

MAR 31 2006

Mr. Lyons Gray  
Chief Financial Officer  
United States Environmental Protection Agency  
1200 Pennsylvania Ave, NW (Mailcode 2710A)  
Washington, DC 20460

Dear Mr. Gray:

The Local Government Advisory Committee ["LGAC"] appreciates your interest in having our members review and comment on the Draft 2006-2011 EPA Strategic Plan Architecture ["the Architecture"]. We have spent considerable time reviewing the document, and we hope that you find our comments helpful.

As EPA continues its work towards a cleaner, healthier environment, the Agency will need definitive benchmarks for the measurement of its progress. The LGAC believes the Architecture provides a good basis for the identification of those benchmarks.

The LGAC has developed the enclosed comment document, which shares our thoughts on general issues as well as issues specific to a particular Goal/Objective. Through this letter the LGAC wishes to share four general observations which relate to: (1) the scope of EPA's commitment to partnership, (2) the importance of sound science, (3) the need for greater financial resources, and (4) the value of a clear statement of the vision that the Plan is meant to promote.

**1. The scope of EPA's commitment to partnership**

In our comments on the Draft 2003 Plan, the LGAC requested that the Draft 2003 Plan reflect in any and all "partnership" references EPA's substantive commitment to its partnership with state, tribal and local government. In making this request, the LGAC recited a variety of supporting considerations, not the least of which was our charter, which expressly notes that:

Federal environmental statutes provide for the delegation of programs to State *and* local governments. *As co-regulators like the States*, local governments are ultimately responsible for the implementation of many public health and environmental programs that ensure that citizens have

clean air and water, safe drinking water, and environmentally sound waste disposal.<sup>1</sup>

The 2003 Report fully honored this request, reciting the expanded perspective on partnership the LGAC had requested, which has thereafter been met by EPA's increased efforts to work together with local governments to achieve positive environmental outcomes. The LGAC is delighted that the Architecture continues to reflect, in form and in substance, a similarly broad EPA commitment to partnership.

## **2. The importance of sound science**

In its comments on the Draft 2003 Plan, the LGAC urged EPA to strengthen its resolve that sound science drive environmental regulatory actions. Given the reality that many of the environmental responsibilities which local government must bear are sustainable only if they rest on foundations of credible and compelling scientific evidence, this still remains a considerable concern.

Accordingly, the LGAC commends EPA for the Architecture's extensive and thorough focus on a wide variety of critical research needs that will substantively address this concern. Moreover, the results of that research will better position EPA as it moves on to confront the array of emerging issues, such as understanding cumulative (and likely non-additive) effects of multiple contaminants, sub-lethal exposures to low doses of contaminants, contamination of the food supply, and the health risks associated with nanotechnology manufacturing, that we can expect to arise during the next five years.

## **3. The need for greater financial resources**

The LGAC recognizes the enormous constraints imposed by these difficult financial times. It is equally important, however, to understand and acknowledge the limited financial resources currently available to local governments, as well as the too frequent inability of their citizens to bear the full costs of compliance with environmental regulatory standards.

Therefore, as EPA moves on to its next steps in the development of 2006-2011 EPA Strategic Plan, the LGAC urges the agency to demonstrate a renewed commitment to the development of innovative financial tools that provide both general assistance to communities with demonstrable need as well as specific aid (in support, for example, of lifeline rates) for targeted needy populations.

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<sup>1</sup> United States Protection Agency Charter, Local Government Advisory Commission, Section 3. Objectives and Scope of Activities (emphasis added).

#### 4. The need for a vision statement

While we recognize that the development of the 2006-2011 EPA Strategic Plan is in its early stages, the LGAC wants to note one other critically important point: the Plan must include a clear and compelling statement of the vision EPA intends to achieve through the Plan's implementation. The mission of the United States Environmental Protection Agency is critical to the future well being of our nation – the recitation of that mission and the vision which drives it should be a significant part of the 2006-2011 EPA Strategic Plan.

