

**Office of Air and Radiation (OAR) FY 2023-2024 National Program Guidance:
External Comments and Responses**
August 26, 2022

**Please note: OAR's Final FY 2023-2024 National Program Guidance and response to comments do not address new activities under the recently passed Inflation Reduction Act. The Agency will communicate further information about that separately.*

Issue Area	Comment	Commenter	Location	Response
General	EPA appropriately acknowledges that there will not be sufficient resources for all activities and that priorities may vary throughout the nation. NACAA supports EPA's plan to work with state and local air agencies "to adjust resources to meet changing priorities," to work collaboratively with state and local air agencies to resolve planning issues and to provide flexibility in developing workplans.	National Association of Clean Air Agencies (NACAA)	Page 3 (Introduction) ----- Page 30 (Flexibility and Grant Planning)	Thank you for your comment. EPA will continue to actively engage states and local air agencies to resolve planning issues and provide necessary and allowable flexibilities where needed in order to meet changing priorities and is prepared to work with air agencies to adjust priorities, as necessary and appropriate. No change to the document.
General	EPA appropriately acknowledges that there will not be sufficient resources for all activities and that priorities may vary throughout the nation. ECOS supports EPA's plan to work with state and local air agencies "to adjust resources to meet changing priorities," to work collaboratively with state and local air agencies to resolve planning issues and to provide flexibility in developing work plans.	Environmental Council of the States (ECOS)	Page 3 (Introduction) ----- Page 30 (Flexibility and Grant Planning)	Thank you for your comment. EPA will continue to actively engage state and local air agencies to resolve planning issues and provide necessary and allowable flexibilities where needed in order to meet changing priorities and constraints due to resource availability. No change to the document.
General	State and local agencies and the jurisdictions that they serve are unique and differ socially, geographically, and economically. AAPCA members appreciate EPA's encouragement of flexibilities and tailored expectations in the work and grant planning processes.	Association of Air Pollution Control Agencies (AAPCA)	Page 3 (Introduction) ----- Page 30 (Flexibility and Grant Planning)	Thank you for your comment. EPA will continue to actively work with the various external stakeholders to meet their unique and differing needs, providing necessary and allowable flexibilities where needed. No change to the document.
General	EPA appropriately acknowledges that there will not be sufficient resources for all activities and that priorities may vary throughout the nation or per court decisions. The NSC supports EPA's plan to work with state and local air agencies "to adjust resources to meet	National Steering Committee (NSC) of the Small Business Environmental	Page 3 (Introduction) ----- Page 30 (Flexibility and Grant Planning)	Thank you for your comment. EPA will actively engage state and local air agencies to resolve planning issues and provide necessary and allowable flexibilities where needed to meet changing priorities and constraints due to resource availability. No change to the document.

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	changing priorities,” to work collaboratively with state and local air agencies to resolve planning issues and to provide flexibility in developing work plans.	Assistance Programs		
General	ECOS supports EPA’s encouragement to use established work-planning processes to provide flexibility and tailor work expectations to meet local circumstances, as appropriate. Including use of the information in the ECOS Field Guide intended to increase flexibility and efficiency.	ECOS	Page 3 (Introduction)	Thank you for your comment. EPA will continue to support the use of established work-planning processes, providing necessary and allowable flexibilities where needed. No change to the document.
General	The document begins to mention ECOS without defining it as the Environmental Council of the States. This should be defined.	Mille Lacs Band of Ojibwe	Page 3 (Introduction)	Thank you for your comment. The document has been revised.
General	ECOS encourages EPA headquarters to maintain a close working relationship with state agencies in addition to maintaining the regional relationship.	ECOS	Page 4 (Introduction)	Thank you for your comment. EPA intends to maintain close relationships with external stakeholders to meet Agency goals and priorities. No change to the document.
General	NSC encourages EPA headquarters to maintain a close working relationship with states agencies in addition to maintaining the Regional relationship. The NSC has appreciated the renewed and strengthened connection with OAR through some of its subordinate offices (OAQPS) in recent years as a demonstration of this close working relationship. The NSC encourages EPA to continue this connection, especially regarding any regulations that may impact small businesses.	NSC	Page 4 (Introduction)	Thank you for your comment. OAR, including the Office of Air Quality Planning and Standards (OAQPS), will continue to provide necessary support and assistance to small businesses impacted by our rules. No change to the document.
General	ECOS supports EPA’s ongoing commitment to participate actively in and advance the efforts of E-Enterprise for the Environment, specifically the Combined Air Emissions Reporting Team and the State Plan Electronic Collaboration Team, as well as work with ECOS in the state-led effort to illustrate the outcomes	ECOS	Page 4 (Introduction)	Thank you for your comment. EPA will continue to actively participate in and advance E-Enterprise efforts for the Environment. No change to the document.

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	of states' efforts to improve public health and the environment.			
General	NSC supports EPA's ongoing commitment to participate actively in and advance the efforts of E-Enterprise for the Environment, specifically the Combined Air Emissions Reporting Team and the State Plan Electronic Collaboration Team. The NSC does caution that electronic reporting should not be a requirement but an option as internet access and internet capability is not uniform across the U.S.A. and may prove a hardship for smaller businesses.	NSC	Page 4 (Introduction)	Thank you for your comment. EPA will continue to actively participate in and advance E-Enterprise efforts for the Environment. No change to the document.
General	ECOS supports EPA's commitment to promote flexibility through the use of Performance Partnership Grants (PPGs).	ECOS	Page 4 (Introduction)	Thank you for your comment. EPA will continue to encourage PPG usage to increase necessary and allowable flexibilities. No change to the document.
General	NACAA's January 15, 2021 transition letter urged the Federal Government to take action to address the climate crisis, calling for "The new Administration [to] make a strong and urgent effort to lead the nation and global community towards comprehensive, inclusive and economically sound climate change mitigation and adaptation policies and regulations. In the last four years, state and local agencies in NACAA have implemented programs that made meaningful progress towards reducing GHGs, but a strong, comprehensive federal approach is essential for providing lasting nationwide reductions, regulatory certainty and a more protective baseline for all states to meet." As NACAA stated in that letter, "EPA should work closely with state and local agencies as it develops federal rules responsive to the 2009 Endangerment Finding to limit emissions of the six identified GHGs. As a part of the federal government's leadership on climate mitigation,	NACAA	Page 4 (Implementing Goal 1, Objective 1)	Thank you for your comment. OAR will continue to work closely with state, local, and tribal air agencies on developing federal rules to address the climate crisis. No change to the document.

