



December 22, 2011

The Honorable Lisa P. Jackson  
Administrator  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

RE: Third NACEPT Advice Letter on EPA Workforce Planning: Ensuring Diversity

Dear Administrator Jackson:

The National Advisory Council for Environmental Policy and Technology (NACEPT) is working on your charge to provide advice for development of the Agency's next Strategic Workforce Plan. The charge comprises the following topics:

1. Scientific and technical competencies needed to be prepared for tomorrow's challenges.
2. Strategies to obtain and retain scientific and technical expertise.
3. Strategies to attract and retain superior executive leadership talent.
4. Leadership capabilities and culture for "One EPA".
5. Ensuring diversity.

On January 31, 2011, NACEPT responded with an advice letter on the first charge question: scientific and technical competencies needed for the Agency to be prepared for tomorrow's challenges. This was followed by a second advice letter on July 11, 2011, summarizing NACEPT's recommendations addressing charge questions #2 (Strategies to obtain and retain scientific and technical expertise) and #4 (Leadership capabilities and culture for "One EPA"). This letter will provide advice on charge question #5 (Ensuring diversity). A forthcoming letter will address charge question #3 (Strategies to attract and retain superior executive leadership talent).

#### **RECOMMENDATIONS AND RESPONSE TO THE FIFTH QUESTION IN THE CHARGE: ENSURING DIVERSITY**

*"How can EPA best ensure access to a diverse and technically astute SES applicant pool? What can EPA do to ensure diverse applicants selected into the SES are retained, developed and promoted? Given the broader concept of Diversity that EPA is espousing to (diversity in thinking styles, educational backgrounds, family experiences, etc.), how can EPA define and then track/measure diversity in this broadest sense?"*

NACEPT was charged with looking at the issues of diversity and inclusion at the Agency, including tools and processes, and how they support the creation of a strong SES applicant pool. As part of the process, NACEPT analyzed current practices, systems and processes, and the commitment by Agency leaders.

A full day session was held in June where Agency leaders were asked to provide the diversity workgroup with information about current practices covering orientation and on-boarding processes, engagement processes, attrition and turnover, programs for people with disabilities, leadership accountabilities for promoting diversity, best practices, and diversity and inclusion priorities. Christine Griffin, then Deputy Director of OPM, was invited to share the broader federal government context for developing and implementing outreach and recruiting strategies.

Additionally, EPA's 2010 EEO Report (MD-715) and 2011 MD-715 Action Plans and the recent Executive Order on Diversity and Inclusion were reviewed.

Based on a review of practices and supporting systems, the following recommendations are presented:

**1. *Update the linkage of diversity and inclusion to the strategic mission of the agency<sup>1</sup> and with the One EPA theme, and expand strategies to include critical stakeholder groups.***

The current focus of diversity and inclusion efforts continue to be dominated by “compliance” driven programs and initiatives targeted at workforce representation. Work must continue to ensure diversity at all levels of the organization are linked to regulatory requirements. However, to move the Agency to the next level of performance, greater clarity and connection of diversity and inclusion to the mission critical strategies and cross-cutting fundamental goals must be considered and embraced.

*“Our concern is that in too many places in America, the burden of pollution and environmental degradation falls disproportionately on low-income and minority communities – and most often, on the children in those communities” – Lisa Jackson, May 2009.<sup>2</sup>*

If the Agency is to successfully address these issues, a workforce that mirrors these impacted communities must be in place. It must be driven by a leadership team that manifests and embraces diversity and inclusion.

