



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

MAY 22 2017

Theresa A. Pardo, Chair
University at Albany, State University of New York
1400 Washington Avenue, Albany, NY 12222

Office of
International and
Tribal Affairs

Dear Ms. Pardo:

On behalf of Commission for Environmental Cooperation (CEC) Council member, Administrator Scott Pruitt, I thank you for the National Advisory Committee (NAC) letter of advice of April 5, 2017, reporting on our forty-eighth meeting held in Washington, D.C. on March 28-29, 2017. Our discussion at the meeting on how to strengthen the concepts and proposed results of cooperative trilateral project proposals under consideration for the CEC operational plan was very valuable. We appreciate the NAC's comprehensive advice on the twelve projects under consideration for the 2017-2018 Operational Plan.

NAC General Thematic Recommendations

1. Clarity about the Big Problem
2. Specificity in Measurable Outcomes
3. Clarity on Methodology, Approach, Mechanism
4. Clear Links to Related and Larger, Ongoing Efforts
5. Attention to Long Term Financial Sustainability
6. Communications and Outreach

We agree that these are six essential components for successful projects. We have shared NAC's advice with the U.S. project teams, and requested that they more clearly identify the trilateral "big problem" or need to be addressed, what gaps exist, and to explore project links and context at the micro- and macro-levels. We desire to achieve measurable results and agree that having more specific measurable outcomes in capacities, behaviors, and environmental impacts is vital in determining a project's success. Long-term sustainability of these projects, where applicable, is important to us. Understanding how each project may fit among the larger national, tri-national, and global context is important to understand how the project or its products can become sustainable over the long-term. While project proposals were developed by trilateral consensus, implementation would certainly present strategic challenges and opportunities in the local, national, trilateral context. The project teams are currently fleshing out details for the full proposals, including milestones, partnerships, and proposed products and outcomes in line with the clearer definitions of "big problems", gaps, and objectives. While detailed methodologies are not included in the project proposal, these are developed and implemented through trilateral expert teams as the projects proceed to implementation. We also continue to work with project teams to engage youth in projects as applicable. Leveraging various communications outlets will

be vital in promoting the value of the projects as well as engaging youth, academia, industry and other stakeholders.

Project Specific Advice on the 12 Individual Preliminary CEC Project Proposals

Project 1: Building Community Capacity to Reduce Marine Litter in North America Border Watersheds

1. Get more specifics on exactly which local groups you are engaging. Make sure the set is representative.
2. Local networks are hard to start and hard to sustain. Focus on engaging local networks that are already in place (and working), and learn from those that have worked in other regions (e.g., cases in China and Peru that were mentioned by EPA).
3. How are pilots selected? What do they represent? Are there choices that provide the most opportunity to leverage the \$ invested?
4. The proposal references the trash free waters as a model – but provides no information to let us know why this is a good choice – the choice or approach isn't rationalized or situated in a larger context.
5. The proposal claims that the project will “describe” various activities – but it is not clear what is meant by “describe”. What will the project produce that didn't exist before, why are they producing it and what will the community do with it to create new value once it is produced?
6. During a previous NAC meeting we heard that this is a solid waste problem – that often the reason for build-up of marine waste is a consequence of the lack of a reliable solid waste program – such as in the case of Tijuana – which has no reliable or regular schedule for trash pickup.

We value the NAC's insight about local groups and networks. The team developing the project has led networks on this topic in the Caribbean and other locations in the America's and is capitalizing on that experience to design this project. Trash Free Waters is the premier EPA /U.S. program to empower communities to develop, implement, and enhance best practices and tools to minimize and manage solid waste that contributes to marine litter. The U.S. brings this baseline expertise and experience to the trilateral project to develop trilaterally relevant approaches in locations to be identified by the trilateral team. We have shared NAC's advice and the team is considering it both in the details of the project proposal but also for development of implementation work plans.

Project 2: Conserving shorebirds through community engagement at key sites in Canada, the United States and Mexico

1. The focus on migratory birds that share habitat in the three CEC countries provides a clear rationale for trilateral engagement
2. The project, as proposed, is very species focused
3. Long term sustainability aspect is weak
4. Important partnerships that should be emphasized and more clearly defined

- Nonprofit: National Audubon Society (and local Audubon chapters, if applicable), American Bird Conservancy, Ducks Unlimited, iNaturalist (California Academy of Sciences), American Birding Association, Native American Fish and Wildlife Society
 - Local Government: State/local tourism agencies or chambers of commerce
 - Academic: eBird (Cornell University)
5. Potential co-sponsors or funders: Ducks Unlimited, National Fish and Wildlife Foundation (NFWF), US Fish and Wildlife Service, optics manufacturers (Bushnell, Cannon, Zeiss, Leica, Swarovski)
6. The project is strong both in terms of TEK and youth engagement.

