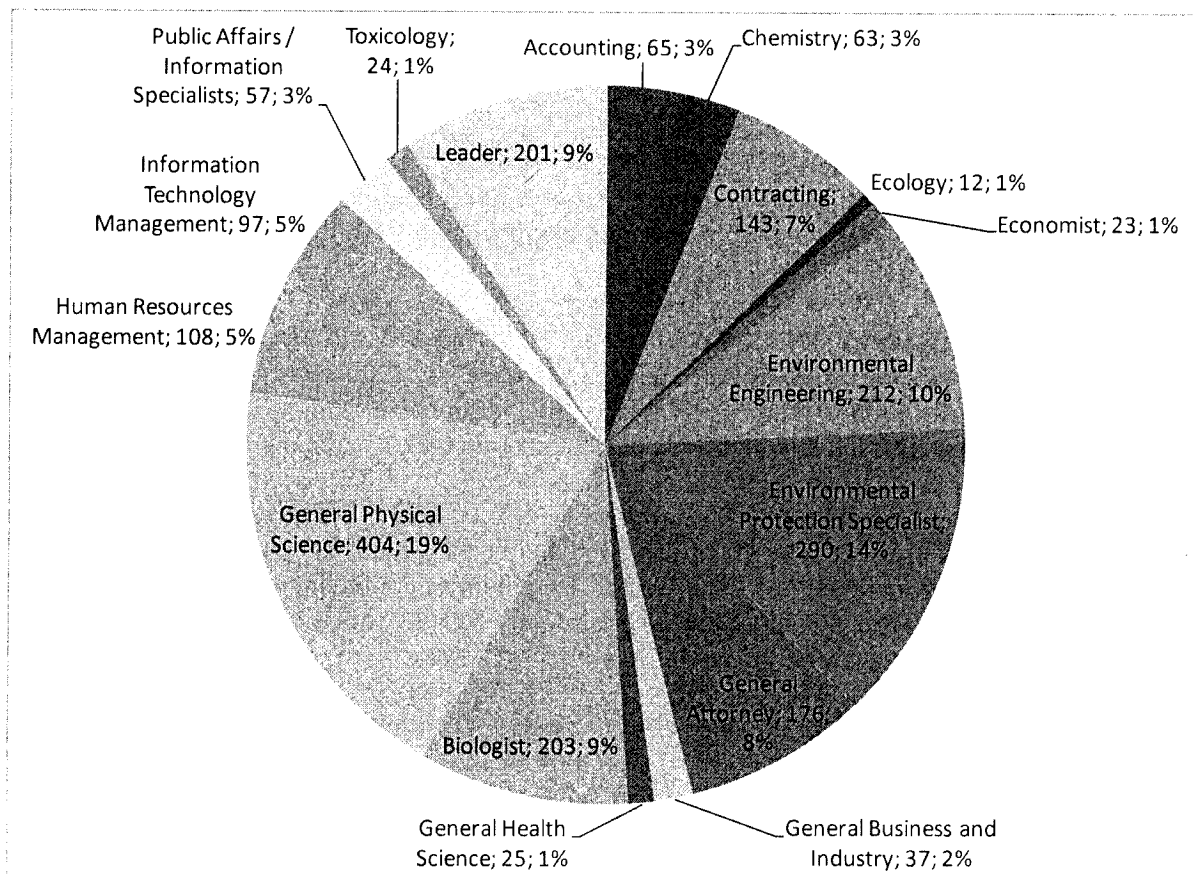


**Figure 1. Distribution of Hires by Grade Level.**  
**Sector labels: Grade Level, Number Hired during FY 2006 – FY 2010, and**  
**Percentage of Total Hires during FY 2006 – FY 2010, respectively**  
**(Sectors less than 1% not labeled).**



**Figure 2. Distribution of Hires by MCO for FY 2006 – FY 2010.**  
**Sector labels: MCO, Number Hired during FY 2006 – FY 2010, and**  
**Percentage of Total Hires during FY 2006–FY 2010, respectively**  
**(Sectors less than 1% not labeled).**

The list below is a summary of the scientific and technical competencies that NACEPT believes will be needed to meet tomorrow's challenges. NACEPT's first Advice Letter on workforce planning highlighted these increasingly important competencies and recommended that several new occupations be added to EPA's list of MCOs in order to develop them within the Agency. Some of these are areas where the Agency may have the most difficulty finding available graduates. In some cases, such as Business and Finance and in leading edge areas of technological change, EPA will be in strong competition with the private sector for graduates. In other cases, such as Trans-Disciplinary Systems Thinking and Partnership Development, there are few educational institutions that provide appropriate training. As a result, developing these competencies will require special attention and effort.

**Business and Finance** – If the Agency is going to put more emphasis on supporting innovation in clean technology or minimizing environmental impacts of emerging technologies, it needs people with MBAs or equivalent experience on the front lines—people who can speak the language of business and are familiar with finance and venture capital.

**Social, Behavioral and Decision Sciences** – Improving the Agency’s capability in areas such as promoting sustainable individual and collective behavior or determining an equitable distribution of risks, costs and benefits requires a broad range of knowledge from the social, behavioral and decision sciences.

**Trans-Disciplinary Systems Thinking** – Dealing with big cross-cutting problems requires thinking that transcends individual media, knowledge domains and government agencies. People capable of this kind of thinking may often be cross-trained in more than one field and will have the ability to collaborate effectively and work across disciplines.

