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Administrator Scott Pruitt  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

RE: EPA–HQ–OAR–2017–0533; Draft FY 2018-2022 EPA Strategic Plan: Public Review Draft

Dear Administrator Pruitt:

Save EPA is a volunteer organization made up of retired and former employees of the Environmental Protection Agency. We have expertise in environmental science, law and policy. We are using our collective expertise to educate and advocate about environmental science, environmental protections and the current Administration's assault on EPA and our public health. We are writing now because we have grave concerns about EPA's s draft strategic plan.

The Draft FY 2018-2022 EPA Strategic Plan, released by EPA on October 2, 2017 is extraordinarily insufficient in multiple ways. In general, it is so lacking in detail as to be almost meaningless. There are few if any measurable goals to which EPA can be held accountable to the public or even gauge internally whether it has achieved success. Historically, one purpose of a strategic plan is to clearly describe what the agency hopes to accomplish, in a way where commitments are clear and success or failure can be tracked. That level of detail is almost entirely missing from this plan. The plan contains vague commitments, many times only restating what programs are required to do in general terms – and sometimes not even that. It contains very few performance measures which would improve accountability, and no longer-term (four-year) measures (as did previous plans), which allow EPA to truly plan and meet goals, and allow the public a clear way to understand EPA priorities and intentions. The draft plan commits to nothing other than following some of EPA's legally-mandated requirements – which of course EPA does not need a strategic plan to do. Further, the budget cuts proposed by the Administration seed doubt that even the few items left in the plan can be accomplished adequately. In summary, the draft plan does not even nominally describe a path to EPA's core mission to protect public health and the environment.

Goal 1 highlights that EPA plans to produce “real results”. In this context, “real results” is surprisingly backward-looking – it implies that, to date, results have not been “real”, contrary to evidence. The plan should clearly spell out how results will somehow be more “real” than they have been in the past, and the environmental and public health will benefit as a result. For instance, the plan should include clear and forward-looking goals using more appropriate descriptors such as improving, protecting, or cleaning up various environmental areas. The five “strategic goals” from the most recent strategic plan is an example of how this might be described.

The subgoals of Goal 1 fall far short of what the agency needs to accomplish under the even the most restrictive reading of various statutes. Again, there is a disconnect between these priority goals and the mission of EPA, which is to protect human health and the environment. For instance, one of the priority goals is to accelerate permit decisions. We note that this goal should, but currently does not, include making sure that permits are appropriately protective and have adequate public input. While accelerated review may be worthy at times (although likely does not rise to the level of a strategic goal), its worth declines if it comes at the cost of shoddy review and skipping necessary steps. All goals should be specifically tied back to EPA’s mission of protecting human health and the environment.

The plan reduces EPA’s entire air and radiation program down to a single strategic measure: “Reduce the number of non-attainment areas.” Please clarify that this goal does not come at the cost of redefining attainment, or failing to update the NAAQS as needed to reflect the best science. Indeed, EPA’s recent attempt to delay the ozone NAAQS gives rise to fear that reducing the number of non-attainment areas will come by papering over the definition of attainment rather than increased environmental protection.

Perhaps the most egregious omission is the deletion of all climate goals. We note that climate, or greenhouse gas emissions, has been included throughout decades of EPA strategic planning, in both Republican and Democratic administrations. This omission is unconscionable and goes far beyond the Administrator’s controversial statements on established science. Even if the Administrator continues to question established science on climate, or chooses to elevate legitimate questions to the level that recklessly delays urgently-needed action, shouldn’t the plan include a strategic goal to find out? Similarly, there is no mention of adaptation, which is certainly needed regardless of the cause of climate change. The fact that neither of these is

includes raises the question as to whether that decision was based on political expediency rather than on environmental science.

In addition radon programs (required by law), indoor air (immediate issues with human health), energy star (popular programs to reduce energy use and consumer costs), and many more programs are gone. There is nothing about continuing research on health effects, keeping up with science, improving modeling & monitoring (except greater reliance on the private sector). There is nothing about research or innovative programs to address cumulative or combined exposures, which are especially critical to our most vulnerable populations.

There is only one priority goal for the entire water program, to increase the percentage of water infrastructure projects funded through EPA grants, loans, or public-private partnerships that achieve or maintain compliance. While important, this reflects only a sliver of the task at hand. The only strategic measures for the water program are to reduce the number of community water systems out of compliance with health-based standards; increase the percentage of water infrastructure projects funded through EPA grants, loans, or public-private partnerships that achieve or maintain compliance; and reduce the number of square miles of watershed with surface water not meeting standards. All geographic-specific programs, climate resiliency programs, water sense, urban waters, ecosystem protection, programs to address non-point sources, and more, are gone. As one illustration, it is difficult to imagine achieving significant improvements in water quality across the nation without reducing non-point sources. Finally, while the water program's strong state and local component is highlighted, EPA's role is not. Aside from working in "partnership", the plan should specify the role that EPA intends to play.

