Region 1 – Goal 1

EPA Region 1-New England Office: State and Tribal Issue/Priorities for the EPA Strategic Plan, Goal 1—Clean Air and Global Climate Change

1. How the information was gathered:

States: The following priorities related to the Clean Air Goal were identified by the New England State Environmental Commissioners in a March 30, 2005 letter to EPA. The issues were further refined through a conference call with EPA-Region1, the New England State Air Directors, NESCAUM, Rob Brenner and other staff from OAR. A direct solicitation was also made to the state planning/PPA contacts.

Tribes: Over the last two years, Region 1 Tribes have developed a regional tribal strategic plan. The Tribal priorities listed below were pulled from the strategic plan as well as more recent information that was gathered from the tribes by the Region 1 TOC representative.

2a. Description of key State issues/priorities:

Greenhouse Gases

The New England states have each adopted a Greenhouse Gas/Climate Change plan, and each is proceeding to implement the measures identified in its plan. The six New England states are actively engaged in implementing the Conference of New England Governors and Eastern Canadian Premiers (NEG/ECP) Climate Change Action Plan, which contains regional GHG reduction targets for 2010 and 2020 for the region.

Federal support is requested by our states in the following areas:

- Development of region-wide, common educational and informational materials on greenhouse gases and climate protection.
- Additional federal support for programs reducing GHG emissions from the transportation sector using advanced technology vehicles.
- Federal efforts to develop and use a suite of analytical tools for calculating GHG emission reductions and benefits thereof.
- Establishment of a federal GHG registry and mandated GHG reporting.
- Federal funds to support state and regional efforts to involve urban municipalities in climate control actions, such as development of municipal climate action plans.

These issues could effect strategic target levels for Objective 1.5 or the creation of new Strategic Targets for Objective 1.5 as well as new approaches for the Means and Strategies Section.

Mercury

The New England states, through NEG/ECP and state actions, are playing a national leadership role in mercury reduction. They are working towards the ambitious goal of achieving regional mercury reduction of 75% by 2010.

Federal support is requested by our states in the following areas:

- Propose mercury rules at the federal level that are similar to ones adopted in Region 1 states.
- Continue and expand efforts to eliminate mercury use in schools and health care settings.
- Identify and promote alternatives to various mercury-containing products
- Ensure stable funding, with increases as possible, for long term monitoring efforts including the Mercury Deposition Network and fish tissue monitoring.
- Improve mercury emissions data for industrial, home heating, institutional and biomass boilers; sewage sludge incinerators, landfills, mobile sources, products and other suspected sources to assist with exploration of further emission reductions.

These issues would be relevant to the Strategic Targets in Sub-Objective 1.1.2 as well as the Means and Strategies section.

$PM_{2.5}$/Diesel

The New England states would like to see EPA revise NAAQS for $PM_{2.5}$ by 2006 to better reflect the current science and health studies.

Federal support is requested by our states in the following areas:

- Support research into the underlying chemical transformation of secondary organics into fine particles and incorporate into accepted models to better characterize emission reduction requirements.
- Update and improve $PM_{2.5}$ emission factors.
- Update NSPS for woodstoves to reflect control capability of new technology and remove exemption for outdoor wood-fired boilers
- Develop and implement a strategy to ensure expeditious chip reflash in non-compliant heavy-duty diesel vehicles.
- Support the Northeast Diesel Collaborative to maximize and leverage federal funding and programs to retrofit the existing fleet of on and off-road heavy diesel engines.
- Support regional 500 ppm sulfur heating oil requirements beginning in July 2007.
- Work with states on securing long-term changes in the PM2.5 ambient monitoring requirements that would allow for the use of continuous monitors in lieu of the current FRM methodology.

A Revised NAAQS Standard for PM 2.5 would effect Strategic Targets for Sub-Objective 1.1.1. Other issues could also be captured by revised Strategic Targets or covered in the Means and Strategies section.

Interstate Transport of Air Pollution

Upwind states that contribute to the New England state's air quality problems need to take aggressive actions to control their emissions. It is also important that there be no backsliding relative to emissions requirements that may increase pollution being transported into the region and that the authorities that states currently have to address the issue of air pollution transport are preserved.

Federal support is requested by our states for the following areas:

- Retaining States ability to address transport into their borders through preservation of Section 126 and NSR provisions.
- Implementation of control measures in upwind states through NOx RACT, VOC RACT, RACM and BACT.
- Continued prosecution of NSR power plant cases.
- Preservation of state's rights under CAA section 177 to adopt California Low Emission Vehicle (LEV) standards.
- Secure aircraft emission reductions and airport ground equipment emission reductions.

These issues could effect Strategic Targets for Objective 1.1 as well as the Means and Strategies section.

