

September 14, 2021

**BOARD OF DIRECTORS**

**Co-Presidents**

Michelle Walker Owenby  
Tennessee

Erik C. White  
Auburn, CA

**Co-Vice Presidents**

Garrison Kaufman  
Colorado

Rollin Sachs  
Kansas City, KS

**Co-Treasurers**

Frank L. Kohlasch  
Minnesota

Mark Buford  
Mount Vernon, WA

**Past Co-Presidents**

Rick Brunetti  
Kansas

Richard A. Stedman  
Monterey, CA

**Directors**

Tracy Babbidge  
Connecticut

Elizabeth Bisbey-Kuehn  
New Mexico

Robert H. Colby  
Chattanooga, TN

Richard Corey  
California

Kelly Crawford  
District of Columbia

Jayne Graham  
Pittsburgh, PA

Uri Papish  
Vancouver, WA

Frank Steitz  
New Jersey

Kathy Taylor  
Washington

**Executive Director**

Miles Keogh

Marc Vincent  
Michael Wolfe  
Office of Air and Radiation  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Michele McKeever  
Elizabeth Ragnauth  
Office of Enforcement and Compliance  
Assurance  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

To Whom It May Concern:

On behalf of the National Association of Clean Air Agencies (NACAA)<sup>1</sup>, thank you for this opportunity to provide early input as you prepare to draft the EPA National Program Guidances (NPG) for FY 2023-2024. We recognize that these are important documents that will guide EPA's activities in the coming years and we appreciate your willingness to consider our recommendations.

On January 15, 2021, NACAA sent a document to the Biden-Harris Administration containing recommendations and priorities for our nation's clean air and climate program. This document – [Improving Our Nation's Clean Air Program: Recommendations from the National Association of Clean Air Agencies to President-Elect Biden's and Vice President-Elect Harris' Administration](#) (January 15, 2021) – provides valuable insights on a variety of program areas for EPA to consider as it drafts the NPGs. The document highlights seven priority recommendations:

- 1) Center Environmental Justice
- 2) Respect State and Local Authorities as a Pillar of the Clean Air Act
- 3) Ensure Scientific and Technical Integrity for Core EPA Actions
- 4) Advance New EPA Programs to Protect Public Health and the Environment and Address Climate Change
- 5) Reset Permitting and Enforcement Priorities to Emphasize Public Health and Equity
- 6) Improve Technical Assistance to State and Local Air Agencies
- 7) Address the Urgent Need for Significant Increases in Federal Funding

---

<sup>1</sup> NACAA is the national, non-partisan, non-profit association of air pollution control agencies in 41 states, including 115 local air agencies, the District of Columbia and four territories. The air quality professionals in our member agencies have vast experience dedicated to improving air quality in the U.S. The comments and recommendations in this letter are based upon that experience. The views expressed in this letter do not represent the positions of every state and local air pollution control agency in the country.

Above all of these, however, was an eighth overarching recommendation: for EPA to work in partnership with state and local clean air agencies.

These recommendations cover a range of topics pertaining to both the EPA Office of Air and Radiation (OAR) and the Office of Enforcement and Compliance Assurance (OECA). We urge you to read this document and incorporate our recommendations into the drafts of the National Program Guidances for both OAR and OECA. We also would welcome opportunities for more focused discussions with you about the impacts of the National Program Guidances on state and local air agencies.

Thank you again for this opportunity to provide you with our input. Please do not hesitate to contact either of us as you work through this process or reach out to Mary Sullivan Douglas ([mdouglas@4cleanair.org](mailto:mdouglas@4cleanair.org)) or Miles Keogh ([mkeogh@4cleanair.org](mailto:mkeogh@4cleanair.org)) of NACAA.

Sincerely,



Kelly Crawford  
District of Columbia  
Co-Chair  
NACAA Program Funding Committee



Craig Kenworthy  
Seattle, Washington  
Co-Chair  
NACAA Program Funding Committee