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	adaptation and justice, EPA and other relevant federal agencies should also encourage, support (and, when necessary, require) state and local actions to reduce GHG emissions.”			
General	<p>With respect to “Reduce Emissions That Cause Climate Change,” NACAA urges EPA to take note of recommendations embodied in the January 15, 2021 Transition Letter and on comments the association has offered in response to proposed EPA rules related to these implementation steps: Final Rule for Light Duty Vehicles through MY 2026: https://www.4cleanair.org/news/nacaa-comments-on-epas-proposed-revisions-to-ldv-ghg-emission-standards/ NSPS for the Oil and Gas Sector: https://www.4cleanair.org/wp-content/uploads/NACAA-Oil-and-Gas-NSPS-Comment-Letter-01_28_2022.pdf HFC Phasedown Implementing the 2021 AIM Act: https://www.4cleanair.org/wp-content/uploads/Final-NACAA_7_2_21_Comments_HFC_AIM_ACT-1.pdf</p>	NACAA	Page 4 (Implementing Goal 1, Objective 1)	Thank you for your comment. OAR will continue to work closely with state, local, and tribal agencies on developing federal rules to address the climate crisis; in particular, rules related to the oil and gas sector and light-duty vehicles. In addition, EPA appreciates the feedback on ways to effectively coordinate with state and local governments on implementation of the AIM Act. The Agency will continue to consult with state and local governments on issues of shared interest as we phase down HFCs, in particular on rules where states have existing regulations. No change to the document.
General	If “ozone” is defined as O3 on page 7 at its first presentation, then other than in the title of “Ozone Advanced”, this chemical symbol can be used in subsequent instances, and then on page 13 for the various NAAQS, all 6 criteria pollutants would be listed by their respective abbreviations.	Mille Lacs Band of Ojibwe	Throughout	Thank you for your comment. The term “ozone” is used in different contexts throughout the guidance for clarity (e.g., ozone layer). No change to the document.
Partnership Programs	It is important that EPA consider that as older, higher emitting coal units retire, the utilization of other units in the fleet may change to meet demand requirements. Therefore, EPA should take into account anticipated generation	Wisconsin Department of Natural Resources (DNR)	Pages 4–7 (Partnership Programs)	Thank you for your comment. EPA intends to continue our collaborative effort with the electric power industry to identify, recommend, and implement cost-effective solutions to reduce SF6

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	shifting in their activities related to supporting renewable energy programs and voluntary fluorinated greenhouse gas reduction programs.			emissions and will also do so in the case of generation shifting. No change to the document.
Partnership Programs	GHG is already defined as “greenhouse gas” on page 4. Redefining this is redundant.	Mille Lacs Band of Ojibwe	Page 5 (GHG Reporting Program)	Thank you for your comment. The document has been revised.
Partnership Programs	Under A.2 Energy Star, “Expected EPA Regional Office Activities” all explain how Energy Star is involved as an activity, with the exception of point 2. where there is no mention of Energy Star and how it can be part of Tribal activity.	Mille Lacs Band of Ojibwe	Page 5 (Energy Star)	Thank you for your comment. The document has been revised.
Partnership Programs	The NSC supports EPA’s plan to support activities to recognize Energy Star partners to help make this program more visible. When it was initially launched, it was a very visible program, but it feels as if it has become more in the background recently. Recognition of successes and steps at how other businesses can implement energy cost savings as well as clear outlines of energy reduction incentives can help increase shifts to a more energy efficient business.	NSC	Page 6 (Energy Star)	Thank you for your comment and support for activities to recognize Energy Star partners to help make this program more visible. No change to the document.
Partnership Programs	The NSC supports the Green Power Partnership and the cooperative nature of the partnership. The NSC would also comment that more widespread implementation of net-metering as a Federal standard may further help drive a residential or small business shift to renewable energy, especially in those areas where net-metering is not currently available.	NSC	Page 6 (Renewable Energy Program)	Thank you for your comment and support for the Green Power Partnership and the cooperative nature of the partnership. No change to the document.
Partnership Programs	The description paragraph of “A.6 Voluntary Fluorinated Greenhouse Gas Emissions Reduction Programs” defines RAD, EPS, and SF6. But in the “Expected EPA Regional Office Activities” those terms are again defined, and shouldn’t be.	Mille Lacs Band of Ojibwe	Page 7 (Voluntary Fluorinated GHG Emissions Reduction Programs)	Thank you for your comment. The document has been revised.

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Partnership Programs	Instead of as SF6, this should be presented as SF6, with a subscripted number 6.	Mille Lacs Band of Ojibwe	Page 7 (Voluntary Fluorinated GHG Emissions Reduction Programs)	Thank you for your comment. The document has been revised.
Partnership Programs	DERA is not defined as “Diesel Emissions Reduction Act” until page 18, and again on pages 28 and 33 when DERA are the main topics on those two pages. DERA, at least on page 8, should be defined as it is the first instance of this acronym.	Mille Lacs Band of Ojibwe	Page 8 (SmartWay)	Thank you for your comment. The document has been revised.
National Ambient Air Quality Standards (NAAQS)	NACAA supports the stated intent that, “In FY 2023 and 2024, EPA will work with air agencies to achieve and maintain compliance with the NAAQS, including the ozone standards established in 2015, 2008, 1997, and 1979; particulate matter (PM _{2.5}) standards established in 2012, 2006, and 1997...” and also urges EPA to begin now to substantially increase its engagement with NACAA on this. With respect to stationary sources, EPA, working with its state and local partners, should reimagine and recreate its role in and approach to nationwide attainment and maintenance of the NAAQS. The State Implementation Plan process is something of an “all-or-nothing” tactic that should be augmented with a stationary-source strategy similar to EPA’s strategy for its mobile source program, built on long-term visions of reducing emissions from each source category; innovative and collaborative technology testing and development; and successively more stringent standards and requirements. Further, NACAA must emphasize that key to state and local air agencies’ success in	NACAA	Page 8 (National Ambient Air Quality Standards or NAAQS)	Thank you for your comment. OAR will continue to work closely with state, local, and tribal air agencies on the development of clean air plans to meet National Ambient Air Quality Standards (NAAQS), including promulgation of appropriate federal rules. No change to the document.

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	<p>achieving and maintaining the ozone and PM NAAQS will be timely EPA development and adoption, in collaboration with air agencies and NACAA, of stringent regulations for “federal” sources of air pollution, including for mobile sources, particularly locomotives, aircraft and oceangoing vessels.</p>			
<p>NAAQS</p>	<p>NACAA supports the stated intent that, “EPA will continue its periodic reviews of the NAAQS as required by CAA, including the reconsideration of the 2020 decisions to retain the 2012 PM_{2.5} standards and the 2015 ozone standards, which EPA expects to complete by the spring of 2023 and by the end of 2023, respectively. EPA will continue to work closely with air agencies on all aspects of implementing the NAAQS” and urges EPA to ramp up such efforts and take advantage of the ability of NACAA to bring together its large membership of state and local air agencies to engage with EPA.</p>	<p>NACAA</p>	<p>Page 8 (NAAQS)</p>	<p>Thank you for your comment and support for EPA’s periodic reviews of the NAAQS as required by the Clean Air Act (CAA). No change to the document.</p>
<p>NAAQS</p>	<p>In the May 2022 <i>Final Policy Assessment for the Reconsideration of the National Ambient Air Quality Standards for Particulate Matter</i> (Final PM PA), EPA staff report that the risk assessment for PM_{2.5} revealed that Black populations experience significantly higher mortality risk when compared to other racial groups, even at the recommended lower standard. With respect to this finding, NACAA urges EPA to engage in the next critical steps of examining the root of this disparity, evaluating opportunities to resolve it and taking meaningful action to close the gap. Final PM PA: https://www.epa.gov/system/files/documents/2022-</p>	<p>NACAA</p>	<p>Page 8 (NAAQS)</p>	<p>Thank you for your comment. If the particulate matter (PM) NAAQS is revised, then EPA would conduct robust and appropriate actions as part of implementation to ensure that sensitive populations receive the protection intended by a revised standard. No change to the document.</p>