**Computer Science and Information Technology** – IT is an area of competence that should be viewed more broadly than as a tool for program and management support. It encompasses everything from environmental sensor systems to environmental simulations, visualization technology and other graphic advances to make information more accessible to the public and IT aspects of emerging clean technology.

**Environmental Design** – This encompasses a variety of professions dealing with the built environment including environmentally oriented (green) architects, landscape architects, ecological designers, planners, interior designers and facility managers.

**Statistical Analysis** – Advanced statistical analysis will be needed to deal successfully with big crosscutting problems, develop rigorous approaches to sustainability and support the widespread deployment of advanced sensor technology.

**Partnership Development** – The role of spanning organizational boundaries to develop partnerships with other public, private and nonprofit organizations will become more central as the Agency focuses more on leveraging limited resources, encouraging technological innovation, dealing with climate change, helping industry “design for the environment,” utilizing advanced sensor technology, and other actions likely over the next decade.

**Public Outreach** – This role will become a major focus of effort as the Agency engages more fully with climate change and other big cross-cutting problems, attends more to environmental justice issues, and works to promote more sustainable individual and collective behavior.

**Global Perspective** – Pollution is increasingly carried from other nations into the U.S. by winds and water and cannot be eliminated without international cooperation. The most challenging cross cutting environmental issues that loom ahead such as climate change, water resource sustainability, ecosystem decline, and ocean health are all global issues requiring global solutions.

### **Recruitment Strategies and Hiring Processes:**

In this section, we will address issues in the hiring process itself that may impede the Agency from achieving its goals. NACEPT members reviewed recruitment programs described in the EPA's 2010 Human Capital Management Report, as well as survey data on new hire satisfaction and management hiring satisfaction. NACEPT members also reviewed data and comments from two outside sources that supplement information provided by EPA:

- 2010 *Best Places to Work* Rankings conducted by the Partnership for Public Service and American University's Institute for the Study of Public Policy Implementation that help measure employee satisfaction and commitment <http://bestplacestowork.org/BPTW/rankings>
- An informal survey of environmental professionals with masters' degrees from Yale University and other programs who have Agency experience.

EPA has centralized its recruiting process into three shared service centers (SSC) across the country. The advantage of this model is cross-fertilization of recruitment efforts. When each SSC undertakes a recruitment activity, they include all job positions across the Agency, both regional and headquarters.

SSC staff monitor the job announcement and application process, and they screen candidates for qualifications pertaining to meeting required skill sets. Based on scores assigned at this screening, only the highest quality candidates are referred to the requesting programs offices and regions. Program and regional managers are solely responsible for interviewing, if needed, and hiring from this pool of top candidates after which the SSC assists successful candidates with employee onboarding.

Although this model maximizes outreach for all positions open to external hires, NACEPT views several opportunities for more effective communications between SSC and the program and regional offices during the hiring process: First, the SSC should disclose the category rating scores for applicants to the hiring managers. For example, if among other criteria, applications are screened at a Grade Point Average, the SSC should inform the hiring manager about applicants with lower GPAs. Such disclosures create opportunities for post-hoc analysis, feedback and continuous, joint development of appropriate category rating criteria to ensure that qualified candidates are not inadvertently screened out. Second, the SSC should be available during the interview as an information resource to the candidate and hiring office on non-technical matters such as salary and benefits negotiations. This advances continuity in the hiring process and facilitates feedback between the hiring office and recruiters on lessons learned during candidate interviews.

The management hiring satisfaction survey evaluates how satisfied a manager was with the hiring process and support provided by Human Resources. Results for FY 2010 indicate that EPA ratings correlate with government-wide ratings.

Actual outreach efforts may have declined as EPA faces budget constraints. Only 28% of recent hires indicated that they found their job opportunity with EPA as a result of a recruitment

outreach. This suggests a potential opportunity for increasing the effectiveness of EPA's recruitment strategies.

The Environmental Careers Program (ECP) has been a key recruitment program. The ECP provides a two-year internship for entry-level candidates. Significantly, 100% of the FY 2010 ECP class were in MCO positions, and this program has a retention rate of 86.5%. This appears to be a highly successful tool for attracting entry-level MCO talent. The class size has decreased by over 60% since 2004, however, which suggests that this key recruitment tool might be more fully utilized by EPA.

The anecdotal survey of recent graduates provides additional informal results. The responses reinforce some of the themes that have emerged through review of EPA's internal analyses and surveys. Attracting and retaining masters' students is apparently not a problem; in fact "getting into EPA" is viewed as highly desirable due to the strong identity with the Agency's mission. There is a strong belief that an individual can be creative and "make a difference."

From the survey of recent graduate students mentioned previously, there appear to be significant barriers for Fellows and those without federal status to learn about and apply for many positions. The respondents described the overall application and hiring process as overly long and tedious. Other hurdles related to the paperwork for USAJOBS, including making sure that certain key words are hit. A manager at a regional office notes that masters' level applicants applying for GS-9 jobs with their experience and education sometimes displace those with undergraduate degrees applying at the GS-7 level.

The respondents' feedback aligns with EPA's own analysis of its hiring process compared to the Office of Personnel Management (OPM) standard. OPM targets an 80-day end-to-end hiring process. In 2010, only 15% of new hires met the 80-day target. EPA's average time-to-hire in 2010 was double the OPM target at slightly more than 161 days. The increased time-to-hire for SES positions from 59 days in 2009 to approximately 84 days in 2010 raises concern. EPA targets a 58-day time-to-hire window for SES positions. Given the potential for increasing attrition at SES positions, if this trend were to continue, it would exacerbate gaps in key leadership positions.

