

Summary of Input from State, Territory, and Tribal Partners for OAR’s FY 2023-2024 National Program Guidance

In September 2021, the Office of Air and Radiation (OAR) offered the opportunity for national, state, local, and Tribal air, public health, and radiation associations to provide early input to inform the development of the OAR National Program Guidance (NPG) for FY 2023-2024 via letters of invitation. OAR received four sets of comments and shared that input with its offices and other national program offices, where relevant.

Process for Soliciting Early Input

Name of Organization	Venue	Date
National Association of Clean Air Agencies (NACAA)	Email solicitation	9/17/2021
National Tribal Air Association (NTAA)	Email solicitation	9/17/2021
Environmental Council of the States (ECOS)	Email solicitation	9/17/2021
Association of Air Pollution Control Agencies (AAPCA)	Email solicitation	9/17/2021
Local Government Advisory Committee (LGAC)	Email solicitation	9/17/2021
Association of State and Territorial Health Officials (ASTHO)	Email solicitation	9/17/2021
Conference of Radiation Control Program Directors (CRCPD)	Email solicitation	9/17/2021

Highlights of Early Input from States, Tribes and Associations

NACAA

- NACAA reiterated the recommendations and priorities from the document *–Improving Our Nation’s Clean Air Program: Recommendations from the National Association of Clean Air Agencies*, for EPA to consider as it drafts the NPG:
 - Center Environmental Justice(i.e., focus regulatory attention on the communities that historically have borne the greatest burdens from air pollution and a changing climate);
 - Respect State and Local Authorities as a Pillar of the Clean Air Act;
 - Ensure Scientific and Technical Integrity for Core EPA Actions;
 - Advance New EPA Programs to Protect Public Health and the Environment and Address Climate Change;

- Reset Permitting and Enforcement Priorities to Emphasize Public Health and Equity.
 - Improve Technical Assistance to State and Local Air Agencies;
 - Address the Urgent Need for Significant Increases in Federal Funding.
- Above all of these is an eighth overarching recommendation for EPA to work in partnership with state and local clean air agencies.

NTAA

- The NPG should focus on protecting ambient air quality, addressing Climate Change, indoor air quality, Radon mitigation and addressing disproportionate impacts on Tribal communities.
- The NPG should provide:
 - Assistance to Tribes without air programs and Tribal air programs in response to wildfire air quality issues;
 - Restored and increased funding for Tribal participation in Regional Planning Organizations, indoor air quality, radon, and climate change;
 - Restored and increased funding and grant assistance to Tribal air programs through Clean Air Act § 105/103 grants;
 - Increased funding and policy improvements to Tribes for Diesel Emissions Reduction Act grants;
 - Support to Tribes in addressing emerging issues such as PFAS;
 - Consistent funding for wood heater change out programs;
 - Assist with outreach and capacity building for Tribal communities to improve understanding of and engagement in regulatory and permitting processes;
 - Provide priority to Tribes on American Recovery Plan Community Monitoring Grants.
- The NPG should address the ongoing impacts of wildfires and COVID-19.
- The NPG should ensure that Tribes are included in the development and review of the PM and ozone NAAQS and that states engage with Tribes in the development, review, and implementation of State Implementation Plans.

ECOS

- Joint governance under E-Enterprise for the Environment is a key tool for driving program modernization and coordinating needed investments in information systems. States urge continued investment in data systems to improve the interoperability between state and federal databases (i.e., Combined Air Emissions Reporting Project, State Plan Electronic Collaboration System Project, Regulation Navigation (Reg Nav) tool project).
- ECOS recommends that EPA include in the NPG references to the benefit of collaborative efforts to develop shared services, to streamlining programs (including process improvement), and to modernizing systems including electronic reporting. Specifically, ECOS urges EPA to:
 - Include language in the NPGs that encourages state and EPA regional staff to pursue flexibility in state grant program implementation using Performance Partnership Grants (PPGs);
 - Reference support for states to include streamlining and modernization activities in grant work plans with regions and recognize that there may be tradeoffs in workload as a result.
- States encourage EPA to focus measures on environmental outcomes and assess the impact of the pandemic on various measures.

AAPCA

- OAR's NPG should emphasize support for training, technical support, reduction of the state implementation plan (SIP) backlog and the timely processing of SIPs, and early engagement and collaboration in planning and regulatory decisions.
- EPA should consider the following priorities when developing the National Program Guidance:
 - Working directly with state and local agencies to implement the Office of Air Quality Planning and Standards (OAQPS) Air Toxics Strategy, in particular when addressing monitoring issues, emerging compounds (such as PFAS6), and risk communication efforts;
 - Closely engaging state and local agencies in the development of emissions standards for heavy-duty vehicles, as well as efforts to reduce heavy and light-duty diesel vehicle emission control systems tampering;
 - Flexibility in air quality planning processes, regulatory actions, and Agency guidance that allows for state and local agencies to accommodate social, geographic, and economic factors that may be jurisdictionally specific.
 - Coordinating with state and local air agencies to understand and address air quality issues associated with events, such as wildfires, that are outside of regulatory control, including enacting Clean Air Act exceptional events provisions when necessary;
 - Consideration of appropriate state and local agency funding that meets new and historical Clean Air Act requirements and providing maximum flexibility to utilize federal grants to determine best use for addressing air pollution control needs.

Next Steps

OAR will consider this input in the development of its draft NPG, which will be issued for public comment following the release of the FY 2023 President's Budget. OAR will provide responses to public comments when the final OAR NPG for FY 2023-2024 is issued.