



**Hon. Bob Dixon, Chair**  
Greensburg, Kansas  
**Secretary Jeff Witte, Vice – Chair**  
State of New Mexico

**Hon. Jose C. Aponte Dalmau**  
Carolina, Puerto Rico  
**Hon. Norm Archibald**  
Abilene, Texas  
**Hon. Kitty Barnes**  
Catawba County, North Carolina  
**Mr. Rodney Bartlett, (SCAS)**  
Peterborough, New Hampshire  
**Hon. Andy Beerman**  
Park City, Utah  
**Hon. David Bobzien**  
Reno, Nevada  
**Hon. Jeff Branick**  
Beaumont, Texas  
**Hon. Dr. Robert Cope, DVM**  
Salmon, Idaho  
**Hon. Mark Fox**  
Mandan, Hidatsa, and Arikara Nation  
North Dakota  
**Hon. Karen Freeman-Wilson**  
Gary, Indiana  
**Mr. Brian Fulton**  
Pascagoula, Mississippi  
**Dr. Hector Gonzalez, M.D.**  
Laredo, Texas  
**Ms. Teri Goodmann**  
Dubuque, Iowa  
**Ms. Susan Hann**  
Brevard County, Florida  
**Mr. Brian Holter (SCAS)**  
Klawock Tribe, AK  
**Hon. Elizabeth Kautz**  
Burnsville, Minnesota  
**Hon. Ben Kimbro**  
Tulsa, Oklahoma  
**Ms. Susan Lessard**  
Bucksport, Maine  
**Hon. Carvel Lewis**  
Georgetown, Georgia  
**Hon. Ron Poltak**  
Auburn, New Hampshire  
**Hon. Carmen Ramirez**  
Oxnard, California  
**Hon. Victoria Reinhardt**  
Ramsey County, Minnesota  
**Hon. Dennis Scott (SCAS)**  
Calcasieu Parrish, Louisiana  
**Sec. Michael T. Scuse**  
State of Delaware  
**Hon. Tom Sloan**  
State of Kansas  
**Hon. Libby Szabo**  
Jefferson County, Colorado  
**Hon. Ryan Sundberg**  
Humboldt County, California  
**Com. Jai Templeton**  
State of Tennessee  
**Hon. Thomas E. Willsey, Jr., (SCAS)**  
Ross Township, Ohio  
**Hon. Mervin Wright**  
Pyramid Lake Paiute Tribe, Nevada  
**Hon. Shawn Yanity**  
Stillaguamish Tribe, Washington  
**Mr. William Youngblood**  
Pittsburgh, Pennsylvania

**Frances Eargle, DFO**

November 19, 2018

Honorable Andrew Wheeler  
Acting Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Dear Acting Administrator Wheeler:

The Local Government Advisory Committee (LGAC) appreciates the ability to have early engagement in the Office of Air and Radiation's planning process as it develops its *FY2020-2021 National Program Guidance*.

The LGAC has the following recommendations:

The LGAC encourages the EPA to consider all the impacts of its actions, particularly economic. For example, in Catawba County, North Carolina, 25% of the region's jobs were lost during the economic downturn. Catawba County's nonattainment status for PM 2.5 during the recession created an inability to recruit new businesses for nearly five years. In the meantime, many families experienced unemployment and an inability to access health insurance, leading to poor health outcomes. All nonattainment areas need additional assistance from EPA and the states to address the impacts of nonattainment status, including economic viability.

The LGAC appreciates the Agency's goal of reducing the number of nonattainment areas. The LGAC believes that to work on individual NAAQS and address air problems, the cumulative impact of multiple air pollutants and sources should be compiled for context, including background levels, thermal inversions, and transported air pollution. These challenges do not seem to be taking into consideration for meeting standards for NAAQS. For example, in Jefferson County, Colorado, the region's topography of foothills essentially prevents the area from being in attainment; over 80% of the area's nonattainment air comes from outside of the region.

Similarly, the LGAC believes that prescribed burning, an integral part of the National Cohesive Wildland Fire Management Strategy, is an important forestry management tool that is not adequately addressed by EPA. Wildfires are exempt from the Clean Air Act as exceptional events, yet prescribed burning, which can be used to decrease the risk of wildfire, is not exempt and can cause an area to fall out of attainment for PM 2.5 or PM 10. In addition, utilizing wood stoves can be a major form of fuel reduction for wildfire management, but communities and residents need access to programs that can help them upgrade their wood stoves to more efficient, cleaner models at little to no cost. The public would also benefit from education about the dangers of wood smoke from wood stoves, as well as information about easy changes they can make to decrease air pollution while continuing to use wood stoves.


The LGAC appreciates the EPA's commitment to collaborate more efficiently and effectively with states, tribes, local governments, and communities to address existing air pollution and prevent future problems. The LGAC encourages the EPA to collaborate more with manufacturers and utilities as well. The LGAC believes that civil penalty guidelines need to be revised. EPA should also consider poly-per-fluoroalkyl substances (PFAS) related to the air. While much attention has been given to addressing PFAS contamination of water sources, the contaminant is highly likely to be found in the air as well. However, our detection capabilities may outstrip our removal capabilities for PFAS in the air, so particular attention should be paid to ensure communities are not asked to do the impossible.

In summary, the LGAC appreciates the opportunity to provide early input into the EPA's National Program Management Guidance. The LGAC looks forward to a final version and the opportunity to provide further input.

Sincerely,



Bob Dixon  
Chair



Commissioner Kitty Barnes  
Chair, Air Workgroup