Integration of P2 into all goals:
A key issue raised by the states' Pollution Prevention (P2) staff is the need to integrate P2 throughout all of EPA's programs, and not just have it be the responsibility of one or two offices. To accomplish this, we recommend that P2 be explicitly addressed as appropriate in each of the Strategic Plan Goals. In addition, or alternatively, P2 could be made a Cross-Goal Strategy. In either case, it is critical that pollution prevention become part of program offices' objectives and be realized through quantifiable targets as much as possible.

2b. <u>Description of key Tribal issues/priorities:</u>

1. Assessing contamination from toxic aerial deposition in subsistence foods and traditional medicines.
2. Air monitoring- in areas of special interest to the tribes.
3. Assessing indoor air quality; remediation of indoor air quality problems.
4. Radon assessment and mitigation.

These Issues are relevant to Objectives 1.1 through 1.6. New or revised strategic targets or new language with a tribal emphasis could address these issues.

Region 2 – Goal 1

Region 2 State and Tribal Input to EPA Strategic Plan

Goal 1

How information was gathered:

Region 2's Regional Administrator solicited comments from the State environmental commissioners in New Jersey, New York, Puerto Rico and the Virgin Islands and from the leaders of the seven federally recognized tribes in New York State. States and tribes were provided background information on EPA's revision of its Strategic Plan and were asked a series of questions designed to elicit comments, by goal, on their priorities, emerging issues, priorities that should be added or deleted from the Agency's plan, and any other advice they might have for the Goal Teams. Additionally, all of our staff that interact with their state/tribal counterparts (such as our Tribal coordinator, NEPPS and PPG coordinators, enforcement coordinators, etc.) were encouraged to solicit feedback regarding the Agency's strategic plan revision. We also committed to engage in an ongoing dialogue about priorities with our state and tribal partners, both as the Agency's strategic plan revision proceeds and when we revise our regional strategic plan next year. We received comments from the New York State Department of Environmental Conservation (NYSDEC), the Puerto Rico Environmental Quality Board (PREQB), the Virgin Islands Department of Planning and Natural Resources (VIDPNR) and the Haudenosaunee Environmental Task Force (HETF), representing the Onondaga Nation (the HETF comments were also endorsed by the Tuscarora Nation).

General Comments on EPA Strategic Plan:
NY stated that the current targets in the current EPA plan at least generally have quantifiable measures for performance that are associated with goals the public can understand. NY suggests that in light of increasingly tight funding, the priority for more cost effective investment in recognizing and providing incentives for sustainable businesses going beyond minimum compliance, pollution prevention and product stewardship should be part of retooling the base regulatory programs, not just an add-on with no funding (i.e. a separate Goal 5.) This is fundamental to the architecture of the 5 goals. The regulatory flexibility necessary to achieve these gains is not evident in the policies of OECA, EPA funding rules nor even the targets established for the media programs in the plan. Current incentives and self-audit policies are also weak, at best. Alignment across EPA offices to support strategic plan goals is critical, otherwise states perceive EPA as speaking with too many different voices on strategic priorities.

Regarding implementation of the strategic plan, NY states that while the states do the majority of work in implementing the goals of the plan, EPA funding to states continues to be cut or unavailable, for example water and wastewater infrastructure, the Resource Conservation Challenge (RCC) initiative, pollution prevention. Fiscal realities undermine the credibility of the commitments made within the strategic plan. Unilateral

rescission of grant funding to states, absent a dialogue, is not an approach consistent with the partnership commitments made in the plan.

NY states that EPA has not taken leadership on targets for which a federal lead is most critical because they affect national markets or global transport considerations (e.g. global warming, mercury, electronics waste). This further erodes the credibility of strategic commitments in the plan. These credibility issues ultimately affect the extent to which states will choose to comment on or participate in the strategic planning efforts. NY mentions concern regarding the unknown effects of nanotechnology product expansion in the environment (can affect several goals across media).

The HETF commented that the Strategic Plan should reflect Administrator Johnson's reaffirmation of government-to-government relationships with Nations in the agency Overview and throughout all Goals. Additionally, HETF suggested that EPA should recognize the jurisdiction and interests of the respective Indian Nations in aboriginal territory (i.e., land claim areas). Other comments from HETF were that tribal grants should limit the required matching funds and should provide flexibility to reallocate grant monies to better meet needs; EPA's budget solicitations should include Tribal Consortia (e.g., HETF); and there needs to be better turnaround time by EPA on award notice and money drawdown.

Data concerns arose such as PREQB's suggestion that EPA establish partnerships with local authorities to develop and distribute updated and comprehensive maps on all sources of water and environmental resources in Puerto Rico, for example: Groundwater wells, Surface Water Intakes, Fisheries and Threatened and Endangered Species by geographical area. (Note, this is a national issue as GIS data acquisition is done centrally by the Agency).

