August 13, 2015

Jeffrey Wennberg, Chair
U.S. Governmental Advisory Committee
VT Department of Environment Conservation
103 South Main St, Building 1 South
Waterbury, VT 05641-0401

Dear Mr. Wennberg,

On behalf of Administrator Gina McCarthy, I would like to thank you for the Governmental Advisory Committee (GAC) letter of advice of May 7th, 2015 reporting on the forty-fourth meeting held on April 16 and 17, 2015 at the EPA Headquarters in Washington, D.C. We appreciate the NAC's commitment to advance the mission of the CEC through the advice provided on tri-national environmental issues and their support to our Administrator.

It was a of great benefit for Sylvia Correa, Senior Advisor for North American Affairs, as well as a various EPA individuals representing several offices, to meet with those who attended the meeting in person. We value our relationship with the GAC committee members and the value brought on by the committee to the work of the CEC.

Recommendations on Charge Question: CEC Operational Plan

(1) *A more detailed breakdown of the Operational Plan budget should be provided in the future, especially in areas where advice is sought.*
(2) *Project proposers should be required to offer clear, specific and measureable metrics to assess the outcomes of projects ("specific, clear and tangible results") and not merely their products, deliverables or outputs.*
(3) *The $600,000 requested by the Monarch butterfly project proponents (projects 12 and 13) should be redirected to other priorities until the regulatory uncertainty surrounding glyphosate is resolved. If the CEC desires to invest in a response to the threatened loss of the Monarch in the meantime, the GAC recommends funding be applied to grants or projects aimed at encouraging planting milkweed in critical migratory path areas that are not subject to herbicide use.*

Thank you for the recommendation on establishing more accurate metrics. The final OP Plan has several monitoring and evaluation measures. However, the CEC continues to develop its expertise in designing and implementing these measures. We look forward to working with you to further improve in this area.

We agree with your recommendation to prioritize the demise of the monarch as well as to identify best practices to restore the iconic species. As a result *Project #12: Engaging Farmers and Other Landowners to Support Monarch Butterfly and Pollinator Conservation* and *Project #13: Monarch Butterfly Flyway: Communication, Participatory Conservation and Education*

program throughout the Migratory Route both prioritize engagement and communication with farmers and others about their roles in its managements and conservation.

Recommendations on Charge Question: NAPECA Grants

(1) The NAPECA invitation should provide better guidance regarding the projects sought. At a minimum the invitations should describe a range of grant award amounts that place upper and lower limits on awards.
(2) The first and essential screen for fundable projects should always be the quality of the projects and the degree to which they meet the Administration and Funding Guidelines and Grant Selection Criteria.
(3) The list of priority applicants/beneficiaries should include 'vulnerable communities.'
(4) The Selection Criteria should mention a preference for projects that are 'replicable' in addition to ". . . environmentally significant for the community and for North America."
(5) Preference should also be given to projects for which other funding sources are limited or nonexistent.
(6) A limited number of 'first funder' applications should be sought and funded in each round.
(7) First funders and small, thinly resourced organizations should have the ability to 'mentor' with universities or larger organizations to help support the administrative requirements of the program.
(8) Special efforts to publicize this program and to seek applications from indigenous communities should include the use of radio, such as the syndicated "Native America Calling" program.
(9) Applications from indigenous communities should demonstrate a strong partnership with the community and its leadership.

Thank you for these recommendations. The 2015-2016 NAPECA announcement provided the historical range of grant amounts as a guide for grant proponents so they could know the potential upper and lower limits of grant award amounts. The Call for Proposals also established a focus area for "Sustainable communities and urban initiatives" which we think is specific enough to support the 2015-2020 Strategic Plan and broad enough to include a wide range of community-level initiatives. Furthermore, this announcement requests identification of how the project could be replicated in other North American Communities as well as the information on other funding sources. As to your advice that small organizations mentor with Universities or larger organizations, project proponents are encouraged to create informal partnerships, including at the indigenous community level, and identify the beneficiaries and target population of proposed projects.

Recommendations on Charge Question: Communications

(1) The Secretariat should seek greater opportunities to use social media as a means of increasing awareness and improving communications.
(2) EPA should establish a set of social media connections for use by the committees and their members.

As you are aware, the CEC is continuing to explore various avenues for communication and outreach to the public. We appreciate your advice in this area.

Recommendation on Article 13 Report on Hydraulic Fracturing

The GAC joins the NAC in recommending that the U.S. propose an Article 13 report on the environmental impacts of hydraulic fracturing technology.

The recommendations on Article 13, the NAAEC is clear that Article 13 reports are initiated by the Secretariat, unless the Council objects, by two-thirds vote, to the preparation of such reports.

Recommendation on Community Reaction to Renewable Energy Development

The U.S. Government should propose a CEC study on the attitudes and concerns of residents and community leaders at various times following completion of a renewable energy generation project.

Recommendation on Oil Trains Briefing

Request for a briefing to the committee.

Again, thank you for your thoughtful advice. We look forward to further discussions to improve the impact of our trilateral cooperation.