There are many good reasons that may cause EPA's hiring process to exceed the OPM standard. For example, the OPM standard does not include time to complete a security check, and EPA counts all of the days in the process including time allowances for personal reasons, which some other agencies may not be counting. Nonetheless, EPA should set more aggressive goals to reduce this hiring timeframe. Especially as the economy improves, potential candidates seeking jobs may simply get snatched up by other entities before EPA can complete its process. EPA has already begun the process to simplify the hiring process and reduce the average hiring cycle time by at least two weeks in response to the President's May 2010 directive to streamline federal hiring. That being recognized, more streamlining by EPA is recommended.

There may also be important opportunities for EPA to improve and expand its electronic hiring processes. As more federal agencies turn to the internet and other automated, electronic systems to streamline their outreach, recruitment and hiring processes, challenges are emerging. Though

not unique to EPA, these challenges should significantly concern the Agency and prospective applicants. USAJOBS is the U.S. government's official one-stop, internet-based source for employment information and job opportunities in the federal civil service. It is operated by the Office of Personnel Management. USAJOBS directs all applications for posted job openings to the respective agency's talent management systems, including EPA's *EZhire* system.

Anecdotal surveys indicate that prospective job applicants face difficulties when using USAJOBS. First and foremost, the operating protocol tends to reward applicants who have time available to scan new job postings each morning and apply right away, which may be more difficult for already-employed people looking to move laterally to EPA. Second, there appear to be some impediments with the USAJOBS website design, including: (1) Finding the exact keywords for job searches; (2) Completing lengthy questionnaires for each job application; (3) Re-entering similar information for every application submittal; (4) Uploading resumes and documents formatted with different word processing software; and (5) Confirming successful application submittal.

Some of these issues are being addressed by ongoing government hiring reforms. According to OPM, more than 90 percent of positions are now filled based on resumes and cover letters instead of knowledge, skills and abilities questionnaires. OPM also requires that USAJOBS provides applicants with progress notification while filling out an application and e-mail confirmation afterwards. EPA staff indicate that a major USAJOBS upgrade scheduled for Fall 2011 will provide additional features and enhanced capabilities. NACEPT commends these efforts.

Several EPA staff have indicated the need for the Agency to enhance its electronic applicant tracking systems. At present, very little applicant data are retained after selected candidates are referred to the hiring program and regional offices for further consideration. As a result, staff cannot retrospectively assess whether or not the Agency is recruiting and hiring the best possible candidates. Recruiters should be able to review applications disqualified because of incomplete information or errors in submittal to determine if better qualified candidates would otherwise have been considered. Lessons learned from such post-hoc evaluations would help identify and rectify electronic system deficiencies to ensure more diverse and technically competent applicant pools. NACEPT recommends periodic review of EPA's electronic hiring systems and continuous improvement by providing user-friendly interfaces and context-sensitive help tools to minimize errors in application submittal. Furthermore, applicant tracking data should be accessible to all levels of head office and regional office management.

In sum, although the Agency's hiring process is cumbersome, the EPA is nonetheless able to attract talent necessary to fill its needs. That does not mean, however, that the situation is desirable; improvements are possible and should be considered. As the Agency prepares to address complex environmental challenges, it must constantly ensure that it is attracting new employees with the needed technical expertise and interdisciplinary skills.

In the third advisory letter, we will more fully discuss issues associated with targeted recruitment to increase diversity at EPA.

### **Retention – Information on Job Experiences Affecting Attrition at EPA:**

NACEPT also evaluated whether there were retention issues, particularly in mid- and senior-level managers that could exacerbate attrition expected from normal retirement trends. Overall, NACEPT found that employees are very satisfied with their careers at EPA, particularly because they support and believe in the Agency's mission. EPA can build on this strength both in retaining current employees and attracting external mid- and senior-level manager hires.

In general, current attrition rates at EPA are not a significant cause for concern. In 2010, the attrition rate fell to 4.1%, from 5.6% in 2008. Over the past five years, the attrition rate has averaged 5%. Organizational norms vary, but 5% compares favorably to the targeted voluntary departure rate of similarly-sized private sector organizations.

The 2010 Federal Employee Viewpoint Survey, issued by the Office of Personnel Management, indicates that, generally, attrition is not caused by people's dissatisfaction with their work at EPA. There is a strong personal sense of commitment, and EPA employees indicate they are willing to go the extra mile to get the job done and are seeking to improve their abilities. There are two cautionary notes, however, that warrant attention:

First, the attrition rate in SES employees is higher than the Agency average, at 8.4% in 2010. This reflects both the aging leadership core at EPA and the high number of retiree eligible SES employees. This issue will be discussed in more detail in our third Advice Letter, which will address topic #3 ("Strategies to attract and retain superior executive leadership talent").

Second, this current low rate of attrition is likely motivated, in part, by the current economic recession. EPA may face higher rates of attrition as the economy recovers and some eligible employees elect to take retirement or seek employment elsewhere as jobs rebound in the private sector. 18% of the current population is retiree eligible now, and 25% will be eligible for retirement by 2012. Most significantly, 68% of the SES corps will be eligible to retire by 2013, creating a concern about loss of leadership and organization transition, skills transfer and achieving a One EPA culture.