Regarding energy, NYSDEC states that EPA's current five-goal architecture does not readily provide for energy considerations as a major goal. The quest for renewable energy resources under the Governor's Renewable Portfolio Standard, the expansion of the Green Building Tax Credit Program, the recognition of energy savings accomplishments in the New York Environmental Excellence Awards and Environmental Leaders programs, DEC's role in NYS energy planning and energy security are all priorities relevant to energy which have direct implications for resource consumption, pollution and homeland security. Notwithstanding scattered references to energy conservation, the energy issue has too many environmental implications to be largely deferred to other federal and state energy agencies. The Puerto Rico Environmental Quality Board also suggests that EPA address issues associated with investigating and developing new sources of energy. The Virgin Islands also comments that there is limited focus on energy. Energy conservation should be of higher priority.

The Virgin Islands DPNR finds EPA's current five-goal architecture adequate to capture priorities with the caveat that sufficient support is available on Caribbean issues. VIDPNR commented that global warming and energy conservation are its highest

priority issues. Also, it is important to include the Virgin Islands in national programs such as EMAP and Global Change (where they currently are not reflected).

Comments Specific to Goal 1:
The mercury strategy and targets under Goal 1 re: Clean Air are not likely to be consistent with New York expectations as NY is on record opposing the current EPA proposal for a mercury emissions cap and trade program.

The impacts of global environmental issues seem to be accelerating in the Virgin Islands. The global warming trend and the impacts of: African dust from the Sahara are of most concern. African dust contributes to health (respiratory) and coral reef decline in the Virgin Islands. Agricultural toxins are also traveling to the Territory with the dust. Other impacts from global warming include dieoffs of coral tissue from elevated sea temperature. Summer 2005 has seen massive coral bleaching events throughout the entire Virgin Islands. This may lead to massive mortality in the near future. There is also a more active hurricane season that is believed to be caused by global warming trends. The Virgin Islands has had many severe hurricanes over the years. Increasing activity and threats are very worrisome, as is the concern about sea level rise. Though none is observed at present, this would have severe impacts in the Virgin Islands as it is a coastal community.

Region 3 – Goal 1

Region 3, Goal 1: State Regional Issue/Priority Paper

1. **Information Gathering:** Region 3 hosted a multi-state conference call on September 13, 2005 to discuss overall priorities and met with each Region 3 division director. In addition, state issues and priorities were solicited during the year through bi-annual meetings with State Secretaries in the Fall and Spring and through EPA/state planning meetings. Information is gathered within the media specific programs in several different ways such as: 1) annual Air Directors meetings; 2) quarterly MARAMA board meetings; 3) STAPA/ALAPCRO state-wide meetings; 4) Performance Partnership Agreements/Grants, and 4) grant negotiations, mid and end-of-year reviews.

2. Description of Key State Issues/Priorities (Most prevalent among states):

- Ozone non-attainment
- PM2.5 non-attainment
- Air Toxics
- Mercury (Upcoming priority as states submit rule to EPA for approval)
- Energy

Comments on Strategic Plan Architecture:

- Goal 1.1: Healthier Outdoor Air underplays the air transport issues which is a major issue in a highly industrialized area like Region 3.

- Increase focus on clean diesel and non-regulatory activities throughout architecture, reflected in 1.1.1: Cleaner Air; 1.1.2: Toxic Air Pollutants; and 1.5: Reduce Greenhouse Gas Intensity.

- Energy is a cross-cutting media issue that should be reflected in more than one goal (currently in Goal 1.5). As it is currently written, Goal 1.5 does not include everything such as advanced energy deployment.

- Radiation protection program: radon in drinking water should be highlighted in Goals 1 and 2.

- Needs to be stronger link between Goal 1 and Goal 5. Air enforcement supports air quality, would like to see integrated into Goal 1.

Region 4 – Goal 1

Region 4 Goal 1 State and Tribal Regional Issue/Priority Paper

How information was gathered

The Region sent a letter to the Region 4 State Environmental Commissioners and Tribal Chiefs requesting their input on the strategic plan and their programmatic priorities. As a supplement to the letter, the APTMD followed up with an email to all of the State and Local Air Directors requesting input. Finally, a call was held with all of the State and Local Air Directors to discuss and solicit direct feedback on the strategic plan. Seven of the 24 state and local agencies were present on the call, but no direct feedback given from the participating agencies.

