



MARAMA
Mid Atlantic Regional Air Management Association, Inc.



October 16, 2025

Aaron Szabo, Assistant Administrator
Office of Air and Radiation
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Sent Via Email

Re: Needs for future year air pollution emissions development as part of the 2022 Emissions Modeling Platform

Dear Mr. Szabo,

State and local air agency personnel need future year air pollution emissions data to fulfill their obligations to multiple federal requirements; these include but are not limited to:

- Ozone and PM_{2.5} National Ambient Air Quality Standards (NAAQS) planning, including attainment demonstrations, redesignation requests, reasonable further progress demonstrations, maintenance and conformity demonstrations, and international transport Sec. 179B(b) analysis;
- Exceptional Events analysis;
- Regional Haze Program analysis;
- Interstate transport analysis for Infrastructure State Implementation Plans (SIPs); and
- Air quality modeling to support Prevention of Significant Deterioration (PSD) permits

Each of these requirements carries federally mandated deadlines and technical specifications. Without access to future year emissions data, state and local air agencies will be significantly hindered, and in some cases unable, to meet these obligations.

Continued EPA collaboration and support to states with meeting these obligations is necessary for air agency staff to meet Clean Air Act deadlines over the next 2-3 years. On behalf of our member agencies, the Multi-Jurisdictional Organizations (MJOs) are requesting EPA assistance to develop the 2022 Version 2 Emissions Modeling Platform (2022v2 EMP) for future years.

An EMP is an indispensable tool used by air agencies and EPA to characterize air pollution emissions in the future. The data compiled for future year inventories are essential, as states and EPA rely on emissions projection scenarios to develop and approve SIPs; understand how best to support economic and population growth; and meet evolving energy demands, all while maintaining the NAAQS. Historically, EMPs have been used in national rulemakings, SIPs,

interstate transport analyses, and state-level air quality permitting, providing a consistent technical foundation for planning and policy decisions. Developing and maintaining a national EMP with future years is the most efficient approach in terms of creating consistency across jurisdictions, avoiding unnecessary duplication of effort, conserving state and federal resources, and reducing the risk of competing model results that could complicate regional and national planning.

A recent survey of state, local and MJO staff who have followed the 2022v2 EMP development showed that there is an immediate need for 2032 and 2038 future years from the platform. EPA has not yet developed future year emissions based on the 2022v2 inventory, nor has it presented any plans or timelines to do so.

Air agencies and EPA have already formed a successful partnership through the work on the 2022 Emissions Inventory Collaborative. Using this momentum and moving into 2022v2 future year development will present an opportunity for continued engagement between state/local air agencies and EPA and serve as an example of successful cooperative federalism. Further, the 2022 Emissions Inventory Collaborative Projections Workgroup, with members from EPA, state, local, and tribal air agency staff, are currently using their expertise in emissions inventories and modeling to identify data and methods for developing future year data for the 2022v2 EMP.

Given the needs for updated future year emissions and the existing structure of the Emissions Inventory Collaborative, we ask that EPA¹:

- Continue to engage with regional/state/local air agency staff through the Emissions Inventory Collaborative
- Finalize the development of the 2022v2 EMP for the 2032 and 2038 future years
- Support the development of inventories, ancillary emissions data, and other tools needed to use the EMP with air quality models
- Conduct the modeling and model performance evaluation to confirm the reliability of the modeling inputs.

Please ask the relevant EPA staff reach out to us to discuss how we can collectively and constructively move forward to address these important air quality planning needs.

Thank you,

Paul Miller
Executive Director
NESCAUM

Marc Cone
Executive Director
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Michael Vince
Executive Director
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Mary Uhl
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¹ The Visibility Improvement—State and Tribal Association of the Southeast (VISTAS) regional planning organization supports EPA completing these asks (see April 14, 2025, letter to Karen Wesson, Air Quality Assessment Division Director, available upon request).