

**SUMMARY OF EARLY ENGAGEMENT ON THE OFFICE OF AIR AND RADIATION (OAR)
FY 2022-2023 NATIONAL PROGRAM GUIDANCE**

November 13, 2020

On August 17, 2020, OAR offered the opportunity for national, state, local, and tribal air, public health, and radiation associations to provide early input to inform the development of the Office of Air and Radiation (OAR) National Program Guidance (NPG) for FY 2022-2023 via letters of invitation. OAR received four sets of comments and shared that input with its offices and other national program offices, where relevant.

OAR will describe how early input influenced its NPG when a draft is released for public comment following the release of the FY 2022 President's Budget. OAR will provide responses to public comments when the final OAR NPG for FY 2022-2023 is issued.

Below is a summary of comments OAR received during the early engagement period.

National Tribal Air Association (NTAA): October 9, 2020

- General:
 - Consider looking at the NPG process as a whole to better align with the enacted budget versus the President's Budget.

- Improve Outdoor Air Quality:
 - Prioritize the continuation and expansion of efforts to improve air quality in Indian Country and Alaska Native Villages.
 - Recognize the immediate and long-term impact of wildfires.
 - Prioritize scientific integrity with regard to the National Ambient Air Quality Standard (NAAQS) setting process.
 - Require state engagement with Tribes in the review, development, and implementation of state implementation plans, and provide additional Tribal support to enable this engagement.
 - Address the effects of COVID-19 in the NPG as COVID-19 has disproportionately impacted American Indian and Alaska Native persons and studies have found correlation between poor air quality and COVID-19 infections and mortality.

National Association of Clean Air Agencies (NACAA): October 15, 2020

- Improve Outdoor Air Quality:
 - Discuss how the agency intends to address interstate ozone transport issues beyond continued implementation of the Cross-State Air Pollution Rule (CSAPR).
 - Include agency commitments to continue to undertake more rigorous federal actions to reduce mobile source emissions. EPA must also include recognition of and support for California's and other states' authorities under Clean Air Act (CAA) Sections 209 and 177.
 - Discuss how EPA plans to address emerging toxic air pollution issues facing federal, state and local agencies.

- Effective Use and Distribution of State and Tribal Air Grants (STAG) Funds:
 - Acknowledge EPA's statutorily mandated training obligations and clearly commit to providing federal funding to sufficiently finance this effort.

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- Requests that state and local air quality agencies receive significant increases in federal grant funding.
- Ensure that state and local air agencies have flexibility to target the grants for the highest priority activities in their areas.
- Continue funding the PM2.5 monitoring program under CAA Section 103.

Association of Air Pollution Control Agencies (AAPCA): October 21, 2020

➤ General/Improve Outdoor Air Quality:

- Engage early and collaborate with state and local air agencies in guidance and regulation development (e.g., SIPs).
- Supports Emphasize training assistance and development, technical support, reduction of the SIP backlog and the timely processing of SIPs.
- Replace Regional Haze Federal Implementation Plans (FIPs) with SIPs and collaboration in developing approval process.
- Review state and local monitoring plans more quickly.
- Acknowledge that heavy and light-duty diesel vehicle emission control systems tampering significantly impact air quality in some states[?].

➤ Effective Use and Distribution of STAG Funds:

- Stable and adequate funding to state and local air agencies important to fulfilling CAA obligations.
- Moving the funding authority for PM2.5 monitoring to CAA Section 105 could adversely impact state and local agencies' budgets.
- Flexibility in the air quality planning process is important in considering potential changes in budgetary circumstances.
- Funding, development, and support of training and training materials for air agency personnel [should be a priority.]

Environmental Council of the States (ECOS): October 23, 2020

➤ General/Improve Outdoor Air Quality:

- Identifies four priority issues: 1) adequate funding, 2) flexibility, 3) E-Enterprise for the Environment, and 4) technology infrastructure.
- Engage with states in enhancing planning and communication in air program work.
- Increase funding for STAG
- Continue to support states' efforts to address equity issues in environmental justice and low-income communities disproportionately impacted by air pollution.
- Continue to work cooperatively with states as they update the National Emission Standards for Hazardous Air Pollutants, specifically regarding lead-acid battery manufacturing.

➤ E-Enterprise:

- Continue investment in data systems to improve the interoperability between state and federal databases.
- Support technology infrastructure and continue latitude for state pilot projects to accelerate the adoption of new, more efficient tools to meet our shared goals such as with current projects, including: The Combined Air Emissions Reporting project (CAER); the State Plan Electronic Collaboration System (SPeCs) project; the Advanced Monitoring Strategy and Implementation project; and the Regulation Navigation (Reg Nav) tool project.