The LGAC thanks you again for the opportunity to comment upon the Architecture. We stand by to work with you and EPA staff as you complete the preparation of this important blueprint for our nation's environmental future.

Sincerely,

[Original signed by]

Roy Prescott, Chair  
Local Government Advisory Committee

Cc: Christopher Hoff  
Director, Planning Staff  
Office of Planning, Analysis, and Accountability

Dona DeLeon  
Deputy Associate Administrator  
Intergovernmental Relations

Kathy Sedlak O'Brien  
Director, Office of Planning, Analysis and Accountability

**Comments of the Local Government Advisory Committee  
on  
EPA's Draft 2006 – 2011 Strategic Plan Architecture**

March 31, 2006

**General Comments Applicable to the Entire Document:**

- In general, the plan seemed comprehensive and ambitious. We especially appreciated that each objective and/or sub-objective had associated with it one or more “strategic targets”; the inclusion of these specific metrics should prove useful for evaluating progress and determining levels of success. The metrics that were most helpful referenced previous benchmarks and indicated the percentage change; less helpful were those that mentioned only specific amounts. To better convey the implications of proposed strategies, we recommend that context be provided relative to current conditions or other recognized benchmarks. Similarly, those that listed more specific approaches or affiliated programs seemed to us more likely to be achieved than those with no discernable approach. In this draft version, several topics still need specific metrics, as noted parenthetically throughout the plan.
- The organization of the plan into five major goals represents a change from previous efforts. It appears EPA’s reduction of the number of goals from ten (10) to five (5) will assist the agency to more clearly focus on environmental outcomes in a manner that can both be better reported and more understandable to all the involved parties. This should help with the task of developing more specific objectives and charting a course for achieving better results. However, the distribution of tasks within these goals seemed artificial in certain sections, especially for objectives related to research. Leading edge research was incorporated for each goal, but targets listed for Goal 4 included more elaboration than did others noted elsewhere in the plan. Many of the topics for research in Goal 4 seemed more appropriate under previous goals (e.g., mercury, global change, safe pesticides). We suggest that the general topic of “advanced research” should attain the level of one of the overall goals, with all relevant research information placed under this single goal..
- The time period for this document is 2006 through 2011. The problem is that this document will not be released before 2007, which reduces the time period to accomplish the objectives substantially. There should be a longer timetable.
- One major problem with the document is the lack of current baseline data. The baseline data cited is as much as 26 years old with the data being 5-10 years old for a significant number of objectives. The use of such old baseline data brings the whole document into question. Such old data raises the question of whether

or not we have already achieved the objective or if we have lost ground in the last 5-10 years. We would also question whether a more recent baseline figure would result in a lower percentage improvement to reach the goal. It may be harder to reach a small percentage goal than a larger percentage goal based on an older baseline. Some baselines have not yet been set. When is this to take place and how do we determine whether the percentage that is being contemplated is correct?

- Several major topics appeared to be either absent or under-represented in the plan. There is no mention of supporting, mentoring, or training the next generation of environmental scientists; while the EPA Science to Achieve Results (STAR) program has been recognized as providing tremendous opportunities for students, it is not included in the plan. Given recent findings concerning the general lack of interest and preparedness of US students for math and science, it seems especially relevant for a major federal agency to afford as many opportunities as possible to students.
- Similarly, there is little mention of how the EPA plans to interact and coordinate with other agencies, including USGS, NPS, NSF, NOAA, etc., despite the obvious need for such collaborative efforts if we are to address the complexities and uncertainties associated with environmental impacts.
- Several emerging issues in environmental science were not adequately addressed, including efforts to understand cumulative (and likely non-additive) effects of multiple contaminants. Single-contaminant, dose-response studies do not adequately address risk associated with multiple stressors, which is the typical condition experienced by organisms in nature. While this topic was mentioned for human health, wildlife also are regularly exposed to multiple contaminants, and these effects should be studied.
- There was little mention of risk associated with sub-lethal exposure to low doses of contaminants. While these may be less obvious than mortality to us as observers, sub-lethal effects may have tremendous implications for altering the structure and function of natural systems.
- There was little attention paid to emerging topics related to the interface between human health and wildlife vectors, including antibiotic-resistant microorganisms, Lyme disease, bird flu, encephalitis, etc.
- There should be some serious consideration to developing a goal to address emerging issues such as the potential for contamination of our food supply through the development of pharmaceuticals in our foodstuffs and the health risks associated with nanotechnology manufacturing.
- EPA should have a goal of maintaining its renowned position as the world's leader in environmental protection, science, and leadership.

