

April 3, 2003

Ms. Linda Combs
Chief Financial Officer
U.S. Environmental Protection Agency
Office of the Chief Financial Officer
1200 Pennsylvania Avenue, 2710A
Washington, DC 20460

Dear Ms. Combs:

On behalf of the State and Territorial Air Pollution Program Administrators (STAPPA) and the Association of Local Air Pollution Control Officials (ALAPCO), thank you for this opportunity to comment on the latest draft of EPA's 2003 Strategic Plan, dated March 4, 2003. We have reviewed the portions related to air quality and have several comments and recommendations to offer.

First, we commend EPA for including a passage in the section on "Strengthening Partnerships: Improved Relationships with States and Tribes" in which you acknowledge the critical role that state and tribal programs have played in our nation's air quality accomplishments. We agree that EPA's partnership with state, local and tribal governments is essential to the success of our efforts. In fact, in light of the very important role that local air quality agencies play, we recommend that future versions of the strategic plan explicitly include mention of those agencies, along with state and tribal programs.

We also commend EPA for specifically identifying the urban air toxics strategy under Objective 1.1, as we recommended in our comments on the previous draft of the Strategic Plan. With respect to our previous comments, however, we are dismayed that EPA did not include or otherwise address the majority of our recommendations. We feel strongly that the suggestions we made would improve the Strategic Plan and should be incorporated. We are attaching a copy of those previous comments for your review and urging you to include as many of our suggestions as possible.

We note that the new draft contains specifics, such as dates and reductions or percentages of the population that will benefit. We are uncertain about how these estimates were derived, so we find it difficult to comment on how reasonable or accurate they are.

The following are some comments and recommendations related to the most recent draft:

- Under “Means and Strategies to Achieve Objective 1,” third paragraph, we suggest the first sentence be amended to read: “Over the next several years EPA and its partners will focus on implementing the 1997 fine particle (PM_{2.5}) and ozone standards, further reducing emissions from electric generating units through the Clear Skies multi-pollutant approach, *or other multi-pollutant approach, as adopted by the U.S. Congress*, and implementing the air toxics program.”
- In the sixth paragraph of the same section, the fifth sentence should be amended to read: “We will continue to seek reductions of risks related to air toxics from mobile sources, *including issuing a proposed rule by July 2003 outlining how the agency will fulfill its statutory responsibility to pursue the greatest emissions reductions achievable based on the available technology.*” A similar statement should be included in the last Strategic Target of Sub-Objective 1.1.2 (Reduce Emissions from Mobile Sources through Federal Regulations).
- In the eighth paragraph of the same section, the second sentence should be amend as follows: “Thus, EPA is developing a program to establish new standards for these engines, including new sulfur requirements for non-road diesel fuel; *the ultra-low sulfur diesel fuel to be required under this program will be extended to locomotive and marine engines, as well.*”
- Somewhere in Objective 1.1 there should be a statement by EPA committing to improving technical tools and emissions data and expanding training opportunities for air quality professionals.
- The document does not contain adequate discussion (including targets and/or objectives) about visibility improvements or regional haze. These should be added.
- In Subobjective 1.1.3, the first sentence should be revised to read "By 2010, *state and* local air quality management programs . . ."

Thank you again for this opportunity to provide you with our comments. We look forward to continuing to work with you on the development of EPA’s 2003 Strategic Plan.

Sincerely,

Lloyd Eagan
President of STAPPA

Ellen Garvey
President of ALAPCO

cc: Rob Brenner (EPA-OAR)
Michael Hadrick (EPA-OAR)