



October 31, 2017

The Honorable Scott Pruitt
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Attention: Docket No. EPA-HQ-OA-2017-0533

Re: Draft Fiscal Years 2018-2022 EPA Strategic Plan

Dear Administrator Pruitt:

The Pennsylvania Department of Environmental Protection (PADEP) appreciates the opportunity to provide comment on the U.S. Environmental Protection Agency's (EPA) *Draft FY 2018-2022 EPA Strategic Plan* (Strategic Plan). Pennsylvania has benefitted from a long partnership with the EPA in addressing environmental concerns, which has resulted in great improvements to the health, quality of life, and economic prosperity of Pennsylvanians. PADEP submits the following comments for EPA to consider.

EPA has failed to conduct a full public participation process on its Strategic Plan.

EPA's Strategic Plan accentuates the need for stakeholder engagement throughout the document, calling it a vital part of the process. There is even an entire section on increasing transparency and public participation, and EPA claims it will seek "to increase the number and type of public participation platforms it has to ensure that the public can meaningfully participate in all of EPA's work—including policy making, regulatory development, outreach, education, and community engagement." However, EPA has provided less than the typical 30-day public comment period on its Strategic Plan. Considering the length of the document and that it delineates the agency's work for the next four years, a much more robust public engagement process is necessary. It is ironic that EPA has failed to provide the opportunity for real public participation on a document that repeatedly highlights the need for it.

In its Strategic Plan, EPA states that over the next four years, it will "assess the impact of pollution (e.g., health impact assessments) on such vulnerable groups as children, tribes, environmental justice communities, and other susceptible populations." However, in his proposed budget, the President recommended eliminating EPA's Office of Environmental Justice, which exists to ensure that Americans, regardless of race, color, national origin, or income, have meaningful involvement in the development, implementation, and enforcement of environmental laws and policies. Based on the decisions of the current administration, that statement is rendered meaningless.

EPA has disregarded the incredible opportunity to show real leadership in the face of climate change, the most significant environmental threat facing the world.

According to its Strategic Plan, EPA will apply common sense and robust, sound science when addressing current and future environmental issues. Scientific data continues to show undeniably that the Earth's climate is changing and comprehensive environmental controls must be applied to slow the pace of the changing atmosphere. However, in the face of this overwhelming evidence, the Strategic Plan fails to even mention climate change. This glaring oversight is incredibly shortsighted and contrary to the mission of environmental protection.

One of the three main goals listed in the Strategic Plan is to "administer the law, as Congress intended, to refocus the Agency on its statutory obligations under the law." Although environmental statutes such as the Clean Air Act and Clean Water Act were designed and amended with significant scientific support to protect the health of the citizens of this country from pollution and other environmental impacts, the science related to environmental protection, environmental controls, toxicology and public health, has evolved exponentially. It is vital that we retain current and relevant elements of our national regulatory framework so that we do not revert to obsolete or out-of-date concepts, scientific theory, and policy.

Additionally, when the foundational federal statutes were first developed and later amended, they did not anticipate that greenhouse gas emissions would linger in the atmosphere for decades causing the Earth's climate to change patterns. They also did not contemplate acidification of the Earth's oceans, or the need for global environmental policy. Climate change has a dramatic effect on our national security, environment, and citizens. Emissions from the United States are a significant cause of the changing climate, and EPA must not shirk its responsibility under federal law to address this critical issue.

In Pennsylvania, we have already experienced a long-term warming of nearly two degrees over the past century, and this trend is expected to accelerate. By 2050, Pennsylvania is predicted to be an average of 5.4°F warmer than it was in 2000. Some of the effects of climate change Pennsylvania has already experienced include higher monthly average temperatures and more extreme storm events. The impacts of climate change will continue to cause more significant and intense negative impacts on our citizens, environment, and economy in the future. By neglecting to even acknowledge climate change, the EPA is placing the livelihood of future generations in jeopardy. Now more than ever, the United States needs decisive action on this crucial issue and it is incredibly disheartening that our lead environmental agency refuses to provide leadership in the effort to reduce greenhouse gas emissions.

Despite inaction at the federal level, PADEP will continue to pursue ways to reduce our state's greenhouse gas emissions and adapt to climate change, because it is a problem that faces all of us today. We at PADEP believe that protecting our environment is an investment in the public health and welfare of our citizens as well as economic prosperity.

Should you have any questions or need additional information, please contact Jessica Shirley, Policy Director, by e-mail at jesshirley@pa.gov or by telephone at 717-783-8727.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick McDonnell". The signature is fluid and cursive, with a large initial "P" and "M".

Patrick McDonnell
Secretary