EPA's best tool for retaining talent is maintaining the strong sense of purpose and importance that employees feel for the Agency's mission. The 2010 Federal Employee Viewpoint Survey results for EPA show that employees believe the work they do is important, and they feel very aligned with accomplishing the Agency's mission; this is a significant motivator for them. [http://www.fedview.opm.gov/2010FILES/2010\\_Report\\_by\\_Agency\\_pt1.pdf](http://www.fedview.opm.gov/2010FILES/2010_Report_by_Agency_pt1.pdf) This strong sense of purpose is an important positive factor for employees considering retirement or attrition for some other reason. EPA has found that many employees eligible for retirement do not, in fact, elect to retire because they feel highly satisfied with their careers. Strong identity with the Agency's mission is an important tool for EPA to build upon in addressing attrition concerns.

Based on NACEPT discussions with EPA staff, a review of current workforce articles and our own outside survey data, some of the reasons for voluntary employee departures include:

- Difficulty navigating the Agency's bureaucracy

- Strained relationship between line managers and subordinates
- Inability to express creativity when developing or implementing work products
- Lack of recognition for work product
- Lack of mentorship and leadership from SES

The key first step in addressing concerns about employee retention is maintaining the personal sense of self-worth and job satisfaction that people bring to the job. These are key reasons for retiree eligible employees to defer retirement and for satisfied employees to not seek employment elsewhere.

The 2010 Federal Employee Viewpoint Survey revealed a higher than government average amount of employee frustration that management does not address the poor performance of other employees. The EPA responses were more significant than the overall government responses in this category – only 26% believe needed steps are taken to deal with a poor performer. Employees who feel that colleagues are not carrying their weight may become pessimistic about their work team and seek employment elsewhere.

Additionally, while EPA employees indicate a fairly high level of immediate job satisfaction, employees indicated a pretty low confidence that they will have the opportunity to get a better job or that good performance will correspond to compensation. Only 38% of EPA employees believe they will have the opportunity to get a better job, and only 22% of EPA employees believe pay raises are based on employee performance. EPA employees ranked significantly below the government average in both of these areas, which is striking given the high sense of alignment that employees have with the Agency's mission.

EPA has an impressive number of programs in place to address employee development, satisfaction and retention. However, looking behind the programs, the number of employees who are able to participate in these programs is relatively small. For example, the Candidate Development Program (CDP), which targets SES candidates, has been able to process 18 employees. Projected gaps in the SES corps are closer to 50-100 vacancies over the next 2-3 years. The CDP may be a good retention and leadership development tool, but it is not robust enough to fill the looming gaps.

An analysis of attrition statistics indicates that attrition occurs across all diversity categories. However, there seems to be slightly higher attrition for females versus males. This is an area that EPA should research further. There may be a correlation with the low ranking that EPA received in the 2010 Federal Employee Viewpoint Survey for Work/Life programs focused on child care and elder care. While EPA ranked very high on its Work/Life programs with respect to alternative work schedules and flex schedules (84% ranked it as a positive), only 24% and 27% ranked elder care and child care, respectively, as a positive. Culturally, there may also be expectations for females that differ from males when it comes to caring for children, parents and grandparents.

While the *Best Places to Work* report draws from questions in the Employee Viewpoint Survey and selects just a few questions to focus on, it is a tool that is used by entry- and mid-level potential hires so its importance in the hiring marketplace is relevant. According to the *Best*

*Places to Work* report, EPA's overall ranking was #11 out of 32 comparable "large" federal agencies with > 2000 employees. This is good, but there is some room for improvement.

For EPA's program offices, 9 offices were ranked at 60.7 - 71.8 on 0 - 100 scales. The Office of Water ranking the highest. EPA Regions received better overall measures with a low/high range of 65.3 - 78.8. Region 1 (Boston) and Region 9 (San Francisco) ranked highest and, in fact, were among the top 10 of all agency subunits. For this data set, staff includes employees who do not have supervisory responsibilities whereas managers include senior leaders, managers, or supervisors. Given the concerns over EPA retirements, it is interesting to note that for the fifth time in a row the survey found "effective leadership, and in particular, senior leadership" to be the primary driver in shaping how employees view their workplace across the federal agencies.

EPA may be especially challenged over the generation ahead to attract and retain people who are at the leading edge of technological innovation. The Agency's leadership understands that converging technical revolutions are underway in areas such as computing and communications, renewable energy, nanotechnology and synthetic biology. These developments will create new environmental problems, but they are also creating a unique opportunity to shape a more advanced technological infrastructure that is more economically competitive and far less harmful to the environment.

This understanding is leading to efforts within the Agency to take on a larger role in supporting research, development and commercialization of next-generation, environmentally advanced technologies. Early efforts are focusing on water technology innovation. To play this role effectively, EPA will increasingly need to attract people who understand leading-edge developments in relevant areas of technology. However, people with these qualifications also will be highly sought after by the private sector and able to command high salaries. To be competitive, EPA must compete even more strongly than it does today on intangible qualities such as the importance of its mission and the quality of its work environment.

### **Summary Recommendations for Hiring, Recruiting and Retaining MCO Talent:**

**1. Focus Efforts on Further Simplifying the Hiring Process.** While the current hiring process is not impeding EPA from successfully filling its MCO positions, as the economy improves, there will be more competition for those same employees and EPA could position itself better as the employer of choice with a faster, more streamlined process. EPA should explore more efficient and effective use of the internet and automated, electronic systems (without compromising opportunities for equal access for minorities, low-income communities and persons with disabilities).