- One inappropriate topic seemed to have been included in the plan. Sub-objective 4.1.4, to “realize the benefits from pesticide use” seems completely unnecessary and contrary to the goal of protecting the environment. Let agricultural agencies and industry make the case for the benefits of pesticides, while the EPA maintains a focus on understanding the implications and potential consequences related to their use. We recommend that this sub-objective should not be included in the plan.
- The language of some Strategic Targets is difficult to understand. As a general rule, when reductions are stated as goals, they should be done in a way which shows a full comparison between before” and “after.” In Sub-objective 1.5.1, 1.5.2 and 1.5.3 as well as at 3.2.1, e.g., this isn't done, which makes it tough to know what the gain really is.
- Some sectors, such as Air, look for solutions only through partnerships, while other, such as Water, look to enforcement, too – why the disparity?
- Sound science is necessary if we are to advance the mission of EPA. But, with that said, why is cost not considered when targets are being proposed? It is commendable to want to reach a goal, but if money is not going to be forthcoming there is no way local governments are going to be able to comply. And, what is EPA going to do when the local governments do not or better said, cannot comply? The result is that the goals are not met and EPA is accused of not fulfilling its objectives. We have to look at these goals realistically and figure out how they can be accomplished.

### **Comments Tied to a Specific Goal/Objective:**

#### **Goal 1: Clean Air and Global Climate Change**

##### **Objective 1.1: Healthier Outdoor Air**

###### **Sub-objective 1.1.2: Air Toxics**

- Comment: How will toxicity-weighted risk for non-cancer be reduced?
- Comment: The first two bullets under Strategic Targets are needlessly complicated in language. For instance, on the first bullet are we saying reduce toxicity-weighted risk for cancer to 19%? If so, why not just say it?

##### **Objective 1.2 Healthier Indoor Air**

- Comment: Is it possible to have a measurement for the “working with partners” in Objective 1.2? It would be nice to know that EPA decided to work with more than 2 partners; and what kind of partners?

Sub-objective 1.2.3: Schools

- Comment: What percentage of all public schools does the 40,000 targeted to implement effective indoor air quality management plans represent?

Sub-objective 1.2.4: ETS

- Comment: How will the number of young children exposed to tobacco smoke in the home be reduced?

Objective 1.3: Protect the Ozone Layer

Sub-objective 1.3.1: Stratospheric Chlorine Concentrations

- Comment: Why will stratospheric chlorine concentrations be allowed to increase to a peak in 2011? Are counter-measures too expensive or otherwise prohibitive to implement?

Objective 1.5 Reduce Greenhouse Gas Intensity

- Comment: Why is the reduction in GHG intensity based solely on a voluntary basis rather than in combination with incentives and regulation? What percentage of the total carbon budget does each stated MMTCE represent? Why are these metrics only targeted to potential source terms rather than to resultant changes in concentrations of greenhouse gases?

Objective 1.6 Enhance Science and Research

Sub-objective 1.6.1: Use Science and Technology to Support Air Programs

- Comment: If ever there was a "slow track" on a key measure for the achievement of some added degree of national energy independence, this is it -- isn't a more aggressive approach in order? The targets are not ambitious enough.
- Comment: Once successfully "demonstrated", would there be plans to implement more stringent fuel efficiency standards?