As an agency of the federal government, EPA is charged with protecting human health and the environment, by writing and enforcing regulations based on laws passed by Congress. Many of its recommendations in areas such as air quality standards, water quality and drinking water standards, global warming, greenhouse emissions, environmental justice, etc., require leaders who can build and sustain effective relations with an increasingly diverse set of policy makers. Taking action on climate change and improving air quality, protecting America's waters, cleaning up communities and advancing sustainable development, ensuring the safety of chemicals and preventing pollution, along with enforcing environmental laws are very laudable

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1 [http://www.inpaws.org/EPA\\_Strategic\\_Plan.pdf](http://www.inpaws.org/EPA_Strategic_Plan.pdf)

2 <http://yosemite.epa.gov/opa/admpress.nsf/12a744ff56dbff8585257590004750b6/67297347ff21319a852575b60063c50b!OpenDocument>

goals but require engaging with diverse congressional leaders, state representatives, other agencies, private industry, citizens and environmental activists.

Therefore EPA leaders must understand that diversity and inclusion are critical to achieving these outcomes across diverse stakeholder groups.

**2. *Analyze the impact of changing demographics on the EPA's ability to successfully implement its cross cutting strategies which include: expanding the conversation on environmentalism, working for environmental justice and children's health, advancing science, research and technological innovation, strengthening state, tribal and international relationships, and strengthening the EPA's workforce and capabilities.***

As part of the "One EPA" framework, the organization should take a systemic approach to how diversity and inclusion are critical to accomplishing its cross cutting strategies. Expanding the conversation on environmentalism requires that leaders and staff build their cultural competence and skill in underserved communities so they can build effective relationships and articulate the value and benefits of "environmentalism" in such a way to optimize results and stakeholder commitment to the policy changes being recommended or implemented.

The 2010 census results point to a very diverse youth population led by growth in the Latino / Hispanic population, growing immigrant communities, and a shrinking middle class.<sup>3</sup> These "emerging demographic populations" have beliefs and perspectives that must be built into how issues are framed. And finally, creativity, problem-solving and issue resolution must be considered in the context of culture and background. See for example S.J. Gate's essay on creativity, diversity and innovation in science and education.<sup>4</sup>

**3. *Establish an EPA-wide framework for the initiative to promote diversity and inclusion covering leadership expectations and accountability, integration with strategic plan, cross-organizational collaboration, governance and compliance, talent management, strategic outreach, institutional systems analysis, risk mitigation, agency work culture and climate, and processes for inspecting and monitoring results. Align with President's Executive Order.***<sup>5</sup>

In reviewing current Agency practices, we found that regional offices and locations have a lot of discretion in determining what should be done and how it should be done in the area of diversity and inclusion. This is especially evident in some of the traditional human resource systems areas such as staffing, recruiting, retention and development.

Creating an over-arching framework for diversity and inclusion allows for greater consistency, and more effective use of resources. This will allow the Agency to streamline processes, to more effectively use its limited human resources, and provide a consistent metric for measuring progress.

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<sup>3</sup> <http://2010.census.gov/news/releases/operations/cb11-cn125.html>

<sup>4</sup> [http://php.aas.org/programs/centers/capacity/documents/Gates\\_Essay.pdf](http://php.aas.org/programs/centers/capacity/documents/Gates_Essay.pdf)

<sup>5</sup> <http://www.whitehouse.gov/the-press-office/2011/08/18/executive-order-establishing-coordinated-government-wide-initiative-prom>

The EPA-wide framework should include the following:

1. Review of the Agency's current definition for diversity and the development of a definition for diversity and inclusion similar to the Department of Veteran Affairs<sup>6</sup>
2. Description of the following elements:
  - Inclusive behaviors and practices for senior management
  - Inclusive behaviors and practices at the individual level
  - Inclusive practices that make a difference at the Agency (e.g., integration of inclusion into its strategic plan, ensure inclusive principles in human resource processes, etc.)
3. Action plans including outcomes, outcome measures, and procedures for monitoring progress
4. Recognition program for units, teams, and individuals who have demonstrated exemplary support for diversity and inclusion
5. Incorporation of other activities consistent with the President's Executive Order (E.O. 13583) on Diversity and Inclusion in the Federal Workforce

Diversity goes beyond programs to develop a workplace that allows all employees to perform at their individual best. The recent E.O. on Diversity and Inclusion in the Federal Workforce moves diversity beyond a valued and understood principle. The E.O. directs "...executive departments and agencies to develop and implement a more comprehensive, integrated and strategic focus on diversity and inclusion as a key component of their human resource strategies."