This proposed project builds upon a current project that identified specific species and migratory sites that are key habitat to the species. We appreciate the recommendations and list of possible NGOs, national government, local government, academic, and private sector partners, and have shared this advice with the project team. NAC's advice is supportive of the objective of the project to identify incentives and drivers to foster conservation through community engagement, festivals celebrating the species, awareness and economic benefits of bird and habitat conservation activities.

Project 3: Tools for Expanding Food Loss and Waste Prevention, Recovery, and Recycling in North America

1. The proposal presents the activities as a disparate set of efforts rather than a coherent program of highly related activities.
2. The proposal is not clear on the potential "big" impact of the effort. The proposal needs to sharpen its focus on the big parts of the problem
3. The proposal seeks funding to create new measures of food loss, but does not make clear the issues with the existing measures. This aspect of the proposal is undefined and appears to include a bit of wishful thinking.
4. The overall data management infrastructure is weak. To accomplish the goals of the project there appears to be a need to improve the ability to create standard data gathering protocols and to build professional data management capabilities. With a robust data management infrastructure, the proposal could target data gaps and a suite of technologies to gather data using measurement standards across the full supply chain.
5. Is the project addressing the question: What difference does shorter food transit make to food loss?
6. Tying the goal of sustainability and scalability to food insecurity and food deserts strengthens the argument.
7. How will data newly available through this project be used to create new understanding about how to change individual and institutional behavior?
7. Important partnerships that should be emphasized, and more clearly defined:
 - Nonprofit: Food donation charities and food banks, Transition Town groups
 - Federal Government: US Department of Agriculture
 - Private Industry: Shipping companies, restaurant chains, agricultural companies (e.g., ConAgra, Purdue...), agricultural coops
8. Potential co-sponsors or funders: US Department of Agriculture, agricultural companies

We agree with the NAC about the importance of having strategically coherent projects, focused on key problems, addressing clear data gaps and information management, and establishing how project findings will be used to change behavior. We value partnerships and appreciate the NAC's advice for improving and expanding our networks. These are important recommendations and the project team is taking these into account as they refine the project proposal to focus on the big gaps/needs and targeted activities for the best impacts and return on investment.

Project 4: Impact of Private Sector Supply Chain Energy Efficiency Efforts through ISO 50001

1. Concerns about the challenges companies face when navigating the bureaucracy of the ISO, and in particular recommended the project proposal provide additional insight on the adoption and use of ISO50001 vis a vis the wide range of existing ISO standards in the industry.
2. The following question was raised: Does the government need to be involved in this at all? We recommend an expansion of the proposal that outlines the unique role of government. If the government does need to be involved, make their role and the rationale for that role very clear.
3. Members of the NAC urged the project proposal team to consider the rapidly changing context of energy efficiency policy and practice.
4. A lack of attention to obstacles to making implementation happen and how those obstacles would be overcome was noted.
5. A lack of attention to the economic opportunities for participating companies that must exist to make this sustainable was noted.
6. A lack of attention to actions that have helped efficiency in the supply chain to date was noted. The proposal did not include attention to what else is happening in related or larger efforts. For example, numerous related ISO efforts.
7. Measurable results have no baseline or targets for the suggested increases or mechanisms to make the increases happen.
8. The NAC recommends seeking more clarity about who the proposal will help?
9. The NAC recommends more clarity about whether there is currently corporate engagement.

We agree with the advice on the need to clearly articulate the economic opportunity of adopting ISO 50001, the role for the government in such endeavor, the importance of corporate engagement for sustainable adoption, and establishing baselines to measure success in the effort. We also agree that the project team should take into consideration potential obstacles and other related ISO efforts that may compete with this effort. We have shared NAC's advice with the project team. They are considering the advice and have also informed us that the proposed industries plan to co-fund the work to promote ISO 50001 in their supply chains.

Project 5: Improving Black Carbon Emissions Inventory Data for Residential Wood Combustion

1. The budget seems high for a survey.
2. The trilateral aspect of this project is not clear.
3. The project is very ambitious in terms of timelines and outcomes given all the survey science

that is involved.

