

December 5, 2017

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The Honorable Thad Cochran Chairman Senate Appropriations Committee U.S. Senate Washington, DC 20510

The Honorable Rodney Frelinghuysen Chairman House Appropriations Committee U.S. House of Representatives Washington, DC 20515 The Honorable Patrick Leahy Vice Chairman Senate Appropriations Committee U.S. Senate Washington, DC 20510

The Honorable Nita Lowey Ranking Member House Appropriations Committee U.S. House of Representatives Washington, DC 20515

Dear: Senators Cochran and Leahy and Representatives Frelinghuysen and Lowey:

As Congress considers an omnibus appropriations bill for FY 2018, the members of the National Association of Clean Air Agencies (NACAA)¹ would like to reiterate the critical need for adequate grant funding for state and local air pollution control agencies under Sections 103 and 105 of the Clean Air Act (CAA), which is contained in the State and Tribal Assistance Grant (STAG) program in the U.S. Environmental Protection Agency's (EPA's) budget.

The House's bill (H.R. 3354) maintained FY 2017 funding levels for state and local air grants in FY 2018 and the Senate recommendation called for an increase of \$10 million for these programs (for a total of \$238.2 million). NACAA requests that Congress, at a minimum, fund these grants at the FY 2017 level (\$228.2 million) and notes that the Senate's higher recommendation would make a particularly beneficial and important contribution to the health and vitality of America's communities, businesses and environment.

State and local agency members of NACAA depend on the continued recognition of the importance of healthful air quality for all Americans by the House and Senate Appropriations Committees. Funding these grants below the FY 2017 level (\$228.2 million) would impede the ability of state and local air agencies to carry out their delegated authorities and sustain the impressive clean air gains of recent decades. In crafting an omnibus appropriations bill, Congress should adequately fund these grants and we note that the Senate version would yield more effective action.

¹ NACAA is a national, non-partisan, non-profit association of state and local air pollution control agencies in 41 states, including 116 local air agencies, the District of Columbia and four territories.

State and local air pollution control agencies have primary responsibility under the Clean Air Act for implementing our nation's air quality programs. NACAA joins with the Environmental Council of the States (ECOS) in calling for robust STAG categorical grants, that are "essential to implementation of environmental programs delegated to states." We strongly support the notion of cooperative federalism, where collaboration and partnership between our members and federal agencies are at the core of protecting the health of Americans and the environment. The federal grant funding that Congress provides allows state and local air agencies across the country to work with EPA to implement and enforce the Clean Air Act and to provide services to both the public and the regulated community. In addition to the benefits to public health, these services include expedited permitting, streamlined operations and compliance assistance, which contribute to economic development and administrative efficiencies.

While federal grants for state and local air agencies have essentially remained level in recent decades, the purchasing power of the funding from EPA to our agencies has actually decreased by nearly 17 percent since 2000 due to inflation. These budgetary limitations make it a challenge for state and local air agencies to provide the services and protections that the public deserves; further constraints in the form of cuts to grant programs could harm our ability to carry out these important programs.

It is important that Congress provide federal support that is commensurate with the scope and complexity of the responsibilities state and local air agencies face. Recognizing the constraints under which Congress must appropriate funds and the likelihood that significant increases are not possible at this time, NACAA supports, at a minimum, a continuation of the amount provided in FY 2017 – \$228.2 million – and notes that the Senate figure of \$238.2 million would afford better outcomes than the bare minimum.

Thank you very much for supporting our efforts in previous years and for your continuing recognition of the importance of healthful air quality. If we can provide additional information, please do not hesitate to contact us or Mary Sullivan Douglas of NACAA at (202) 624-7864 or mdouglas@4cleanair.org.

Sincerely,

Sam Rubens (Akron, Ohio)

Co-President of NACAA

Bart Sponseller (Wisconsin)

Co-President of NACAA

cc: House and Senate Appropriations Committees

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² https://www.ecos.org/wp-content/uploads/2017/03/Passback-Letter-from-ECOS-3 1 17-FINAL.pdf