

**Testimony of Miles Keogh**  
**Executive Director, National Association of Clean Air Agencies (NACAA)**  
**Before the House Appropriations Committee**  
**Subcommittee on Interior, Environment, and Related Agencies**  
**Regarding the FY 2021 Budget for the U.S. Environmental Protection Agency**  
**February 6, 2020**

Good morning. I am Miles Keogh, Executive Director of the National Association of Clean Air Agencies (NACAA). Thank you for this opportunity to testify on the FY 2021 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 urges Congress to 1) increase federal grants to state and local air agencies by \$87 million above FY 2020 levels, for a total of \$315 million; 2) provide flexibility to these 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.

NACAA is the national, non-partisan, non-profit association of air pollution control agencies in 40 states, including 115 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.

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 and millions suffer serious health problems as a result of exposure to such air pollutants as particulate matter, ozone and hundreds of toxic compounds. State and local air pollution control agencies work tirelessly, and without sufficient resources, to address this threat to public health 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 2020, which is the same amount these agencies received over 15 years ago, in FY 2004. If the FY 2004 figure is adjusted for inflation, level funding would translate to approximately \$315 million in today’s dollars – an \$87-million difference. While the need for increases is far greater, NACAA’s recommendation for Section 103 and 105 grants in FY 2021 is merely for level funding, adjusted for inflation – or \$315 million.

Additionally, NACAA recommends that state and local agencies be provided with flexibility to use the increased funds on the highest priority programs in their areas. Finally, NACAA requests that grants for fine particulate matter monitoring remain under CAA Section 103 authority, where matching funds are not required, rather than being shifted to Section 105 authority, as the Administration has proposed in recent years.

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 their “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. These ongoing core programs are critical and they are only a part of the picture. State and local air quality agencies are also called upon to address new and emerging issues. Yet since FY 2004, when we were receiving the same dollar amount we do now, our responsibilities have expanded, while the purchasing power of our grants has diminished by more than 30 percent.

How would increased federal grants be spent? The list is long, but a few activities for which additional funding is necessary include:

- reducing concentrations of fine particulates;
- improving small business compliance assistance;
- modernizing modeling and other estimation tools;
- improving emission inventories of air pollutants;
- increasing the frequency of inspections;
- improving monitoring, including adding locations and replacing outdated equipment;
- developing strategies to meet our health-based air quality standards;
- improving risk assessment capabilities; and
- improving communications with the public 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, as we have been charged to do by the people of this country.

In conclusion, NACAA urges Congress to 1) increase federal grants to state and local air agencies in FY 2021 by \$87 million above FY 2020 levels, for a total of \$315 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 testify today. I am happy to answer any questions you have.