

June 1, 2021

Mr. Aaron Yeow
Designated Federal Officer, Clean Air Scientific Advisory Committee
U.S. Environmental Protection Agency
1300 Pennsylvania Ave NW
Washington, DC 20460
Via Email: yeow.aaron@epa.gov

Subject: *Invitation for Public Comment on the List of Candidates for the U.S. Environmental Protection Agency's (EPA) Clean Air Scientific Advisory Committee (CASAC)*

Mr. Yeow:

The Association of Air Pollution Control Agencies (AAPCA)¹ appreciates U.S. EPA's request for public input on the list of candidates for service on the Agency's chartered CASAC.² In previous comments on candidate lists for CASAC, AAPCA has stressed state environmental agency membership and geographic diversity as important factors in meeting the Committee's Charter³ and Membership Balance Plan.⁴ AAPCA recommends that U.S. EPA's Science Advisory Board (SAB) Staff Office consider experts from state and local agencies in the current chartered CASAC selection process.

On U.S. EPA's list of qualified candidates are officials from several state and local air quality programs.⁵ These candidates have demonstrated high levels of competence, knowledge, and expertise in fields relevant to air pollution and air quality issues, with impressive backgrounds in meteorology, chemical and environmental engineering, modeling, and toxicology. As agency experts, these candidates are well-versed in the technical aspects of National Ambient Air Quality Standards (NAAQS), and would bring vital, on-the-ground experience to the scientific review process.

Among the "Selection Criteria for CASAC" detailed in the *Federal Register* notice calling for nominations, U.S. EPA states that nominees should have "Demonstrated scientific credentials and disciplinary expertise in relevant fields" and "Background and experiences that ... contribute to the diversity of perspectives," and "For the committee as a whole, consideration of the collective breadth and depth of scientific expertise; and a balance of scientific perspectives is important."⁶ Further, CASAC's charter and the federal Clean Air Act direct EPA to appoint "at least one member of the National Academy of Sciences, one physician, and one person representing state air pollution control

¹ AAPCA is a national, non-profit, consensus-driven organization focused on assisting state and local air quality agencies and personnel with implementation and technical issues associated with the federal Clean Air Act. AAPCA represents 48 state and local air pollution control agencies, and senior officials from 22 state environmental agencies sit on the AAPCA Board of Directors. AAPCA is housed in Lexington, Kentucky as an affiliate of The Council of State Governments. More information on AAPCA can be found at: www.cleanairact.org.

² U.S. EPA Science Advisory Board Staff Office, "[Invitation for Public Comment on the List of Candidates For the Environmental Protection Agency's Clean Air Scientific Advisory Committee](#)," May 10, 2021.

³ [CASAC Charter \(renewed 6/5/2019\)](#).

⁴ [CASAC 2019 Membership Balance Plan](#), March 21, 2019.

⁵ Three candidates are from the following AAPCA member agencies: Arizona Department of Environmental Quality; Georgia Environmental Protection Division; and, Texas Commission on Environmental Quality.

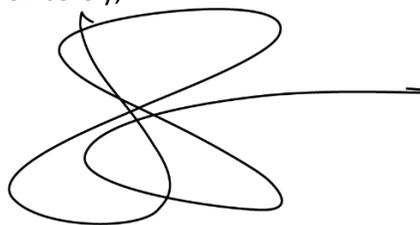
⁶ [86 FR 17146 – 17147](#).

agencies.”⁷ And CASAC’s current Membership Balance Plan states that “Geographic location may be considered” the only other balance factor that “EPA identifies as important in achieving a balanced [Federal Advisory Committee].”⁸

With U.S. EPA currently reconstituting the full chartered CASAC, strong consideration should be given to candidates that best help meet the directives for CASAC composition as well as assist the Committee in undertaking the responsibilities set forth in the Clean Air Act.⁹ In selecting a geographically diverse membership with experts from state and local agencies to meet these statutory and federal requirements, the Agency would receive key technical and scientific insight that would improve the review and input process. AAPCA not only recommends the selection of state and local candidates to the CASAC, but encourages the SAB Staff Office to work toward exceeding specifications of *at least* one person from a state air pollution control agency as a method for meeting calls for broader geographic perspectives.

Thank you for the opportunity to provide input on U.S. EPA’s remarkable list of candidates for CASAC. If you have any questions, please contact Jason Sloan, AAPCA’s Executive Director, at jsloan@csg.org or (859) 244-8043.

Sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Jason Sloan
Executive Director, AAPCA

⁷ [CASAC Charter](#).

⁸ [CASAC 2019 Membership Balance Plan](#), March 21, 2019.

⁹ See 42 U.S. Code §7409.