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# FY 2025-2026 Draft National Program Guidance/U.S. EPA Office of Enforcement and Compliance Assurance: National Association of Clean Air Agency's Comments

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The National Association of Clean Air Agencies (“NACAA”) sent a June 10th letter to the United States Environmental Protection Agency (“EPA”) providing comments on the federal agency’s FY 2025-2026 National Program Guidance (“NPG”) for the Office of Enforcement and Compliance Assurance (“OCA”).

The NACAA letter was transmitted to the following EPA personnel:

- Grant Peacock, Office of Air and Radiation
- Michael Wolfe, Office of Air and Radiation
- Michele McKeever, Office of Enforcement and Compliance Assurance
- Aimee Hessert, Office of Enforcement and Compliance Assurance

NACAA describes itself as the:

...national, non-partisan, non-profit association of 157 air pollution control agencies including 40 states, the District of Columbia, 117 metropolitan areas, and 4 territories.

An initial overriding comment is the concern that the \$400.2 million in grants for state and local air pollution control agencies in the EPA’s FY 2025 budget request is (despite the fact that it is an increase) inadequate. The organization recommends that federal grants under Sections 103 and 105 be increased to \$500 million annually beginning in FY 2025.

The rationale for the request is a concern that a number of state and local agencies are experiencing inadequate funding for basic responsibilities such as:

- Monitoring
- Permitting
- Enforcement
- Wildfire response
- Staffing
- Training
- Planning
- Regulatory development

- Public outreach
- Community support

The June 10th NACAA letter includes an attached template that provides additional detailed comments on various portions of the OAR draft.

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