

FY 2014 EXTERNAL COMMENTS AND RESPONSE TO COMMENTS SUMMARY TEMPLATE

**Office of Congressional and Intergovernmental Relations (OCIR)
National Environmental Performance Partnership System (NEPPS) FY 2014 Draft Guidance**

Instructions:

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
Issue Area - Divide comments into general issue areas (e.g., NAAQS, indoor air, etc., where appropriate):				
<i>Include your comment.</i>	<i>Organization of Commenter (e.g., ECOS, New England Commissioners, tribe, etc.).</i>	<i>State the section and page number the comment is referring to.</i>	<i>The response should include adequate discussion and details to support the decision to modify/retain the draft language. Note: If more than one commenter raises the same issue, please cross-reference the individual responses.</i>	<i>Specify changes made in response to comments and identify all locations in the final Guidance (e.g., page numbers, sections, etc.).</i>

Template:

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
Issue Area: Partnership Concept; Sustainability				
Recommend linking the Partnership System to larger issues like sustainability and product life cycle approaches.	Tennessee Department of Environment & Conservation (TDEC); Division of Solid Waste	Page 3	Agree. Comment has been addressed. See National Focus Area II, Activity No. 4 on pages 12-13 which encourages the regions to advance the principles of sustainability through the NEPPS process.	None

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
	Management (DSWM)			
<p>Recommend not only working for a “level playing field” across the country, but looking across international borders to address other nations. Can the partnership concept be expanded to work with neighboring countries in our hemisphere? Could partnerships and the free flow of ideas and approaches to environmental protection benefit both the U.S. and other nations, many of whom are our allies and trading partners?</p>	<p>Tennessee Department of Environment & Conservation (TDEC); Division of Solid Waste Management (DSWM)</p>	<p>Page 3</p>	<p>The recommendation is outside the scope of NEPPS guidance which is focused on our partnership efforts with states and tribes. OCIR will forward this recommendation to the Office of International and Tribal Affairs for consideration.</p>	<p>None</p>
<p>The concept of sustainability may also need regulatory support in order to succeed. The Action Plan should also address what statutory and regulatory changes are needed to move to the new paradigm?</p>	<p>Tennessee Department of Environment & Conservation (TDEC); Division of Solid Waste Management (DSWM)</p>	<p>Page 13</p>	<p>This comment is outside the scope of NEPPS guidance. OCIR will forward this comment to the Office of Policy for consideration.</p>	

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<i>Issue Area: Strategic Planning</i>				
<p>Consider using APHL as a strategic planning partner for involving state and local government environmental laboratories to accomplish NEPPS' goals. APHL works directly with state and local laboratories that are experiencing budget constraints, and can bridge the gap between states and NEPPS. APHL has experience working with EPA in identifying opportunities and resources to accomplish mutual goals.</p>	<p>Association of Public Health Laboratories</p>	<p>Page 4 et seq.</p>	<p>OCIR appreciates APHL's interest in furthering NEPPS' goals and will explore opportunities to collaborate with APHL in the future.</p>	<p>None needed</p>