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	05/Final%20Policy%20Assessment%20for%20the%20Reconsideration%20of%20the%20PM%20NAAQS_May2022_0.pdf (see pp. 3-150 to 3-164 and, especially, p. 3-162)			
<p>NAAQS</p>	<p>ECOS supports the stated intent that, “In FY 2023 and 2024, EPA will work with air agencies to achieve and maintain compliance with the NAAQS and urges EPA to begin now to substantially increase its engagement with states in this area early and often.</p>	<p>ECOS</p>	<p>Page 8 (NAAQS)</p>	<p>Thank you for your comment and support for compliance with the NAAQS. No change to the document.</p>
<p>NAAQS</p>	<p>ECOS appreciates EPA’s commitment to work with regions on implementing the results of the February 2018 lean effort to improve the timeliness of EPA’s review and approval of State Implementation Plans (SIPs). EPA should participate in early engagement with states and be able to process SIPs in a timely manner consistent with Clean Air Act (CAA) timelines.</p>	<p>ECOS</p>	<p>Page 8 (NAAQS)</p>	<p>Thank you for your comment and appreciation for EPA’s work to implement the 2018 lean effort. No change to the document.</p>
<p>NAAQS</p>	<p>ECOS is surprised that EPA did not address exceptional events demonstration review activities more directly in the draft FY23-24 NPG. With the increased frequency of wildfires resulting in an unprecedented amount of wildfire smoke events with regulatory significance in 2021 alone, exceptional events workload for EPA and state, local, and tribal air agencies will increase. EPA should also work with states to identify process improvements allowing greater efficiency to ensure reduced workload strain at the state, local, tribal and federal level. EPA should work with states, local air agencies, and tribes to identify ways to streamline exceptional events demonstrations, especially for wildfire smoke, and internal EPA review.</p>	<p>ECOS</p>	<p>Page 8 (NAAQS)</p>	<p>Thank you for your comment. OAR will continue to work closely with state, local and tribal air agencies on the process for preparing exceptional event demonstrations. The document has been revised.</p>

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NAAQS	<p>The draft Guidance states that a key identified process improvement for improving EPA's review and approvals of State Implementation Plans (SIPs) is "early engagement between EPA and air agencies during the air agencies' SIP development process, as well as early coordination among EPA offices during EPA's review and action on submitted SIPs."</p> <p>AAPCA members agree that deep coordination with air agencies is critical to successful implementation of the NAAQS and underscore the Agency's primary goal to efficiently and timely process SIPs in this effort.</p>	AAPCA	Page 8 (NAAQS)	Thank you for your comment and support for early engagement on SIP development. No change to the document.
NAAQS	EPA should ensure that the 2015 Ozone Transport Federal Implementation Plan provides a full remedy to nonattainment areas that are heavily influenced by interstate transport such that areas are capable of meeting future attainment dates. In addition to stationary source NOx reductions, EPA should consider potential VOC reductions or reductions in emissions from other source categories such as mobile sources which are best addressed at the national level.	Wisconsin DNR	Pages 8 -10	Thank you for your comment. Specific comments on a specific rulemaking will be considered through that rulemaking process. No change to the document.
NAAQS	EPA should reduce the length of time between draft and final report submission (i.e., State Review Framework, Technical Systems Audits) to the states. While the review and reporting process is currently working well to identify and resolve issues, delays in receiving written feedback often leads to resolutions prior to final reports being issued.	Wisconsin DNR	Pages 8-10	Thank you for your comment and for bringing this to our attention. OAR will share this comment with EPA's Regional offices that are the lead in working with state monitoring agencies on various report submissions. Note, the OAR/OAQPS and the National QA Workgroup developed a Technical Systems Audit Guidance Document in 2017 ¹ to assist in streamlining the audit process as well as developing timely reports. Final reports take more time to develop; however, the draft report is

¹ See: <https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=P100W5NN.TXT>

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				designed to allow the monitoring organization to begin addressing audit findings and begin improvements immediately rather than waiting for a final report. No change to the document.
NAAQS	Under section “B.1.1.2 SIPs” on point 6, the phrase “startup, shutdown, and malfunction” defines “SSM” at the second instance of this phrase instead of at the first instance of this phrase, which it should, and then the abbreviation can be used directly at the second instance.	Mille Lacs Band of Ojibwe	Page 9 (NAAQS)	Thank you for your comment. The document has been revised.
NAAQS	NACAA supports these stated EPA efforts and, with respect to B.1.1.3.5 (“Engage air agencies as early as possible in guidance and regulation development processes.”), we emphasize the critical importance of beginning engagement at the very start of the process and continuing it throughout.	NACAA	Pages 9-10 (NAAQS)	Thank you for your comment and support for EPA’s early engagement efforts. No change to the document.
NAAQS	EPA OAR has outlined expected Regional Office activities under the 2015 Startup, Shutdown, and Malfunction (SSM) SIP Call. This rule is still in litigation in the U.S. Court of Appeals for the D.C. Circuit, and EPA should withhold any actions under the 2015 SSM SIP Call until the D.C. Circuit issues an opinion.	AAPCA	Page 9 (NAAQS --- B.1.1 Expected EPA Regional Office Activities B.1.1.2 SIPs)	Thank you for your comment. Specific comments on a specific rulemaking will be considered through that rulemaking process. No change to the document.
NAAQS	The NSC supports the removal of Stage II gasoline vapor recovery programs as a cost saving to GDFs and because in most cases currently, Stage II would cause an increase in gasoline vapor emissions from GDFs. Some state SBEAPs have been involved in their state removal of Stage II requirements and can be a resource within the states to help with their	NSC	Page 9 (NAAQS --- B1.1.2 SIPs)	Thank you for your comment. In 2012, EPA adopted a final rule that waives Stage II requirements and allows states to remove these requirements. Guidance was provided at that time on removal of Stage II requirements from state implementation plans. ² EPA acknowledges that state SBEAPs have been involved in their state removal of Stage II requirements and can be a resource within the states to help with their SIP

² See: https://www3.epa.gov/ttn/naaqs/aqmguide/collection/cp2/20120807_page_stage2_removal_guidance.pdf

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	SIP development to remove Stage II requirements			development to remove Stage II requirements. No change to the document.
NAAQS	<p>EPA has proposed to deny 23 state implementation plans (SIPs) addressing interstate transport for the 2015 ozone NAAQS. Prior to finalizing these actions, AAPCA recommends that EPA prioritize and seriously consider state comments on their proposed SIP denials.</p> <p>Concurrently with taking comment on the proposed SIP denials, EPA accepted comment on a proposed interstate transport federal implementation plan (FIP) for 26 states that would significantly increase the scope of the Cross-State Air Pollution Rule (CSAPR). Here, too, AAPCA recommends priority consideration of comments from impacted air agencies.</p>	AAPCA	Pages 9–10 (NAAQS --- B.1.1 Expected EPA Regional Office Activities, B.1.1.2 SIPs --- B.1.2 Expected Air Agency Activities, B.1.2.1 SIPs)	Thank you for your comment. Specific comments on a specific rulemaking will be considered through that rulemaking process. No change to the document.
NAAQS	<p>AAPCA members support the Expected EPA Regional Office Activities to:</p> <ul style="list-style-type: none"> •Take final rulemaking actions on any remaining SIP submittals for all NAAQS •Work to reduce backlogged SIP submissions in accordance with agency performance measures and the SIP management plans negotiated with states. •Work with states to ensure early engagement between states and EPA. •Collaborate with EPA HQ to ensure early engagement on novel and unique issues of national significance. <p>Key examples of novel and unique issues include: wildfires; ethylene oxide (EtO); exceptional events; air quality impacts of per- and polyfluoroalkyl substances (PFAS); and, monitoring challenges.</p>	AAPCA	Page 9 (NAAQS --- B.1.1 Expected EPA Regional Office Activities, B.1.1.2 SIPs)	Thank you for your comment and support for EPA Regional Office activities. No change to the document.

