



**National Advisory Council for
Environmental Policy and Technology**

April 5, 2012

The Honorable Lisa P. Jackson
Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington D.C. 20460

Dear Administrator Jackson:

The National Advisory Council for Environmental Policy and Technology (NACEPT) unanimously supports the EPA adopting the National Academies overall recommendation in its *Sustainability and the U.S. EPA* report that EPA more fully incorporate sustainability considerations into its decision-making processes and day-to-day operations.

NACEPT members believe that this recommendation is fully in line with EPA's historical mission to protect human health and the environment in a manner that can also support the nation's economic and social goals. It is in keeping with the National Environment Policy Act's (NEPA) mandate to "create and maintain conditions under which humans and nature can exist in productive harmony, that permit fulfilling the social, economic and other requirements of present and future generations." It is responsive to Executive Order 13514, which sets sustainability goals for Federal agencies and focuses on making improvements in their environmental, energy and economic performance. Moreover, it aligns EPA with the movement among corporations, international organizations, NGOs and governments to adopt sustainability as a common framework for addressing environmental, social and economic issues.

Incorporating sustainability into areas of decision-making where EPA has regulatory authority and discretion in its regulatory and non-regulatory programs will have important benefits for EPA and the nation. It helps the Agency pursue its historical and statutory mission by encouraging a constant search for innovative win-win-win approaches that advance the Agency's environmental and public health goals and optimize economic and social benefits as well. A focus on sustainability will act over time to build EPA's capacity to work more effectively with other organizations in dealing with complex, cross-cutting problems like biodiversity loss, resource depletion, climate change, impacts of emerging technologies and entrenched poverty.

The concept of sustainability has firmly taken hold among EPA's stakeholders from leading corporations and universities to NGOs, and municipal, state and tribal governments. Formally including sustainability considerations into its vision and processes, including decision-making, can help EPA achieve a more comprehensive approach with its stakeholders.

A Vision of Sustainability

The National Academies report urges EPA to adopt a *Sustainability Vision*. NACEPT members believe that, by creating its own sustainability vision, the EPA can embed an emphasis on sustainability into all levels of the Agency's operations.

A vision is a compelling image of the preferred future that sets out an organization's highest aspirations in clear, confident language. The power of an effective vision lies in its ability to motivate and align efforts. When people are committed to a vision, they will stretch themselves and their organization to make it happen. Visions raise people's personal aspirations and provide a focus for collective activity. They create a big picture of "what we are about" and "where we are going" that makes day-to-day activities more meaningful.

NACEPT recommends that EPA consider incorporating the following ideas into its vision of sustainability that describes the future state EPA is trying to help the country reach as well as what it is trying to achieve internally:

- Achieve and advance the Agency's environmental and public health responsibilities in ways that also advance social and economic goals.
- Protect biodiversity and the integrity of the ecological foundations on which our societies and economies are built.
- Ensure that everyone enjoys protection from environmental and health hazards.
- Meet current needs in ways which ensure that future generations have the conditions and resources to meet their needs.
- Facilitate a smooth transition to more efficient, environmentally superior technologies, recognizing that this transition is an opportunity to accelerate innovation, create jobs and foster equitable economic development.
- Promote sustainability as a means to advance U.S. competitiveness.
- Avoid significant irreversible adverse effects on the environment and public health.
- Manage the release of toxic substances to prevent exceeding the assimilative capacity of the natural environment, treating pollution as a "design failure" to be eliminated over time.
- Promote renewable resources, which are continuously regenerated and available, for future use.
- Utilize nonrenewable resources efficiently, recycle them extensively, track their depletion levels and develop substitutes for critical resources with limited availability.

NACEPT members' thoughts on EPA actions to achieve these results are summarized below:

- Connect the EPA's risk-based paradigm with a broader sustainability paradigm to achieve and advance the EPA's environmental and public health responsibilities in ways that also optimize social and economic goals.
- Emphasize whole system thinking aimed at understanding the larger context in which problems arise, the connections between issues, and the full potential benefits and costs of different actions.
- Advance environmental justice, emphasize the social aspect of sustainability and improve human health by utilizing place-based approaches for meeting the needs of underserved communities, reducing disparities and fostering places that are healthy, vibrant and diverse.
- Hire professionals who are proficient in more than one discipline, including social scientists and technologists who have applied their expertise to environmental issues.
- Support and emphasize sustainability R&D that is solutions-driven and interdisciplinary.
- Coordinate extensively with government agencies and a full range of other stakeholders.
- Build a "sustainability toolbox" that includes new methodologies and technologies for addressing complex, cross-cutting issues and draws on traditional knowledge.
- Create a "dashboard of progress" that includes a wide variety of indicators and associated metrics for systematically tracking progress toward the Agency's sustainability goals, and publish progress reports at regular intervals.
- Develop an environmental scanning system and targeted foresight studies to identify emerging environmental threats and to highlight emerging ideas and technologies that support sustainability.

