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

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 2007 Report on the Environment: Science Report*

Dear Administrator Johnson:

The Local Government Advisory Committee (LGAC) has reviewed the draft *EPA 2007 Report on the Environment: Science Report* (ROE SR). Since 2001, the LGAC has been actively engaged in reviewing and providing local government consultation on the ROE. In a June 15, 2005, letter (enclosed), the LGAC provided comments on the 2003 ROE and recommendations for the development of new indicators and the contents of future reports.

We commend EPA for the expansion of the ROE SR. Many of the additions and improvements are consistent with our recommendations to improve environmental and public health indicators. The clarity in the design of the report and its organization makes the report more useful to both and technical and public audiences.

We also find that the ROE SR provides better linkages between the indicators and the strategic planning process. In this regard, the questions appear to be properly framed and broken into appropriate component parts. The environmental issues addressed are the ones most crucial to our health and natural surroundings. This ROE SR is a vital and important application of the best available scientific information, information that can inform public policy and the Agency's decision-making.

The blend of national and regional indicators makes the report more useful and allows for the tracking of environmental issues of regional significance. The selected indicators are generally useful at a national level, with a caveat. The weight of each indicator, its relevance to the whole—air, water, waste, land, human health picture, is not calculated. Treating all indicators equally can detract from those that may be

"critical." We understand that assigning weight to indicators might be difficult and subjective, but it would improve public understanding if future reports could focus on one or two key indicators for each section.

Some additional general comments about the ROE SR and indicators follow:

- The LGAC recommends that it would be worthwhile to explain "how to use this document" in the 'introduction' of the document.

- EPA should also consider developing a one or two page "scorecard" that could be used for outreach. The scorecard should be in simple plain English, similar to what might appear in "USA Today."

- In our letter of June 15, 2005, we recommended that groundwater indicators should be expanded to include more indicators about the nature, extent, and distribution of groundwater. Today, information about deep ground water is needed in order to assess and monitor the impacts of oil, natural gas, and coal bed methane development in both shallow and deep groundwater supplies. It also appears that better groundwater indicators are still needed to measure water quality changes.

- The oceans are a major component of our nation's natural environment and play a significant role in the national economy. However, the report does not contain a single indicator addressing oceans even though the surface area of the ocean that is under U.S. jurisdiction is larger than our national land mass. A set of indicators addressing the health of our oceans should be developed for future Reports on the Environment.

- The various sections of the ROE SR end with discussions on limitations, gaps, and challenges. Presently, the reader is left with a statement of the problem, some ideas for improvement, but no recommended course of action. The Agency's response or course of action following the ROE SR should be tied to the Agency's strategic plan, and the planning and budgeting processes.

- The reader should be directed to other sources of information to fill gaps as well as to analyze the costs and benefits of doing so or not doing so.

- The ROE SR should provide a schedule or timeline for periodic updates.

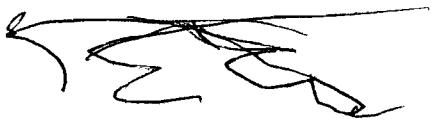
- A discussion of the process and methods to affirm the existing set of indicators should be included, as well as a discussion of process for developing new indicators to address emerging environmental matters.

- Trends and indicators try to predict results or impacts in the real world, which then give some predicted course of action to mitigate or reverse negative impacts. However, the causal link between objective, measurable data and impacts is often a tenuous one. For example, Exhibit 4-12 measures the amount of solid waste generated for impact on "land." However, better landfill treatment of solid waste, may or may not have a causal link, in lowering the impacts despite greater waste generation. The Agency's goals, objectives, and program performance measures should be tied more directly, where possible, to the indicators in the ROE SR, to the extent practicable.

- There are first and second level indicators. For example, measuring pollutant levels in streams, such as pesticides, nitrogen or sediment is a helpful first-level indicator. A second-level indicator would be actual stream health, i.e. increase or decrease in miles of impaired waterways. The ROE SR seems to better address first-level indicators-- the indicators measure "inputs" rather than "outcomes". The Agency should commit resources to the development of higher level indicators. And, as they are developed, the Agency should use them as program performance measures.

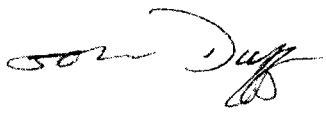
We thank you for the opportunity to review and provide comments on the ROE SR and we look forward to the soon to be released *Highlights Report,* and continuing to work with the Agency on these important matters.

Sincerely,



Roy Prescott
Chair, LGAC

Sincerely,



John Duffy
Chair, Indicators Workgroup

Enclosure

cc: George Gray, Assistant Administrator, Office of Research and Development
Molly O'Neill, Assistant Administrator, Office of Environmental Information