

**Testimony of the National Association of Clean Air Agencies (NACAA)
Submitted to the House Appropriations Committee
Subcommittee on Interior, Environment, and Related Agencies
Regarding the FY 2020 Budget for the U.S. Environmental Protection Agency
March 14, 2019**

On behalf of the National Association of Clean Air Agencies (NACAA), thank you for this opportunity to provide testimony on the FY 2020 budget for the United States Environmental Protection Agency (EPA), particularly grants to state and local air pollution control agencies under Sections 103 and 105 of the Clean Air Act (CAA), which are part of the State and Tribal Assistance Grant (STAG) program. NACAA has three recommendations with respect to FY 2020 appropriations. The association urges Congress to 1) increase federal grants to state and local air pollution control agencies by \$82 million above FY 2019 levels, for a total of \$310 million; 2) provide flexibility to state and local air quality agencies to use any additional grants to address the highest priority programs in their areas; and 3) retain grants for monitoring fine particulate matter (PM_{2.5}) under the authority of Section 103 of the Clean Air Act, rather than shifting it to Section 105.

NACAA is the national, non-partisan, non-profit association of air pollution control agencies in 41 states, including 114 local air agencies, the District of Columbia and four territories. These agencies have the “primary responsibility” under the Clean Air Act for implementing our nation’s clean air programs. As such, they carry out an array of critical activities intended to improve and maintain air quality and protect public health.

NACAA first wishes to thank the Subcommittee for the commitment to air quality that you have shown for many years. We recognize there are insufficient resources for you to support all the requests you receive from many competing and worthwhile programs. While over the years there have been some recommendations from the Administration to cut funding for state and local air quality grants, you have steadfastly recognized the importance of these programs and have opted to not reduce our resources. We would like to take this opportunity to express our appreciation and to explain the importance of providing additional funding for these important programs going forward.

There Is a Strong Need for Additional Air Quality Funding

A good national air quality program is an essential investment in America. The sad fact is more Americans die or get sick from air pollution than from almost any other environmental or domestic problem facing our nation. Tens of thousands of people die prematurely each year in this country as a result of exposure to such air pollutants as particulate matter, ozone and hundreds of toxic compounds. Additionally, millions suffer serious health problems, such as cancer and cardiovascular, respiratory, neurological and reproductive damage. According to EPA’s estimates, in 2016 over 120 million people lived in counties with air quality that did not

meet the health-based standards for at least one of the six “criteria pollutants.”¹ Additionally, millions of Americans are exposed to risks from hazardous air pollutants.² State and local air pollution control agencies work tirelessly, and without sufficient resources, to address these threats to public health and welfare by implementing the Clean Air Act.

The responsibilities facing these agencies have continued to grow while, unfortunately, federal funding has lagged behind. Federal grants to state and local air quality agencies under Sections 103 and 105 of the CAA were \$228 million in FY 2019, which is the same amount these agencies received 15 years ago, in FY 2004. If the FY 2004 figure is adjusted for inflation, level funding would translate to approximately \$310 million in today’s dollars – an \$82-million difference. While the need for increases is far greater, NACAA’s recommendation for Section 103 and 105 grants in FY 2020 is merely for level funding, adjusted for inflation – or \$310 million.

State and local air quality agencies have made do with inadequate resources for many years. While the Clean Air Act envisioned the federal government supporting up to 60 percent of the cost of state and local air programs, the truth is it provides only 25 percent and in some cases much less, while state and local agencies provide the remaining 75 percent. While we understand Congress is not able to grant increases to fully meet the needs of our clean air programs, even the modest increases we are requesting will help.

On a day-to-day basis, as part of our “core” programs, our agencies carry out a host of essential resource-intensive activities, including monitoring, compiling emission inventories, planning, conducting sophisticated modeling, permitting and inspecting sources and adopting and enforcing regulations. It takes a tremendous effort to keep up with our existing responsibilities, especially when one considers that since FY 2004, we have received the same dollar amount we do now while the purchasing power of our grants has diminished by more than 30 percent.