We take special note of one of the strategies listed – to “invest in infrastructure to spur environmental benefits and economic growth”. While it is true that investments in water infrastructure can spur economic growth, that is not the goal of such investments nor is it a part of EPA's mission, both of which focus on providing and protecting clean healthy water.

The goals for EPA's Emergency Response are extremely vague, and seem more like summary of requirements and procedures more than a true strategic review of needs. In addition, much more explanation is needed on the “top ten” process for Superfund sites, specifically the impact on and process for furnishing resources, selection criteria, opportunity for public input, and preferred stage of reclamation, if any. In addition, this section has nothing about sustainable development, or municipal waste management and waste prevention programs including food recovery.

Perhaps EPA views some of this as beyond what is minimally required by law. Nonetheless, these forward-looking programs, and others like them, are the keys to preventing the types of problems that the rest of EPA is dedicated to addressing after the fact, and it is extremely short-sighted to omit them. Finally, as we have recently seen, adaptation as it pertains to waste sites becomes critically important in areas of possible sea level rise or extreme weather events. Yet the strategic plan includes nothing on this.

The last section on the programmatic goals concerns EPA's newly invigorated chemicals program. Yet the other programs in this area are completely omitted. The pesticide program has no measures at all. The lead poisoning prevention program is likewise completely omitted – meaning that even when parents or landlords want to ensure that their properties are lead-safe, there will be no assurances from EPA that those doing the work are properly trained. Research is completely absent, yet this is how we find out more about existing and emerging dangers to human health. Pollution prevention programs are also omitted, yet these are low-cost voluntary programs designed to help avoid problems down the road. It is short-sighted to exclude them.

Goal 2 discusses cooperative federalism. While it can be worthwhile to review state/federal working relationships, describing this as a “rebalancing of power” is puzzling and inappropriate. The plan is also unclear as to how the joint governance model will be developed. Like Goal 1, this goal implies that “power” has been “unbalanced” at EPA. In our decades of experience, we have found that EPA normally tailors oversight to states, with strong state programs getting little oversight and weak ones getting more, including sharing work, and while highlighting the need to work across states. We would be happy to furnish you with dozens of examples of cooperative and productive partnerships between EPA and states, as well as dozens of examples where we have worked to maximize public input. What “unbalancing” does this plan address? What will change in EPA activity, as a result of this strategic goal, to allow it to better achieve its mission of protecting the environment and public health? Instead, we recommend that the plan focus on optimizing the relationship, using the criterion that both entities are working together effectively and in partnership to advance environmental and public health protection to the maximum extent possible, rather than whether power is somehow “balanced” (whatever that means). We further recommend that the “partnership” section of the most recent strategic plan be used as a starting point.

An essential part of cooperation with partners is enforcement (who does it and when), yet this is not addressed. Yet the plan includes a measure to address the elimination of unnecessary

reporting from regulated community. We recommend that decisions on whether reporting is “unnecessary” be placed in an enforcement context; it is unclear how this fits with this objective.

In a startling omission, the plan makes no mention of increasing oversight to avoid occurrence such as what happened in Flint, Michigan. We ask that the plan align its focus on community-based work with the fact that the agency is eliminating funding for these types of activities, such as urban waters, environmental justice, geographic programs, environmental education, and other programs.

Goal 3 discusses “Rule of Law and Process”. This is an odd formulation because EPA normally adheres to laws and required processes without having to describe it as a goal in a strategic plan. For instance, this was included as a “core value” in the most recent strategic plan. This goal seems to say that EPA will do no more than specifically obligated. However, EPA, like other agencies, does many things that are not statutorily required, such as maintaining email systems, websites, and security details for its Administrator. We suggest that, this goal be clarified to specifically say what will and will not be done, and to allow public comment on that. We also point out that “obeying the law” compels EPA to move forward with work on climate.

The highlighted measure (increasing the percentage of decisions using EPA science) to be puzzling, as we believe it is now at or close to 100%.

Several of the items in this category sound like they are not worthy of priority attention given other pressing demands on EPA’s time that contributes directly to protection of human health and the environment. For instance, reengineering permitting and contracting has already been done a number of times. Developing a base catalog of EPA responsibilities seems like a poor use of time – this has been done by many offices already and is also reflected in agency-wide documents. While the items listed in section 3.5 may have merit, they have also been done in recent years; review should be (and is) a normal part of business, hardly a priority goal.

Finally, like others, we are concerned about the scientific integrity of the various science boards discussed in section 3.3 if anyone who has ever received EPA money is excluded, particularly given that many others will receive funding from industry.

Thank you for considering our comments on this important statement on Agency direction.

Joni Teter & Carol Campbell,  
for the Save EPA Steering Committee