



January 18, 2023

U.S. Environmental Protection Agency  
EPA Docket Center, OAR  
1200 Pennsylvania Avenue NW  
Mail Code 28221T,  
Washington, DC 20460

Re: Docket IDs. EPA-HQ-OAR-2022-0873, Climate Pollution Reduction Grants  
EPA-HQ-OAR-2022-0874, Transportation Programs  
EPA-HQ-OAR-2022-0875, Methane Emissions Reduction Program  
EPA-HQ-OAR-2022-0876, Funding to Address Air Pollution  
EPA-HQ-OAR-2022-0877, Funding for Implementation of American Innovation and  
Manufacturing Act  
EPA-HQ-OAR-2022-0878, Low Emissions Electricity Program & GHG Corporate  
Reporting

Dear Administrator Regan,

Thank you for taking the time to consider WESTAR's comments regarding your Request for Information (RFI) on the use of funding allocated to EPA from the Inflation Reduction Act (IRA). The purpose of this letter is to provide input regarding certain questions that are common among many of the RFI dockets.

EPA's dockets address the following six areas of the IRA:

- Climate Pollution Reduction Grants (Section 60114)
- Transportation Programs (Sections 60101, 60102)
- Methane Emissions Reduction Program (Section 60113)
- Funding to Address Air Pollution (Sections 60105, 60106)
- Funding for Implementation of American Innovation and Manufacturing Act (Section 60109)
- Low Emissions Electricity Program & GHG Corporate Reporting (Sections 60107, 60111)

Some of the common questions in the dockets include topics regarding regional and interagency coordination, technical assistance, and equity and environmental justice concerns.

## Regional/Interagency Coordination

In several of the docket questions, EPA asks for input on how to structure programs to facilitate cooperation and coordination within and across Tribal, local, regional, and state agencies. There are also questions about how these same agencies can best coordinate with local governments and community

groups. Multijurisdictional organizations (MJOs) like WESTAR have a track record of facilitating coordination and cooperation across state, local, and Tribal air agencies. WESTAR facilitates coordination on air quality issues in the west through our executive council of air directors and committees. We also coordinate with local, Tribal, and Federal agencies through a technical steering committee and six workgroups that function under the Western Regional Air Partnership (WRAP). We encourage EPA to use this existing structure to coordinate work on climate change and air pollution reduction. Many of the grant programs funded by the IRA will require the development of environmental data or information systems. The effectiveness of the programs will, in part, hinge on the quality of this data. WESTAR has a history of coordinating high quality regional data collection and analysis. We recommend that grant funding for states include money for regional technical work such as data collection and modeling. We also recommend that EPA use the input and expertise from our member agencies who have also submitted comments to these dockets. Many states already coordinate closely with communities and can offer their expertise in how to make communications with specific communities most effective.

## Technical Assistance

There are several ways that EPA can provide technical assistance to state, local, and Tribal agencies (SLTs). Overall, SLTs need resources to apply for planning and/or implementation grants. These resources include staff, technical assistance, and training. Many western states, local, and Tribal air agencies are understaffed. While these agencies may have the expertise to develop grant applications or new programs, they do not have the staffing capacity. Additionally, some SLTs in the west do not have nonattainment areas and therefore lack expertise in applying for and implementing competitive grants. It would be helpful if EPA established regional assistance centers for grant applications, particularly for agencies with fewer personnel and with less experience in grant applications. It would also be helpful for agencies/applicants to have examples of successful grant applications and grant-funded programs so that they don't have to write the grant application or design a program from scratch. Templates and other examples of successful grant applications and programs would be very helpful as long as they are relevant to the program.

Because of staffing shortages, many agencies will not have people to administer the grants. Any way that EPA can make grant administration easier would be helpful. Two suggestions are to provide funding for implementation so that agencies can contract or add staff, and to provide grant funding to universities and colleges that partner with SLTs to assist those agencies that lack adequate staffing resources. EPA should utilize the Intergovernmental Personnel Act (IPA) to allow EPA staff to locate temporarily at a SLT agency to provide grant administration and program management assistance. The IPA Mobility Program provides for the temporary assignment of personnel between the Federal Government and state and local governments, colleges and universities, Indian Tribal governments, federally funded research and development centers, and other eligible organizations and can serve as an innovative way to address grant administration needs. EPA could also use the IPA to hire interns (college students or recent graduates) and place them at SLTs.

## Equity and Environmental Justice Concerns


WESTAR appreciates EPA's desire, as reflected in the many docket questions, to make sure that disadvantaged and low-income communities benefit from the air quality and climate improvements realized through IRA funding. While many of these communities are part of the urban fabric of large

metropolitan areas, many disadvantaged and low-income communities in the West are located far from urban centers. According to the U.S. Census Bureau, the population density of the Western States is 43 people per square mile. By comparison, the population density of the Northeast is 346 people per square mile. The WESTAR member states comprise 50% of the U.S. land mass and only 24% of the U.S. population. EPA must consider that western states are much larger in geographic size than eastern states. Addressing underserved communities in western states may require additional resources due to the large distance agencies must travel to work with underserved communities. Because of the remote location of these places, some underserved communities in the west have unique communications challenges, including the lack of broadband internet access. Significant funding should be provided to western air agencies to augment the work they are doing to address the needs of these remote underserved communities.

Because state, local, and tribal agencies already work closely with the communities within their jurisdiction, it is important that EPA ensure that those agencies have a voice in determining which communities face disproportionate impacts and in assessing their needs and priorities. WESTAR recommends that EPA allocate additional funding for outreach to communities by state, local, and tribal air agencies to determine communities' needs and priorities.

WESTAR appreciates EPA's commitment to working with state, local, and Tribal agencies to understand how to best use the funds from the IRA to improve air quality, address climate change, and improve equity and equality in our communities.

Sincerely,

  
Ali MIRZAKHALILI (Jan 18, 2023 14:58 PST)

Ali Mirzakhali, President  
Western States Air Resources Council