

June 9, 2021

The Honorable Jeff Merkley
Chair, Senate Appropriations Subcommittee on
Interior, Environment, and Related Agencies

The Honorable Lisa Murkowski
Ranking Member, Senate Appropriations Subcommittee on
Interior, Environment, and Related Agencies

The Honorable Betty McCollum
Chair, House Appropriations Subcommittee on
Interior, Environment, and Related Agencies

The Honorable David Joyce
Ranking Member, House Appropriations Subcommittee on
Interior, Environment, and Related Agencies

Dear Appropriators,

On behalf of the [Environmental Protection Network](https://www.epn.org/) (EPN), an organization of almost 550 U.S. EPA alumni volunteering their time to protect the integrity of EPA and its mission, I would like to submit our views on EPA's FY 2022 budget.

We believe the president's proposed budget for EPA represents an essential and overdue investment in the agency that protects public health and the environment.

CONTEXT FOR THE FY 2022 EPA PROPOSAL

EPA's budget accounts for less than 1% of the total federal discretionary budget—a small price to pay for the health of children, the elderly, the infirm, disadvantaged communities, and others who are especially vulnerable to environmental threats.

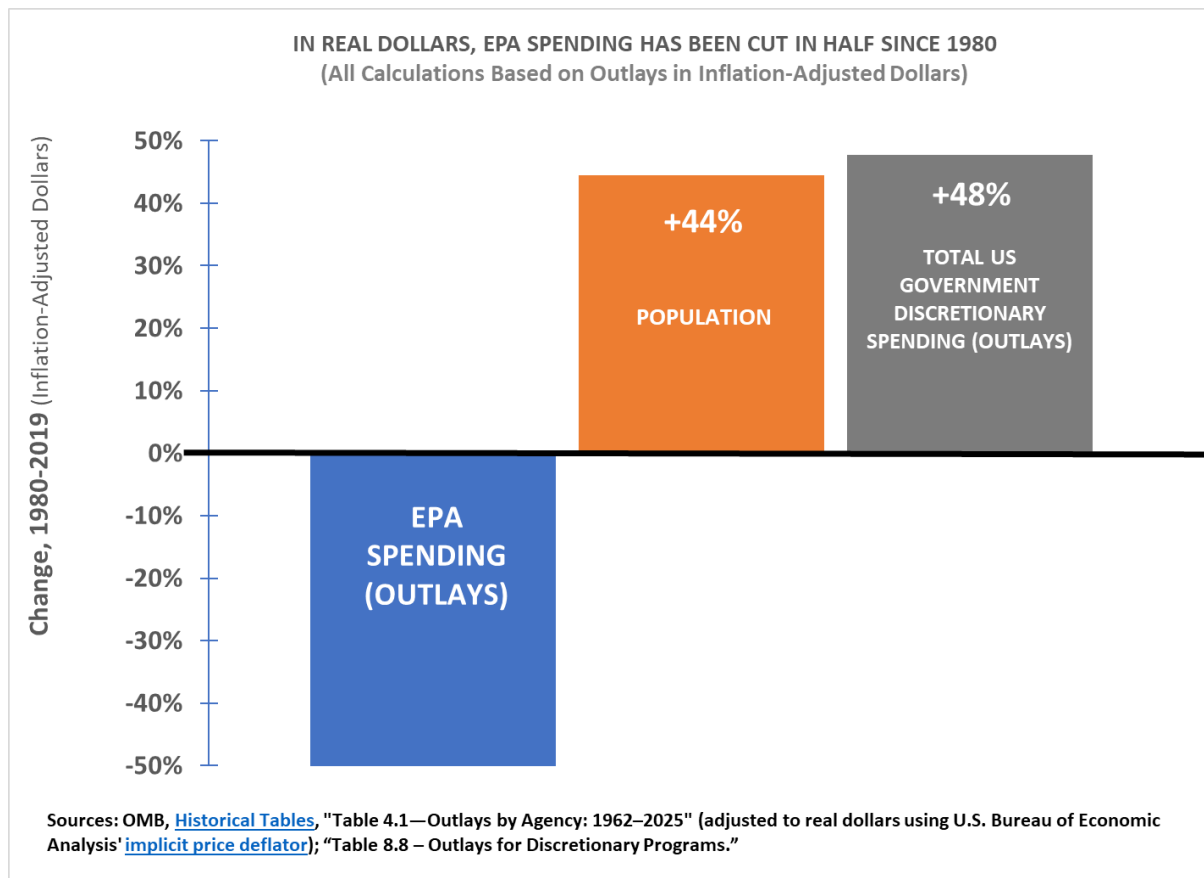
EPA programs make our Nation safer and healthier, protect the places we live and work, the air we breathe, and the water we drink. These protections create tremendous benefits, reducing health care costs and making all of our nation's people safer, including vulnerable and overburdened communities of color and low-income communities.

