity to comment on the three priority actions for OW under its draft climate adaptation implementation plan. AMWA supports the first goal of improving climate resilience of America's water infrastructure and emphasizes that OW should encourage water sector stakeholders to proactively pursue climate resilient infrastructure now by enabling access to federal funding opportunities for climate-resilient investment. As an example, action items of the first goal include "deploying grant and loan programs to advance climate initiatives;" OW should encourage states to reduce the burden on communities applying for climate adaptation projects with Drinking Water State Revolving Funds and other funding opportunities through a memo or other guidance aimed at simplifying grant processes. Regarding the action item of incorporating climate planning resources in technical assistance, AMWA recommends highlighting key resources and webpages where stakeholders can find technical assistance on climate change adaptation and funding opportunities. Specifically, OW

could list the [Climate Resilience Evaluation and Awareness Tool \(CREAT\)](#) and information about [Water Infrastructure and Resiliency Finance Centers](#) in the final plan. Additionally, OW could consider advertising these tools to utilities again through efforts like press releases or communications to associations. AMWA supports the goal of promoting resilient infrastructure solutions but encourages OW to be clearer about how it plans to implement this provision and how it will measure the success of actions that promote resilient infrastructure. Ultimately, AMWA is encouraged by the provisions outlined as part of the plan's actions and encourages OW to outline publicly its anticipated methods for encouraging resilient infrastructure.

Priority Action Goal 2: Protect the Nation's Waters from the Impacts of a Changing Climate

The plan's second goal – protect the nation's waters from the impacts of a changing climate, through integrating climate considerations in the Clean Water Act (CWA) and Safe Drinking Water Act (SDWA) actions and programs – is a significant priority for AMWA. AMWA therefore asks OW to more clearly outline how it plans to address this action item. We encourage OW to proactively explore how environmental change will affect the operations, actions, and statutory obligations of water utilities. AMWA recognizes the importance of understanding how changes in water quality, drought, and ambient water temperatures, to name a few, will impact utilities in a changing climate; ensuring that climate considerations are incorporated into major statutory programs and actions is necessary to proactively address utilities' obligations in a changing climate.

Priority Action Goal 3: Advance the Adaptive Capacity of the Water Sector and the Climate Knowledge of all Communities and Decisionmakers

AMWA supports the last goal of the draft plan, “advance the adaptive capacity of the water sector and the climate knowledge of all communities and decisionmakers.” AMWA encourages OW to share more about how the plan will utilize current partnerships and platforms to broadly share climate data. Regarding the action item of leveraging the Urban Waters Federal Partnership to address climate adaptation in urban, underserved communities, AMWA requests that this partnership includes strategies to involve drinking water utilities in program activities. Many AMWA members operate in cities that are part of the Urban Waters Federal Partnership, so additional communication about how this partnership can advance climate adaptation initiatives in urban areas would be beneficial. AMWA would welcome the opportunity to learn more about this partnership and work together with EPA to leverage this program.

Also related to this final goal, AMWA asks that OW be more specific about which types of climate data will be added to the How's My Waterway? tool and consider how to support the addition of regional climate data. AMWA also encourages OW to establish measures for understanding whether climate data it makes accessible are used by water sector stakeholders. AMWA encourages OW to engage in cross-agency efforts (e.g., sharing and collecting information from the National Oceanic and Atmospheric Association (NOAA), US Geological Survey (USGS), and US Army Corps of Engineers (USACE), among others) to ensure that the

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best, most regionally accurate and applicable climate data is available. Tools like How's My Waterway? could benefit from additional information collected by EPA's sister agencies.

Identification of Science Needs

Similarly, regarding the plan's identification of science needs, AMWA recommends that the implementation plan describe in more detail how OW plans to work with other government agencies that have spearheaded climate research and data collection, such as NOAA, the Department of Interior (including the USGS and the Bureau of Reclamation), USACE, and FEMA. One important initiative OW should consider in its climate adaptation implementation plan is to work with agencies like FEMA, NOAA, and USACE to construct tools that assess the saved costs of implementing climate adaptation measures proactively rather than in response to events like hurricanes, floods, or extended droughts. One possibility is for OW to continue to develop [FEMA's benefit-cost-analysis toolkit](#) and other [cost estimating tools](#) specifically for water utilities considering climate adaptation projects. Ultimately, AMWA believes that the OW climate adaptation implementation plan and its outline of scientific needs should be used as an opportunity for OW to work with other federal departments and agencies to collaboratively share and capitalize on climate data and projection information to help water sector stakeholders proactively plan for climate change.

Conclusion

AMWA sincerely thanks OW for the opportunity to engage and provide feedback on its draft Climate Adaptation Implementation Plan. We appreciate the commitment of OW to proactively address the impacts of climate change on water resources and encourage a continuation of engagement with water sector stakeholders. If you have any questions, please contact Jessica Evans (evans@amwa.net), AMWA's Security & Resilience Policy Analyst or Erica Brown, Chief Strategy and Sustainability Officer (brown@amwa.net).

Sincerely,



Michael Arceneaux
Acting Chief Executive Officer

cc: Radhika Fox, EPA OW
Mindy Eisenberg, EPA OW
Stephanie Santell, EPA OW