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<p>NAAQS</p>	<p>Early and collaborative engagement with state and local air agencies in the development of guidance and regulations can bring important on-the-ground expertise to the process, as EPA OAR recognizes in this draft NPG.</p> <p>AAPCA reasserts that receiving and incorporating input from stakeholders is a core component of rulemaking, and sufficient time should be provided for state and local agencies charged with Clean Air Act implementation.</p>	<p>AAPCA</p>	<p>Page 9 (NAAQS --- B.1.1 Expected EPA Regional Office Activities, B.1.1.3 Other)</p>	<p>Thank you for your comment. OAR will continue to work closely with state, local, and tribal air agencies on the development of clean air plans to meet NAAQS and is committed to early and collaborative engagement. No change to the document.</p>
<p>NAAQS</p>	<p>Under section “B.1.1.3 Other” on point 9., three tools are mentioned as examples. The website URL for each of those three examples should be provided as footnotes.</p>	<p>Mille Lacs Band of Ojibwe</p>	<p>Page 10 (NAAQS)</p>	<p>Thank you for your comment. The document has been revised.</p>
<p>NAAQS</p>	<p>Developing exceptional events demonstrations are time-and resource-intensive activities for air agencies, which can cost an estimated \$20,000 to \$40,000 to produce and sometimes exceed 200 pages in length.</p> <p>This is an important Clean Air Act provision for addressing air quality impacts outside of regulatory control. With a lengthened wildfire season and likely more stringent NAAQS for PM2.5 and ozone, agencies will need to develop demonstrations more often. EPA OAR should work with state and local agencies to improve the process for drafting and reviewing exceptional event demonstrations.</p>	<p>AAPCA</p>	<p>Page 10 (NAAQS --- B.1.1 Expected EPA Regional Office Activities B.1.1.3 Other --- B.1.2 Expected Air Agency Activities, B.1.2.2 Designations)</p>	<p>Thank you for your comment. OAR will continue to work closely with state, local, and tribal air agencies on the process for preparing exceptional event demonstrations. No change to the document.</p>
<p>Regional Haze</p>	<p>Generally, states continue to work toward submittal of Regional Haze SIPs for the second planning period ahead of EPA’s updated deadline of August 15, 2022, to avoid findings of failure to submit.</p>	<p>AAPCA</p>	<p>Page 11 (Regional Haze - -- B.2.1 Expected EPA Regional Office Activities,</p>	<p>Thank you for your comment. OAR will continue to work closely with state, local, and tribal agencies on the regional haze program. No change to the document.</p>

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	EPA OAR indicates that the Agency will “continue to address any relevant legal challenges” regarding the Regional Haze program. EPA should ensure appropriate state consultation on Regional Haze SIPs, including on any potential consent decrees.		B.2.2 Expected Air Agency Activities)	
Permitting	EPA does not explain “meaningful public involvement” in the context of incorporating EJ concerns into permits. All permit reviews include public participation requirements under existing rules. Many states, including WDNR, do not have statutory authority to unilaterally change the public comment process or to grant extensions in public comment timelines or final decision timelines. If EPA wishes permitting authorities to have meaningful public involvement beyond what a state or local agency may legally require, EPA should propose requirements to this effect.	Wisconsin DNR	Page 12 (Title V and New Source Review Permitting)	Thank you for your comment. OAR will continue to work closely with state, local, and tribal air agencies on permitting issues, including how to best address environmental justice concerns. EPA expects to communicate more specific information on this topic in the near future. No change to the document.
Permitting	EPA should clarify and define expectations related to Environmental Justice (EJ) considerations in permitting. EPA should either propose requirements to implement EJ to the extent allowed in rule and statute or identify flexibilities in existing regulations where EJ could be an additional consideration, for example in case-by-case determinations or compliance demonstration methods.	Wisconsin DNR	Pages 12-13 (Title V and New Source Review Permitting)	Thank you for your comment. OAR will continue to work closely with state, local, and tribal air agencies on permitting issues, including how to best address environmental justice concerns. EPA expects to communicate more specific information on this topic in the near future. No change to the document.
Permitting	The draft OAR NPG states, “EPA will emphasize environmental justice considerations in all aspects of implementing permit programs,” including setting as a Regional Office activity to “Advance environmental justice and Title VI civil rights considerations in air agency permitting for major stationary sources and major modifications, as well as for minor sources” and “Provide training and technical	AAPCA	Pages 12–13 (Title V and New Source Review Permitting --- B.3.1 Expected EPA Regional Office Activities,	Thank you for your comment. OAR will continue to work closely with state, local, and tribal air agencies on permitting issues, including how to best address environmental justice concerns. EPA expects to communicate more specific information on this topic in the near future. No change to the document.

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	<p>guidance and support to permitting authorities and the public.”</p> <p>AAPCA welcomes clear communication from EPA HQ and OAR regarding expectations for permitting and community outreach involving defined environmental justice communities. Training and technical support may be appropriate. AAPCA also stresses the need for EPA to effectively partner with state and local agencies when engaging communities on environmental issues.</p>		B.3.2 Expected Air Agency Activities)	
Permitting	<p>As EPA advances environmental justice (EJ) and Title VI civil rights considerations in EPA permitting actions and incorporates EJ considerations into permits issued by EPA regional offices, ECOS request that the process and tools used by EPA be shared with states. ECOS also request that sample language EPA intends to use be shared with states and other interested parties.</p>	ECOS	Pages 12-13 (Title V and New Source Review Permitting)	<p>Thank you for your comment. OAR will continue to work closely with state, local, and tribal air agencies on permitting issues, including how to best address environmental justice concerns. EPA expects to communicate more specific information on this topic in the near future. No change to the document.</p>
Permitting	<p>As EPA advances environmental justice (EJ) and Title VI civil rights considerations in EPA permitting actions and incorporates EJ considerations into permits issued by EPA regional offices after conducting analysis and using available tools and guidance. The NSC requests that the process and tools used by EPA be shared with states. The NSC also requests that sample language EPA intends to use also be shared with states and other interested parties. The NSC would like to further note that EPA should involve the state SBEAPs in relation to minor sources. Within an EJ community, minor sources would be the type of sources most commonly operated by members within the community. The SBEAPs</p>	NSC	Page 12 and 13 (Title V and New Source Review Permitting)	<p>Thank you for your comment. OAR will continue to work closely with state, local, and tribal air agencies on permitting issues, including how to best address environmental justice concerns. EPA expects to communicate more specific information on this topic in the near future. No change to the document.</p>

