

Virginia, like EPA and many other states, is working on numerous innovations that we expect will increase accountability, flexibility, and compliance, and at the same time provide reliable measures of improved environmental performance. EPA's Performance Track (PT) is one such innovation. Virginia is proud that its own Environmental Excellence Program shares the values and goals of Performance Track. Along with more than 20 other state performance-based programs, Virginia works closely with EPA to use this alternative approach to making environmental gains. Using a state-federal approach provides opportunities for innovation in meeting environmental challenges while yielding benefits for the environment.

While conscious that these programs are voluntary, both EPA and the states safeguard program integrity by establishing rigorous criteria. EPA requires PT members to have and maintain a record of strong environmental compliance, and many states have followed this example. Where members' compliance histories have been questioned, reviews have generally found the questioned data to be outdated or erroneous. We also share a vested interest in ensuring our members deliver environmental results that go above and beyond what is required by law. I laud EPA and those states that encourage their membership to work towards ambitious environmental goals, and I support efforts to make their progress publicly transparent.

Those of us who work daily to improve the environment see that programs like Performance Track complement our regulatory efforts. As an environmental professional of 30-plus years, I welcome innovations like PT that augment the traditional approach. I believe PT and state performance-based programs will help us achieve a cleaner environment than would result from compliance with existing regulations alone. I've noted convincing results to date, and not surprisingly have witnessed support for EPA's and states' performance-based programs from several administrations representing both political parties at the national level and here in Virginia.

I believe that, as programs like Performance Track grow, both federal and state regulators, facilities, and communities will continue to accrue greater efficiencies, more environmentally protective activities, and forward movement towards their environmental goals. I continue to support innovative opportunities to spur environmental improvement, and I certainly count Performance Track, our own Environmental Excellence Program, and the other state performance-based programs among these.

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