The Department of Veterans Affairs Diversity Council (VADC) has defined Diversity as "...all the ways in which people differ including innate characteristics (such as age, race, gender, ethnicity, natural origin, mental or physical disabilities, and sexual orientation) and acquired characteristics (such as education, socioeconomic status, religion, work experience, language, skills, etc.).

The VADC Charter as well as others has identified inclusion as the engine that puts diversity to work. Inclusion behaviors and practices are operative at the individual, leadership and organizational levels. Therefore, the Agency's Diversity Program must contain not only a definition for diversity but also an action plan that embraces and encourages inclusion.

The Administrator's recent reaffirmation of equal opportunity and diversity in the work place and urging to cultivate an inclusive environment in the work environment provide the direction for the vector for the Agency to move forward. The President's E.O. provides the guidance and direction for diversity and inclusion in the federal workforce. This recommendation outlines a framework for implementing the strategy and measuring progress of diversity and inclusion at EPA. Additional information on a sample framework is included in the addendum.

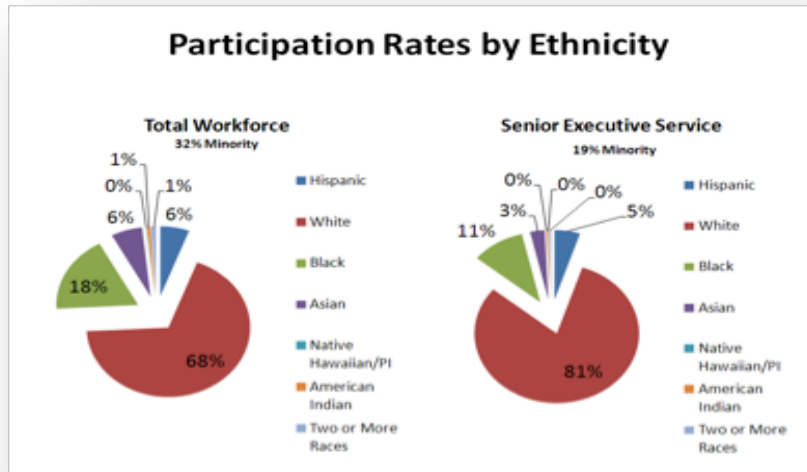
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<sup>6</sup> <http://www.diversity.va.gov/council/files/charter.pdf>

#### 4. Strengthen the pipeline of talent for SES level positions, particularly among minorities:

Even with the progress EPA has made to expand the pipeline for potential SES applicants, there is still the question of how to ensure that there are enough trained individuals from underrepresented minorities in the pipeline for existing positions as well as for the new types of jobs EPA has envisioned for the future described in our first workforce letter. It is not enough to assume that this pool has already been hired

but is simply waiting for transfer for promotion; rather, EPA should take the proactive stance that this pipeline needs to keep developing and see to it that there are programs available that can provide trained and diverse personnel on a continual basis.<sup>7</sup>



There are a number of actions that the EPA can take to enhance the pipeline in the short-term. These actions include the following:

- Diversity SWOT Analysis – Perform a SWOT analysis to provide insight into the strengths, weaknesses, opportunities and threats of diversity and inclusion efforts within the Agency.
- Leadership Accountability – Make it a requirement that diversity and inclusion be a part of every leader’s annual performance management process with clear actions and metrics for measuring progress.
- Diversity and Inclusion Analytics - Adopt a dashboard to monitor progress in achieving Agency-wide objectives, including:
  - Diversity in applicant pools.
  - Workforce representation trends (e.g., year over year progress in areas of underutilization).
  - Participation of minorities and women in HR programs (e.g., development, training, mentoring, etc.). Link to requirements and recommendations in MD-715 reports.
- Strengthen focus on pipeline by focusing on “Placements of women and minorities against opportunities” in areas of underutilization (e.g., SES level and professional levels).