**Goal 2: Clean and Safe Water**

Objective 2:1: Protect Human Health

Sub-objective 2.1.1: Water Safe to Drink

- Comment: The current compliance rate of 88% for public water supplies is based on the existing contaminants that are regulated by EPA. By the year 2011, the EPA objective is for 95% of the nation's population served by water systems to be in complete compliance with federal requirements. This will include a dramatic increase in the number of federally regulated contaminants for drinking water. A system that is in 100% compliance with the list of contaminants today, could well be out of compliance with many of the new contaminants that become regulated

by the year 2011. The quality of the community's water may not have deteriorated, yet through the addition of more regulated contaminants, the system may be out of compliance with the newly regulated contaminants. For example, if an additional 15 contaminants have been added to the list of regulated contaminants by 2011, and the community has added treatment and is compliant with 14 of the new contaminants, the water would actually be of better quality and safer than before, but the system would be out of compliance because of the 15th contaminant and would get no credit for the improvements or the funds spent to bring the system to this point. A system that is out of compliance with even one of the 15 new regulated contaminants is 100% out of compliance, rather than 93% in compliance (14 divided by 15= 93%). A system that is out of compliance with the existing regulations for contaminants and violates all 15 of the new contaminant regulations is also 100% noncompliant. The measure for this particular objective will not accurately represent what has been accomplished by most systems.

- Comment: For a strategic plan to be meaningful to the average citizen, the objectives and measures must be understandable. Most of us can comprehend terms for measures such as "percent of the population served", or "parts per million". However, the measures of success in achieving the goal of clean and safe water include terms such as "person months."

#### Sub-objective 2.1.2: Fish and Shellfish Safe to Eat

- Comment: The measure of success is a reduction in the level of mercury in the blood of women of childbearing age. We are unsure how the two can be connected directly. An individual with elevated blood mercury level may not even eat fish or shellfish. Individuals who are determined to have elevated mercury blood levels may not represent the average American woman of childbearing age. Only individuals who have their blood tested for mercury levels are likely those who have some symptoms or other indication. Testing for mercury blood levels is not a routine test. Without testing a truly representative group of people for mercury blood levels, the results are only representative of the individuals sampled, rather than the population as a whole. The compilation of such results would not be a true measure of whether or not fish and shellfish were safe to eat.
- Comment: Is 2.1.2's objective for pregnant women the best we can do? The targets are not ambitious enough.
- Comment: What is meant by the strategy to "maintain or improve the percentage of state monitored shellfish-growing acres that are approved or conditionally approved for use that are impacted by anthropogenic sources"? This could be interpreted to mean that the goal is to extend shellfish-growing into areas known to be impacted by anthropogenic sources, rather than to mitigate and reduce the extent of areas affected by anthropogenic sources.



#### Sub-objective 2.2.1: Improve Water Quality on a Watershed Basis

- Comment: A whole series of measures related to improving water quality by basins or watersheds is included in the Strategic Plan. If water quality data were routinely collected from all basins, EPA could determine if the water quality was actually improving, remaining the same, or getting worse. Funding limitations result in only a few lakes and streams being monitored on any set frequency. As a result, the information does not exist for the majority of the streams and lakes of the nation. Therefore, the measures for improvement need to apply to only those lakes and streams with monitoring data that indicates their current condition, and evaluates improvements to those water bodies at some future date. Additionally, the goal for total restoration of those lakes and streams may not be achievable by the year 2012, yet their quality could well improve. Success should be measured in improvement to water quality, rather than in the total restoration of the streams and lakes. Most streams and lakes where the impacts of pollution are easily identified probably did not become polluted in only a few short years, and it is doubtful that many will be entirely restored within the next six years. The yardstick of "all or nothing" is likely to show almost complete failure instead of some measure of progress.
- Comment: The water quality section should include a strategic target that promotes the protection of unimpaired watersheds. Certainly it is more cost effective to keep something from becoming impaired than trying to return an impaired watershed to unimpaired status.