**2. Reinvigorate the Environmental Careers Program.** EPA's historical success with this program contrasted with diminishing utilization of the program presents an opportunity, particularly for developing candidates to fill MCO and MCC needs in light of the potential for increasing attrition due to retirements and departures when the economy improves.

**3. Update Descriptions of EPA.** To help meet the growing need to recruit people on the leading edge of technological change in different areas, the Agency should consider giving more emphasis in its descriptive materials on how efforts to help shape a more advanced 21<sup>st</sup> century technological infrastructure is both more economically competitive and less environmentally harmful.

**4. Consider the Emerging Leaders Network (ELN) Employee Retention Briefing Paper Recommendations for Agency-Wide Implementation.** The ELN was founded about five years ago to help build the capacity and reinforce the passion of EPA's emerging leaders to protect human health and the environment. The network organizes seminars, professional skills workshops, round-table discussions, community service programs and social events to promote effective leadership and interdisciplinary teamwork. Regional chapters have been launched in Regions 1, 2, 3, 5, 8, 9, and 10 and membership currently exceeds 1,000 employees.

The ELN Chapter in the EPA Region 8 (Denver) office recently developed a briefing paper that tackled the issue of employee retention. The recommendations include: (1) Encouraging a culture of competence, high performance and pride in public service; and (2) Facilitating knowledge transfer between career employees and newer employees by increasing opportunities for cross-generational sharing and cross-organizational exchange of expertise and knowledge.

**5. Complete a Workload Analysis and Utilize Findings to Allocate Human Capital Efficiently.** An audit performed by the EPA Office of Inspector General on June 29, 2010 indicated that the Agency has not completed a workload analysis; therefore, it is unable to demonstrate whether or not it has the staff resources needed to accomplish its mission. Completion of a workload study could help the Agency to: (1) Identify the number of people needed to complete the tasks in the Agency; and (2) Ensure there is equity with staff work load.

**6. Conduct "Stay" and "Exit" Interviews to Solicit Input from Existing or Departing Staff and Proactively Use the Results.** "Stay" interviews provide existing employees with a venue for expressing their likes and dislikes about their work environment. Exit interviews are valuable tools for determining the reasons why an employee has decided to leave the Agency. Both of these assessment methods can provide valuable insights into the Agency's culture, functionalities and opportunities to do better at retaining top talent (Partnership for Public Service & Booz Allen Hamilton, 2011). As mentioned above, the first step in addressing concerns about employee retention is to maintain the personal sense of self-worth and job satisfaction that people bring to the job.

**7. Understand Better Who Is Leaving EPA and Why.** EPA should create an attrition profile and dimension by age, gender, race, education level, job title and geography to more fully understand "who" is leaving the Agency. The EPA exit interview process should address the "why" by specifically asking employees their reasons for leaving the Agency: if to take another position, is it with another government agency, an NGO or the private sector? This will help answer who is leaving and why, and focus EPA's retention programs on the reasons more likely to cause employees to depart.

**8. Measure the Performance of Existing Retention Programs.** EPA has multiple programs aimed at retaining and developing top talent within the Agency – for example, the Leadership Institute, Leadership and Professional Development and Rotation Program, Quality of Work Life Campaign and Telework Program, and Labor and Employee Relations Program. We recommend that Agency staff track key performance indicators such as: the number of program participants; program completion rates; and program surveys or evaluation results or other tools which can be used to measure program success. Maintaining this type of data is important in order for the Agency to determine the efficacy of existing retention programs.

### CONCLUSION

Many of the recommendations to foster a One EPA culture and the recommendations focused on better enabling EPA to recruit, hire and retain the technical and science talent that it will need in the coming years are complementary and synergistic for achieving both outcomes. Building on the strength of employees' positive identification with EPA's mission and energizing that important competitive advantage with the One EPA cultural strategies will significantly enhance the employee value proposition to better enable EPA to attract and retain key employees and mitigate concerns about potential future attrition.

We express our appreciation to the following EPA managers and members of their staff who provided valuable suggestions and support in developing this Advice Letter: Dr. Paul Anastas, Ms. Nanci Gelb, Mr. Raul Soto, Mr. James Newsom, and Mr. Rafael Deleon.

We appreciate the opportunity to work on this important topic and offer any additional advice that you may require in the future.

Sincerely,

A handwritten signature in cursive script, appearing to read "James H. Johnson, Jr.", written in dark ink.

Dr. James H. Johnson, Jr.  
Chair

Attachment: NACEPT Workforce Planning Workgroup Member List

cc: Bob Perciasepe, Deputy Administrator  
Craig E. Hooks, Assistant Administrator, OARM  
Cynthia Jones-Jackson, Acting Director, OFACMO  
NACEPT Members



# Correspondence Management System

Control Number: AX-11-001-2084

Printing Date: July 20, 2011 03:15:49



## Citizen Information

**Citizen/Originator:** Elmendorf, Michael J

**Organization:** Associated General Contractors of New York State LLC

**Address:** 10 Airline Drive, Albany, NY 12205-1025

**Constituent:** N/A

**Committee:** N/A

**Sub-Committee:** N/A

## Control Information

**Control Number:** AX-11-001-2084

**Alternate Number:** N/A

**Status:** Pending

**Closed Date:** N/A

**Due Date:** Aug 3, 2011

**# of Extensions:** 0

**Letter Date:** Jul 12, 2011

**Received Date:** Jul 20, 2011

**Addressee:** AD-Administrator

**Addressee Org:** EPA

**Contact Type:** LTR (Letter)

**Priority Code:** Normal

**Signature:** DX-Direct Reply

**Signature Date:** N/A

**File Code:** 404-141-02-01\_141\_b Controlled and Major Corr. Record copy of the offices of Division Directors and other personnel.

