

## FY 2018-2019 NPM GUIDANCE RESPONSE TO EXTERNAL COMMENTS

Issue Area	Comment	Commenter(s)	NPM Response
<p><i>Key Programmatic Activity 1; Action 1</i></p>	<p><i>ECOS appreciates EPA’s encouragement to regional staff to “proactively reach out to states and tribes to discuss the value and benefits of PPAs and PPGs as tools for implementing Performance Partnership principles.” Since according to an OCIR study only 41% of eligible funds were being awarded under a PPG in 2016, there may be additional opportunities to work with states who wish to voluntarily increase awareness and utilization of PPA’s and PPG’s.</i></p>	<p><i>ECOS</i></p>	<p>OCIR agrees with the comments provided by ECOS and recognizes that there is ample opportunity to further support state and tribal implementation of performance partnerships. EPA will continue to work with ECOS to raise awareness and further promote utilization of performance partnership tools, including PPA’s and PPG’s. EPA is retaining the language from the draft version but is committed to further discussions with states, tribes and ECOS in order to identify additional opportunities that support NEPPS.</p>
<p><i>Key Programmatic Activity 1; Action 4-5</i></p>	<p><i>ECOS agrees with EPA’s support for regional staff to share business process modernization projects or activities currently proposed or underway using the E-Enterprise shared governance model, and to use Lean principles and methods to improve the effectiveness and efficiency of the NEPPS system. ECOS suggests that these sections include an encouragement for regional staff to take advantage of the resources and transference projects of the EPA Lean Action Board (LAB) in their joint Business Process Improvement efforts with states and to seek to have a dialogue with states in their regions about priority areas for streamlining and adoption of completed streamlining recommendations.</i></p>	<p><i>ECOS</i></p>	<p>EPA agrees with the comment and has revised action 4 in response to the suggestion from ECOS. EPA has added a sentence that references the value of the work being undertaken by the Lean Action Board (LAB). The new language states: <i>Regions are also encouraged to seek transference of successful joint EPA-state and EPA-tribal process improvement projects, as a result of work of both the Lean Action Board (LAB) and the E-Enterprise Leadership Council (EELC).</i></p>

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<p><i>National Environmental Performance Partnership System</i></p>	<p><i>EPA’s core mission is not to “restore cooperative federalism among the states” as stated in this guidance document, but to protect human health and the environment. That language should be corrected to accurately reflect the goals of the Environmental Protection Agency. Pollution does not stop at state borders, as noted in your guidance document about working with international partners, and delegating some of these regulations and enforcements to the states infringes upon their neighboring states’ efforts to protect their resources.</i></p>	<p><i>Makah Tribe</i></p>	<p>Thank you for your comment. The document has been revised to accurately reflect EPA’s mission and the goals of the administration.  Revised Language:  <i>The National Environmental Performance Partnership System (NEPPS) reflects EPA Administrator Scott Pruitt’s positive environmental agenda to fulfill EPA’s core mission to protect public health and the environment while restoring cooperative federalism among the states in order to afford them with the flexibilities necessary to protect and promote both their state’s environment and economy.</i></p>
<p><i>National Environmental Performance Partnership System</i></p>	<p><i>“The Regions are asked to consider how to advance the goals of the FY 2018-2022 Strategic Plan and other priorities identified by the Administrator when negotiating NEPPS agreements. “ (p.6) Since this is a partnership program we believe this statement should be amended to include language that recognizes the importance of advancing the goals and priorities identified by states, tribes, or other partners in the program in addition to those of the Administrator.</i></p>	<p><i>Makah Tribe</i></p>	<p>OCIR agrees with the comment provided and has included language to reflect the desire to incorporate joint priorities within performance partnerships.  Revised language:  <i>Regions should identify the priorities shared by states and tribes to foster joint intergovernmental planning and priority setting within Performance Partnerships.</i></p>