

To: Munoz, Charles[munoz.charles@epa.gov]; Jackson, Ryan[jackson.ryan@epa.gov]
From: Alexandra Dunn
Sent: Mon 10/2/2017 9:39:31 PM
Subject: Thank You for the Time on Friday and Follow Up
[Resolution-17-2-Innovative-Approaches-to-Adv-Compliance.pdf](#)

Dear Ryan and Charles,

Thank you for the fantastic opportunity to speak with Administrator Pruitt, and you both, about the Region 1 Regional Administrator position. I remain convinced that this opportunity aligns the President's and the Administrator's goals for the Agency and Cooperative Federalism with my deep background in state environmental issues and personal connection to the New England region. During our conversation on Friday, the Administrator expressed interest in ECOS' policy statement in support of compliance assistance in lieu of traditional enforcement. It is attached here for sharing with him and/or the appropriate EPA leaders.

This morning I went to the EPA badging office for the fingerprint process. I am making my way through the SF86 Questionnaire for National Security Positions via e-QIP and the public financial disclosure report in INTEGRITY.

I look forward to hearing from you regarding next steps.

Kind regards,

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Resolution 17-2
Approved April 8, 2017
Washington, D.C.

As certified by
Alexandra Dapolito Dunn
Executive Director

**ON THE VALUE OF DIVERSE AND INNOVATIVE APPROACHES
TO ADVANCE COMPLIANCE WITH ENVIRONMENTAL REQUIREMENTS**

WHEREAS, substantial environmental and human health gains have been achieved over the past four decades as a direct result of state and federal implementation of environmental laws and regulations; and

WHEREAS, all stakeholders desire a national system of environmental protection system that is results-oriented, protective, understandable, transparent, accessible, and cost effective; and

WHEREAS, innovative approaches and tools that build on successes and accomplishments are important to reducing environmental compliance problems; and

WHEREAS, these innovative approaches include, but are not limited to, compliance assistance integrated into our rules and permits, simpler permit processes, real-time electronic notices of violations, transparency, self-audits, independent third-party certifications, advanced monitoring, public communication and messaging, online training programs for industry sectors, checklists, voluntary industry incentive programs, technology advancements, outreach to small and medium sized businesses, and the inclusion of social science and human behavioral research in the design of such approaches; and

WHEREAS, the development of innovative approaches can benefit from including social and behavioral science findings and research methods in the design of these innovations and the evaluation of them; and

WHEREAS, EPA's Office of Enforcement and Compliance Assurance (OECA), working with ECOS and the state media program associations identified a variety of innovative approaches states and EPA have already taken in its Next Generation Compliance public compendiums; and

WHEREAS, OECA has adopted policies that provide states with flexibility to direct compliance resources to piloting and evaluating the effectiveness of these innovative approaches (*see* ECOS' October 2016 "Field Guide to Flexibility and Results (<http://www.ecos.org/documents/fieldguide-to-flexibility-and-results/#.WLnC67Upamo.email>)); and

WHEREAS, increased flexibility that allows states to target evolving priorities is greatly appreciated; and

WHEREAS, demonstrated and measured results are essential to EPA and public support for these innovative approaches complementing and sometimes substituting for more traditional approaches.

NOW, THEREFORE, LET IT BE RESOLVED THAT THE ENVIRONMENTAL COUNCIL OF THE STATES:

Requests EPA participate with states in their efforts to cultivate, design, and implement innovative compliance approaches to protect human health and the environment through pilots and shared governance;

Seeks EPA participation with the regulated community and academic institutions in projects and efforts to measure the effectiveness of these approaches;

Requests EPA allow, in state-EPA workplans, compliance assistance and innovative compliance approaches to function as true substitutes for traditional compliance activities, when the state can provide evidence that the approaches are effective;

Encourages EPA to evaluate the effectiveness of its existing compliance assistance centers and to seek input from states, the regulated community, and the public on how its existing compliance centers can be made more modern, results oriented, and effective;

Encourages EPA to incorporate significant language in the next version of its Office of Enforcement and Compliance Assurance (OECA) National Program Manager's Guidance on the value of piloting and/or evaluating compliance and compliance assistance programs, and their eligibility to serve as alternatives to more traditional inspection activities, when carried out by EPA and/or states.