

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF CONGRESSIONAL
AND INTERGOVERNMENTAL RELATIONS

The Honorable Stephen L. Johnson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

RE: *"EPA's 2009-2014 Strategic Plan Change Document"*

Dear Administrator Johnson:

The Local Government Advisory Committee (LGAC) wishes to take this opportunity to provide preliminary comments on the Environmental Protection Agency's *2009 – 2014 Strategic Plan Change Document* (Strategic Plan) dated September 30, 2008. The LGAC generally endorses the revisions to EPA's Strategic Plan articulated as 'Change Elements' and commends EPA on its efforts to reflect new and emerging environmental and public health concerns. We recognize that EPA will seek more comments in the Spring of 2009 and look forward to providing additional comments then. The LGAC's comments are as follows.

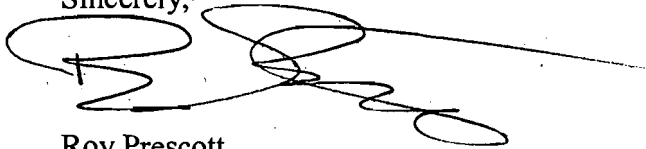
- The use of a side-by-side comparison between the previous and the proposed Strategic Plan greatly aids in the review of document. The format allows for very quick comparisons.
- There is ample evidence that greenhouse gas emissions are affecting our environment. It is therefore encouraging to see that the topic of climate change is now found within EPA's Strategic Plan. We suggest that the Strategic Plan consider policies, long-term strategies, and performance measures to measure the reduction of greenhouse gas emissions.
- It is critical that a strategic plan contain actions steps and performance measures so that progress, or the lack thereof, can be measured and appropriate actions taken. However, the Strategic Plan does not contain performance measurements for Goal 5--

Compliance and Environmental Stewardship--but should, so that progress towards goal attainment can be monitored. In addition, this section of the Strategic Plan should also discuss the roles of the states in enforcement.

- Our nation imports a very large amount of products and foodstuffs from other countries, some of which have been found to contain serious contaminants. EPA's Strategic Plan should contain goals, objectives, and performance measures that both prevent and detect problems prior to distribution with the nation.
- Some of the side effects of agriculture uses are linked to increasing nitrogen loads in our river systems and coastal waters. The Strategic Plan should identify ways that EPA can partner with its sister agency the USDA in developing policies and strategies for maintaining agricultural productivity while reducing unintended consequences.
- The Strategic Plan should provide some discussion about the probable course of action that the Agency will undertake once a goal is achieved. For example, will funds be reallocated? Will monitoring continue? Is the goal simply removed and replaced with another?
- The Strategic Plan contains new strategies for improving program implementation with Tribes. As there is little "Indian Country" in Alaska, the Strategic Plan should make mention of the need to work with Alaskan Native communities as well.
- Our experience has shown that less of an investment is necessary to keep a natural resource free of contamination than it is to clean one that is polluted and contaminated. The Strategic Plan should recognize this fact and identify goals that protect unimpaired waters and other resources. For instance, the Strategic Plan should include goals, objectives, and performance measures for watersheds and estuaries that are not presently impaired with the goal of keeping them unimpaired.
- Many places in our nation are now challenged by greater demands being placed on dwindling supplies of clean drinking water. Adequate supplies of clean drinking water are basic to our economy and community well-being. Thus, the Strategic Plan should also include goals, objectives, and performance measures for maintaining adequate drinking water supplies.
- The amount of debris, drift nets, and plastics that exists in our oceans poses a major threat to the viability of marine mammals such as the monk seal, and many species of sea birds, turtles, and fish. Without serious attention to reduce these contaminants many species will be lost to future generations and the web of marine life disturbed with resultant fish stock will crash. The Strategic Plan should include a set of objectives and performance measures to address the levels of debris, contamination, and decimation of marine life resulting from plastics and drift nets.

The LGAC appreciates the obvious hard work that has gone into the preparation of EPA's new Strategic Plan. We thank EPA Administrator Johnson for the opportunity to provide comments on the *2009-20014 EPA Strategic Plan Change Document* and also for all of your hard work over the years to improve the environmental conditions of our nation. We wish you well in all of your future endeavors. Please let us know if you have any questions or require further explanation.

Sincerely,



Roy Prescott
Chairman
Local Government Advisory Committee



John Duffy
Chairman
Climate Change Indicators Work Group

cc: Lyons Gray, OCFO
Vivian Daub, OCFO