As a network of dedicated, bipartisan experts who spent decades working at the agency, we can attest to the serious erosion in EPA's capacity and the serious consequences for America in protecting the public, advancing sound science, enforcing environmental laws, and meeting new threats.

EPA's budget has been substantially “hollowed out” from inadequate resources that have long been dangerously declining. While Congress rejected nearly all of the Trump administration’s proposed budget cuts to EPA, the relief at preventing a worst-case scenario has distracted attention from the urgent need for added EPA, state, and tribal resources to adequately protect public health and the environment.

In recent years, Congress has appropriated less than half of what EPA spent in 1980, when adjusted for inflation. Even as EPA’s budget has shrunk, its environmental responsibilities have grown. For example, in recent years Congress has worked on a bipartisan basis to add new responsibilities for EPA as the agency addresses toxic substances, greenhouse gas emissions, and other critical elements of the agency’s mission. The agency needs the resources and workforce to meet these and other responsibilities.

If EPA spending since 1980 had just kept pace with government-wide increases in discretionary federal spending, its budget would be three times as large as it is today. Instead, EPA has had to protect a growing population from an increasing array of public health and environmental threats with fewer and fewer resources.



The long, steady, and damaging erosion of EPA's budget has happened across both Republican and Democratic administrations at a heavy public health cost. The tangible benefits of EPA programs include fewer premature deaths, lower rates of lung and heart disease, reduced infant mortality, fewer emergency room visits, and less time lost from school and work due to illness.

Some example studies of the benefits and costs of EPA's environmental and public health protections:

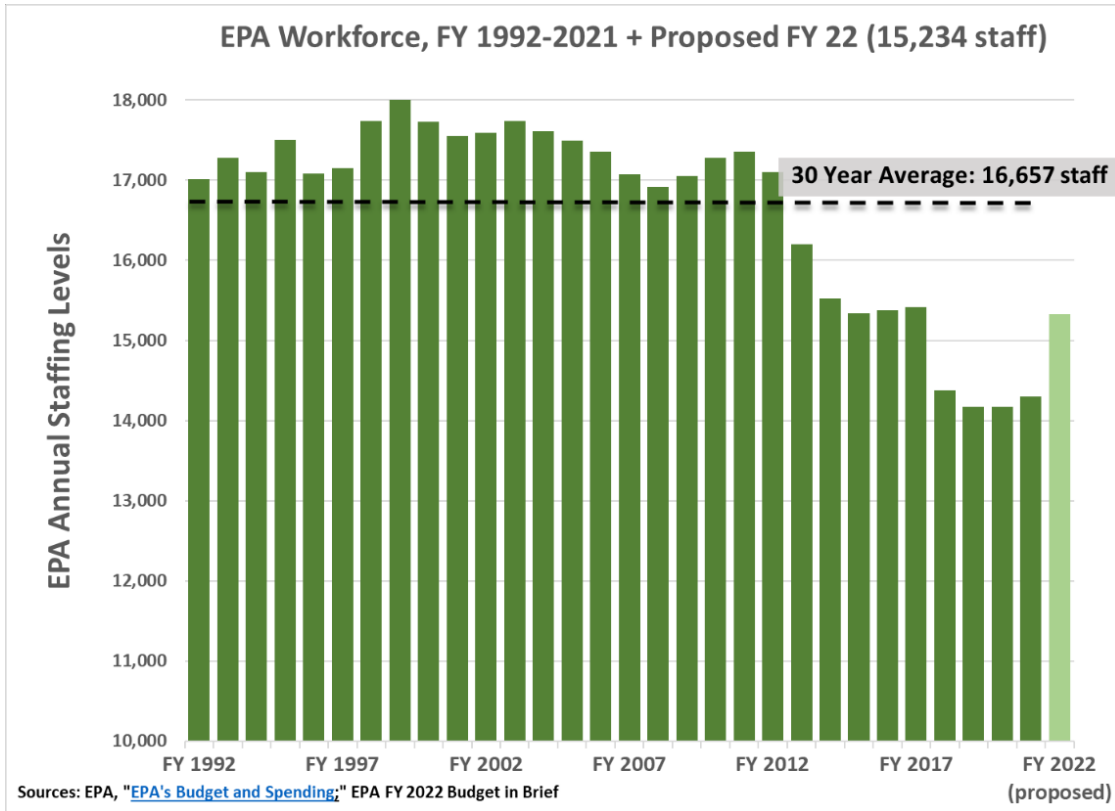
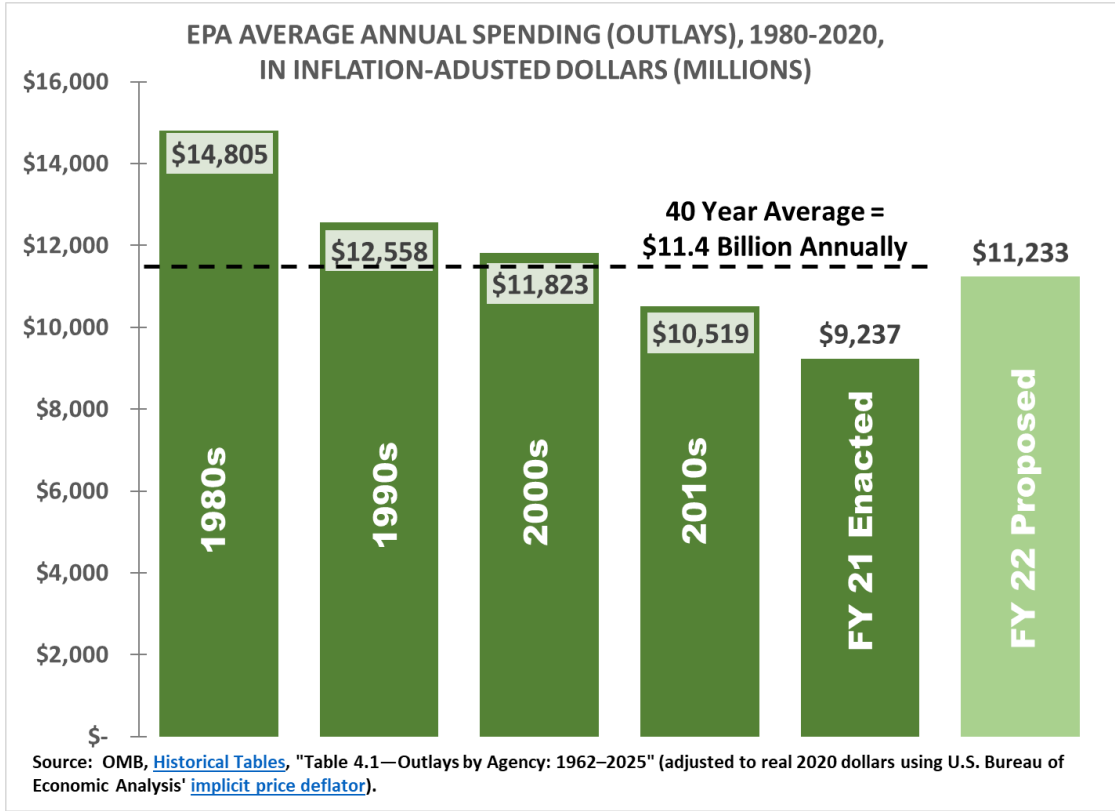
- An [OMB report](#) finalized in 2019 estimated the annual benefits of 39 EPA regulations over a decade at between \$194 and \$687 billion, far outweighing costs to polluters, which was less than \$55 billion.
- An [EPA study](#) on 30 years of air quality improvements under the Clean Air Act found benefits of more than \$2 trillion, 30 times more than the costs of \$65 billion.
- Retrospective studies illustrate that regulatory costs are often overestimated, for example, by ignoring industry's capacity to adapt. A case in point is the requirement for power plants to limit their mercury emissions. The limits were [predicted](#) to cost nearly \$9.6 billion per year but have now been fully implemented for less than a quarter of that, barely \$2 billion per year.

The steady erosion of EPA's workforce and budget have especially harmed the EPA core programs that are the backbone and muscle of the country's environmental protection system. These core programs protect air, water, and drinking water; address the harmful effects of pesticides, chemicals, and hazardous waste; promote environmental justice; and respond to emergencies.

State capacity to enforce environmental laws has also been significantly undermined. States are core agency partners in protecting public health and the environment and depend on EPA for more than 25% of their environmental operating budgets. Many state environmental agencies have faced declining resources, with 40 states reducing environmental staffing during the last decade. They need budget and other support from EPA now more than ever.

THE PRESIDENT'S FY 2022 BUDGET PROPOSAL

President Biden and Administrator Regan have proposed to Congress a desperately needed budget increase for the agency and states. The \$11.2 billion budget request—a \$2 billion increase over current funding level—would make historic investments in public health and the environment, especially in disproportionately impacted low income and BIPOC communities. The funding level would come close to restoring EPA to its historic, average funding levels (\$11.3 billion annually, in inflation-adjusted dollars).