<sup>7</sup> Charts adapted from EPA Office of Civil Rights 2010 data.

- Selection Pool and Interview Panel Diversity - Make it a priority that women and minorities be represented in selection pools and interview panels (“Rooney Rule”). Managers should be held accountable via the annual performance management process for ensuring parity and transparency in all selection processes.
- Education (e.g., Inclusion, Harassment Prevention, Unconscious bias) - Make it mandatory that all EPA employees participate in an annual harassment prevention education program. Require all leaders to do a self assessment on personal inclusive behavior and lead a discussion with their team on personal and team behavior.
- Outreach - Enhance Agency outreach to ensure that more Hispanic and Latino candidates are in the candidate pools. Strengthen the Limited English Proficiency Program (LEP) to provide meaningful access by stakeholders with limited English proficiency.
- Employee Resource Group Engagement - Solicit feedback and input from employee resource groups (Affinity Groups) to assist in strategy and outreach programs in targeted communities.
- Resource Allocation – Establish a central diversity budget to focus on carrying out these programs and strategies.
- Recruiting Firms - Consider using firms specialized in recruiting minorities and other groups currently under-represented in the Agency.

Additionally, work with higher education to address the pipeline issue involving higher education:

- By creating or enhancing relevant programs at minority-serving institutions.<sup>8</sup>
- By linking minority institutions with non-minority institutions that already have achieved excellence in key program areas for joint training through partnerships.
- By encouraging existing institutions that have achieved excellence in key program areas to recruit minority candidates more successfully through incentives and assistance.<sup>9</sup>

Ideally, all three of these strategies would be deployed in different programs to test and gather data about which are most effective. In the current funding environment, however, it is likely to be difficult to create new programs from scratch if existing universities already have suitable programs. In that case, linkages are helpful and have been used in the past.

One example is a current Memorandum of Understanding between EPA and Vermont Law School that has the goal of improving the flow of information between EPA and minority communities. So far several law students from North Carolina Central University, a historically black college, have attended the summer session on environmental law at Vermont Law School in the Agency's first organized effort to train more lawyers to handle environmental justice issues in minority and low-income communities, which bear a disproportionate amount of health and environmental impacts from pollution.<sup>10</sup>

<sup>8</sup> [http://meldi.snre.umich.edu/diversity\\_initiative/Diversity+Programs+and+Initiatives](http://meldi.snre.umich.edu/diversity_initiative/Diversity+Programs+and+Initiatives)

<sup>9</sup> <http://www.environmentaldiversity.org/people.html>

<sup>10</sup> [http://www.vermontlaw.edu/News\\_and\\_Events/News/2010\\_News\\_Archive/EPA\\_Minority\\_Fellows\\_Kick\\_Off\\_Environmental\\_Law\\_Outreach\\_Program\\_at\\_VLS.htm](http://www.vermontlaw.edu/News_and_Events/News/2010_News_Archive/EPA_Minority_Fellows_Kick_Off_Environmental_Law_Outreach_Program_at_VLS.htm)

Sincerely,

A handwritten signature in black ink that reads "James H. Johnson, Jr." in a cursive style.

Dr. James H. Johnson, Jr.  
Chair

Addendum: Sample Framework for Diversity and Inclusion Initiative  
Charts of EPA Feeder Pools

cc: Bob Perciasepe, Deputy Administrator  
Craig E. Hooks, Assistant Administrator, OARM  
Cynthia D. Jones-Jackson, Acting Director, OFACMO  
NACEPT Members

## ADDENDUM

### A SAMPLE FRAMEWORK FOR DIVERSITY AND INCLUSION INITIATIVE

The framework is intended to be an “Agency-wide” framework for managing a diversity and inclusion initiative. It should be examined against the Agency’s mission critical strategies for effectiveness.

