

August 30, 2021

Dear NACAA colleagues,

Looking back over the past twelve months it's obvious that this has been a very eventful year, and I wanted to send you this letter highlighting all the things we've accomplished together since last summer. As a community, the members of the National Association of Clean Air Agencies faced a global public health emergency, a national reckoning on racial justice, the presidential election and a new administration with new priorities, and new opportunities presented on Capitol Hill. I'm proud of how our family of state and local agencies has risen to meet each challenge. So without further ado, here are seven NACAA highlights from the past year...

1. [We updated and strengthened our core mission and values.](#)

NACAA was founded on the belief that nobody should suffer harms from air pollution. Our shared commitment to advancing environmental justice is nothing new, but last year we took a new look at how to articulate that commitment. We started organizing discussions on community resilience and environmental justice in 2019, and in October 2020, our national meeting was organized with environmental justice as its central theme. In October 2020, the NACAA board of directors and committee chairs revised NACAA's mission, values, and strategic priorities to reflect our ambitions to center inclusion and equity in the work that we do, and they approved a statement and direction on racial justice that has guided our 2021 actions as well. Since then, NACAA has built strategic partnerships with environmental justice leaders and advocates and conducted a baseline survey of the members' issues and actions in this area that will guide our future efforts. (Please stay tuned for the results of that survey, along with actions informed by what we learn from them!)

2. [We spoke with one voice to the incoming administration.](#)

Immediately following the presidential election, our clean air agency members started a process to identify and prioritize the association's issues and needs in the years ahead. Before the inauguration, NACAA sent a transition letter to the Biden administration detailing our priorities. The letter ([available on our website](#)) made seven 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

Above all of these recommendations, however, was an eighth overarching recommendation: to work in partnership with state and local clean air agencies. To advance this foundational recommendation, NACAA's leadership met with the Biden transition team in January 2021 to brief them on our transition letter and to explore paths forward. To follow up on the recommendations, NACAA turned to where we have our greatest subject matter expertise: our committees, which have advanced each of the major points in the transition letter by continuing to engage with EPA in our regular calls and meetings and sending multiple letters and comments. It's been a great way to advance working successfully with the federal government.

3. We championed your funding and mission on Capitol Hill.

NACAA's professional staff has been active on Capitol Hill for the last 40 years advocating for increases in federal funding for state and local grants to implement the Clean Air Act. It hasn't always been easy, but NACAA has remained focused and persistent over the years, and for FY 2022 appropriations both the administration's budget and the numbers proposed by Congress mirror NACAA's appropriations recommendations. I'm hopeful that over the next few months, those appropriations will be enacted, bringing millions of dollars in additional funding to your agencies. NACAA was also able to advance our members' shared clean air mission with as much as \$43 million in Section 103 grant funding included in the American Rescue Plan, the 2021 stimulus bill, and I'm hopeful there will be other funds forthcoming. This reflects the good reputation that your agencies have in Washington for bringing prosperity and healthy lives to American families, and I hope it also validates the value of your investment in having a presence in our nation's capital.

4. We found common ground in our committees.

At the heart of NACAA's policy work are our 12 committees – the engine of our efforts to develop policy, offer resources, and nurture a community of agencies. Each of our committees worked hard over the past year bringing key information to NACAA members to keep you up-to-date on everything you need to know to be effective in your challenging, dynamic, deeply technical jobs. Every committee creates opportunities for our members to talk with a cadre of EPA staff experts, develop comments on proposals, and learn from and with each other. Capturing the last year of committee action could fill a whole book, but here are a few highlights from the past 12 months:

