



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

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OFFICE OF  
CHIEF FINANCIAL OFFICER

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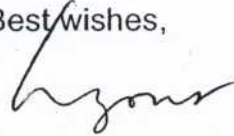
Dear Mr. Howard:

I am responding to your letter of July 14, 2006 providing comments on EPA's draft *2006-2011 Strategic Plan*. On behalf of Administrator Johnson, I wish to convey again my appreciation for the thorough and thoughtful review by the National Advisory Council for Environmental Policy and Technology (NACEPT). Although we had a large and diverse group of partners and stakeholders that reviewed and commented on the *2006-2011 Strategic Plan*, we look to NACEPT for consistent, expert, and reliable advice on strategic planning and many other aspects of the Agency's environmental protection programs. The enclosed response provides feedback on NACEPT's major comments.

We appreciated receiving NACEPT comments on the draft document along with recommendations for improvements in the Agency's strategic planning process. NACEPT's comments were thought-provoking and had considerable merit. The comments on the strategic architecture were particularly helpful, including the feedback on ways to improve the baselines and targets. Many of the recommended changes, however, were not addressed due to a number of factors. We sought to keep the document as concise and readable as possible, making it difficult to provide all the contextual information and cross-linkages we might have otherwise included. In addition, we also had to adhere to a number of previously-negotiated agreements on performance metrics (through such mechanisms as the Office of Management and Budget's Program Assessment Rating Tool (PART) process and other Agency agreements).

We hope that you will find our response useful in fashioning ways in which NACEPT can continue to provide valuable input to the Agency on strategic planning issues with maximum impact and benefit to both our organizations. We look forward to continuing our cooperative relationship with you and the Council in the coming years.

Best wishes,



Lyons Gray  
Chief Financial Officer

Enclosure

cc: Jennifer Nash, Working Group Chair, NACEPT  
Sonia V. Altieri, NACEPT, Designated Federal Officer, Office of Cooperative  
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## Response to Major NACEPT Comments on the Public Review Draft of the 2006-2011 EPA Strategic Plan

NACEPT's major comments on EPA's draft *Strategic Plan* fall within three broad areas of concern: appropriateness and feasibility; connectivity; and partners. The Agency's response to these observations and comments on the draft *Plan* is provided below.

### Appropriateness and Feasibility

- We agree with NACEPT on the importance of the rapid pace of change in today's world and the potential positive and negative impacts it may have on human health and the environment. Emerging issues, such as increased use of nanotechnology and other new materials, population growth and demographic shifts, changes in fuel use, climate change, and others, present unique challenges and opportunities for the Agency. Recognizing the significance of these issues, we included a discussion of them for the first time in our *2006-2011 Strategic Plan*. These issues are initially mentioned in the Introduction of the *Plan* and then are more fully explored in each Goal chapter in the section entitled, "Emerging Issues and External Factors." On the Agency's Internet website, the online version of the *Plan* provides links which connect the reader to additional websites with more detailed information about these emerging issues.
- In response to NACEPT comments and those of other commenters, we made numerous revisions to the strategic targets contained in the draft *Plan*, with a particular focus on providing improved clarity, baselines, target numbers, and, in some cases, contextual information. Contextual information may have been incorporated into either the strategic target language, the supporting narrative, or the end notes for the Goal chapter. Some specific examples of improvements we made in response to NACEPT comments on the strategic architecture include the strategic targets in Goal 1 for air toxics (better baselines that make it easier to understand the targets), in Goal 3 for cleaning up and revitalizing contaminated land (additional baseline information for several targets to provide clarity), in Goal 4 for reducing chemical risks (improved baselines for several targets), and in Goal 5 for pollution prevention (important correction to the baseline units), among others.
- NACEPT raised some concerns regarding the ambitiousness of the strategic targets. The targets underwent particularly rigorous review with program staff in our headquarters and Regional offices and were reviewed by our state partners to ensure that the targets were sufficiently ambitious and still attainable, given reasonable assumptions regarding future funding levels.