4. Who is being surveyed is not clear. If the survey is to be adapted for the specific context of the select cities, how will the issues related to response rates be addressed, for example how will trust be built with potential respondents so that they complete the survey? How will these strategies to build trust vary by region? Further, how will the survey design address likely resistance to responding based on concerns “big brother” is “tracking” my personal wood burning practices.
5. The proposal does not make clear the range of wood burning practices to be covered by the survey; the range of wood burning behaviors is wide - burning wood for fun to burning wood for food preparation.
6. No reference is made to existing resources or references to existing models of potential use.

We have shared NAC’s comments with the project team, and have requested an expansion of the scope to also consider other fuels that are used by local and indigenous communities in all three countries (such as diesel in the north) and their impacts on air quality.

Project 6: Supporting Science for Continental Conservation of the Monarch Butterfly

1. The proposal provides the opportunity to be a door opener for collaboration – build the foundation for the agencies in each country assessing risk to communicate and coordinate.
2. The proposal does not make clear the science gap it is trying to fill. One focus might be trying to find out what is happening to habitat between the wintering grounds in Michoacán, Mexico, and the Rio Grande.
3. Could the CEC play the role as a unifying coordinator here? Is this an opportunity that is not leveraged in this proposal?
4. The proposal should seek to get everyone on the same page regarding where the gaps are in field monitoring and in building a strategy to work together to fill them.
5. Research needs to be grounded in, or situated in, the larger context to make sense. This is such a crowded field – how is what is proposed here related to the field? How is it additive and novel? Further, current research strategy is focused on national level governments and the trilateral commission, doesn’t recognize work of others.
6. The proposal seems to miss an opportunity to link to the larger environmental factors and cycles and other policy issues such as food security.
7. The proposal should include a communication strategy to make the value proposition of the work clear vis a vis the crowded field.
8. The proposal appears to be missing an opportunity to leverage the shared interest with large international partners such as the WWF.
9. An annual multi-stakeholder convening is a strength of the proposal and should include industry stakeholders to partner in knowledge sharing, science and assessment.
9. Important partnerships that should be emphasized, and more clearly defined:
 - Nonprofit: Association of Fish and Wildlife Agencies (AFWA), Midwest Association of Fish and Wildlife Agencies, Native American Fish and Wildlife Society, NatureServe, Student Conservation Association (SCA), Boy/Girl Scouts, US Government: National Phenology Network (USGS);
 - Private Industry: Agricultural companies (e.g., ConAgra), chemical companies (e.g., DuPont, Monsanto, Syngenta, Bayer Crop Science), agricultural coops.

10. Potential co-sponsors or funders: US Department of Agriculture, US Fish and Wildlife Service, National Fish and Wildlife Foundation (NFWF), chemical and agricultural Companies.

We agree with the NAC that this project provides an opportunity for collaboration given the monarch butterfly's conservation is a trilateral concern, and have supported several projects over the years on Monarch butterfly conservation. Under the 2015-2016 operational plan, the team is developing a Monarch conservation action plan. For this project proposal, we have requested that the project more clearly articulate the science gaps being addressed and the linkage to conservation of other pollinators, food & sustainability. Leveraging partnerships with some of the actors identified by the NAC and the links this project has with wider environmental issues are enhancements that could make this project more impactful.

Project 7: Helping North American communities respond to extreme heat events (Phase II) – Scaling up syndromic surveillance systems

- 1) Link this proposal more clearly to “criteria pollutants” such as ozone, or link to existing monitoring networks. This will strengthen the impact and sustainability.
- 2) The areas you plan on identifying as “at risk” are unclear. The criteria to be used in this selection process are unclear.
- 3) Be clear this is a health issue – this will expand the opportunity for partnership and for future long term financing opportunities.
- 4) The proposal seems to be missing an opportunity for greater youth engagement in this project.
- 5) The proposal seems to be missing an opportunity for greater engagement of TEK in this project. For example, Tribal Health Agencies.
- 6) Expand and clarify/make coherent your partnership strategy. How will you effectively coordinate among all the levels and branches of government with a formal responsibility for response in localized extreme weather events?
- 7) Provide evidence of the success of such systems in other places; tell us who has done this well and why, and what you have learned from them that you will apply in this project.
- 8) Clarify the value proposition in terms of public health and vulnerable communities.
- 9) The trilateral aspect of this proposal is not clear. The focus appears to be on how to create networks that enable local coordination using data from similar technologies deployed in three cities. The proposal appears to have more of a comparative case study character.
- 10) Climate change as a triggering event here is a powerful message – it is underutilized in making a case for the reason for, and potential value of, this project.
- 11) Important partnerships that should be emphasized, and more clearly defined:
 - Nonprofit: Is there a group that would have connections to Native American healers?
 - Academic: Institute for Tribal Environmental Professionals (Northern Arizona University)
 - Local/Tribal Government: Tribal Health Agencies

