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**Victoria Ludwig,**  
Acting Designated Federal Officer, EPA

January 5, 2021

The Honorable Andrew R. Wheeler  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Dear Administrator Wheeler:

The Local Government Advisory Committee (LGAC) appreciates the opportunity to provide early input on the EPA Office of Air and Radiation's (OAR) development of its FY2022-2023 National Program Guidances (NPG).

We understand the NPG communicates key implementation expectations for EPA regions, states, tribes, local governments, and territories; includes measures by which progress will be assessed; and guides the annual grant work planning process. In response to input from a variety of partners, OAR has streamlined the guidance narrative and air program measures over the past several guidance cycles. OAR is planning to build on these improvements in its FY 2022-2023 Guidance, which has an expected issuance in late spring 2021.

OAR requested the LGAC's feedback on the following specific questions:

- 1) What activities at the local government level should the EPA identify to help us achieve our long-term performance goal of reducing the number of non-attainment areas?
- 2) Are there streamlining opportunities that you see for the National Program Guidance that would help its utilization?
- 3) What local circumstances should the EPA better address in its National Program Guidance (e.g., prescribed burning)?

In response to these questions, The LGAC is pleased to offer the following recommendations:

The LGAC strongly supports clean air for all Americans and members of tribal nations. We recognize the important role that the EPA has as a regulator in ensuring this, and we encourage the agency to continue to help local, tribal, and territorial governments to monitor and address the causes of air pollution that affect their communities.

The LGAC supports the EPA's goal that the 2022-2023 NPG reflect OAR's overriding long-term strategic goal of reducing nonattainment areas nationwide. The jurisdictions of several LGAC members are designated as nonattainment or may be designated so in the future. The LGAC encourages the EPA to consider the impacts of air pollutants that travel across local, state, or national borders. Localities cannot regulate or reduce air pollution generated

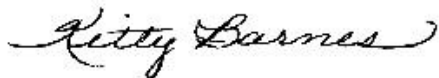
by sources in a neighboring area; therefore, the EPA should factor this in when making attainment determinations. For example, Jefferson County, Colorado, is designated as nonattainment, but an air monitoring station at the National Renewable Energy Lab shows that some emissions originate in nearby counties. Similarly, the city of Hickory, NC, discovered after doing analysis that many of its emissions are generated at power plants along the Ohio River. A third example is in Santa Cruz County, Arizona, along the U.S.-Mexico border. About 4,000 diesel trucks carrying fresh produce enter the area from Mexico per day. This contributes to the nonattainment status of the county. A similar issue occurs in southern California, due to commercial truck traffic from northern Mexico.

In addition to considering cross-jurisdictional air pollution, the LGAC encourages the EPA to account for the fact that air pollution can be caused by natural phenomenon and natural background conditions. For example, Santa Cruz County, Arizona, is located in a desert. This means there is a significant amount of natural background dust, which contributes to particulate matter (PM) readings. Also, in Jackson County, Mississippi, the coastal bayous naturally emit substances that contribute to air pollution. In addition, wildfires in Canada affect communities in northern Minnesota.

Regarding local circumstances that the EPA should better address in its NPG, the LGAC recommends that the agency make additional accommodations for prescribed burning. In some parts of the country, such as Mississippi, there are many forested areas that undergo prescribed burns as a maintenance measure. These burns help prevent wildfires, but they also result in unavoidable air pollution. For example, because of this kind of pollution, Jackson County, MS, has requested that the EPA exempt it when considering the stringency of air quality standards. Another local circumstance that the EPA should better address are wood stoves. Wood stoves are a leading cause of poor air quality in Lacey, WA.

The LGAC appreciates the opportunity to offer early input on OAR's FY 2022-2023 National Program Guidances. The LGAC looks forward to a final version and the opportunity to provide further input.

Sincerely,



Commissioner Kitty Barnes  
Chair, LGAC



Commissioner Libby Szabo  
Chair, Air Workgroup



Administrator Brian Fulton  
Chair, Small Communities Advisory Subcommittee (SCAS)