



Environmental Council of the States

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January 8, 2021

U.S. Environmental Protection Agency
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

Dear Assistant Administrator Bodine:

Thank you very much for your letter of December 18, 2020 inviting the comment of states on the proposed approach to conducting State Review Framework (SRF) reviews in 2021.

States recognize the challenges presented by the COVID-19 public health emergency and are supportive of the use of FY2019 data as the basis for reviews to be conducted this year, in conjunction with the option to request use of FY2020 data instead. States support the proposed option of using FY2020 data should the individual state prefer, or an individual program within a state agency, and we are already aware that some states will prefer to use FY2020 data.

Your letter states that “EPA is willing to consider SRF reviews in FY2021 using FY2020 data.” States that might be interested in using the FY2020 data would benefit from additional detail as to what factors would be used to inform that consideration and how that decision would be made.

Again, thank you for your consultation with states and with your willingness to provide flexibility as we work to maintain protection of human health and the environment during these challenging times.

You or your staff may feel free to call on me should you wish to discuss this further or if you have any questions.

Sincerely


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