We agree that this is a health project related to climate and that it could potentially be linked to other pollutants. Under the current phase of the project, the team is producing a Guide on Syndromic Surveillance for Heat-Related Health Outcomes-A Guide for Health Departments in

North America. We have advised the project proponents to strengthen participation by tribal health agencies and locales, and adopt a trilateral communication strategy for the health tools being developed. We have also shared NAC's advice on engagement of youth and partnerships with targeted organizations.

Project 8: Marine Protected Areas (MPAs) as Tools for Promoting Ocean Health

1. The budget seems low for the work required
2. The project is very ambitious in terms of timelines and outcomes (tool development is expensive). What existing tools would form the foundation of the toolkit to keep expenses down?
3. Are there a set of adaption principles that could be applied based on the type of ecosystem?
4. How robust can the tool kit be if trying to be all things to all people? In particular, because the budget is small. Can a modular approach be used?
5. The deliverables are not clear
6. The target audience for the toolkit is not clear
7. The project appears to be focused on improved management rather than climate focused change
8. Show linkages to other efforts outside the MPA that might amplify or negate these efforts
9. TEK connection should be much more
10. Specifics in this proposal might be a model for future proposals
11. Important partnerships that should be emphasized, and more clearly defined
 - Nonprofit: Pew Charitable Trusts, The Nature Conservancy, NatureServe, Compass (for communications plan), National Wildlife Federation
 - Tribal Fisheries Agencies
 - US Government: NOAA
 - Private Industry: Local/State tourism agencies, chambers of commerce, fishing companies
12. Potential co-sponsors or funders: Pew Charitable Trusts, The Nature Conservancy, Packard Foundation

This project is building on activities and products from a project in the 2015-16 operational plan. The NAC's advice and suggestions on how the project could improve its clarity and focus, such as deliverables, target audience, how it may be linked to other efforts outside the MPAs, and TEK are appropriate for consideration of the team as they flesh out the project proposal and work plans. We appreciate the list of potential partners and potential co-sponsors and have shared these with the project team.

Project 9: Implementation of North American Action Plans to boost the sustainable, legal and traceable production and trade of CITES Appendix II priority sharks, turtles, tarantulas and timber

1. Good trilateral project
2. References to key partners are limited – yet we know all states have lead CITES agencies
3. More acknowledgement and links to key partners is recommended
4. The project is too ambitious – too much money, too many deliverables, too little time

5. Proposal needs more information on sequencing and iteration of these critical processes in this proposal
6. Make the elements of the action plan more clear. Make it easier to review to provide feedback
7. Make clear how this builds on previous works
8. Why these species?
9. How does CITES relate to work on monarch butterflies?
10. What is the value *vis a vis* the requirement for action plans?
11. Important partnerships that should be emphasized, and more clearly defined:
 - Nonprofit: Association of Fish and Wildlife Agencies (AFWA), HerpNet, NatureServe, zoos and aquariums, IUCN North America, Wildlife Society, Native American Wildlife Society
 - State/Local Government: State fish and wildlife agencies, Tribal fish and wildlife agencies
 - Private Industry: Associations of collectors

This project builds on a current project where the team is finalizing five action plans on conservation and sustainable harvesting of specific species. These plans define actions items (legal, capacity, other) for national and local agencies, as well as non-governmental organizations and communities where there is natural habitat for the species. The objective of this project is to facilitate implementation of a couple of the action plans, which are being selected considering local and trilateral feasibility in terms of laws, actors, and capacity. We have shared NAC's advice and suggestions for the team to consider as they detail activities, actors, timelines, and proposed results.