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	are specifically tasked with providing assistance to small businesses/minor sources by the Clean Air Act and can be a great resource in relation to determining language and tools that may be most beneficial within EJ communities.			
Air Monitoring	Agencies have recently expressed concerns that there is not consistency across EPA Regional Offices during technical reviews, including reviews of annual network plans. To ensure standard review of technical systems associated with the ambient network, EPA OAR may consider adding direction for Regional Offices.	AAPCA	Pages 13 -14 (Ambient Air Monitoring for Criteria Pollutants --- B.4.1 Expected EPA Regional Office Activities)	Thank you for your comment and for bringing this to our attention. OAR will work with EPA Regional offices to address consistency in technical reviews, including annual monitoring network plans. No change to the document.
Air Monitoring	EPA should prioritize funding to support existing monitoring infrastructure through 105 and 103 grants. As highlighted in the Government Accountability Office (GAO) report, consistent with national trends, Wisconsin’s aging air monitoring infrastructure requires modernization and increases in funding of the 105 and 103 grants to allow for the purchase of equipment to support the “mission critical” monitoring network.	Wisconsin DNR	Pages 13 -16 (Ambient Air Monitoring for Criteria Pollutants) ----- Page 31 (Continuing Air Program)	Thank you for your comment. OAR will continue to work closely with state, local, and tribal air agencies on air monitoring issues, including how to best utilize available resources. No change to the document.
Air Monitoring	EPA OAR, in consultation with state and local agencies, has recognized that continuous PM2.5 or Federal Equivalent Method (FEM) monitors tend to show higher concentrations than filter-based or Federal Reference Method (FRM) monitors. EPA OAR is considering technical improvements, including working to develop FEM method calibrations, but this could impact area designations under current or future NAAQS. EPA’s ambient air monitoring modernization plan should take into account potential	AAPCA	Pages 14 -15 (Ambient Air Monitoring for Criteria Pollutants --- B.4.2 Expected Air Agency Activities)	Thank you for your comment and for sharing these concerns. OAR is working both (1) technically in advance of a proposed rulemaking, and (2) as part of the PM NAAQS review, to address improvements in data produced from PM Federal Equivalent Methods (FEMs). OAR will continue to share and communicate with state and local agencies on this issue should there be any changes to the calibration of any PM FEMs and the use of data from these monitors. No change to the document.

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	challenges and discrepancies that incorporating new technology could pose to this infrastructure. In modernization plans, EPA might also consider improvements to the method designation process.			
Air Toxics	Ethylene oxide (EtO) continues to pose technical challenges for EPA OAR and air agencies, in particular monitoring and modeling at the risk level. Air agencies have asked for early and close collaboration ahead of public data releases, including support with risk communication efforts.	AAPCA	Page 15 (Air Toxics Program Implementation)	Thank you for your comment. OAR will continue to work closely with state, local, and tribal air agencies on air toxics issues, especially ethylene oxide (EtO). EPA has been actively engaging with air agencies on EtO and will continue to do so. No change to the document.
Air Toxics	EPA emphasizes activities to “support and assist air agencies in addressing air toxics” and calls upon the regional offices to “delegate and assist air agencies with Section 111, 112, and 129 standards.” Additionally, the draft includes activities related to the National Air Toxics Monitoring Network. These activities are certainly necessary, but if EPA intends to rely on state and local air agencies to implement the air toxics program it is equally important that the agency provide adequate resources in the form of increased federal grants.	NACAA	Page 15 (Air Toxics Program Implementation) ---- Page 16-17 (Ambient Air Monitoring for Toxics)	Thank you for your comment. EPA Regions will work collaboratively with air agencies to prioritize activities and commitments and agree on the level of effort within available resource levels. Please also note that Congress determines through the appropriations process how funds are provided, not EPA. No change to the document.
Air Toxics	ECOS request that EPA provide adequate resources to implement requirements associated with the National Air Toxics Network. EPA emphasizes activities to “support and assist air agencies in addressing air toxics” and calls upon the regional offices to “delegate and assist air agencies with Section 111, 112, and 129 standards.” Additionally, the draft includes activities related to the National Air Toxics Monitoring Network. If EPA intends to rely on state and local air agencies to implement the air toxics program, it is equally	ECOS	Page 15 (Air Toxics Program Implementation) ---- Page 16-17 (Ambient Air Monitoring for Toxics)	Thank you for your comment. EPA Regions will work collaboratively with air agencies to prioritize activities and commitments and agree on the level of effort within available resource levels. Please also note that Congress determines through the appropriations process how funds are provided, not EPA. No change to the document.

Issue Area	Comment	Commenter	Location	Response
	important that the agency provide adequate resources in the form of increased federal grants.			
Air Toxics	ECOS encourages EPA to ensure that the Quality Management Plan (QMP) and Quality Assurance Project Plan (QAPP) review and approval process is not further slowed down by the influx of QAPPs from federally-funded community monitoring projects that require QAPPs. EPA should ensure that all QMPs and QAPPs are reviewed and approved in an efficient and timely manner. Timely approval of QAPPs from state agencies and community groups will be essential to achieving EPA’s goal to “ensure data collected from federally-funded community monitoring projects using American Rescue Plan funds are useable, accessible to the public, and shared with appropriate stakeholders in a practicable amount of time.”	ECOS	Page 16 and 17 (Ambient Air Monitoring for Toxics)	Thank you for your comment and for raising this issue. OAR will alert EPA Regional offices to expect and plan for this additional workload. No change to the document.
Mobile Sources	NACAA is concerned that the draft NPG does not include specific OTAQ regulatory initiatives for FY 2023-2024 and urges OAR and OTAQ to engage with NACAA prior to finalizing the NPG to discuss EPA’s plans for federal regulatory initiatives for mobile sources during FY 2023-2024.	NACAA	Pages 18-19 (Mobile Sources Program)	Thank you for your comment. EPA appreciates NACAA’s engagement in OAR’s Office of Transportation and Air Quality’s (OTAQ) mobile source regulatory activities, and EPA looks forward to continuing our close communication and coordination on our regulatory initiatives. ³ While the OAR National Program Guidance is a guide, there may be specific requirements that exist through applicable law, regulation or court order. There also may be other activities appropriate to include in grant agreements negotiated by an EPA region and implementing air agency not specifically listed in this guidance. No change to the document.
Mobile Sources	See comment above, related to NPG NAAQS discussion on p. 8, regarding the need for	NACAA	Pages 18-19	Thank you for your comment. EPA appreciates NACAA’s engagement in OTAQ’s mobile source

³ See: <https://www.epa.gov/laws-regulations/regulatory-agendas-and-regulatory-plans>