**Subject:** Daily Reading File DOT and EPA developing national fuel economy standards for 2017-2025 share views.

**Instructions:** DX-Respond directly to this citizen's questions, statements, or concerns

**Instruction Note:** N/A

**General Notes:** N/A

**CC:** OEAAE - Office of External Affairs and Environmental Education

OP - Office of Policy

OSBP - Office of Small Business Programs

R2 - Region 2 -- Immediate Office

## Lead Information

**Lead Author:** N/A

**Lead Assignments:**

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
(b) (6) Personal Privacy	OEX	OAR	Jul 20, 2011	Aug 3, 2011	N/A
<b>Instruction:</b> DX-Respond directly to this citizen's questions, statements, or concerns					

## Supporting Information

**Supporting Author:** N/A

**Supporting Assignments:**

Assigner	Office	Assignee	Assigned Date
No Record Found.			

## History



**Associated General Contractors  
of New York State, LLC**

10 Airline Drive, Suite 203  
Albany, New York 12205-1025  
518-456-1134 P 518-456-1198 F  
www.agcnys.org

July 12, 2011

The Honorable Ray LaHood  
Secretary  
Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

The Honorable Lisa Jackson  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20004

REC'D  
2011 JUL 20 PM 1:42  
OFFICE OF THE  
EXECUTIVE SECRETARIAT

Dear Secretary LaHood and Administrator Jackson:

The Associated General Contractors of New York State, LLC (AGC NYS), New York's largest statewide contractor association providing advocacy and education for contractors and affiliated firms, is opposed to the aggressive and unprecedented Federal CAFE (Corporate Average Fuel Economy) standards set for the years 2017-2025. The proposed regulations will have a decidedly negative effect on many of our nation's businesses and specifically the construction industry.

Our members help support and grow the New York's economy by constructing its \$30 billion annual building, transportation, civil and environmental infrastructure. The need for the power that exists in today's light trucks, vans and utility vehicles cannot be supplied with the miles-per-gallon this proposal would require without significantly higher costs--and with it a significantly higher cost of doing business on an industry already struggling with a treacherous economy and historic levels of unemployment. This proposal would pile on new costs that the construction industry simply cannot bear.

AGC NYS urges the NHTSA and EPA to reconsider this job-killing proposal and to instead pursue policies that more effectively balance environmental concerns with the need for economic recovery and job creation.

Very truly yours,

Michael J. Elmendorf II  
President and CEO  
Associated General Contractors of New York State



*A Chapter of the Associated General Contractors of America*



# Correspondence Management System

Control Number: AX-11-001-2156

Printing Date: July 21, 2011 12:19:38



## Citizen Information

**Citizen/Originator:** Long, Eldon

**Organization:** City of Lowell, Arkansas

**Address:** 216 N. Lincoln Street, Lowell, AR 72745

**Constituent:** N/A

**Committee:** N/A

**Sub-Committee:** N/A

## Control Information

**Control Number:** AX-11-001-2156

**Alternate Number:** N/A

**Status:** Pending

**Closed Date:** N/A

**Due Date:** Aug 5, 2011

**# of Extensions:** 0

**Letter Date:** Jul 12, 2011

**Received Date:** Jul 21, 2011

**Addressee:** AD-Administrator

**Addressee Org:** EPA

**Contact Type:** LTR (Letter)

**Priority Code:** Normal

**Signature:** DX-Direct Reply

**Signature Date:** N/A

**File Code:** 404-141-02-01\_141\_b Controlled and Major Corr. Record copy of the offices of Division Directors and other personnel.

**Subject:** DRF - Docket No. EPA-HQ-OAR-2011-0044

**Instructions:** DX-Respond directly to this citizen's questions, statements, or concerns

**Instruction Note:** N/A

**General Notes:** N/A

**CC:** OCIR - Office of Congressional and Intergovernmental Relations  
OEAE - Office of External Affairs and Environmental Education  
R6 - Region 6 -- Immediate Office

## Lead Information

**Lead Author:** N/A

### Lead Assignments:

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
(b) (6) Personal Privacy	OEX	OAR	Jul 21, 2011	Aug 5, 2011	N/A
<b>Instruction:</b> DX-Respond directly to this citizen's questions, statements, or concerns					

## Supporting Information

**Supporting Author:** N/A

### Supporting Assignments:

Assigner	Office	Assignee	Assigned Date
No Record Found.			

## History

Action By	Office	Action	Date
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# CITY OF LOWELL

ELDON LONG, MAYOR

July 12, 2011

RECEIVED

2011 JUL 21 AM 10:44

OFFICE OF THE  
EXECUTIVE SECRETARIAT

The Honorable Lisa Jackson  
Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Ave. N.W.  
Washington, DC 20460

RE: Docket No. EPA-HQ-OAR-2011-0044

Dear Administrator Jackson,

As Mayor of Lowell, a small City in Northwest Arkansas, I urge you to work with the nation's electric utilities as new environmental regulations are being developed so that they will be as flexible and cost efficient as possible. I have been advised by our electric utility that the proposed hazardous pollutants rule, in conjunction with other pending regulations, could result in double-digit increases in the cost of power.