The strategy should be guided by principles focused on ways to enhance representation at all levels, meet regulatory requirements and to consolidate efforts, streamline processes, and strengthen senior leadership accountability and commitment.

Element of Initiative	Key Components	Expected Outcomes	Element Owner
<b>Leadership</b>	<ul style="list-style-type: none"> <li>• Build a leadership “mindset” that understands and is committed to diversity and inclusion</li> <li>• Hold Agency leaders accountable for results and actions</li> <li>• Develop a clear case for diversity (including definition)</li> <li>• Clarify expectations and accountability (roles, responsibilities and relationships)</li> <li>• Reinforce relationship to the “One EPA” strategy</li> </ul>	<p>SES Leaders held accountable for diversity and inclusion; Human Resource Officers (HROs) and Equal Employment Opportunity (EEO) Officers provide support.</p> <p>Diversity and inclusion results become a component of performance evaluation and development plans</p> <p>Leaders role modeling the behaviors that are required</p>	EPA Administrator and Senior Leadership Team
<b>Integration with EPA Strategic Plan</b>	<ul style="list-style-type: none"> <li>• Identify critical diversity and inclusion levers</li> <li>• Understand implications on cross cutting strategies</li> <li>• Build into human capital plans and workforce / stakeholder development strategies</li> </ul>	<p>Leaders understand how diversity and inclusion can be a competitive advantage in relationships with stakeholder groups and in achieving goals outlined in the strategic plan.</p> <ul style="list-style-type: none"> <li>• Mindset</li> <li>• Guiding Principles</li> </ul>	EPA Administrator and Senior Leadership Team
<b>Governance and Compliance</b>	<ul style="list-style-type: none"> <li>• Align action with Presidential EO and seek ways to eliminate redundant functions.</li> <li>• Use MD-715 as the tool for identifying and eliminating barriers, examining gaps and for building workforce improvement strategies</li> <li>• Ensure effective implementation of Executive Orders: 13171 (Hispanic employment), 13518 (Veterans), 13548 (Individuals with Disabilities employed in FG), 13163 (Increasing Opportunities for People with Disabilities in FG), 13078 (Employment of Adults with Disabilities)</li> </ul>	<p>Build on the work that is already underway in the Agency to address gaps.</p> <p>Institute strategies for consolidation and integration of compliance efforts through use of technology and cross-organizational teaming.</p> <p>Increase people with disabilities hiring.</p> <p>Increased rigor in developing and implementing MD-715 Action Plans by Senior Management annually</p>	<p>Human Resource Officers (HROs),</p> <p>EEO Officers</p> <p>Office of Diversity, Outreach and Collaboration (ODOC)</p> <p>Office of Civil Rights (OCR)</p>
<b>Cross Organizational Collaboration</b>	<ul style="list-style-type: none"> <li>• Identify opportunities to “team” and / or collaborate with other federal agencies               <ul style="list-style-type: none"> <li>○ Best practices</li> <li>○ Sharing resources</li> <li>○ Engaging other Federal Agencies (OPM, etc.)</li> </ul> </li> </ul>	<p>Ensure cost effective and efficient ways of delivering tools, processes and services to support diversity and inclusion</p> <p>Enhance flexibility and customer service by promoting cross-organizational teaming, education and communications</p>	<p>EPA Administrator and Senior Leadership Team</p> <p>OPM</p> <p>ODOC</p> <p>HROs and EEO Officers</p>