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	stringent federal regulations for additional heavy-duty mobile source categories, including locomotives, aircraft and oceangoing vessels.		(Mobile Sources Program)	regulatory activities, and EPA looks forward to continuing our close communication and coordination on our regulatory initiatives. ⁴ No change to the document.
Mobile Sources	In addition to Regional Office activities on DERA and Clean School Bus Grants, NACAA urges EPA OAR and headquarters to work with the Departments of Energy and Transportation to gain a meaningful role in the development of rules, policies and guidance on grants and grant eligibility for EV infrastructure, to ensure the achieving meaningful air quality benefits is among the highest priorities.	NACAA	Pages 18-19 (Mobile Sources Program)	Thank you for your comment. EPA will continue to work with our federal agency partners, including with the Department of Energy and the Department of Transportation, to address the climate crisis, including on electric vehicle (EV) infrastructure policy, projects, and funding. No change to the document.
Tribal programs	Numerous elements throughout this subsection identify needs (and expectations) for EPA resources to enable Tribes to develop and implement air quality management programs. As shown in the BNA, Tribes are committed to protecting their air quality resources and to addressing the threats of climate change. As noted above, the NTAA supports the robust consideration of climate change and mitigation through EPA’s Tribal programs. The proposed increase in “Tribal Assistance Grants for Air” to \$23,126,000 is woefully inadequate for reasons documented in the BNA. Existing resources are insufficient to sustain Tribal Air Programs. Importantly, 79% of the BNA respondents agreed that “insufficient air quality funding impacts the health and welfare of their people.” And 72% of respondents said that they did not have funding for even one full-time air quality position. Further, the activities that the NPG identifies in “Expected Tribal	National Tribal Air Association (NTAA)	Pages 26-30 (Improving Outdoor and Indoor Air Quality in Indian Country and Alaska Native Villages)	Thank you for your comment. Please note that Congress determines through the appropriations process how funds are provided, not EPA. With that said, OAR will consider information from the NTAA STAR report and the BNA as we further implement the Tribal air budget. EPA also will continue to actively engage Tribes to resolve planning issues and provide necessary and allowable flexibilities where needed in order to meet changing priorities and constraints due to resource availability. No change to the document.

⁴ See: <https://www.epa.gov/laws-regulations/regulatory-agendas-and-regulatory-plans>

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	<p>Activities” (subsections A.1.2 and A.2.2) cannot be adequately performed at the proposed funding level. NTAA’s BNA identifies “\$76.6 million as [t]he amounts necessary to provide minimum baseline funding of \$133,484 to all 574 federally recognized Indian Tribes.” and the NTAA Climate Change Funding document suggests an additional \$19.2-24 million for the opportunity to tackle climate change and sustain existing cc programs. In addition, this funding levels will not allow some Tribes to begin dedicated climate change programs. NTAA recommends that EPA request Tribal Air Program support in FY 2023-2024 in the range of \$55-60 million.</p>			
<p>Tribal programs</p>	<p>Air quality threats to public health and the environment in Tribal communities, including those associated with climate change, are severe and growing. As we noted in our October 2021 letter, NTAA supports the Agency’s commitment to grant resources to Tribes and Tribal organizations to enable and facilitate their participation in “regional and national level activities such as policy making, monitoring, rule or program development, and implementation workgroups.”</p>	<p>NTAA</p>	<p>Pages 26-28 (Expected EPA Activities Unique to Tribal Work A.1.1.1(4), A.1.2 ---- Expected Tribal Activities § 5.1.2.1(9), (10))</p>	<p>Thank you for your comment. OAR looks forward to working with NTAA and Tribes to continue to recognize and improve the potential of our partnership with regard to Regional and national level activities. No change to the document.</p>
<p>Tribal programs</p>	<p>Building Tribal capacity to advance air quality management programs is a continuous need and has been a high priority of OAR for many years. These NPG elements and several others in the current draft remain a high priority of Tribes. Among these support needs are technical training, monitoring, education and outreach, grants management, and indoor air quality.</p>	<p>NTAA</p>	<p>Pages 26-27 (Expected EPA Activities Unique to Tribal Work A.1.1.1.1 – A.1.1.1.3)</p>	<p>Thank you for your comment. OAR continues to fund the American Indian Air Quality training program that supports training, monitoring, education and outreach, grants management, and indoor air quality issues. No change to the document.</p>

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<p>Tribal programs</p>	<p>NTAA has consistently supported EPA’s initiatives to reduce emissions from new and existing diesel engines. We support the enhancement of the Diesel Emissions Reduction Act (DERA) as described in this NPG element. Most recently we encouraged strengthening the initial portion of the Clean Trucks Program. This regulatory program will help address important impacts on Tribal air quality. More than three-fourths of BNA respondents reported being “impacted by mobile source emissions from on-and off-road vehicles, including diesel emissions from on-and off-road vehicles.”</p>	<p>NTAA</p>	<p>Pages 27-28 (Expected EPA Activities Unique to Tribal Work A.1.1.2.5 & A.1.1.4)</p>	<p>Thank you for your comment and support for DERA. No change to the document.</p>
<p>Tribal Programs</p>	<p>This broad statement regarding “expected tribal activity” addressing climate change is a critical element in the OAR NPG. Based on conversations with NTAA and consultations with Tribal Nations, the EPA should develop this NPG element to more fully acknowledge and support Tribal actions to address climate change. Many Tribes have performed climate change vulnerability assessments, including evaluating air pollution effects, or participated in community-based monitoring, and some have begun comprehensive planning and mitigation efforts to address climate change impacts. As noted above, Tribal Lands and Alaska Native Villages are impacted by climate change and continuously pursue ways to reduce emissions of greenhouse gases. Further Tribal professional staff, including those in air quality programs, necessarily are increasingly allocating resources to address climate change needs. Tribes must receive additional resources to meet their air quality management needs and expectations.</p>	<p>NTAA</p>	<p>Page 29 (Expected Tribal Activities 5.1.2.3)</p>	<p>Thank you for your comment and we look forward to continuing to work with you to address the climate crisis in Indian Country and Alaskan Native Villages. No change to the document.</p>

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Grant Planning	Core work directed by the Clean Air Act, specifically to determine and plan for attainment of the NAAQS remains underfunded with no updates (i.e., no 105 grant increase in 19 years), while special projects get significant funding, they are often short term in nature and have no long term plan to support monetarily or functionally. EPA should ensure core work is funded and that the infrastructure and data being invested in via short term projects are sustainable beyond the term of the project agreements.	Wisconsin DNR	Page 30 (Flexibility and Grant Planning)	Thank you for your comment and support for core work directed by the Clean Air Act. No change to the document.
Grant Planning	The FY 2023 Administration budget request calls for \$322.2 million in grants for state and local air quality agencies under Sections 103 and 105. While NACAA appreciates the recognition that additional funds are needed, NACAA believes that is still not sufficient. NACAA recommends that federal grants under Sections 103 and 105 be increased to \$500 million annually, beginning in FY 2023. This is \$178 million above the President's proposed budget for FY 2023 and an increase of \$269 million over the FY 2022 appropriation of \$231 million. Such increases are necessary if state and local air agencies are to continue to fulfill their current responsibilities and take on new and high-priority programs to reduce air pollution and address climate change.	NACAA	Page 30 (Grant Assistance to Co-Implementers)	Thank you for your comment. As noted in OAR's National Program Guidance Introduction, EPA recognizes that there will not be enough resources to do everything. EPA is prepared to work with air agencies to adjust priorities, as necessary and appropriate, while acknowledging that Congress ultimately decides funding levels. No change to the document.
Grant Planning	AAPCA members appreciate EPA's willingness to work with air agencies to adjust resources to meet needs, including the commitment "to working collaboratively with air agencies to resolve issues that may arise during work planning."	AAPCA	Page 30 (Flexibility and Grant Planning)	Thank you for your comment. EPA is prepared to continue to work with air agencies to adjust resources, where necessary and allowable, to meet priorities and address issues that arise during work planning. No change to the document.
Grant Planning	Budget increases are necessary if state and local air agencies are to continue to fulfill their	ECOS	Page 30	Thank you for your comment. As noted in OAR's National Program Guidance Introduction, EPA

