

October 1, 2014

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Daniel Hopkins
Margaret Walters
Office of Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Daniel and Margaret:

On behalf of the National Association of Clean Air Agencies (NACAA), thank you for this opportunity to provide early input to the EPA Office of Air and Radiation (OAR) on the OAR National Program Manager (NPM) Guidance for FY 2016-2017. NACAA is a national, non-partisan, non-profit association of air pollution control agencies in 42 states, the District of Columbia, four territories and 116 metropolitan areas. The air quality professionals in our member agencies have vast experience dedicated to improving air quality in the United States. These comments are based upon that experience. The views expressed in this document do not necessarily represent the positions of every state and local air pollution control agency in the country.

It is important that the NPM guidance focus on high-priority activities. However, our biggest concern has to do with the amount of funds the federal government will provide state and local air agencies through Sections 103 and 105 of the Clean Air Act. As you know, state and local air quality agencies have been faced with insufficient budgets for many years and significant increases in grant funds are essential. It is imperative that we have adequate resources for our core programs, which include day-to-day activities that are the foundation of our efforts to protect public health and welfare, as well as for new and expanded program responsibilities under the Clean Air Act. Therefore, we call on EPA to do all that it can to ensure that grants are increased in the future.

As EPA's co-regulators, we commend the agency for seeking our input as it moves through the process of developing the NPM guidance. We recommend that the guidance acknowledge, as it did in the last version, that it is merely the basis for negotiations among EPA and state and local air agencies. Since priorities vary throughout the nation, we recommend that EPA allow regions to tailor work expectations and resource allocations to meet local circumstances, and work with air agencies to do likewise. We recommend that the guidance state that identification of priorities within a region should be done collaboratively among

federal, state and local officials. Additionally, we welcome EPA's recognition that circumstances may change during the course of a year and that the agency should work with air agencies to make adjustments to address changing priorities. Finally, in view of the expertise that state and local agencies possess, we believe EPA should engage them as co-regulators in consistent and meaningful ways, especially early on, when the agency initiates the development of rules, guidance and other policies and processes.

We also request that EPA leave funding for the fine particulate matter (PM_{2.5}) monitoring network under Section 103 authority, rather than shifting it to Section 105 authority, which would require state and local agencies to provide matching funds of 40 percent. Unfortunately, not all agencies would be able to afford the match in these difficult economic times. Those agencies that are unable to provide matching funds would not be able to accept the grants for these important monitoring programs. As a result, these agencies could be forced to discontinue required monitoring at existing sites. Since these are nationwide monitoring efforts, NACAA believes the funding should be provided under Section 103 authority so it is accessible to all, regardless of their ability to match the grants.

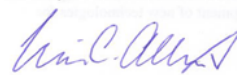
We believe EPA's proposed national areas of focus for FY 2016-2017 (identified in your attachment) generally touch on the priorities of the air program, including criteria pollutants, air toxics, monitoring, permitting, mobile sources and others. We look forward to discussing the details related to these individual programs as you continue to develop the NPM guidance.

Thank you again for seeking our input and we look forward to working with you throughout the process of developing and issuing the draft and final NPM guidance documents.

Sincerely,



Bruce Andersen
Kansas City, Kansas
Co-Chair
NACAA Program Funding Committee



William Allison
Colorado
Co-Chair
NACAA Program Funding Committee