There may be cases in which some final targets do not appear to external readers to be sufficiently ambitious. However, many factors can make even maintaining the status quo a challenging goal. For example, growth in population and vehicle miles traveled can result in increased emissions. New or more stringent environmental

standards are continually coming on line, making compliance with all standards increasingly difficult. And, in some cases, additional information has recently become available, resulting in downward adjustments to assessments of past progress or current status, making targets more difficult to achieve.

- Another of NACEPT's major concerns with the draft *Plan* was the removal from the *Plan* of all the "strategic targets" for research and development. This does not reflect a lower priority for research in any way. The "strategic targets" for research in the draft architecture were only included as qualitative placeholders. EPA's Office of Research and Development (ORD) has a process underway, working with the EPA Board of Scientific Counselors, to develop improved performance measures for its program. However, the results of this process were not available in time for inclusion in the *2006-2011 Strategic Plan*.

### **Connectivity**

- NACEPT recommended that the *2006-2011 Strategic Plan* and future *Plans* be better linked to the Agency's other planning and performance-reporting documents. EPA addressed this recommendation. The "Introduction" to the new *Strategic Plan* describes how the *Plan* relates to the Agency's *Performance and Accountability Report* (Annual Report) and the *Report on the Environment*. The *Strategic Plan* website also contains links to these and other planning and performance-related documents. In addition, the electronic version of the *Strategic Plan* itself contains numerous electronic links throughout the text to other documents that provide additional information on Agency programs. These links allow the reader to locate supplemental documentation and history and may provide greater context to understand the formulation of the strategic targets, for example, while keeping the document concise and easy-to-read.
- EPA concurs in the view expressed by NACEPT that to successfully address many of the environmental challenges facing the Agency in the future, EPA will need to employ its resources and creativity across environmental issues, programs, communities, and ecosystems. In fact, two overarching themes of the *2006-2011 Strategic Plan* are innovation and collaboration with our partners, which are discussed throughout the document. However, we believe that inclusion of cross-references to address all the inter-connections among the various Agency programs and goals would not be possible while maintaining the readability and conciseness of the document.

### **Partners**

- NACEPT was clearly concerned with the level of detail in the description of EPA's relationships with its partners contained in the draft *Plan*. It is the Agency's view that the *2006-2011 Strategic Plan* reflects the high level of importance that the Agency places on its state and tribal partnerships and the critical role they play in achieving results under our environmental statutes. The "means and strategies" sections in

the objective narratives describe the significant contributions of the Agency's state, tribal, federal, and other partners, as well as useful web links to expanded descriptions of some of these partnership efforts, particularly in Goal 1 and Goal 5. The "means and strategies" also discuss efforts to build state, tribal, and local capacity where appropriate, and there is an entire objective dedicated to building tribal capacity in Goal 5. In addition, the *Plan* contains a summary chart of areas of EPA coordination with other federal agencies in Appendix D, and a cross-goal strategy on "Innovation and Collaboration" that discusses general collaboration with other governmental entities at several levels.

- NACEPT also points out the important role of individuals in environmental stewardship. EPA agrees completely. In fact, we made innovation and environmental stewardship key areas of focus in this *Strategic Plan* revision. The role of individuals and the general public are emphasized throughout the document, including promotion of voluntary actions by the public in the indoor air and radon programs, outreach and education efforts to foster recycling behavior in public venues, encouraging individuals to purchase environmentally responsible products, and involving the public in local community toxics programs, and many other areas.

In addition, we re-emphasize this theme in the cross-goal strategy on "Innovation and Collaboration," in which we state "...we will promote an ethic of environmental stewardship that engages all parts of society—businesses, companies, communities, and individuals—in taking responsibility for environmental quality and achieving sustainable results. Environmental stewardship is based on the premise that government cannot meet environmental challenges alone."