Project 10: North American TEK Atlas/Inventory and case studies on best practices in integrating TEK in decision making in the three countries

1. The case study is missing from the measurable results column
2. Replication strategy needs attention
3. How will conflicts/perspective differences between TEK and western science be resolved? How will gaps be bridged to ensure we get the best of both?
4. Is the project necessary?
5. The case study text is too thin – no description of what case and why the focus is selected. How will the case studies be selected? Who will be involved?
6. Be more clear on the operating context – Canada is good at integrating TEK, less so the US – less so even – Mexico. How will this variability be accounted for in efforts to integrate TEK into government decision making in a single project?
7. Not much discussion or view of social media content. Would like to see more discussion of how the data points will be verified – e.g. data quality. Fitness for use, for example.
8. IP How will contributions to the collection be attributed to the different experts – how will IP be protected?

Several of NAC's comments and questions are being considered and addressed by the project team in the project design. For example, emphasis is being placed on the Atlas as a repository and resource of TEK leadership and expertise and on exploring how TEK can be shared

appropriately at the national and trilateral contexts, while the case studies are deferred for a future time.

Project 11: Reducing Emissions from Goods Movement via Maritime Transportation in North America (Phase III)

1. Public health focus strengthens the proposal. This proposal provides variety and balance to the portfolio
2. The proposal makes clear the problem of patchwork efforts – they are trying to fix or link the disparate efforts
3. All eyes are on this industry and measuring emissions. Advice from NAC – link to, and be aware of, IMO efforts
4. Expand focus to ship emission in ports. Is this included? If not, why not? This is a big piece of regulation in the US
5. Does the project look at loading and unloading – the movement of trucks in and out of ports?
6. The proposal needs more clarity on deliverables – and the benefit of each – the approval processes and outcomes
7. The proposal connects to the administration’s agenda – more than any of the proposals. Emphasize the connects here in the interest of sustainability
8. Build in outreach around the science of emissions and emissions testing. New technologies to reduce emissions in the full ecosystem of ports, goods movement including ship based transport

The current project on this topic has been focused on IMO emissions control areas, which only address emissions from vessels. We have advised the team to expand the scope to address the port side emissions from port equipment, operations, trucks and rail, and emphasizing the health and climate impacts, as well as the economic and sustainable trade and transport benefits.

Project 12: Quantifying Methane and Black Carbon Emissions from Flaring in the Oil and Gas Industry

1. Is this viable given US requirement to measure methane emissions on federal lands has been reversed?
2. Does this project shift the pressure to private firms?
3. Who will pay for step 2? This is important as the incentive is in step 2
4. Trilateral aspect of this proposal seems weaker than others. TEK and youth aspects of this are also weak
5. This project could be improved through an emphasis on how this project, if successful, will contribute to competitiveness.

This project provides an opportunity to look at recoverable resource with corresponding environmental benefits, technology and competitiveness benefits. We have shared NAC’s advice with the team to inform their detailing of objectives and work plan and value proposition.

NAC’s Advice on the CEC Project Proposal Process

1. Encourage proposers to develop their proposals in terms of return on investment and

partnering. Adopting a frame of reference that draws attention consistently to this two ideas is recommended for proposers. Being able to express the value of the project clearly and consistently, in measurable ways, and to specify related partners and networks will contribute to the likelihood that a project can secure the resources and partners needed to be sustainable and scalable, and to be of interest in terms of replication to new locations and other contexts.

2. Map the proposal sections to the evaluation criteria. The NAC observed that our ability to make judgements about the extent to which the projects involved TEK and youth related activities was facilitated because there was a specific question asked about these criteria. Making similar judgements about sustainability, scalability and replicability, was much more difficult as no direct questions about these criteria were asked so we, as reviewers, had to infer from what was provided.

3. The proposal summary asked the proposers to list partners. The lists provided were in some cases short and general, in others long. The members of the NAC found it difficult to determine what the lists represented in terms of valuable resources to the projects. We found it difficult to determine if the projects proposed included activities necessary to leverage the project itself to build out partnership networks. Such leveraging activity is considered, by the NAC, to be critical to achieving success in achieving the outcome of the project, and in terms of its long terms sustainability, scalability and replicability.

For the 2017-18 Operational plan, we have started a revised process for project proposals and intend to continue to refine it. NAC's advice on this aspect is quite valuable for our continued improvement as we continue to refine our process.

Thank you for all your time and efforts in providing this valuable advice and insight into the CEC projects. We look forward to continue to working with you as we advance the important integration of trade and environmental issues in North America.

Sincerely,

A handwritten signature in black ink, appearing to read "Jane Nishida". The signature is fluid and cursive, with a large initial "J" and "N".

Jane Nishida
Acting Assistant Administrator
U.S. Alternative Representative