June 28, 2011

The Honorable Michael Simpson
Chairman
Subcommittee on Interior, Environment, and Related Agencies
Committee on Appropriations
U.S. House of Representatives
Washington, D.C. 20515

The Honorable James Moran
Ranking Member
Subcommittee on Interior, Environment, and Related Agencies
Committee on Appropriations
U.S. House of Representatives
Washington, D.C. 20515

Dear Congressmen Simpson and Moran:

I am writing to you on behalf of the National Association of Clean Air Agencies (NACAA), an association of air pollution control agencies in 51 states and territories and over 165 metropolitan areas across the country that have the primary responsibility under the Clean Air Act for implementing our nation’s clean air program. As you prepare to discuss FY 2012 appropriations for the U.S. Environmental Protection Agency, including grants for state and local air pollution control agencies, I would like to tell you about the results of a NACAA study that highlight the critical need for increased federal funding for these important state and local programs.

As you know, the President’s budget proposal calls for $305.5 million in grants to state and local air quality agencies under Sections 103 and 105 of the Clean Air Act, which includes a much-needed $78.9-million increase above FY 2010 levels. NACAA supports this budget proposal and requests that Congress include the recommended funding level in the final appropriations bill.

The NACAA study included a survey of the association’s members to gather information on the effects of the recession on state and local air quality agency staffing and budgets. The responses to our survey paint a bleak picture, with significant cuts in staffs and budgets, resulting in a host of programs that have been curtailed or even eliminated. This study has revealed some of the devastating effects the recession is having on clean air agencies and underscores the need for immediate increases in funding from the federal government.
We received responses from 40 state and local air quality agencies. Among our findings are the following:

**Lost Staff** – Eighty percent of the state and local agencies that responded to the survey have laid off or otherwise lost staff in the last four years. Thirty-five percent of the agencies that responded reported losses of 10 percent or more of their staffs *in a single year*. Half of the respondents reported losses in multiple years, which had a devastating cumulative effect. When FY 2008 – 2011 are taken as a whole, the average loss of staff was 16.7 percent, with 35 percent of the agencies *having cumulative losses of 15 percent or more*.

**Furloughs** – Forty-eight percent of the responding agencies have been subject to furloughs, with the average being approximately six days per year.

**Reduced Budgets** – Eighty-five percent of the respondents reported cuts to their air quality budgets during the last four years. Forty percent of the respondents reported cuts of over 10 percent in a single year; 25 percent experiencing a cut of 15 percent or more *in a single year*. Thirty-five percent of the respondents suffered cuts in multiple years between FY 2008 and 2011, resulting in cumulative negative impacts to their budgets.

**Curtailed Activities** – Perhaps the most sobering information we received addressed the types of activities these agencies have had to curtail due to staff and budget reductions and furloughs. Nearly all identified worrisome program contractions. Several noted that they have had to cut back to very basic “core” program activities. Among the common responses, mentioned over and over again, were reductions to and/or eliminations of programs for the following:

- Monitoring, including curtailment of monitoring and/or analysis activities or even closing down of monitoring sites (30 percent of respondents);
- Permitting for major (i.e., Title V) and minor sources, resulting in delay and backlogs in permit issuance and reduced permitting assistance to sources (28 percent of respondents);
- Inspections of sources, including for compliance purposes (25 percent of respondents);
- Air toxics programs, including implementing federal air toxics standards, taking delegation of federal area source standards and addressing air toxics near schools (20 percent of respondents); and
- Public education and outreach (30 percent of respondents).

Other activities that agencies identified for reduction and/or elimination include emissions inventory work, training, data analysis, citizen-complaint response, rulemaking, development of State Implementation Plans and motor vehicle-related programs.

Air pollution is an extremely significant public health threat that causes the premature deaths of tens of thousands of people in this country each year and results in many other serious
health problems. As you can see from the results of the survey, the budget crisis is having a profound and negative impact on state and local agencies’ efforts to address our significant air quality problems. NACAA urges you to promote public health by supporting the President’s proposed budget increases for state and local air grants. Thank you for any assistance you can offer. If I can provide you with any additional information, please feel free to contact me (bbecker@4cleanair.org) or Mary Sullivan Douglas (mdouglas@4cleanair.org) by email or telephone at (202) 624-7864.

Sincerely,

S. William Becker

cc: House Committee on Appropriations