We received copies of strategic plans or programmatic priorities from the States of North Carolina, Georgia, Florida, Alabama, Kentucky, and Tennessee. These states did not identify any issues inconsistent with the Agency's strategic plan as now structured. Below is a summary table of the priorities identified by each state. In addition, the State of Tennessee submitted specific areas of interest on each of the Goal 1 sub-objectives. We have identified a few of the major comments for each of their identified priorities in the table below.

Description of key state issues/priorities

State	Priorities	Additional Strategic Plan Comments
North Carolina	-Global Warming/Climate Change - -Continue to implement Clean Smokestacks Act	None
Florida	-Pursue voluntary agreements to reduce emissions from power plants -Create capacity to advance new and emerging energy technologies -Increase energy efficiency	None
Alabama	-All areas will meet the new NAAQS for ozone and PM fine by 2012 and 2018 respectively -Improve visibility by 2018 in Class 1 areas by reducing regional haze -Reduce levels of non-criteria air pollutants (Air Toxics)	None
Kentucky	Develop and implement a statewide air toxics reduction program that improves air quality and reduces risks to Kentucky's citizens.	None

Tennessee	Listed in order of priority - Healthier outdoor air - Enhance science and research - Healthier indoor air	- Help needed to reduce mobile sources emissions of not only NOx and SOx but air toxics - Fuels and engine preemptions in the CAA prohibit state regulations for air pollution purposes in most cases - Indoor air contaminants continues to present a problem - Need better information about acceptable ambient exposure limits for air toxics to help in risk assessments to the public - Integrate P2 into all programs
Georgia	- Attain and maintain all NAAQS and develop and implement programs in a timely manner, which address interstate and international transport adversely impacting air quality. - Attain Federal visibility standards - Manage Georgia's air quality so that concentrations of non-criteria air toxic pollutants are minimized to protect public health.	

Region 5 – Goal 1

State and Tribal Regional Issues/Priorities
in regard to the
Revision of the U.S. EPA's 2006 – 2011 Strategic Plan

Region 5
Goals 1, 3, 4, and 5

How information was gathered

Region 5 sought input from the states in the Region through a direct solicitation to the state members of the Region 5/State Planning Work Group and through program to program contacts between Region 5 program managers and their state counterparts. Region 5 sought input from the tribes in the Region through a direct solicitation to the environmental coordinators for each tribe and through discussion in the Regional Tribal Operations Committee.

Description of key state and tribal issues/priorities

None of the Region 5 states or tribes has, to date, identified any issues or priorities for the revision of the U.S. EPA's strategic plan for 2006 – 2011.

Region 6 – Goal 1

US EPA REGION 6 - - INPUT ON STATE/TRIBAL ISSUES/PRIORITIES

Cross Goal Issues

1. How Information Was Gathered - Letters were sent to the Directors of R6 State Environmental Agencies requesting their review of the current EPA Strategic Plan and the identification of any new or emerging issues that http://www.epa.gov/ocfo/plan/planare not adequately addressed in the current plan. The Director of the Office of Tribal Affairs contacted tribes to ask for the same input. The Tribes said that they did not feel that they were given adequate time to provide a meaningful response and declined to provide input. The Tribes have been assured that other opportunities will be available in the future for them to review drafts and provide input.

2. Description of Key State Issues/Priorities
   a. Short description of the issues/priorities:
      i. States recommend that EPA consider adding a section in the "Cross-Goal Strategies" chapter regarding the various bi-national and multi-media international border initiatives.
      ii. States recommend that EPA continue to develop and maintain a centralized training source and make training available to the states through the internet or by other means.
      iii. States need EPA's assistance in the development and maintenance of electronic data management systems for environmental data that will enhance the ability of remediation programs to assess the risk to human health and the environment.
      iv. States would like to see an expanded discussion of how EPA's strategic goals fit together organizationally with its proposed performance measures and strategic architecture.
      v. States recommend improvement in the agency's partnerships with states, and to help assure more effective strategic planning documents and processes at all levels to include Joint Planning/Alignment Process, Annual Commitments, Better alignment and integration of National and State priorities
      vi. States recommends including a time-line for achieving Homeland Security goals
      vii. States recommend increased emphasis on improving Performance Partnership Agreements and Grants

   b. Potential impact to a specific Agency Program and its relevance to the national Strategic Plan. How might this issue/priority translate into a change in the architecture (objectives, sub-objectives, targets)? Means

and strategies? - The issues outlined above would not directly impact the architecture of the Agency's Strategic Plan. They could, however, impact the introduction to the plan and the section on cross-goal strategies.

c. Prevalence of the issue among the states and/or tribes in the Region - The issues outlined above were submitted only by the State of Texas.

Region 7 – Goal 1

REGION 7 STATE/TRIBAL INPUT TO EPA STRATEGIC PLAN

Goal #1.