Critical Steps

NACEPT members believe that the initial critical step is to establish an Agency-wide sustainability vision and develop a set of sustainability principles. Rather than starting from the present and setting goals that inch forward, NACEPT recommends a "backcasting" approach that starts with a bold vision of the preferred future and then sets intermediate goals that will help EPA to make significant progress toward the long-term vision.

The next critical step is to establish several 3 to 5-year breakthrough objectives at the program level that extend beyond current capabilities and experiences and require new strategies and approaches to achieve. The Agency should also set several mid-term goals reaching out to 2020. These objectives and goals should demonstrate the commitment of Agency leadership to new ways of operating by being ambitious enough to require a new level of performance in driving toward sustainable outcomes.

Over the next two years, NACEPT is willing to provide additional advice letters responding to specific questions in the formal charges developed on this topic. We have attached recommended charge questions for your review and consideration. NACEPT appreciates the opportunity to work on this important sustainability topic and offer any additional advice that you may require in the future. Thank you for your consideration.

Sincerely,

/Signed/

Dr. James H. Johnson, Jr.
Chair

cc: Bob Perciasepe, Deputy Administrator
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NOTICE

This letter is the product of the National Advisory Council for Environmental Policy and Technology (NACEPT), an advisory committee created under the Federal Advisory Committee Act. NACEPT provides independent advice and recommendations on environmental policy, technology, and management issues to the Administrator and other officials of the U.S. Environmental Protection Agency (EPA). The recommendations in this letter reflect the opinions and views of NACEPT, and not necessarily the views or opinions of the U.S. EPA.

NACEPT's reports and advice letters are posted on the EPA website at <http://www.epa.gov/ofacmo/nacept>.

Appendix I:

NACEPT Recommended Sustainability Charge Questions for Review and Consideration

This First Sustainability Advice Letter responds to Charge Question #1 below. NACEPT suggests Charge Questions #2, #3 and #4 below for the EPA Administrator's consideration as subjects for additional advice letters.

1. The National Academies report on *Sustainability and the U.S. EPA* recommends that the Agency adopt or adapt a comprehensive Sustainability Framework with "... specific processes for incorporating Sustainability into decision processes."

Should EPA adopt the National Academies recommendation to incorporate sustainability into its decision-making processes? If yes: (a) How should the Agency include sustainability in its vision and mission? (b) What are the key points that should be included in a sustainability vision? (c) What are the critical steps necessary to implement sustainability principles and processes into its programs and practices?

2. What strengths can EPA leverage to successfully deploy, across the Agency, sustainability strategies drawing upon both the National Academies report recommendations and, also, approaches to sustainability and recommendations from other sources and stakeholders? How can EPA's deployment also achieve positive influence with other agencies and stakeholders?

Are there internal or external challenges – barriers and gaps – that EPA will need to address, manage and overcome to successfully deploy sustainability strategies drawing upon both the National Academies report recommendations and, also, approaches to sustainability and recommendations from other sources and stakeholders? If yes: (a) Identify the significant internal challenges and then recommend strategies to address, manage and overcome them; and (b) Identify the significant external challenges and the stakeholders involved, and then recommend strategies to address, manage and overcome them and contribute to the EPA's successful roll-out of its defined sustainability strategy while engaging with key stakeholders.

3. Using EPA's sustainability vision as a starting point, and backcasting from that vision, what breakthrough objectives does NACEPT recommend for the EPA over the next 3 - 5 years drawing upon both the National Academies report recommendations and, also, approaches to sustainability and recommendations from other sources and stakeholders? In particular: (a) What measurement systems does NACEPT recommend for assessing progress toward these breakthrough objectives and EPA's sustainability vision? (b) What tools are available to help EPA consider the qualitative and quantitative environmental, public health, social and economic benefits? (c) What approaches should EPA use to share progress with the public? and (d) What other new approaches might be necessary to implement the breakthrough goals that NACEPT has identified?

4. How can sustainability evolve from a vision to be part of EPA's organizational culture? How should EPA leaders integrate sustainability programs across the Agency and with other government programs? How should EPA identify, evaluate and celebrate successful sustainability programs within and outside the Agency?

Appendix II:

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