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U.S. Environmental Protection Agency FY 2022-2023 Office of Air and Radiation/National Program Guidance: National Association of Clean Air Agencies Comments

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The National Association of Clean Air Agencies (“NACAA”) submitted October 15th comments to the United States Environmental Protection Agency Office of Air and Radiation (“OAR”) addressing development of the:

FY 2022-2023 Office of Air and Radiation (OAR) National Program Guidance (“Guidance”)

NACAA describes itself as the national, nonpartisan, non-profit association of air pollution control agencies in 41 states, including 115 local air agencies, the District of Columbia and four territories.

NACAA’s initial comment is characterized as its most important recommendation. The organization requests that state and local air quality agencies receive significant increases in federal grant funding. This is based on their argument that state and local air agencies responsibilities:

. . . have continued to grow while, unfortunately, federal funding has not been commensurate with these obligations.

Examples of funding needs and available funds are provided.

The additional topics addressed by the comments include:

- Monitoring Funding (referencing OAR’s proposed shift of funding for the fine particulate matter monitoring network from Section 103 to Section 105 requiring matching funds)
- Interstate Ozone Transport (requesting discussion of how OAR intends to address interstate ozone transport issues beyond continued implementation of the Cross State Air Pollution Rule)
- Mobile Source Emissions (referencing some states’ limited ability to address these emissions and asking that it include commitments to continue to undertake rigorous federal actions to reduce such emissions)
- Toxic Air Pollutants (guidance to address how OAR plans to address emerging issues facing federal, state and local agencies regarding toxic air pollution)
- Training (asks that guidance acknowledge the OAR’s statutorily mandated training obligations with commitment to provide funds sufficient to finance)

A copy of the comments can be downloaded [here](#).