Source of Input: Region 7 convenes a meeting of the state environmental directors twice yearly. The issue of joint planning & priority setting is always foremost on the agenda. In this way, every six months we verify the continuing validity of existing priorities and general environmental issues that were established in the development of the state PPA (All region 7 states have PPAs & PPGs with both state environmental and agriculture departments). These discussions are also held at the program level annually as regional and state program counterparts negotiate the work plans for PPGs and other discrete environmental grants.

Tribal priorities and concerns are also developed and verified on an ongoing basis. Senior management meets quarterly the ROC, and these meetings are supplemented by monthly conference calls in which all 7 tribes participate. Field visits by regional staff average at least one per month. Planning & priority setting are always part of the visits. In addition, four of the tribes have PPGs and these comprehensive work plan negotiations generate a plethora of information regarding crucial tribal issues.

Finally, on September 20, 2005 Region 7 convened a 90 minute conference call of the Regional Planning Council which included planning representatives of all the states & tribes to discuss specifically this OCFO exercise.

Overarching Concerns About EPA Plan: We began with general comments. IA opened with the comment that the EPA Strategic Plan, 2003-2008, is entirely too long. The others were in agreement that 239 pages is too much. It was proposed that if the current length is required to satisfy GPRA, the OMB and the Congress, then a shorter, more user friendly version might be developed for public consumption and broad management purposes. Most participants felt that the plan was not remotely strategic, but was a five year operating plan.
NE commented that national priorities shouldn't drive regional priorities and cited as an example the absence of blue-green algae (which is a real priority for NE). Another was "small communities." It was observed that the language was present in the plan, but concrete action and projected results were absent. The plan needs to permit the flexible development of local strategies. While they agreed that this is technically possible, the reality seems to be overshadowed by the national emphasis. The general view was that we have what is allegedly a "bottoms up" process but a "top down" product.
MO remarked that the measures were difficult to interpret. Do they represent targets that are aggregated nationally or one target to be met in each state?.

The Tribal rep. remarked that the environmental problems encountered by the tribes were not specifically reflected in the plan. However he said that the National Tribal

Council (NTC) had no specific recommendations at the moment. It was merely an observation.

MO said that we desperately need a unified, simple reporting system so that what we're accomplishing gets recorded. The other states and the tribes heartily agreed. This point came up several times in slightly different contexts.

Several states noted that there are too many activity measures (more like an operating plan than a strategic plan). Need to have a few key measures and leave the nitty-gritty to the states. (This relates to the general comment regarding the length of the plan.)

In conclusion, there was a fairly unanimous opinion that the Plan had little relevance for the states & tribes. What counts is the money, and it is difficult to see a clear connection between the plan and the budget. The Agriculture interests in the region also feel that any strategies, but particularly those which feature "Stewardship" (which stresses individual responsibility) demand a greater stress on timely and relevant stakeholder communication regarding regulations and practices.

Specific to Goal 1: MO noted that as a measure, "the number of people breathing clean air" (as a measure) is more a factor of sprawl since air quality is heavily affected by population density. A measure regarding % or number of people suffering from respiratory illnesses might be more telling. CAFOs and other agriculture issues are left out. KS noted that regional haze is also an ag factor.

Goal 1: Clean Air and Global Climate Change
Synthesis of State and Tribal Priorities and Issues --- U.S. EPA, Region 8

1. Information source: Information from states was solicited in a memo from Region 8's State Assistance Program to State Environmental Directors, State Planning Contacts, and State Agriculture Program Directors. Performance Partnership Agreements (PPAs) were also used to collect initial information on state priorities. Information from tribes was gathered at the Regional Operations Committee's (ROC) Quarterly Meeting.

2. Description of key state and tribal issues and priorities:

Monitoring the increasing levels of air pollution due to the surge in energy development is an important state priority. States select specific areas to monitor where human impacts are most likely the greatest. Currently, monitoring resources are focused on criteria pollutants and the impacts of other pollutants on visibility. While the issues of monitoring, permitting (below) and inspections (below) do not impact the Strategic Plan's architecture, the broader issue of energy development's impact on air quality and state resources deserves adequate discussion in Objective 1.1. This is a concern for most Region 8 states.

Permitting: Another issue resulting from increased energy development is processing the large volume of new permits requests. Air quality permits are primarily related to coalbed methane and natural gas developments. This problem has been exacerbated by the declining federal cost share which makes it difficult to provide adequate compensation packages to recruit and retain quality personnel.

Inspections: Providing air quality inspections of permitted facilities is also a state priority. To ease the burden on the inspected entity and the inspecting staff members, the state is sharing inspection tasks between department programs. The use of Environmental Management System certifications and self audit procedures are also being considered to improve inspection coverage without requiring additional staff resources.

