

February 6, 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 EPA's Draft 2003 Strategic Plan, dated December 31, 2002. We have reviewed the portions related to air quality and have several comments and recommendations to offer.

On November 14, 2002, STAPPA and ALAPCO commented on a previous draft of the Strategic Plan. We were gratified to note that the December 31, 2002 draft responded in part to one of our primary concerns expressed in our earlier comments, which was that the "Air Quality Management" sub-objective contained far too many critical activities. This amalgamation tended to obscure some key individual plan elements. Therefore, we support the fact that "Area-Specific Air Toxics" receives separate treatment as an independent sub-objective in the subsequent draft.

Although we are happy that "Area-Specific Air Toxics" was given greater attention, we remain concerned that "Area-Specific Air Quality Management" is still an enormous category containing many critical activities. By merging them all into one subcategory, it appears as if EPA does not recognize how important the elements are. Also, while regulation of electric generating units and regulation of mobile sources and fuels are extremely important, we do not believe they warrant individual sub-objectives, especially if so many other essential activities are lumped together into "Area-Specific Air Quality Management." Furthermore, by placing them in the order presented, "Area-Specific Air Quality Management" is further diminished in comparison to the others. Accordingly, we believe that "Area-Specific Air Quality" should be further divided into separate sub-categories and that its components should be placed first, followed by the air toxics sub-objective.

Additionally, the current architecture goals reflect the status quo based on existing EPA rules. We recommend that EPA also look forward in the Strategic Plan. The emission reduction goals should be modified to also anticipate *future* EPA actions that support attainment of all national ozone and particulate matter standards, as well as reduce the risks from toxic air pollutants.

With respect to the sub-objectives identified, we have several specific recommendations:

- under the Federal Regulation of Electric Generating Units and Other Stationary Sources, add a strategic target on updating the NSPS standards;
- under the Federal Regulation of Mobile Sources and their Fuels, add a strategic target on adopting the nonroad diesel program;
- under Area-Specific Air Quality Management (or an appropriate sub-objective if this one is divided, as we suggested), add strategic targets on preventing deterioration of air quality in attainment areas and haze;
- under Area-Specific Air Quality Management, the draft uses terms such as "healthy levels", when the intention is to meet the National Ambient Air Quality Standards (NAAQS), as reflected in the strategic targets. The NAAQS are not always fully protective of health, especially for fine particles. Thus, these measures should be restated as "% of population that live in areas where NAAQS are not exceeded" or similar language. As written, achievement of the stated goals/objectives would lead most lay persons to the conclusion that health is being fully protected;
- under Area-Specific Air Toxics, add strategic targets on the urban area source strategy (reflective of the statutory requirements), air toxics monitoring and retrofit of existing diesel engines; and
- under "Atmospheric Change" (Objective 3), the plan expresses the intention of protecting the public from the effects of climate change, although the identified actions will not do that. Perhaps "reduce the effects of" could be substituted for "protects". If the objective is left as written, at least sub-objective 3.1 should be restated to reflect what will be accomplished, which is slowing the rate of increase in pollution levels. The sub-objective implies emission reductions will occur.

Finally, as we suggested in our previous comments, we recommend the Strategic Plan discuss the relative priority of the goals contained in it. Instead of presenting the five goals as equal in weight, urgency and importance, the Strategic Plan should indicate that certain environmental problems present greater risk to public health and the environment than others and should therefore be of higher priority.

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)