



5/10/2018

Chairman Ken Calvert
Ranking Member Betty McCollum
House Appropriations Committee
Subcommittee on Interior, Environment, and Related Agencies
United States House of Representatives
Washington, DC 20515

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Oregon Department Environmental
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Executive Director & General Counsel
Julia Anastasio

Re: FY 19 Appropriations for the U.S. Environmental Protection Agency for Water Programs

Dear Chairman Calvert and Ranking Member McCollum,

As the national voice of state, interstate, and territorial officials responsible for the implementation of programs that protect surface waters across the nation, The Association of Clean Water Administrators (ACWA) opposes the President's FY19 Budget Proposal's suggested cuts of 23% to the Environmental Protection Agency's budget.

Specifically, the budget cuts and potential rescissions affecting categorical grants, such as the State and Tribal Assistance Grants (STAG grants) and BEACH grants, will severely limit states' ability to implement core water protection programs as required by the Clean Water Act (the Act). The budget proposal reduces or eliminates \$106 and \$319 funds, both of which are critical funding sources for water protection efforts. In addition, the budget proposal eliminates BEACH Grants which will severely limit states' ability to implement monitoring programs for recreational bathing beaches and to protect public health and safety. The proposed reduction in FY19 federal funding 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. Federal partners have recognized the importance of cooperative federalism. However, for the principles of cooperative federalism to work, and for surface waters to be adequately protected, there must be strong, stable, and well-funded state partners. The states have not experienced an increase in federal funding for the past five years. The states have worked hard to find ways to leverage the funds and do more with less. While the states appreciate the consistent funding, the funding levels are still far below what is needed to effectively protect the nation's waters because of increasing mandates and inflation. Therefore, ACWA requests that there be an increase from FY18 levels for \$106 and \$319 FY19 funding.

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 can also negatively affect local economic development. Without necessary permits industries will not expand or open new facilities and §106 funding is critical to support state permitting programs.

Section 319 funds are used for restoration efforts for waterbodies impaired by nonpoint source pollution. Currently, most 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 impede on states' ability to address nonpoint source pollution, which is already a difficult, cost-intensive problem.

The proposed elimination of many of the regional programs is ill-advised and hinders an effective relationship between EPA and the states. These programs protect some of the nation's most important water resources 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 precursor conditions without the staff and resources needed to maintain recent progress. Therefore, we request that the funding for the regional programs remain at least at the FY18 level.

ACWA appreciates Congress's support of the Clean Water and Drinking Water State Revolving Funds in the FY18 Omnibus Bill. ACWA asks for continued support for the State Revolving Funds and supports the FY19 President's budget increase request for State Revolving Funds. The slight increase will greatly benefit states' backlog of water infrastructure needs.

In conclusion, ACWA asks that the Subcommittee considers these funding requests. The proposed FY19 EPA budget provides insufficient funding, especially 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. However, if the states are to make strides in reaching the nation's water quality goals, which benefit all Americans, funding for the §106 and §319 programs must be increased.

Sincerely,



Jennifer Wigal
President, Association of Clean Water Administrators