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	<p>current responsibilities and take on new and high-priority programs to reduce air pollution. ECOS recommends that federal grants under Sections 103 and 105 be increased to \$257.90 million annually above the FY22 enacted amount, beginning in FY 2023. ECOS also recommends that OAR review and consider streamlining paperwork requirements such as for SIPs, exceptional events, and other activities to minimize burden on state environmental agency staff.</p>		<p>(Grant Assistance to Co-Implementers)</p>	<p>recognizes that there will not be enough resources to do everything. EPA is prepared to work with air agencies to adjust priorities, as necessary and appropriate, while acknowledging that Congress ultimately decides funding levels. No change to the document.</p>
<p>Grant Planning</p>	<p>Budget increases are necessary if state and local air agencies are to continue to fulfill their current responsibilities and take on new and high-priority programs to reduce air pollution. The FY 2023 Administration budget request calls for \$322.2 million in grants for state and local air quality agencies under Sections 103 and 105. The NSC echoes comments from ECOS on budget increases. The NSC wishes to further comment that grant funding may be especially necessary in those states that receive a majority of air fees based on tons of emissions for facilities within their state. As emissions decrease, so does the funding available from air fees, while the workload does not decrease. Increased funding can offset the successful reduction of emissions (a prime goal of EPA regulations) and not cause state fees to increase to level that may be punitive to small sources just to maintain an air program.</p>	<p>NSC</p>	<p>Page 30 (Grant Assistance to Co-Implementers)</p>	<p>Thank you for your comment. As noted in OAR’s National Program Guidance Introduction, EPA recognizes that there will not be enough resources to do everything. EPA is prepared to work with air agencies to adjust priorities, as necessary and appropriate, while acknowledging that Congress ultimately decides funding levels. No change to the document.</p>
<p>Grant Planning</p>	<p>The FY 2023 Administration budget request appropriately calls for funding for the Diesel Emission Reduction Act (DERA) program. This is an important program to address emissions from the large legacy fleet of diesel engines. However, it is important that DERA not be</p>	<p>NACAA</p>	<p>Page 30 (Grant Assistance to Co-Implementers) ----</p>	<p>Thank you for your comment. Please note that Congress determines through the appropriations process how funds are provided, not EPA. No change to the document.</p>

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	<p>funded at the expense of the Section 103/105 grants, and NACAA strongly urges that any future funding for DERA not be in lieu of increases to state and local air grants. Additionally, since many of the DERA funds are not provided to state and local governments, future DERA activities should not be funded through the STAG account. Instead, the grants should be provided through one of EPA’s other accounts.</p>		<p>Page 33 (Diesel Emissions Reduction Act Grants)</p>	
<p>Grant Planning</p>	<p>The draft mentions “a proposed transition in funding authorities for PM_{2.5} monitoring” and refers to the current NPG Monitoring Appendix. The posted document is for FY 2020, so it is unclear if there is a more recent version. Page 3 of that document indicates that EPA plans to transition the funding authority for PM_{2.5} monitoring from Section 103 to Section 105. This would require state and local agencies to provide matching funds. The PM_{2.5} monitoring program has long been funded under Section 103 and this arrangement has worked very well. NACAA recommends that it continue and, therefore, opposes the transition of the program to Section 105 authority. The proposed shift would require state and local agencies to provide a 40-percent match, which not all agencies can afford. Those agencies that are unable to provide matching funds could not accept the grants for these important monitoring programs. As a result, these agencies could be forced to discontinue required monitoring at existing sites. Since these are nationwide monitoring efforts, NACAA believes the funding should be provided under Section 103 authority so it is accessible to all, regardless of their ability to match the grants.</p>	<p>NACAA</p>	<p>Page 31 (Continuing Air Program, Ambient Monitoring)</p>	<p>Thank you for your comment. The National Program Guidance Monitoring Appendix will be updated in FY 2023 and will reflect that EPA is not requesting to move PM_{2.5} monitoring from Section 103 to Section 105.</p>

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Grant Planning	AAPCA members do not support EPA OAR’s proposal “to transition the funding authority for PM2.5 monitoring from section 103 to section 105.” AAPCA has previously noted the importance of maintaining the granting authority for PM2.5 monitoring under Clean Air Act Section 103, which does not require the 40-percent funding match of Section 105.	AAPCA	Page 31 (Continuing Air Program - Ambient Monitoring) --- Page 3 (FY 2020 Monitoring Appendix)	Thank you for your comment. The National Program Guidance Monitoring Appendix will be updated in FY 2023 and will reflect that EPA is not requesting to move PM _{2.5} monitoring from Section 103 to Section 105.
Grant Planning	EPA discusses the development of an updated methodology for allocating Section 105 grants among agencies. If the agency is to do this, any reevaluation of the allocation methodology should include early collaboration with affected state and local agencies to inform the proposal. Those agencies should be involved in the process well before a refinement in the allocation methodology is released for public comment.	NACAA	Page 34 (Future Refinements to the Allocation of Section105 Grants)	Thank you for your comment. EPA will actively engage states and local air agencies in any review and potential revision of the allocation methodology that may be undertaken in the future. No change to the document.
Grant Planning	ECOS opposes the transition of funding authority for PM2.5 monitoring from Section 103 to Section 105. The draft mentions “a proposed transition in funding authorities for PM2.5 monitoring” and refers to the current NPG Monitoring Appendix. Page 3 of that document indicates that EPA plans to transition the funding authority for PM2.5 monitoring from Section 103 to Section 105. This would require state and local agencies to provide matching funds. The PM2.5 monitoring program has long been funded under Section 103 and this arrangement has worked very well. ECOS recommends that it continue to be funded under Section 103. The proposed shift to Section 105 would require state and local agencies to provide a 40-percent match, which not all agencies can afford. Those agencies that	ECOS	Page 31 (Continuing Air Program, Ambient Monitoring)	Thank you for your comment. The National Program Guidance Monitoring Appendix will be updated in FY 2023 and will reflect that EPA is not requesting to move PM _{2.5} monitoring from Section 103 to Section 105.