The ongoing and essential core programs we have identified are only a part of the picture. State and local air quality agencies are also called upon to address new and emerging issues. Our responsibilities continue to expand as new regulations, technologies, monitoring, controls and other elements of our programs become more sophisticated. Additionally, the public is demanding more information and assistance from state and local air quality agencies, including, for example, data related to wildfires and natural disasters that can be used to understand the level of risk and how they may protect themselves.

Air quality monitoring is just one area where the public expects and demands new and evolving state and local efforts. The state of technology is advancing at a rapid pace, including the ability of individuals and organizations to obtain and use localized monitoring and sensor equipment. Our agencies will need resources to manage the air quality data that the public is generating and to develop the sensible programs that the public will demand to address any air quality issues that may come to light.

¹ <https://www.epa.gov/sites/production/files/2018-08/documents/fy-2018-2022-epa-strategic-plan-print.pdf> (page 8)

² <https://www.epa.gov/national-air-toxics-assessment/2014-nata-assessment-results#nationwide>

Another activity for which additional federal funding is critically needed is training of state and local air quality staff. We are facing an unprecedented rate of retirements and staff turnover, resulting in a loss of invaluable institutional knowledge. Having well-trained staff not only helps air agencies to operate more effectively, but it allows them to be more efficient and provide better customer service to the public and the regulated community. It is critically important that we have the resources to ensure that air agency staff are well trained and ready to take on the responsibilities they will face in an ever more complicated program.

In addition to the aforementioned examples, how else would state and local air quality agencies spend increased federal grants? The list is very long, but a few activities for which additional funding is necessary include the following:

- reducing concentrations of fine particulate matter;
- improving small business compliance assistance;
- modernizing modeling and other estimation tools;
- improving emission inventories of air pollutants;
- increasing the frequency of inspections;
- developing new strategies to meet our health-based air quality standards;
- improving risk assessment capabilities; and
- helping the public better understand air pollution and how to protect their health.

All these activities are critical to our mission to reduce air pollution, maintain the many improvements we have already made and continue to protect public health and welfare, as we have been charged to do by the people of this country. Additionally, well-funded and well-functioning air agencies can help support the economy through timely, well-reasoned responses and actions.

Flexibility in the Use of Funds Is Important

Each area of the country faces its own unique air quality challenges. A one-size-fits-all strategy would not result in the best use of additional funding. For example, while an area in the West may wish to use additional resources on activities related to air pollution from wildfires, an area in the East may find a better use of increased funding for ozone-related programs. It is important, therefore, that state and local agencies be provided with the flexibility to use the increased funds on the highest priority programs in their areas.

NACAA Recommends that Authority for Monitoring Grants Remain Under Section 103

EPA has proposed in recent years to begin shifting funds for PM_{2.5} monitoring from Section 103 authority, where no state or local matching funds are needed, to Section 105, which would require additional matching funds. We recommend that the funds remain under Section 103 authority. For individual agencies that have concerns about the matching requirements, this will ensure that they do not have to refuse essential monitoring funds because they do not have the resources to provide the required match. In past years, Congress has been very responsive to

our requests on this issue, for which we are very grateful, and we recommend that Congress again call for these grants to be provided under Section 103 authority.

Conclusion

State and local clean air agencies work to protect the public every day. Investing in them pays major dividends in avoided health care costs. NACAA urges Congress to 1) increase federal grants to state and local air agencies by \$82 million above FY 2019 levels, for a total of \$310 million; 2) provide flexibility to state and local air agencies to use any additional grants to address the highest priority programs in their areas; and 3) retain grants for monitoring fine particulate matter under the authority of Section 103.

Thank you very much for this opportunity to provide testimony. If you have any questions or require additional information, please contact Miles Keogh, Executive Director of NACAA, at mkeogh@4cleanair.org or Mary Sullivan Douglas, Senior Staff Associate, at mdouglas@4cleanair.org.