

**Written Public Testimony of The Association of Clean Water Administrators**

**Submitted to the Senate Committee on Appropriations Subcommittee on Interior,  
Environment, and Related Agencies**

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The Association of Clean Water Administrators (ACWA) appreciates the opportunity to submit written testimony to the U.S. Senate Committee on Appropriations, Subcommittee on Interior, Environment, and Related Agencies. As the national voice of state, interstate, and territorial officials responsible for implementation of programs that protect surface waters across the nation, ACWA opposes the FY18 Budget Proposal's suggested drastic cuts of 30%.

Specifically, the budget cuts affecting the State and Tribal Assistance Grants (STAG grants) will severely limit states' ability to implement core water protection programs as required by the Clean Water Act (the Act). Most notably, the budget proposal reduces or eliminates §106 and §319 funds, both of which are critical funding sources for water protection efforts. The proposed reduction in FY18 federal funding to states will leave states with fewer resources, while their obligations under environmental statutes remain.

The Act relies on state governments for implementation, more so than other environmental statutes. In turn, federal partners have recognized the importance of cooperative federalism, and strong relationships with states by providing sorely needed funding through the aforementioned grants. For the principles of cooperative federalism to work, and for our waters to be adequately protected, there must be a strong and stable state partner. Therefore, we request that the §106 and §319 FY18 funding at least be consistent with the enacted FY17 amounts of approximately \$230.8 and \$164.9 million respectively— recognizing this is still far below what is actually needed to effectively protect the nations waters.

Section 106 of the Act is the main authorized funding source provided to the states and interstates to directly assist with preventing, reducing, and eliminating pollution to the nation's waters. States use these funds to help develop standards, set pollution reduction loads, issue permits, confirm compliance, monitor results, and report on successes. Without these funds, states will lose many full-time employees that perform these duties, which would negatively affect local economic development. Without necessary permits industries will not expand or open new facilities.

Section 319 funds are used for restoration efforts for waterbodies impaired by nonpoint source pollution. Currently, the majority of the waterbodies listed as not meeting their designated uses are impaired by nonpoint source pollution. While further collaboration with USDA is important for addressing agriculture based pollution, there is no other federal funding source available to support states efforts to address nonpoint source water pollution from non-agriculture sources such as mining, urban development, failing septic systems, and other hydrological modifications. Eliminating federal §319 funding will handicap states' ability to address nonpoint source pollution, which is already a difficult, cost-intensive problem.

ACWA supports the focus on water infrastructure funding through the State Revolving Fund (SRF) programs. However, infrastructure funding will require state resources, including staff, to ensure these funds are awarded and disbursed effectively and efficiently. Applying for and administering SRF funds will take longer with state resources stretched thinner considering the 30% reduction to STAG grants. State agency operations, which ensure that SRF projects can proceed unencumbered, will be affected, and implementation of desperately needed infrastructure investments will be slower and less effective.

The proposed elimination of the Great Lakes, Chesapeake Bay, Puget Sound, Long Island Sound, Gulf of Mexico, Lake Champlain regional programs, as well as the National Estuary Program is ill-advised. These programs protect some of the nation's most important water resources and places from degradation, invasive species, and algal blooms. These bodies of water and estuaries have made great progress towards reaching their long term goals, and risk backsliding into worse conditions without the staff and resources needed to maintain recent progress. Therefore, we request that the funding for the regional programs, remain at the FY17 level.

In conclusion, ACWA asks that the Subcommittee considers these funding requests. The proposed FY18 EPA budget provides insufficient funding, especially now when states are under extreme pressure due to increased federal requirements. Funding must be at least consistent with last year's budget to allow states to carry out their duties under the Act and increased if the states are to make strides in reaching the nation's water quality goals which benefit all Americans. States cannot do it alone. The Act is built on a federal-state partnership. The states' and interstates' contributions to the nation's water goals are vital to the Act's success, which is critically important to stimulate economic growth by expanding American manufacturing and American jobs while at the same time increasing tourism, water-based recreation, and a clean water supply for America's water infrastructure.