Element of Initiative	Key Components	Expected Outcomes	Element Owner
<b>Talent Management</b>	<ul style="list-style-type: none"> <li>• Build a compelling reason to work with EPA that resonates with Millennials and emerging leaders</li> <li>• Focus efforts on building the pipeline of diverse talent, especially in the Hispanic population. Understand why certain populations are underrepresented in SES positions. Analyze turnover by demographic groups. Develop a “One EPA” strategy for sourcing talent (National Outreach Program). <ul style="list-style-type: none"> <li>• Understand feeder pools</li> <li>• Explore creative solutions such as Vermont NCCU collaboration</li> <li>• Focus on creative solutions (partnerships, linkage to strategic plan, engagement of operating management)</li> <li>• Enhance OnBoarding (goals, tracking, feedback, linkage to survey)</li> </ul> </li> </ul>	<p>Improvement in workforce representation of underserved minorities especially SES level.</p> <p>More targeted and integrated sourcing strategy.</p> <p>Continued strengthening of the executive OnBoarding process (SES)</p> <p>Reinforced commitment to the EPA Emerging Leaders Network</p>	<p>HROs</p> <p>EEO Officers</p> <p>ODOC</p>
<b>Culture and Organization Climate</b>	<ul style="list-style-type: none"> <li>• Address any workplace or satisfaction issues that may impact satisfaction and engagement of the workforce. <ul style="list-style-type: none"> <li>○ Generational diversity</li> <li>○ Employee Resource Groups</li> <li>○ Demographic analysis of retention, satisfaction</li> <li>○ Work flexibility</li> <li>○ Accessibility</li> </ul> </li> <li>• Ensure that process for raising issues and concerns about work place issues (discrimination, harassment, and retaliation) are effective and being used.</li> </ul>	<p>Goal is lower turnover rates for high talent employees, increased satisfaction levels, and greater work-life integration</p> <p>Continued use of employee resource groups to provide input and feedback on work place issues.</p> <p>Timely intervention, investigation and decisions, and effective Alternative Dispute Resolution (ADR) for charges of discrimination, inappropriate behavior, and retaliation</p>	<p>HROs</p> <p>EEO Officers</p> <p>ODOC</p> <p>OCR</p>
<b>Strategic Outreach</b>	<ul style="list-style-type: none"> <li>• Strengthen relationships with key diversity organizations, particularly those focused on Hispanic /Latino; African American and other underrepresented minorities.</li> <li>• Build more inclusive strategies for working with increasingly diverse stakeholder groups (businesses, communities, activists, government officials).</li> </ul>	<p>More effective relationships with employees, regulators, communities, tribes, etc.</p>	<p>EPA Administrator and Senior Leadership Team</p> <p>Office of Human Resources</p> <p>ODOC</p> <p>OCR</p>

Element of Initiative	Key Components	Expected Outcomes	Element Owner
<b>Institutional Barriers and Systems</b>	<p>Examine barriers that are created in recruiting, staffing, and hiring processes Shift to a centralized resume management system, align with OPM office or use same tool</p> <ul style="list-style-type: none"> <li>• Monitor applicant flow data to assess the level of diversity in pools</li> </ul> <p>Eliminate policies and procedures that may unintentionally make it more difficult to attract and retain diverse talent.</p> <ul style="list-style-type: none"> <li>• For example, only hiring the first 50 applicants that apply</li> <li>• Lack of coordination of regional offices on prospective employees</li> <li>• Policies that make it difficult for people with disabilities to apply</li> </ul> <p>Evaluate diversity and workplace best practices from other federal agencies / businesses to improve efficiency / effectiveness</p>	<p>Institutional barriers that create an impediment to building a more diverse and inclusive workforce are minimized or eliminated.</p>	<p>HROs, EEO Officers</p> <p>ODOC</p> <p>Office of Civil Rights</p> <p>Office of General Counsel</p>
<b>Monitoring and Measurement</b>	<p>Set specific goals and targets for Agency directors and leaders to achieve in carrying out this initiative</p>	<p>Leaders are held accountable for implementing the specific actions identified in this initiative.</p>	<p>EPA Administrator and Senior Leadership Team</p>