EPN fully supports EPA's request to restore its core capacity to fulfill its mission, including \$110 million for 1,000 new full-time employees that will help rebuild EPA's overall capacity to protect our air, land, and water. Cuts to EPA's workforce have especially undermined the agency's ability to protect human health and the environment by draining off skilled professionals who are essential to making environmental protection work. In recent years, the agency has lost a high number of experienced staff, and the workforce today is more than 2,300 staff lower than its 30-year average staffing levels. EPA's staff was 28% larger under President Clinton in 1999 than today's EPA.

It's important for EPA to have the resources to build a thriving and diverse workforce that will not only deliver on the agency's mission in FY 2022, but also provide the foundation that can continue to serve the country for decades to come. Fortunately, the agency has a strong core of talented and experienced managers and employees to help onboard the new workforce.

EPN also fully supports EPA's proposal for \$930 million of new funding to address environmental justice and ensure that EPA considers it in every aspect of its work, including \$287 million and 170 staff positions to create new environmental justice programs, and \$140 million for several new types of grants to implement environmental justice. The proposed budget also adds \$56 million in enforcement support to incorporate environmental justice in monitoring and compliance activities and to develop a comprehensive civil enforcement plan that addresses environmental justice, climate, and other priority concerns.

EPA's proposed budget appropriately recognizes that tackling climate change requires going beyond reducing greenhouse gas emissions by also taking measures to redress the legacy of pollution and underinvestment that has historically burdened our Nation's disadvantaged communities. Cleaned up toxic waste sites, adequate infrastructure for treating and managing wastewater, and safe and affordable drinking water are essential to community resilience in the face of rising sea levels, catastrophic storms and flooding, severe droughts, heat waves, and wildfires driven by a changing climate. Cataclysmic storms and uncontrollable fires have already begun overwhelming inadequate water systems, devastating entire communities and leaving them without safe water.

To that purpose, EPA's proposed budget adds \$463 million to funding for state revolving loan programs for wastewater and drinking water infrastructure and \$110 million for other infrastructure programs that support safe water for small and disadvantaged communities, infrastructure sustainability, reduced lead in drinking water, testing for lead in school drinking water, and sewer overflow control.

EPA's FY 2022 budget request includes a number of additional important investments, including:

- \$150 million in new funding for EPA clean air and climate programs, including \$100 million to improve air quality monitoring and create a community notification system that collects real-time air emissions data from the fence-line and frontline communities that bear the heaviest burdens from pollution exposure and generate timely and reliable information for targeting enforcement resources to address the worst pollution.
- \$100 million for state and tribal grants for managing air quality and facilitating use of air monitoring, permitting, and pollution reduction efforts to accelerate efforts to reduce greenhouse gases.

- A \$60 million increase for diesel emission reduction grants to relieve crippling pollution burdens on disadvantaged communities near transport corridors, ports, and industrial facilities.
- A \$100 million increase to EPA science funding, including \$60 million for climate research, more than doubling support for that important work.
- A \$300 million increase to Superfund cleanup funding to start or accelerate cleanups at 35 priority sites awaiting adequate funding. Extreme climate events can also disturb and circulate dangerous pollution from the 1,370 hazardous waste sites on the EPA Superfund National Priorities List, including at least 800 sites vulnerable to extreme flooding. The budget also increases support for the brownfields hazardous waste site redevelopment program by \$40 million.

The new resources in the EPA budget will be critical to rebuilding our depleted national system of environmental protection. While most of the new funding goes to the highest priorities, climate protection and environmental justice, all of it will help rebuild and restore the ability of EPA and its state, tribal, and local partners to carry out their collective mission of protecting public health and the environment.

Congress should consider EPA's FY 2022 budget proposal to be a floor, not a ceiling, on meeting the critical and urgent needs of the agency to achieve its mission. Additional investments will be needed in future years. The FY 2022 budget is an essential start to rebuilding the capacity of the agency so it can get back to work protecting public health and the environment.

The EPA's future success at confronting climate change, cleaning up toxic threats, and protecting vulnerable communities will depend heavily on whether Congress steps up and delivers the funding it needs.

EPN appreciates this opportunity to share our thoughts on EPA's budget. We would welcome any opportunities to answer questions and brief members or their staff. I can be reached at michelle.roos@environmentalprotectionnetwork.org.

Respectfully submitted,

Michelle Roos
Executive Director
Environmental Protection Network

cc:
U.S. Senate Committee on the Budget
House Budget Committee
U.S. Senate Environment and Public Works Committee
House Energy and Commerce Committee