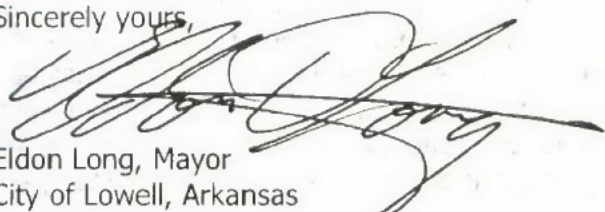
Electricity is a major cost of doing business for most businesses. Our economy is still struggling, job growth has been stagnant and many other costs are exceeding the general level of inflation. Now is not the time to impose higher costs on businesses through regulatory inflexibility or artificially short deadlines. We need an energy policy that will let American businesses continue to expand if we are to generate jobs and secure the resources to improve our standard of living, including a cleaner environment. Please consider these dynamics as you devise the final rules.

Businesses need certainty to plan for the future. Please clearly outline the conditions in which you will grant the additional year to comply with the new regulations. Please allow power companies to operate their plants as efficiently as possible, including allowing plants scheduled to close to operate on a restricted basis without additional controls, as they upgrade their facilities and move toward a new generation.

There is no reason to burden our economy with costs that can be avoided by being flexible and cooperative. A strong economy is the best tool we have to protect our environment and our future.

Thank you for the opportunity to comment.

Sincerely yours,

  
Eldon Long, Mayor  
City of Lowell, Arkansas



# Correspondence Management System

Control Number: AX-11-001-2157

Printing Date: July 21, 2011 01:16:23



## Citizen Information

**Citizen/Originator:** Prescott, Kerri L.

**Organization:** House of Representative

**Address:** 2 State House Station, Augusta, ME 04333

**Constituent:** N/A

**Committee:** N/A

**Sub-Committee:** N/A

## Control Information

**Control Number:** AX-11-001-2157

**Alternate Number:** N/A

**Status:** Pending

**Closed Date:** N/A

**Due Date:** Aug 4, 2011

**# of Extensions:** 0

**Letter Date:** Jul 13, 2011

**Received Date:** Jul 21, 2011

**Addressee:** AD-Administrator

**Addressee Org:** EPA

**Contact Type:** LTR (Letter)

**Priority Code:** Normal

**Signature:** AA-OAR-Assistant Administrator  
- OAR

**Signature Date:** N/A

**File Code:** 404-141-02-01\_141\_a(2) Copy of Controlled and Major Correspondence Record of the EPA Administrator and other senior officials - Electronic.

**Subject:** Daily Reading File- I would like to take this opportunity to share with you my concerns about issuing even tougher fuel economy requirements.

**Instructions:** AA-OAR-Prepare draft response for signature by the Assistant Administrator for OAR

**Instruction Note:** N/A

**General Notes:** N/A

**CC:** OCIR - Office of Congressional and Intergovernmental Relations  
OEAE - Office of External Affairs and Environmental Education  
OP - Office of Policy  
R1 - Region 1 -- Immediate Office

## Lead Information

**Lead Author:** N/A

### Lead Assignments:

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
(b) (6) Personal Privacy	OEX	OAR	Jul 21, 2011	Aug 4, 2011	N/A
<b>Instruction:</b> AA-OAR-Prepare draft response for signature by the Assistant Administrator for OAR					

## Supporting Information

**Supporting Author:** N/A

### Supporting Assignments:

Assigner	Office	Assignee	Assigned Date
No Record Found.			

## History



# HOUSE OF REPRESENTATIVES

2 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0002

(207) 287-1400

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## Kerri L. Prescott

3 Goldeneye Drive

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Residence: (207) 319-7589

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July 13, 2011

The Honorable Ray LaHood  
Secretary  
Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590

The Honorable Lisa Jackson  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20004

OFFICE OF THE  
EXECUTIVE SECRETARIAT

2011 JUL 21 AM 10:45

REC'D

Dear Secretary LaHood and Administrator Jackson:

I understand the National Highway Traffic Safety Administration (NHTSA) and Environmental Protection Agency (EPA) will be reviewing the already rigorous fuel economy standards that will be in effect from 2012 to 2016 to determine if they need to be increased beginning in 2017.

As House Chair of the Maine Legislature's Joint Standing Committee on Labor, Commerce, Research and Economic Development, I would like to take this opportunity to share with you my concerns about issuing even tougher fuel economy requirements.

Every day my colleagues and I hear about the issues facing Maine people. The majority center around the economy, with many focused on the high cost of energy, food and transportation — elements essential to raising families and building businesses.

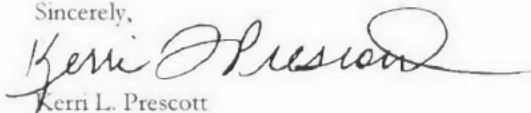
In Maine, with very few exceptions, every family relies on cars and trucks to get where they need to go. Industries across our state from shipbuilding and papermaking to farming and fishing to tourism and the service sector depend on motor vehicles to meet obligations to their customers.

I believe the last thing we should do is add on regulations that will make it even more expensive for Maine people to feed their families, own a vehicle or create new jobs. We need transportation that is safe, reliable and affordable. Otherwise, we are putting our families, jobs and businesses at risk.

I ask that NHTSA and EPA give every consideration to establishing a single, national fuel economy standard that takes into account the potential economic impacts that more stringent standards would bring to so many hardworking Maine people.

I appreciate your taking the time to review my concerns and look forward to following your actions on this important issue.