Mercury Emissions from Coal Fired Power Plants: A key issue for tribes in Region 8 is mercury pollution from western coal fired power plants. Tribes would like to see stricter mercury control measures implemented for coal-fired power plants, as well as an increase in monitoring of mercury for these operations. This issue is not expected to impact the Strategic Plan. The issue impact 100% of tribes in Region 8.

Increase Tribal Capacity of Air Programs: A priority for tribes is an increase each tribe's environmental program capacity for air programs. The revised plan should keep the section entitled "Working with Tribes and Partners."

Off-Indian Country activity impacts/Cross Boundary Issues: It is a priority for tribes to be more involved with airshed groups with other agencies to address transport of pollutants across boundaries between state and tribal lands, as well as international boundaries. Regional haze and mercury deposition are significant concerns to tribes, and tribes need help to develop programs to control upwind sources that contribute to air pollution over tribal lands. This issue impacts 100% of tribes in Region 8.

Minor Source Air Rules: It is a priority for all Region 8 tribes that the minor source air rule to be finalized and implemented. Tribes in Region 8 currently have no mechanism to monitor minor air pollution sources, which are prevalent throughout the Region. Increased technical assistance is needed for tribes to develop capacity to address minor air pollution sources. Minor source rules are expected to developed soon (within the timeframe of Strategic Plan revision), and should be reflected accordingly.

State Implementation Plans: Another state priority is the need to improve the process for developing and modifying State Implementation Plans (SIPs). States encourage EPA to embrace the NAS Air Quality Management Report recommendations developed in collaboration with the States. The Air Quality Regional Haze State Implementation Plan will also be a future priority/issue for states during the strategic plan timeframe. While the change in the SIP process is not expected to change the architecture of the Strategic Plan, it should be acknowledged. Two states commented on this issue.

Prevention of Significant Deterioration: Addressing air pollution issues associated with the Prevention of Significant Deterioration (PSD - sulfur dioxide) in Class 1 areas is an important state priority. Protection of Class I areas from air pollution is also a significant concern to tribes. While only one state commented on this issue, it impacts most states in the Region, and approximately 35% of tribes. It is expected the CARE and NSR will be discussed in the plan, which will address this comment. No change in architecture.

Air Quality - Energy Efficiency Integration: EPA offers Energy Star resources and programs that assist governments, businesses and consumers. However, these activities are not included in the state PPA. Targets and objectives would be set for participation in Energy Star marketing campaigns. Estimates of energy savings would be provided and environmental benefits calculated from the reduction in energy use. This priority should benefit all states. State contributions to energy efficiency and reduction in greenhouse gases should be acknowledged in Sub-objective 1.5. This does not affect the plan's architecture.

Air Quality at Animal Feeding Operations: One state and Region 8 recently entered into a Memorandum of Understanding (MOU) to implement the state's Animal Feeding Operations Air Quality Strategy. This MOU will expand the state's CAFO strategy, which focused on water quality issues to include air emissions and cross media issues. Jointly advancing this could benefit other states.

3. Other Cross-Goal Issues:

Building State Capacity: States feel strongly that EPA's Strategic Plan address reductions in federal funding for core programs that are occurring concurrently with increases in the workload required of these delegated programs by EPA. States and EPA need to work collaboratively to address federal funding shortfalls for the delivery of environmental programs at the state level. We need to make strides in eliminating duplication and inefficiencies by jointly defining the relative roles, responsibilities, authorities and resources of the state and EPA. This includes jointly and collaboratively redefining regional oversight to ensure that federally authorized programs are conducted adequately with authorization agreements in the most efficient manner.

Standardization of Media Program Databases: EPA manages an individual database for each media program. As states consolidate their databases into statewide, enterprise-based systems, it becomes more problematic to communicate with EPA's unique databases. Standardization of EPA's databases would facilitate a more fluid exchange of information and bring consistency to the data gathered among programs. Currently states and/or tribes must have media-specific database managers to communicate with EPA's databases. These duties and expertise could be optimized if one state database communicated with one federal database.

Region 9 – Goal 1

Goal 1 - Clean Air and Global Climate Change

Overall Comments:

o It is critical that BAS/APGs/Organizational Assessment measures are aligned to minimize the reporting burden on regions/states/tribes/Pacific Islands and to ensure that we are measuring environmental results.

o Tribes constitute a high priority in Region 9. Key activities to develop and enhance tribal capacity for this goal and the other four goals (including providing adequate assistance and funds for those tribes seeking program approvals, authorizations, delegations, or Tribal Standards) are included in Goal 5, Objective 3 Build Tribal Capacity.

