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October 12, 2016

Marc Vincent
Office of the Chief Financial Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

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

Dear Messrs. Vincent and Hopkins:

On behalf of the National Association of Clean Air Agencies (NACAA), thank you for this opportunity to provide early input related to the development of the FY 2018-2019 National Program Manager (NPM) Guidance for the Office of Air and Radiation (OAR). NACAA is a national, non-partisan, non-profit association of air pollution control agencies in 40 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.

The most important comment we wish to make relates to the amount of funding provided to state and local air agencies under Sections 103 and 105 of the Clean Air Act. Since these agencies have been severely underfunded for many years, it is essential that federal grants for these programs be increased significantly. Accordingly, even though our funding shortfall is far greater, NACAA appreciates the grant increases that EPA has recommended in recent years. Regardless of the amount of the grants, it is essential that state and local agencies be given as much flexibility as possible with respect to how they spend these resources. We believe they should be able to use them for the highest priority activities in their areas, including, but not limited to, new and expanded activities and ongoing core programs.

In the materials EPA provided to guide early input comments, the agency requested feedback on which national priorities/areas of focus/cross-media priorities OAR should focus. We agree that the list provided in this document appears to be an appropriate set of issues.

EPA also requested comments on the content of the FY 2016-17 OAR NPM Guidance and the FY 2017 OAR Addendum. NACAA submitted comments on both of these documents when they were issued in draft form and we would like to refer you to those comments as you develop the next draft NPM guidance. We believe our comments are still relevant and ask that you consider them as you prepare the FY 2018-2019 guidance. NACAA's comments are available here http://www.4cleanair.org/sites/default/files/Documents/NPM_FY16_17_NACAA_Comments.pdf (March 23, 2015) and here <http://www.4cleanair.org/sites/default/files/Documents/NPM-FY17-Addendum-NACAA-Comments.pdf> (March 22, 2016).

Among the points contained in NACAA's previous letters that we believe remain of great importance and that we wish to highlight are the following:

- NACAA is pleased that EPA acknowledged in previous guidance that there are not sufficient resources for all activities and that priorities may vary throughout the nation. Therefore, we supported EPA's plan to work with state and local air agencies to adjust resources to meet changing priorities.
- NACAA was gratified that EPA acknowledged that NPM guidance is merely the basis for negotiations among EPA and state and local air agencies. Since state and local air agencies have a great deal of expertise, we believe EPA should engage and work collaboratively with 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.
- EPA has proposed for several years to begin shifting funding for the fine particulate matter (PM_{2.5}) monitoring network from Section 103 to Section 105 authority, which would require state and local agencies to provide matching funds. The PM_{2.5} monitoring program has been funded under Section 103 and this arrangement has worked very well. NACAA recommends that it continue and, therefore, we oppose the transition of the program to Section 105 authority as EPA has proposed in recent years. Such shifts would require state and local agencies to provide a 40-percent match, which not all agencies can afford. 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 thank you for this opportunity to provide input prior to the development of the FY 2018-2019 National Program Manager Guidance for the Office of Air and Radiation. We look forward to working with you as you develop this document and to providing additional comments during the process.

Please do not hesitate to contact us if you need additional information.

Sincerely,



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



William Allison
Colorado
Co-Chair
NACAA Program Funding Committee