



ECOS

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April 26, 2015

Ms. Shana Harbour
Office of the Chief Financial Officer
U.S. Environmental Protection Agency
Mail Code 2732A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Docket ID: EPA-HQ-OEI-2015-0039

Via email to: harbour.shana@epa.gov and www.regulations.gov

Dear Ms. Harbour,

ECOS appreciates the opportunity to comment on the U.S. Environmental Protection Agency's (EPA or Agency) development of an E-Enterprise for the Environment Portal. While states and the Agency are already working closely on this effort, we provide the following high level comments in response to the Federal Register notice published on January 26, 2015 (80 Fed. Reg. 3962).

Overall Process Comments:

1. States are collaborating with EPA through a joint governance framework to reshape how government agencies deliver environmental protection.
2. States appreciate the February 19 co-regulator webinar held.
3. States were pleased to co-present on each of the public webinars and in other forums on planning for an E-Enterprise for the Environment portal.
4. States find the E-Enterprise Architecture Integrated Project Team (IPT) co-led by states and EPA to further discuss development of an E-Enterprise portal, overarching architecture and related areas included shared identity management and facility identity management, to be effective and productive.

Overall Functionality Comments:

1. Interoperability between state and EPA portals is vital. Interoperability, if done properly, would protect investments made by states of both a monetary nature and a relationship nature with the regulated community and would reinforce existing delegated authority and data ownership.
2. States believe it is important that use of an E-Enterprise portal remains voluntary.
3. It is important that existing and future state portals and the E-Enterprise portal are able to be linked. This capability reinforces the partnership relationship between state and EPA. Specific steps will need to be taken to design, scope, and facilitate such capability.

4. Portal search results should at a minimum identify the source and context of the data displayed, for instance from state data sources or EPA data sources. Where appropriate, consideration should be given to the order of data displayed (e.g., should the result first display state, then federal, data?). This may include state data on regulated facilities as well as state environmental indicator type information.
5. For co-regulator users, beyond suggestions offered in the April 9 portal presentation hosted for several state associations by ECOS, there will be additional needs as this area of the portal is built out. For instance, it may be useful to display and include searchable features related to monitoring, standard setting, modeling or other activities delegated to states as well as results of State Review Framework (SRF) assessments. Conversations with states will continue over a significant course of time.
6. It is important to gain an understanding of the inventory of current EPA, state, and tribal E-Enterprise activities; consider how this information may be kept up to date; and to leverage this information to consider where to invest in new activities, shared services, or other activities and how to prioritize these investments. The portal could be a place that such an inventory would be accessible to co-regulators if the portal serves as a gateway for states to access such systems as SharePoint.
7. The portal might also serve as a place to share boiler-plate language or sample documents that could be a beneficial resource to co-regulators when they seek to update regulations or policies, build or update sample forms, develop or update audit tools, and other activities.
8. It is essential for EPA to continue to proactively seek state grant funding through its annual budget requests to Congress and in conversations with the Office of Management and Budget to assist in effective state-EPA interoperability of portal functions and underlying data transactions.
9. The portal could serve as a place for states, tribes, and EPA to better prepare for the future of advanced monitoring to leverage its benefits and address challenges. This may occur by more readily highlighting new data sets, training staff on different uses of information, development of performance metrics, and other means.
10. The portal could also serve as a place for co-regulators to publish completed lean exercises within states, within EPA, or across states and regions so that efficiencies might be more quickly adopted and facilitate “scaling out” of streamlined processes. This may be similar to the existing Reusable Component Services.
11. The portal might offer a mechanism to track EPA input on draft state permits, program reviews, or other areas, particularly where timeliness may be advantageous.
12. The portal may allow for states and EPA to expand the availability of information in ways that more readily enable development of mobile “apps.” This might include public notice systems related to beach closures, air quality, and others. This should be done in a way that is system agnostic, e.g. through the development of web services that outside developers could utilize.
13. Consideration should be given to the question of the primary audience(s) for an EPA portal versus the audiences for state portals and how that may guide decisions regarding the scope of the EPA portal. Specifically, ECOS recommends that EPA set forth an implementation schedule for major portions of the portal. Attempting to build out all portions (public, regulated community, co-regulator, and so forth) sections at the same time may render the portal cumbersome and frustrate users. Prioritization of the portal’s development phases will be key. States are committed to working with EPA as co-regulators through ECOS to assist with this process.

Again, thank you for the opportunity to provide comments. States appreciate the joint governance model with EPA that has been embraced under E-Enterprise. ECOS and states look forward to continued collaboration on the E-Enterprise portal as well as other efforts.

Sincerely,

A handwritten signature in blue ink, reading "Alexandra Dapolito Dunn". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Alexandra Dapolito Dunn
Executive Director and General Counsel
Environmental Council of the States

Cc: Tom Burack, State Co-Chair, E-Enterprise for the Environment and Commissioner, New Hampshire Department of Environmental Services
Andy Putnam, State Co-Chair, Exchange Network and Colorado Department of Public Health and Environment
Mary Montoya, State Co-Chair, E-Enterprise Architecture and Services Integrated Project Team (IPT) and New Mexico Environment Department