Text from current Agency Strategic Plan:

Objective 1.1: Healthier Outdoor Air

Subobjective 1.1.1 More People Breathing Cleaner Air

By 2010, working with our partners, we will improve air quality to healthy levels for 39% of people who live in areas where air does not meet new national standards for fine particles in 2001, and for 60% who live in areas not meeting new national standards for 8-hour ozone in 2001. While some areas may not reach attainment of these new standards because of air pollutant concentrations that sometimes exceed allowable levels, air quality will improve for an additional 27% of people who live in areas not meeting new 8-hour ozone standards in 2001. We will maintain attainment status for the 123.7 million people who had health air for criteria pollutants in 2001.

New Input from Region 9, States/Tribes/Pacific Islands:

Priority: Attain the NAAQS in key geographic areas of the region. Particular areas of concern are the San Joaquin Valley and the greater South Coast Air Basin (California); the Phoenix area (Arizona); the Las Vegas area (Nevada); and the US/Mexico Border region. (Tribes are addressed in Priority 2.)

Impact: No change to architecture.
Geographic scope: Arizona, California, Nevada

Priority: Increase the number of Tribal members breathing clean air that meets NAAQS. (Note: Many tribes do not know if their air is safe to breathe. As such, EPA needs to do more to assist Tribes in gathering baseline information and interpreting it. In addition, by providing adequate funds and assistance we can help tribes develop their air programs based on clear objectives and the results

of monitoring activities. Through a combination of monitoring and inspections, there will be an improvement in compliance results and measurable improvements in air quality.)

Impact: Adds an additional measure for the NAAQS that focuses on tribes.
Geographic scope: Tribes

Priority: Reduce diesel emissions, particularly particulates, from heavy-duty trucks, equipment and port-related activities on the West Coast. States need federal Agency assistance to reduce diesel emissions from sources they cannot control. Provide funding to support states and regions on diesel reduction efforts, including the West Coast Diesel Collaborative.

Impact: No change to the architecture at this time.
Geographic scope: California focus, but impact is region-wide and multi-region wide.

Priority: Protecting the health of children is a key priority in the Region. Exposure to pollutants occurs in a variety of ways, but one of the most prevalent methods is inhalation of bad air. Region 9 states, for example Arizona Department of Environmental Quality, have made exposure to indoor and outdoor air a program focus that is working in partnership with the private sector to address asthma triggers, diesel exhaust from school buses, etc. This priority covers many programs contained in Goal 1.

Impact: No change to the architecture at this time.
Geographic scope: Regionwide

Text from current Agency Strategic Plan:

Subobjective 1.1.2 Reduced Risk from Toxic Air Pollutants

By 2010, reduce air toxics emissions and implement area-specific approaches to reduce the risk to public health and the environment from toxic air pollutants.

New Input from Region 9 States/Tribes/Pacific Islands:

Priority: To address communities facing adverse disproportionate impacts, reduce risk from toxic air pollutants by using a community-based approach to achieve air toxics emission reductions.

Impact: May require a change to architecture.
Geographic scope: Arizona, California, Hawaii, Nevada

Priority: Reduce risk associated from naturally occurring asbestos (NOA) which occurs in numerous counties in California, most notably in El Dorado County. Concerns have been raised regarding health risks associated with exposure to NOA relate to land development, new school construction, recreational activities, and asbestos containing gravel roads in areas where NOA is found. California has made this a special priority.

Impact: May require a change in architecture.
Geographic scope: Regionwide, but a special priority in California.

Text from current Agency Strategic Plan:

Objective 1.2 Healthier Indoor Air

By 2008, 22.6 million more Americans than in 1994 will experience healthier indoor air in homes, schools, and office buildings.

New Input from Region 9, States/Tribes/Pacific Islands:

Priority 1: Reduce risk to public from indoor air pollution in general, with a special focus on reducing asthma triggers in the schools and radon exposure in Guam (Pacific Islands) and California.

Impact: No change in architecture required at this time.
Geographic scope: Arizona, California, Hawaii, Nevada, Tribes, Pacific Islands

Text from current Agency Strategic Plan:

Objective 1.3 Protect the Ozone Layer

By 2010, through worldwide action, ozone concentrations in the stratosphere will have stopped declining and slowly begun the process of recovery, and the risk to human health from overexposure to ultraviolet radiation, particularly among susceptible sub-populations such as children, will be reduced.

New Input from Region 9, States/Tribes/Pacific Islands:

Priority: Impact ozone depletion and recovery efforts through outreach/education, compliance assistance, and enforcement activities.

Impact: No change in architecture needed at this time.
Geographic scope: Regionwide.