#### Sub-objective 2.2.2: Improve Coastal and Ocean Waters

- Comment: In the third of the Strategic Targets, does the West Coast definition include Alaska and Hawaii?
- Comment: The protection and enhancement of aquatic ecosystem health will likely require work in the central areas of the oceans to control or remove discarded fishing nets and plastic debris. How will this requirement be addressed?

#### Objective 2.3: Enhance Science and Research

##### Sub-objective 2.3.2: Conduct Leading-Edge Research

- Comment: Reliable science should be the basis for establishing expectations for the quality of the nation's waters, and sound scientific data should be used in establishing allowable levels for contaminants in drinking water. It is questionable, at best. It seems questionable, at best, to use data and studies from countries which differ markedly in culture, sanitation, foods consumed, and the like to establish drinking water standards for use in the United States, i.e., the arsenic level for drinking water.

- Comment: The federal government could provide a great service to small communities by identifying new technologies for treating drinking water and domestic wastewater. Small communities lack access to new treatment technologies and the expertise to determine those that would be appropriate for their own needs. However, the focus should be on new technology that accomplishes the level of treatment needed by small communities while being cognizant of their capabilities both economically and operationally to utilize the technology.
- Comment: The federal Safe Drinking Water Act anticipates that the drinking water standards will be re-evaluated by EPA on some regular basis in an effort to modify requirements as more experience and operational data are collected and evaluated. Instead, EPA appears to spend all available time and resources, establishing maximum allowable levels for ever more complicated and costly contaminants without truly evaluating the appropriateness of existing regulated contaminants. While communities and rural water systems are often required to comply with every aspect of the federal Safe Drinking Water Act, EPA is not required to revisit the appropriateness of the existing regulated contaminants. The Strategic Plan does provide scientific tools for EPA to utilize in re-evaluating drinking water standards. Hopefully, this provision not only remains a part of the Strategic Plan, but also is carried to completion.

#### Sub-objective 4.3.1: Increase Wetlands

- Comment: One of the final objectives related to water programs involves the concept of increasing wetlands. Wetlands act as a "sponge" and a "filter" for adjacent waterways. They are also recognized as important for providing habitat for wildlife. There is little question about their importance in protecting the environment. Yet it is surprising to see an objective to "increase wetlands" when both EPA and The Corps of Engineers, the primary federal agencies charged with wetlands protection, have actually attempted to rewrite new guidelines and proposed regulations that would remove much of the protection afforded wetlands by the federal Clean Water Act. Protection of wetlands needs to begin with EPA and the Corps of Engineers carrying out the mandates of Congress which were included in the federal Clean Water Act when it was adopted in 1972.

### **Goal 3: Land Preservation and Restoration**

#### Objective 3.1: Preserve Land

- Comment: Goal 3 is limited to waste management and does not address over land preservation issues such as erosion. The goal should address erosion, sprawl, etc.

### Sub-objective 3.1.1: Increase Recycling

- Comment: Like everyone else in the country, Oklahoma citizens throw away more trash every year. Any recycling in local communities would be beneficial. However, many communities are very small, and often relatively isolated. For example" Ponca Cit Oklahoma, is the closest drop-off opportunity for Braman, Oklahoma. It is 29 miles away. Ponca City has to haul the material they collect 43 miles to another city with an actual market. The most practical recycling opportunity for many small towns the size of Braman is composting organic materials. We need EPA's support to help our citizens understand that making their own compost benefits everyone- our land, our town, and our nation.
- Comment: Power plants are already doing everything they can do to market their fly ash. It makes sense and cents when construction projects are close enough to the point of generation to use fly ash in the concrete. Location and logistics will do more to promote fly ash use in concrete than other stimuli.
- Comment: The tribes don't need a solid waste plan. They need the infrastructure to actually collect the garbage. Illegal dumps are a big issue everywhere in Oklahoma Indian Country. They priority needs to be to clean those up and institute routine trash collection on tribal land.

