



#### EXECUTIVE COMMITTEE

##### PRESIDENT

**Kishia L. Powell**

*Chief Operating Officer and  
Executive Vice President  
DC Water  
Washington, DC*

##### VICE PRESIDENT

**Thomas W. Sigmund**

*Executive Director  
NEW Water  
Green Bay, WI*

##### TREASURER

**Oluwole A. McFoy**

*General Manager  
Buffalo Sewer Authority  
Buffalo, NY*

##### SECRETARY

**Diane S. Taniguchi-Dennis**

*Chief Executive Officer  
Clean Water Services  
Hillsboro, OR*

##### CHIEF EXECUTIVE OFFICER

**Adam Krantz**

1130 Connecticut Ave NW  
Suite 1050  
Washington DC 20036

**T** (202) 833-2672

**F** (888) 267-9505

[www.nacwa.org](http://www.nacwa.org)

May 25, 2022

Council on Environmental Quality  
730 Jackson Place N.W.  
Washington, D.C. 20503

**Re: Docket ID No. CEQ-2022-0002**

### **Comments of the National Association of Clean Water Agencies on the Climate and Economic Justice Screening Tool Beta Version**

To Whom It May Concern:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to provide comments on the Council on Environmental Quality's (CEQ) Climate and Economic Justice Screening Tool (CEJST). NACWA represents the interests of over 350 municipal clean water agencies that own, operate, and manage publicly owned treatment works, wastewater and stormwater systems, and water reclamation districts nationwide.

Public clean water agencies are anchor institutions that play a vital role not only in providing environmental and public health protections to local communities, but also in developing resilient critical infrastructure and advancing the principles of environmental justice. Federal investments in climate adaptation and mitigation, clean energy, training and workforce development, pollution reduction, and water infrastructure covered under the Justice40 Initiative will aid clean water agencies in their important work.

NACWA appreciates CEQ's goal of developing a uniform, whole-of-government definition of disadvantaged communities for federal agencies to use as they target Justice40 investment benefits to communities that are economically disadvantaged and overburdened by pollution and historic underinvestment. However, while environmental justice is a national issue, projects that will advance equity on the ground and address environmental injustice are inherently local.

NACWA encourages CEQ to allow for some flexibility when identifying projects that will promote the goals of Justice40. NACWA urges CEQ to allow regions and localities to submit information to federal agencies on a project's benefits to marginalized, underserved, or overburdened

NACWA Comments on CEJST

May 25, 2022

Page 2 of 2

communities. This will help local communities elevate unique situations where a project directly advances environmental and public health goals in disadvantaged communities in a way that is not captured by the national tool. Investments in clean water, for example, may benefit areas downstream or improve the resilience of communities adjacent to where the investments are put in the ground. Local communities should have a clear avenue to petition for their project to qualify as benefitting disadvantaged communities to help them access key funding for environmental justice initiatives that may otherwise be excluded by CEQ's national methodology.

As CEQ notes, CEJST may not identify certain disadvantaged communities that are recognized by state and local tools due to a lack of consistent nationwide data. Allowing for consideration of additional local information via a uniform process could help alleviate this concern without sacrificing a whole-of-government approach.

NACWA also encourages CEQ to provide additional clarity concerning how CEJST will be used in the allocation of federal funding pursuant to Justice40. While NACWA appreciates CEQ's July 2021 Interim Implementation Guidance for the Justice40 Initiative, CEQ should provide more information on how CEJST will be applied by federal agencies as they identify and quantify Justice40 benefits so that stakeholders can better determine project opportunities.

Thank you for the opportunity to submit these comments on the CEJST tool. NACWA has established an Environmental Justice Committee comprised of public and private water sector executives who would be happy to share their expertise with CEQ where helpful as agencies implement the Justice40 Initiative. Please do not hesitate to reach out with any questions.

Sincerely,



Amanda Aspatore

General Counsel

NACWA

[AAspatore@nacwa.org](mailto:AAspatore@nacwa.org)