

June 13, 2016

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The Honorable Hal Rogers, Chairman
House Committee on Appropriations
H-305
The Capitol
Washington, DC 20515

The Honorable Nita Lowey, Ranking Member
House Committee on Appropriations
H-305
The Capitol
Washington, DC 20515

Dear Congressmen Rogers and Lowey:

I am writing on behalf of the National Association of Clean Air Agencies (NACAA)¹ regarding FY 2017 appropriations for the U.S. Environmental Protection Agency (EPA), specifically grants for state and local air pollution control agencies under Sections 103 and 105 of the Clean Air Act, which are part of the State and Tribal Assistance Grant (STAG) program. As you consider legislation containing these appropriations this week, NACAA makes three requests of Congress: (1) provide state and local air pollution control agencies with federal grants in the amount of the President's request – \$268.2 million – which is an increase of \$40 million over FY 2016 levels; (2) provide these agencies with the flexibility to use the \$40-million increase on the highest-priority activities in their areas, rather than earmarking the additional resources for any particular activity (e.g., climate change); and (3) retaining grant funds for fine particulate matter (PM_{2.5}) monitoring under Section 103 authority, rather than being shifted to Section 105 authority, as EPA is proposing.

Air pollution continues to be a significant public health concern in this country. Every year tens of thousands of people die prematurely as a result of breathing polluted air. Millions are exposed to unhealthful levels of air contaminants, which result in many health problems, such as cancer and damage to respiratory, cardiovascular, neurological and reproductive systems. While the programs that federal, state and local agencies have undertaken to address air pollution under the Clean Air Act have been hugely successful, significant problems still exist, posing threats to public health and welfare.

¹ NACAA is a national, non-partisan, non-profit association of air pollution control agencies in 40 states, the District of Columbia, four territories and 116 metropolitan areas. The members of NACAA have the primary responsibility under the Clean Air Act for implementing our nation's clean air program. The air quality professionals in our member agencies have vast experience dedicated to improving air quality in the United States. These observations and recommendations are based upon that experience. The views expressed in this letter do not necessarily represent the positions of every state and local air pollution control agency in the country.

NACAA recognizes that the task Congress faces of balancing many competing needs is daunting. However, air pollution is among one of the most pressing public health challenges we face. Congress has the opportunity to take aim at this critical public health and welfare problem by providing additional federal grants to those fighting on the front lines – state and local air quality agencies.

State and local air quality agencies have many responsibilities as part of their efforts to attain and maintain healthful air quality, including ongoing activities to sustain the improvements that have been made and new initiatives to address emerging issues. Unfortunately, for many years these agencies have faced a serious shortfall in federal grants and they struggle to continue the essential air quality programs that the public needs.

While the proposed increase in state and local air grants would not fully fill the funding gap we endure, it would provide much-needed resources that can be applied to a range of critical activities. These include planning efforts, expanded monitoring networks, sophisticated modeling, emission inventory development, and the adoption and enforcement of regulations, among other things. Because different regions of the country are faced with varying problems, it is especially important that state and local air agencies be provided the flexibility to use any increases for the highest priority activities in their areas.

The Administration's request also proposes to phase in a shift of fine particulate monitoring funds from Section 103 authority, where no match is needed, to Section 105, which would require additional state and local matching funds. NACAA is very grateful that Congress has prevented this shift in the past by calling for these funds to remain under Section 103 authority and we ask that you include this provision in the final FY 2017 bill as well. For individual agencies that have difficulties with the matching requirements, this will ensure that they can receive these important funds for their monitoring programs.

In summary, NACAA urges you to (1) provide \$268.2 million in grants to state and local air pollution control agencies under Sections 103 and 105 of the Clean Air Act for FY 2017, which is an increase of \$40 million above FY 2016, (2) not "earmark" these funds for specific activities and instead provide state and local air pollution control agencies with the flexibility to use the additional resources on the highest-priority activities in their areas, and (3) retain grants for PM_{2.5} monitoring under Section 103 authority, rather than allowing them to be shifted to Section 105 authority.

Thank you for your support over the years and we hope we can count on your assistance for FY 2017. 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