# EPA Feeder Pools - Minorities

Expressed as Percentage of Total Population in Grade

Grade	Hispanic	White	Black	Asian	Hawaiian/PI	A.	Indian	Two or More
GS 2 Population: 2	0	50	0	50	0	0	0	0
GS 3 Population: 13	23.07	46.15	15.38	7.69	0	0	7.69	
GS 4 Population: 103	6.79	59.22	17.48	15.54	0	0	0.97	
GS 5 Population: 68	7.35	51.47	36.76	2.94	0	0	1.47	
GS 6 Population: 61	9.87	37.71	47.54	4.94	0	0	0	
GS 7 Population: 417	12.71	48.68	32.14	4.32	0.24	0.72	1.20	
GS 8 Population: 204	13.23	35.29	44.61	3.43	0	0.98	2.45	
GS 9 Population: 649	6.78	56.24	29.43	5.24	0.31	0.31	1.69	
GS 10 Population: 90	0.0	58.88	32.23	4.44	1.11	1.11	2.22	
GS 11 Population: 772	5.57	57.32	28.89	5.18	0.0	0.91	2.33	
GS 12 Population: 2248	7.03	57.74	26.47	6.80	0.22	0.62	1.11	
GS/GM 13 Population: 6866	5.37	69.56	16.26	7.18	0.08	0.77	0.77	
GS/GM 14 Population: 2957	4.81	74.25	13.36	6.23	0.06	0.68	0.61	
GS/GM 15 Population: 2407	4.45	82.14	8.43	3.86	0.16	0.54	0.42	
SES Population: 277	5.05	80.87	10.47	2.89	0.0	0.36	0.36	

*Based on EPA Office of Civil Rights 2010 Data*

# EPA Feeder Pools – Females

Expressed as Percentage of Total Population in Grade

Grade	Hispanic	White	Black	Asian	Hawaiian/PI	A.	Indian	Two or More
GS 2 Population: 2/2	0.0	50.0	0.0	50.0	0.0	0.0	0.0	0.0
GS 3 Population: 8/13	15.38	15.38	15.38	7.69	0.0	0.0	7.69	
GS 4 Population: 46/103	2.91	24.27	11.65	5.83	0.0	0.0	0.0	
GS 5 Population: 45/68	4.41	27.94	30.88	2.94	0.0	0.0	0.0	
GS 6 Population: 48/61	8.20	27.87	40.98	1.64	0.0	0.0	0.0	
GS 7 Population: 315/417	8.63	33.81	28.30	3.12	0.24	0.48	0.96	
GS 8 Population: 194/204	12.25	32.84	43.14	3.43	0.0	0.98	2.45	
GS 9 Population: 447/649	4.93	33.13	25.58	2.93	0.31	0.31	1.69	
GS 10 Population: 59/90	0.0	34.44	25.46	3.33	0.0	0.0	2.22	

GS 11 Population: 528/772	4.40	36.88	23.06	2.85	0.0	0.78	1.42	
GS 12 Population: 1416/2248	4.58	31.94	21.35	3.78	0.09	0.31	0.93	
GS/GM 13 Population: 3347/ 6866	2.56	30.18	11.58	3.61	0.07	0.41	0.33	
GS/ GM 14 Population: 1344/2957	2.00	30.74	9.00	2.98	0.03	0.44	0.27	
GS/GM 15 Population: 1011/2407	2.12	31.99	5.77	1.66	0.04	0.25	0.17	
SES Population: 110/277	0.72	31.41	5.42	1.81	0.0	0.36	0.0	

*Based on EPA Office of Civil Rights 2010 Data*

## **NOTICE**

This letter is the product of the National Advisory Council for Environmental Policy and Technology (NACEPT), an advisory committee created under the Federal Advisory Committee Act. NACEPT provides independent advice and recommendations on environmental policy, technology, and management issues to the Administrator and other officials of the U.S. Environmental Protection Agency (EPA). The recommendations in this letter reflect the opinions and views of NACEPT, and not necessarily the views or opinions of the U.S. EPA.

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