## **Goal 4: Healthy Communities and Ecosystems**

### Objective 4.2: Communities

#### Sub-objective 4.2.3: Assess and Clean Up Brownfields

- Comment: EPA's Brownfield Initiative has positive benefits for local communities. Every year it provides grants to local governments for the environmental assessment and cleanup of historically contaminated properties. EPA also provides state and tribal governments funds to create and implement Brownfields programs. In Oklahoma, DEQ uses a portion of those funds to assess properties for local communities (at no cost to the local government). The DEQ uses the remaining funds to operate a state Brownfield Cleanup and Redevelopment Program, completion of the program ensures that the site is suitable for reuse and breaks the chain of environmental liability associated with the site.
- Many developers point to the unknown nature of contamination at abandoned sites as the reason they are not interested in historically contaminated properties. EPA and DEQ can provide assessments to local governments that will help them get their abandoned properties redeveloped because the environmental condition of the property is no longer unknown and developers can factor in cleanup costs into their calculations. It also assists local communities get other grants because

most federal and state programs involving real property require Phase I assessments to be submitted with the grant application.

## **Goal 4: Healthy Communities and Ecosystems**

### Objective 4:1: Chemical and Pesticide Risks

#### Sub-objective 4.1.1: Reduce Chemical risks

- Comment: Presently communities must prepare for accidents involving chemicals which have a high risk. This means training and equipping fire departments at a high cost to the community. If risks for the chemicals can be managed or removed in processes, then the community will not have to bear the cost of preparing to respond to accidents involving them. EPA should look at methods for eliminating or managing the risk associated with high production volume chemicals services and increase the productivity of the workforce thereby [attracting business opportunities](#).
- Comment: Blood lead levels in children have been shown to be correlated to learning difficulties. A reduction in the percentage of children with elevated blood lead levels would result in savings to local school districts because the cost of providing special education would be reduced.

#### Sub-objective 4.1.2: Protect Human Health from Pesticide Risk

- Comment: Reducing the percentage of population with detectable levels of pesticides in their bodies and reducing the occurrence of pesticide related illness is a nice goal since this should benefit communities by relieving them of some costs of providing medical services. However, an explanation of how this will be achieved is critical.

#### Sub-objective 4.1.3: Protect the Environment from Pesticide Risk

- Comment: All communities, particularly small rural communities, have a relationship to the land which sustains them. Any reduction in environmental impairment from pesticides will benefit communities by providing areas for residential growth, recreation, industry, and most importantly, farming which all benefit the tax base of communities. Again, how is this goal to be attained.

#### Sub-objective 4.1.4: Realize the Benefits from Pesticide Use

- Comment: Communities must be able to control damage to public and private structures from pests as well as to prevent vector illnesses. Safe, effective pesticides benefit the community by reducing building maintenance costs and medical costs. Small rural communities dependent on farming will benefit from the increased crop production which results from safe and effective pesticides.
- Comment: One inappropriate topic seemed to have been included in the plan. Sub-objective 4.1.4, to “realize the benefits from pesticide use” seems completely unnecessary and contrary to the goal of protecting the environment. Let agricultural agencies and industry make the case for the benefits of pesticides, while the EPA maintains a focus on understanding the implications and potential consequences related to their use. We recommend that this sub-objective should not be included in the plan.

#### Sub-objective 4.1.5: Reduce Risks at Facilities or in Communities

- Comment: All communities have chemicals used and stored within the community. There is a cost to the community to prepare for chemical accidents, respond to accidents and recover from accidents. Any activities which reduce the likelihood of chemical accidents and increase effective response to accidents benefit communities. Loss of life and infrastructure can be prevented or mitigated by meeting these objectives.
- Comment: How will “vulnerability zones” be reduced? Will this be accomplished by successfully decreasing the actual vulnerability in these areas, or simply by reclassifying the spatial extent of the zones?

#### Objective 4.2: Reduce POPs Exposure

- Comment: Why are other serious and widespread POPs (e.g., TCE) not mentioned specifically, as are PCBs and chlordane?

