

Draft FY 2018 – 2022 EPA Strategic Plan: October 31st Association of Air Pollution Control Agencies Comments



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

11/03/2017

The Association of Air Pollution Control Agencies (“AAPCA”) submitted October 31st comments on the United States Environmental Protection Agency’s (“EPA”) Draft FY 2018 – 2022 Strategic Plan (“Plan”).

EPA states the Plan supports the four year update required by the Government Performance and Results Act (Public Law 111-352).

The Plan is stated to advance the Administrator’s priorities and identifies three strategic goals:

- Goal 1: Core Mission
- Goal 2: Cooperative Federalism
- Goal 3: Rule of Law and Process

AAPCA’s comments note by way of introduction appreciation for the:

... emphasis on these three strategic goals, and the corresponding comments are grounded in recent consensus comments and reports transmitted from AAPCA since 2015.

The AAPCA comments subsequently address each of the three Plan goals focusing on issues related to air programs.

As to Goal 1, AAPCA addresses issues such as:

- Support for the Plan goal to reduce the number of non-attainment areas under the Clean Air Act National Ambient Air Quality Standards program
- Support for communicating information about the improvement in air quality
- Comments on interstate transport issues
- Suggestions on improving the National Ambient Air Quality Standards and State Implementation Plan process

As to Goal 2:

- Discussion of comments by AAPCA agencies on various air related regulations
- Encouragement to identify avenues to increase early participation of state, local and travel experts through federal advisory committees
- Notes the need for “stable, adequate resources to enable this shared accountability” referencing the role of joint governance and compliance assistance in improving environmental protection
- Support for strengthening partnerships with states, tribes and communities
- Noting transparency concerns

As to Goal 3:

- Supports a focus on statutory obligations
- Discussion of communication in issues such as monitoring technology, etc.
- References prior AAPCA identification of permitting and reporting requirements which should be modernized

AAPCA describes itself as a national, non-profit, consensus-driven organization focusing on assisting state and local air quality agencies and personnel with implementation and technical issues associated with the federal Clean Air Act. The organization represents more than 40 state and local air agencies. Arkansas Department of Environmental Quality Associate Director – Air, Stuart Spencer, is President of the organization.

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