Sincerely,

  
Kerri L. Prescott  
State Representative

cc: Honorable Olympia J. Snowe  
Honorable Susan M. Collins  
Honorable Michael H. Michaud  
Honorable Chellie Pingree



# Correspondence Management System

Control Number: AX-11-001-2164

Printing Date: July 21, 2011 12:56:25



## Citizen Information

**Citizen/Originator:** Girgis, Shawna M.

**Organization:** City of Bedford  
**Address:** 1102 16th Street, Bedford, IN 47421

**Constituent:** N/A

**Committee:** N/A **Sub-Committee:** N/A

## Control Information

**Control Number:** AX-11-001-2164 **Alternate Number:** N/A  
**Status:** Pending **Closed Date:** N/A  
**Due Date:** Aug 4, 2011 **# of Extensions:** 0  
**Letter Date:** Jul 14, 2011 **Received Date:** Jul 21, 2011  
**Addressee:** AD-Administrator **Addressee Org:** EPA  
**Contact Type:** LTR (Letter) **Priority Code:** Normal  
**Signature:** DX-Direct Reply **Signature Date:** N/A  
**File Code:** 404-141-02-01\_141\_b Controlled and Major Corr. Record copy of the offices of Division Directors and other personnel.  
**Subject:** Daily Reading File-I would like to share my views regarding the National Fuel Economy Standards for 2017-2025.  
**Instructions:** DX-Respond directly to this citizen's questions, statements, or concerns  
**Instruction Note:** N/A  
**General Notes:** N/A  
**CC:** OCIR - Office of Congressional and Intergovernmental Relations  
OEAE - Office of External Affairs and Environmental Education  
OP - Office of Policy  
R5 - Region 5 -- Immediate Office

## Lead Information

**Lead Author:** N/A

**Lead Assignments:**

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
(b) (6) Personal Privacy	OEX	OAR	Jul 21, 2011	Aug 4, 2011	N/A
<b>Instruction:</b> DX-Respond directly to this citizen's questions, statements, or concerns					

## Supporting Information

**Supporting Author:** N/A

**Supporting Assignments:**

Assigner	Office	Assignee	Assigned Date
No Record Found.			

## History



## City of Bedford

Office of the Mayor

Shawna M. Girgis

RECEIVED

2011 JUL 21 AM 10:44

OFFICE OF THE  
EXECUTIVE SECRETARIAT

July 14, 2011

The Honorable Ray LaHood  
Secretary  
Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

The Honorable Lisa Jackson  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20004

Dear Secretary LaHood and Administrator Jackson:

Today jobs, the economy and energy security are on the minds of every American. As the Mayor of Bedford, Indiana I am focused on proactive policies to address these critical issues and grow my city toward a more secure future. Transportation and the automotive industry is a critical component of Bedford's economic vitality and given that your agencies are now developing national fuel economy standards for 2017-2025, I wanted to share my views.

Safe, efficient and reliable transportation impacts each individual, family and business in my city. Jobs in the automotive, sector, limestone industry, steel manufacturing, and those organizations that support the Armed Forces, are all tied to cost effective transportation. With the recent increase in gas prices and turmoil in the Middle East, reducing fuel use and dependence on foreign oil are on all our minds. I support your efforts to improve fuel economy by laying out a long-term program, but encourage you to carefully consider a balanced and thoughtful approach.

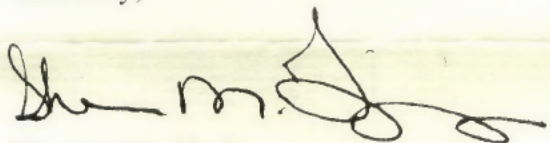
I encourage NHTSA and EPA to adopt a single, national fuel economy standard that considers America's needs for increased fuel economy while preserving the choices for families and businesses to meet their transportation needs without sacrificing affordability, safety, or jobs. NHTSA and EPA have already set strong standards for 2012-2016 that raise the fleet average by 40% to 35 miles per gallon. Looking forward, technology improvements should continue to support increases in fuel economy and greenhouse gas standards. However, I recognize that overreaching regulations can place a significant cost burden on individuals, families and businesses in my city.

It is important that standards for 2017-2025 support a broad range of consumer needs in terms of utility and function. Americans need a range of vehicles to meet their family and business needs. Large families require automobiles with sufficient passenger space, including room for multiple child-safety seats in the back. Small businesses need vans and utility vehicles to conduct commerce. Living in a rural community agriculture is an important part of the local economy that depends on pickup, as do the construction industry and local trades. The limestone industry is an important source of revenue for my city as well, and it depends on vehicles to carry out day-to-day business needs.

My residents all share the need for affordable transportation. The next phase of fuel economy standards should not pick winners and losers, but should support a variety of technologies and fuel diversity to preserve affordability. If fuel economy standards increase too quickly, resulting in more expensive vehicles, many consumers can be expected to hold on to their older vehicles longer and defer buying a new car, which could put auto jobs across the country at risk and delay compliance with federal air quality standards. Affordability, customer choice and job preservation is as much as priority as raising fuel economy.

As a mayor, I think every day about job creation and security for my city. As a policymaker, I know that good regulations and laws are often a balancing act of competing demands. I encourage you to carefully balance the factors that impact sensible fuel economy standards, including consumer choice, affordability and the economic concerns that weigh on our nation's fragile recovery.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shawna M. Girgis', with a stylized, flowing script.

Shawna M. Girgis  
Mayor

cc: Senator Richard Lugar, Senator Dan Coats, Congressman Todd Rokita