Text from current Agency Strategic Plan:

Objective 1.5 Reduce Greenhouse Gas Intensity

Through voluntary climate programs, contribute 45 million metric tons of carbon equivalent annually to the President's 18% greenhouse gas intensity improvement goal by 2012.

New Input from Region 9, States/Tribes/Pacific Islands:

Priority: Encourage energy efficiency, green building, and development of renewable energy resources in areas of rapid population expansion and where efficiency opportunities exist. Key areas include Clark County (Nevada), Phoenix (Arizona), and California.

Impact: No change in architecture proposed at this time.
Geographic scope: Regionwide

Region 10 – Goal 1

State and Tribal Comments from R10 on
Goal 1: Clean Air and Global Climate Change

Monitoring: Alaska is extraordinarily large state with unique concerns. We need greater monitoring and understanding that colder climate can concentrate air pollutants.

Suggested modification to NSP: Place greater emphasis on monitoring in the science objective that supports clean air.

Comments provided by: State of Alaska and Native Village of Savoonga

Address Fine Particulates: Objective 1, "More People Breathing Cleaner Air" – this objective is notably missing strategic targets for fine particulate. If the $PM_{2.5}$ standard is not updated by 2006, EPA needs to commit to getting that done. The current standard is less stringent than called for by the science.

Suggested modification to NSP: Set strategic targets specifically for $PM_{2.5}$.

Comment provided by: State of Oregon

Address Clean Areas: EPA also needs to focus on prevention in clean areas, as required by Title 1, Part C of the Clean Air Act. This is a key issue for the West in general.

Suggested modification to NSP: Add sub-objectives or strategic targets that deal with prevention of air quality degradation in clean areas.

Comment provided by: State of Oregon

Refocus EPA's Air Toxics Program: It may be time for EPA to refocus its air toxics program. The MACT program allows risk-based off ramps to standards that should be technology-based. We are facing little progress with residual risk and urban air toxics, lack of an air toxics standard for new cars.

Suggested modification to NSP: Revitalize strategy for Air Toxics Program.

Comment provided by: State of Oregon

Indoor Air Quality: The HUD houses that were built in 1970's were not designed to prevent black mold. This has significant impact on indoor air for our children, who are exhibiting increased asthma rates.

Suggested modification to NSP: Indoor air strategies need improvement.

Comment provided by: Native Village of Savoonga

Science and Research: The existing wording, "Support Air Programs" is unclear. Does this cover monitoring, modeling, or training? We need a more robust discussion of EPA's goals with respect to the science supporting clean air.

We suggest that you address visibility and other air quality-related values. These are significant concerns in the West.

Suggested modification to NSP: Add clearer objectives, sub-objectives and strategic targets for science supporting Clean Air and Global Climate Change.

Comment provided by: State of Oregon

Global Warming Needs to be Addressed: Alaska is experiencing increased temperature and melt. Global warming sources need to be addressed.

Comment provided by: Native Village of Savoonga.

Need to Align Measures among States, Tribes, Locals and EPA: Inherent in EPA's stated desire for greater alignment, joint planning, and coordination is the need for many jurisdictions to share similar measurements and use them to adaptively manage their programs. Idaho is moving away from the traditional bean counting to focus on performance and efficiency measures. EPA should consider the following measurements for air: (1) Number of days, as measured by the Air Quality Index, that air is in the healthy category; (2) Number of days ambient monitoring demonstrates compliance with NAAQS; (3) Percentage of Inspection reports returned to a facility within 30 days; (4) Percentage of Permits to Construct issued within required timelines, after completeness is determined.

Suggested modification to the NSP: Consider incorporating these measures into the NSP.

Comment provided by: State of Idaho

Fund a full field study for the Alaska Rural Diesel Health Assessment project: The goals and strategies in the 2003 Strategic Plan address national problems, but there are a number of unintended consequences for the State of Alaska, because Federal programs do not adapt easily to Alaska. Impacts from diesel in rural settings do not appear to be high on the national agenda, but are of significant concern in Alaska, where diesel energy and heat generation are widespread and have large potential human health impacts.

Suggested modification to the NSP: Fund a full field study for the Alaska Rural Diesel Health Assessment project in FY07.

Comment provided by: State of Alaska

How Information Was Gathered: In July, information on this exercise was presented at the Regional Tribal Operations Committee Meeting. In August, the Acting Regional Administrator sent letters to all the Directors of the State Environmental Programs and all Tribal Leaders requesting input on EPA's National Strategic Plan. Additionally, Region 10 GAP-grant coordinators transmitted similar requests to their tribal contacts. In September, this exercise was discussed at the Pacific Northwest Directors meeting that includes all the Directors of the State Agencies, Region 10's Regional Administrator and Director of the environmental programs for the Province of British Columbia and representatives from Environment Canada.