

July 27, 2010

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S. William Becker

Docket ID: EPA-HQ-OA-2010-0486
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Sir/Madam:

On behalf of the National Association of Clean Air Agencies (NACAA), thank you for the opportunity to comment on the U.S. Environmental Protection Agency's "Draft FY 2011 - 2015 EPA Strategic Plan." We commend EPA for including in the draft plan many important activities on which the agency should focus its efforts in the coming years. We are especially pleased to see the inclusion of "Taking Action on Climate Change and Improving Air Quality" as the first goal in the plan. Placing this goal in such a prominent position recognizes the importance that air quality plays in our quest to improve and preserve public health.

We agree with EPA's decision to streamline the document and make it more readable. Additionally, we praise the agency for articulating the fundamental cross-cutting strategies that EPA plans to use in working towards its goals. We were particularly pleased to see that "Strengthening State, Tribal and International Partnerships" is one of these fundamental strategies. If EPA is to be successful in improving and protecting the environment, it is vital that the agency recognize its partners and co-regulators and do all it can to work in cooperation with these entities. We recommend that EPA explicitly recognize the critical role of local governmental entities in its mission by expressing the strategy as "Strengthening State, Local, Tribal and International Partnerships."

We focused our review on the first goal and would like to offer the following specific comments:

Page 7: We recommend revising the second bullet as follows: "Issuing new standards to reduce emissions from cars and light-duty trucks for model years 2012 through 2016, ~~extending that program to~~ developing and promulgating even more rigorous standards for model year 2017 and beyond, and creating a similar program to reduce GHGs from the medium- and heavy-duty trucks for model years 2014-2018. Implementing the light-duty GHG rule is one of the Agency's high priority performance goals."

Pages 7-11: The plan contains a goal for reducing greenhouse gas (GHG) emissions from vehicles, but does not include a goal for reducing GHG emissions from stationary sources. Since emissions from power plants, for example, comprise 40 percent of GHG emissions in this country, we recommend that EPA include steps for addressing GHG emissions from stationary sources as well. Specifically, we recommend that EPA include the establishment of a New Source Performance Standard (NSPS) for GHG from stationary sources as a priority. Currently EPA is specifically reviewing whether to set a GHG NSPS for electricity generation units.

Additionally, the draft plan notes that the Transport Rule will be made final in the spring of 2011, but EPA has also committed to developing a second Transport Rule, to be finalized in 2012, if it tightens the ozone standard in August 2010.

Page 32: The strategy entitled, “Strengthening State, Tribal and International Partnerships” should be changed to “Strengthening State, *Local*, Tribal and International Partnerships” and the text throughout the document should be changed accordingly. One of EPA’s specific objectives related to working with state and local partners should be consultation with them *prior* to the proposal of a rule. Additionally, since state and local air agencies are the primary implementers of the rules that EPA develops, EPA should discuss implementation strategies with state and local air agencies prior to rule promulgation.

Page 34: The draft discusses EPA employees and what the agency plans to do to attract, retain and train staff. We recommend that the plan also state that EPA will implement the National Training Strategy, which was prepared by NACAA and EPA to articulate a national training strategy for federal, state, and local clean air professionals. The strategy lists steps to be taken to create a national program that provides training for federal, state, and local air quality professionals to develop and enhance the knowledge, skills and abilities needed to accomplish their organizational objectives and support the national clean air mission. We also recommend that EPA commit to funding for training that would benefit state, local and EPA staff.

Page 39 and 53: Some of the Strategic Measures have placeholders of “XX” rather than specific numbers. It is difficult to review and comment without knowing what the final measures will be.

Page 42: The plan contains goals for reducing the population-weighted average concentrations of ozone and fine particulate matter to certain levels by certain dates. Shouldn't the goal be to bring X number of nonattainment areas into attainment? Improving an average could mean that clean air gets cleaner but that the worst air stays the same, which is not what we hope for.

Thank you for this opportunity to provide comments on the document. Please let us know if you have any questions.

Sincerely,



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