- In May 2021, the NACAA Air Toxics Committee sent a letter to EPA suggesting additional action the agency and NACAA could take to improve collaboration on several high-priority air toxics issues. Most recently, the committee has been working with EPA to ensure that state and local agencies continue to have access to the valuable inventory and risk estimate data that have historically been available through the National Air Toxics Assessment, as EPA transitions to a different platform (EJSCREEN) for making air toxics information publicly accessible.
- NACAA's Criteria Pollutants Committee submitted comments on EPA's 2020 proposed decision on the ozone NAAQS review, remained actively engaged in protecting the integrity of the New Source Performance Standards for residential wood heaters, including raising enforcement concerns with EPA.
- NACAA's Enforcement Committee provided comments on EPA's National Program Guidance for 2022-2023 and became deeply engaged in the modernization of the ICIS compliance system used by EPA and our members.
- NACAA's Climate Change Committee filed comments on EPA's June 2021 proposal to draw down hydrofluorocarbons, calling for EPA to continue research to enable a global substitution and phase-out of these chemicals in the future.
- The NACAA Monitoring Committee is serving as an important conduit between EPA and state and local agencies as EPA works to implement the November 2020 U.S. Government Accountability Office recommendations on ways to sustain and modernize the U.S. monitoring networks. In September 2020, our Monitoring Steering Committee held a two-day virtual meeting with EPA staff to share technical research and discuss current and future policy and implementation issues.
- In June 2021, NACAA Emissions and Modeling Committee representatives helped to organize a highly successful Regional, State and Local Modelers' Virtual Workshop.
- NACAA's Mobile Sources and Fuels Committee developed NACAA's comments and testimony on EPA's and the National Highway Traffic Safety Administration's actions to reconsider or propose the repeal of the 2019 "SAFE 1" Rule; EPA's proposal to improve the GHG "clean cars" standards set in the 2020 "SAFE 2" Rule; EPA's request for information on its 1986 policy on the sale and use of aftermarket catalytic converters; EPA's proposed

aircraft GHG emission standards; EPA’s proposed vehicle test procedure adjustments for Tier 3 certification test fuel; and California’s proposed heavy-duty omnibus regulation. In addition, the Committee joined with the Criteria Pollutants Committee to write a letter to EPA advancing the association’s position in support of immediate action to substantially reduce NO_x emissions from highway heavy-duty trucks.

- NACAA’s Permitting and New Source Review Committee is engaging closely with EPA as it considers potential revisions and rescissions to the numerous permitting rules, policies and guidance documents adopted by the previous administration. In June 2021, the committee created an NSR Improvement Subcommittee to examine ways in which the NSR permitting processes can be made more efficient and effective, post-applicability determination. The subcommittee is developing a comprehensive report that aims to release by the end of 2021.
- The NACAA Training Committee continued its very popular 45-minute “Coffee Breaks” to provide busy NACAA members with information to help you run a world-class organization. This year’s coffee breaks featured the future of Title V permit fees; retaining talent at your air agency; tribal air agencies; and cybersecurity at clean air agencies. You can find recordings of these sessions on our website.
- During Air Quality Awareness Week in May 2021, NACAA’s Public Outreach Committee helped disseminate daily air quality Tweets for use by state, local and tribal air agencies, which boosted views of our members “#AQAW21” tweets on social media to 59,300 impressions!
- Many of our comments were developed by multiple committees working in partnership; our Board of Directors took the lead on bridging all our committees to draft and finalize comments on EPA’s 2020 Clean Air Act cost-benefit analysis proposal, create a statement and direction on racial justice, write our transition letter, and take other actions.

5. Our meetings and events went virtual.

One of the best parts of NACAA is our ability to come together with our colleagues in a community of friendship. Our Fall 2020 membership meeting emphasized environmental justice issues and our spring 2021 membership meeting focused on engaging with the new administration, featuring the usual scientific and policy expertise, as well as addresses from EPA Administrator Michael Regan and the Chairman of the U.S. Senate Committee on Environment and Public Works, Senator Tom Carper. The shift from in-person to virtual meetings has been challenging, but this year we have broadened and deepened the reach of our services – our membership meetings each boasted over 500 attendees, and participation in our committee calls is up by over 50%. Our Fall 2021 membership meeting is scheduled for October 20-21, 2021 on Zoom, and I hope we’ll see you there! As with all our meetings since the pandemic started, there will be no registration fee for you or your team. We at NACAA HQ miss our clean air family, and look forward to the day when we can be together in person again.