#### Objective 4.3: Restore and Protect Critical Ecosystems

##### Sub-objective 4.3.1: Increase Wetlands

- Comment: With respect to increasing wetlands, local government should be included as a partner.
- Comment: How can the strategy to achieve a “net increase of 100,000 acres of wetlands per year” be compatible with the subsequent strategy to achieve “no net loss of wetlands each year”?

#### Sub-objective 4.3.3: Improve the Health of Great Lakes Ecosystems.

- Comment: The sub-objective 4.3.3 under Goal 4 is very interesting in that continued progress at the rate projected in this goal would mean that it would take 60 years to remediate contaminated sediment in the Great Lakes. This is not consistent with the Great Lakes Regional Collaboration Strategy.
- Comment: What challenges prevent continued improvement of the Great Lakes beyond the proposed modest increase of 1.5 points?

#### Sub-objective 4.3.4: Improve the Aquatic Health of the Chesapeake Bay

- Comment: Nothing in the document addresses the issue of funding, and in reality this section seems to imply that it is not the concern of EPA (page 24). The goals are commendable yet without adequate funding, how does EPA propose that these goals be reached? To use the Chesapeake Bay example, it is proposed that the cost will be \$8.2 billion in Pennsylvania alone. Yet, there is no mention of funding.

#### Objective 4.4: Enhance Science and Research

- Comment: A continuing commitment on EPA's part to use the best science and to conduct human health and environmental research is the key to assuring that adequate data is available to assess risk and propose reasonable rules to manage the environment. See also, comments to Objective 2.3
- Comment: In the section Global Climate Change Research, "economy" is included as an expressly stated consideration, which appears to be the case nowhere else in weighing environmental option-setting; why?

#### Sub-objective 4.4.1: Apply the Best Available Science

- Comment: What is meant by the application of the "best available science"? Does this mean that all scientific information must be consistent (i.e., no amount of contradictory evidence may exist) before actions and standards are implemented? Will the "precautionary principle" be considered when making such decisions?

#### Sub-objective 4.4.7: Restore and Protect the South Florida Ecosystem

- Comment: Why are all metrics for the South Florida Ecosystem stated as to achieve "no net loss" or to "maintain" current conditions? Will there be no effort to improve the overall health and functionality of seagrass beds or the water quality in near-shore, coastal, and Everglade waters?

## **Goal 5: Compliance and Environmental Stewardship**

### Objective 5.1: Achieve Environmental Protection through Improved Compliance

- Comment: Communities benefit when industries reduce the pollution burden in the community. Assisting regulated entities in achieving and maintaining compliance, encouraging reduction, treatment, and elimination of pollution does increase compliance

### Objective 5.2: Improve Environmental Stewardship through Pollution Prevention

#### Sub-objective 5.2.2: Promote Improved Environmental Performance through Business and Community Innovation

- Comment: Reduction in hazardous chemicals, conservation of energy, reduction of water use and reduction of government costs are of financial benefit to communities. Reduced cost of training and preparing for chemical emergencies, reduced energy costs, conservation of natural resources which reduces cost to replace those resources, and reduction of community government costs are all benefits

#### Sub-objective 5.4.2: Conducting Research

- Comment: In the text of the Sub-objective, insert the clause “emerging environmental issues” after “new technology development.”
- Comment: Add a new bullet to the Strategic Targets for Economics and Decision Sciences: “Through 2011 make progress in identifying potential and emerging threats to the public’s health and environment from new technological processes and industries such as nano-technology and pharmaceutical development through the use of food stuffs. Success is defined by an external expert review process to measure the potential and emerging threats and methods for key Agency decisions (metric to be established in consultation with external reviewers; measurement methodology still under development).”
- Comment: In the Strategic Target for Economics and Decision Sciences, what is meant by efforts to investigate “how market-based programs can be designed to improve environmental quality at the lowest cost, to support the design of policies using market mechanisms and incentives for environmental management”? Will these efforts include an economic valuation of “free” services provided by ecosystems? Will ecological economics be incorporated in these studies so that public lands do not suffer the “tragedy of the commons”?