Issue Area	Comment	Commenter	Location	Response
	<p>are unable to provide matching funds could not accept the grants for these important monitoring programs. As a result, these agencies could be forced to discontinue required monitoring at existing sites. Since these are nationwide monitoring efforts, ECOS believes the funding should be provided under Section 103 authority so it is accessible to all, regardless of their ability to match the grants.</p>			
<p>Grant Planning</p>	<p>EPA OAR states that the President’s FY 2023 Budget requests \$322.2 million for “continuing air programs carried out by states/locals” that “will help expand the efforts of air pollution control agencies to implement their programs” toward meeting the Administration’s priorities.</p> <p>AAPCA stresses that the President’s FY 2023 Budget request is more than \$90 million above the enacted appropriations levels for both FY 2021 and FY 2022.</p> <p>In early engagement comments, AAPCA spotlighted the need for providing maximum grant flexibilities to state and local air agencies to best address air pollution control needs.</p>	<p>AAPCA</p>	<p>Page 31 (Continuing Air Program)</p>	<p>Thank you for your comment. EPA acknowledges that there will not be sufficient resources for all activities and that priorities may vary throughout the nation. EPA plans to work with state and local air agencies to adjust resources to meet changing priorities, to work collaboratively with state and local air agencies to resolve planning issues and to provide flexibility in developing workplans. No change to the document.</p>
<p>Grant Planning</p>	<p>AAPCA members do support EPA OAR’s commitment to assisting state and local agencies meet the listed core activities for FY 2023 and FY 2024, including “working with states to reduce the SIP backlog as well as improving the timeliness of SIP action.”</p>	<p>AAPCA</p>	<p>Page 31 (Continuing Air Program - Core Activities)</p>	<p>Thank you for your comment and support for EPA’s core SIP activities. No change to the document.</p>
<p>Grant Planning</p>	<p>State and local agencies should be engaged early in any EPA plans to update allocation methodology.</p>	<p>AAPCA</p>	<p>Page 34 (Future Refinements to the Allocation of Section 105 Grants)</p>	<p>Thank you for your comment. EPA will actively engage states and local air agencies in any review and potential revision of the allocation methodology that may be undertaken in the future. No change to the document.</p>

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Training	EPA should work with state and local air agencies through the Joint Training Steering Committee to ensure high-quality training. Adequate high-quality training is especially critical now due to the large number of retirements and the associated loss of institutional knowledge that federal, state and local air agencies are experiencing.	ECOS	Page 33 (Continuing Air Program - Clean Air Act Training)	Thank you for your comment. OAR will continue to work closely with state and local air agencies on training through the Joint Training Steering Committee. No change to the document.
Training	The draft acknowledges EPA’s responsibility to provide training. Adequate high-quality training is especially critical now due to the large number of retirements and the associated loss of institutional knowledge that federal, state and local air agencies are experiencing. EPA should work with state and local air agencies through the Joint Training Steering Committee to ensure such training.	NACAA	Page 33 (Continuing Air Program - Clean Air Act Training)	Thank you for your comment. OAR will continue to work closely with state and local air agencies on training through the Joint Training Steering Committee. No change to the document.
Training	EPA’s commitment to support air pollution control agencies through the funding and development of training programs and materials for personnel is critical to air improvement efforts. EPA’s coordination with the Joint Training Committee is important to this work and provides EPA an important resource for understanding the training needs and priorities of state and local air agencies. Air agencies recognize the importance of both training for new personnel and continuing education for professional development.	AAPCA	Page 33 (Continuing Air Program - Clean Air Act Training)	Thank you for your comment. OAR will continue to work closely with state and local air agencies on training through the Joint Training Steering Committee. No change to the document.
Other (Reporting Results)	The NSC encourages the posting of programmatic and environmental results to the EPA website, potentially with state level details. This helps provide transparency as well as examples that other states can view and follow-up on for implementation within their own state. Methods of data collection and	NSC	Page 35 (Achieving Programmatic and Environmental results)	Thank you for your comment. EPA publishes long-term performance goals (LTPGs) in its Strategic Plan. EPA also identifies annual performance goals associated with LTPGs and with other core program work in the Agency’s Annual Performance Plan (APP) and Budget, which are the focus of results described in EPA’s Annual Performance Report (APR). This information for EPA and for

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	<p>results can also enhance methodology of states in reporting results.</p>			<p>other federal agencies can be found on a publicly available website: Performance.gov.⁵ EPA’s methods of data collection and calculation of results for the LTPGs and associated annual performance goals are published in Data Quality Records (DQRs).⁶ State-level performance data align with many of EPA’s measures and are available on individual state dashboards. The Environmental Council of the States (ECOS) also developed a performance dashboard with measure results by participating states, which is available at ECOSResults.org.⁷ No change to the document.</p>
<p>Other (Reporting Results)</p>	<p>In addition to the priorities outlined above, states encourage EPA to continue to focus measures on environmental outcomes rather than outputs such as the number of inspections or evaluations.</p>	<p>NSC</p>	<p>Page 35 (Achieving Programmatic and Environmental results)</p>	<p>Thank you for your comment. EPA uses a mix of output and outcome measures to describe results in achieving its mission of protecting human health and the environment. These measures support the agency in effectively managing its programs, including efficient use of its resources. No change to the document.</p>
<p>Other (Wildland Fires)</p>	<p>In NTAA’s comment letter of October 22, 2021, NTAA urged that the OAR NPG “recognize the deadly immediate and long-term impact of wildfires.” More than sixty percent of our BNA respondents reported that “wildfire smoke has become impactful to their community”. Wildfires burden Tribes with additional costs like increased air quality monitoring, public outreach, damage assessment, and clean-up operations. Once again, NTAA encourages EPA to appreciate and prioritize this severe public health concern, and to work with Tribes to mitigate wildfire--caused air pollution.</p>	<p>NTAA</p>	<p>N/A</p>	<p>Thank you for your comment. OAR will continue to work with tribal partners regarding wildland fires and other issues related to addressing the climate crisis. No change to the document.</p>

⁵ See: <https://www.performance.gov/agencies/epa/>

⁶ See: <https://www.epa.gov/planandbudget/fy-2022-2026-data-quality-records>

⁷ See: <https://www.ecosresults.org/>

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Other (Wildland Fires)	With more wildfires on or near the Navajo Nation due to climate change, tribes will need additional air quality resources for their Tribal environmental departments to respond to wildfire emergencies.	Navajo Nation	N/A	Thank you for your comment. OAR will continue to work with tribal partners regarding wildland fires and other issues related to addressing the climate crisis. No change to the document.
Other (Road Dust)	More than eighty percent of the participants in NTAA's BNA report stated that road dust, including the many associated air pollutants, is a major concern. This insidious yet common air pollution source persists in rural Tribal communities, Alaska Native Villages, and many urban Tribes. The OAR NPG should recognize this issue and work with Tribes to develop and implement emissions control strategies. For example, EPA's R10 office implementation through a 2005 FIP that addressed road dust control strategies for Indian Country that could be used as a template for a national FIP.	NTAA	N/A	Thank you for your comment. OAR will continue to work with tribal partners regarding road dust issues and looks forward to working with NTAA on this issue in the NTAA mobile source subcommittee. No change to the document.
Other (PFAS)	As we noted in our October 2021 letter, PFAS and other emerging issues such as airborne microplastics will impact air quality in Indian Country and Alaska Native Villages. The updated NPG draft does not address PFAS or airborne microplastics in its section about Tribal priorities, and we reiterate our request that EPA add it to ensure that Tribal air quality issues from air pollutants like PFAS are an EPA priority.	NTAA	N/A	Thank you for your comment. OAR will continue to work with our tribal partners and NTAA to develop approaches to address this important and emerging issue, which is also an Agency Priority. No change to the document.