6. We developed new tools and resources to support our community.

NACAA continues to produce resources that help advance the capability and effectiveness of our member agencies. This year a lot of that work had to happen online. In June 2021 the association replaced our website, and with virtual operations and everyone teleworking, this was like replacing the plane while flying it. It was a big undertaking, engaging a competitively selected vendor and coordinating with members and staff to make sure that our online tools would drive even more value to the members. It was done seamlessly and under budget, and the new site has an improved calendar, better navigation, and easier searchability so you can find everything you need. [See for yourself!](#)

In addition to these new features, our website is a good place to find resources we’ve provided for years like our VW Settlement Hub, our Permitting Resources Clearinghouse, our D.C. Circuit Clean Air Act litigation tracker, and our NACAA Training Resources Hub, which provides members with a consolidated listing of available training opportunities and recordings of NACAA’s own training webinars, including our “Coffee Breaks.”

NACAA's Capital area staff continues to track and disseminate federal legislation and action in the courts, and every week we produce *The Washington Update*, a newsletter that is invaluable for staying on top of all the news happening in the world of clean air and climate. (It's archived in our library online.) Our site also hosts an active jobs board for your agencies to attract the best talent from our community. You can find all these resources on our newly redesigned members-only website, [AirWeb](#).

7. We maintained seamless operations during the pandemic.

In December 2020, NACAA received an unqualified audit with no deficits, findings or material weaknesses, keeping alive our perfect multidecade streak as a low-risk auditee. The savings the NACAA headquarters team has accrued over the past year – due to lower rent, lower operating expenses, lower personnel expenses and securing a PPP loan – have strengthened the association's financial position, allowing us to replenish our reserves for unplanned expenses in the future while keeping dues level since 2018. We have not charged registration fees for any of our virtual meetings, and are looking at ways to direct a modest surplus toward new services like travel support and scholarships to attend trainings, among other things. If you have ideas, we'd love to hear them!

In terms of our operations, NACAA remained strong during the lockdowns and turmoil that came with the COVID-19 pandemic. As is occurring with many of your agencies, our staff of six has started to come back into the office in Northern Virginia, though we continue to conduct many operations remotely. The team has world-class expertise in the subjects that matter most to you, but more importantly, we are totally committed to your success. If we can support you in any way, please don't hesitate to reach out!

So what's next?

Last October, our outgoing co-presidents, Rick Brunetti of Kansas and Charlene Albee of Washoe County, Nevada, passed the baton to this year's co-presidents: Michelle Walker Owenby of Tennessee and Erik White of Placer County, California. Our members include officials from 35 state agencies, 115 cities and counties, 4 territories and the District of Columbia. NACAA convenes these pre-eminent experts in a national policymaking conversation to find common ground, advance our mutual interests, and thrive by respecting each other's differences. In the last year we celebrated (bittersweetly) the retirement of some of our most active air directors, and welcomed new committee chairs and association leaders. That kind of turnover looks likely to continue, so if you'd like to be more involved with NACAA, I'd love to explore the possibilities with you. We can't do it without you!

Looking ahead, 2022 seems likely to offer new challenges and new opportunities. We expect our community will be kept busy responding to new proposals from the administration, continuing our commitment to our clean air mission, and rising to meet any emerging challenges. Some of these are foreseeable, including addressing our changing climate, renewing our commitment to environmental justice, and better understanding of the hazards posed by increasingly widespread contaminants. We also know that many challenges will simply be impossible to predict until they appear. NACAA will face all of these challenges in a way that is guided by our mission and values – and, as we always do, together.

We've had an eventful, successful and memorable year. I'm looking forward to working with and for you to achieve even more in the year ahead.

Wishing you well,



Miles E. Keogh, NACAA Executive Director