



THE  
ENVIRONMENTAL  
COUNCIL OF  
THE STATES

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PAST PRESIDENT

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**Alexandra Dapolito Dunn**  
Executive Director &  
General Counsel

March 1, 2017

The Honorable Mick Mulvaney  
Director  
Office of Management and Budget  
Eisenhower Executive Office Building  
1650 Pennsylvania Avenue, NW  
Washington, DC 20460

The Honorable Scott Pruitt  
Administrator  
U.S. Environmental Protection Agency  
William Jefferson Clinton Federal Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20503

Dear Director Mulvaney and Administrator Pruitt:

The Environmental Council of the States (ECOS), the national nonprofit, nonpartisan association of state and territorial environmental agency leaders, is aware of the deliberative passback budget process between the Office of Management and Budget (OMB) and the U.S. Environmental Protection Agency (EPA). Passback does not include participation by directly affected states or other parties. Information released yesterday regarding the OMB passback for the Fiscal Year (FY) 2018 EPA budget proposed cuts of 30 percent to State and Tribal Assistance Grant (STAG) categorical grants, and cuts to infrastructure and other important state programs.

This new information is concerning as ECOS has long-standing positions, expressed in congressional testimony, resolutions, and letters, that robust STAG categorical grants are essential to implementation of environmental programs delegated to states. Further, state-EPA collaboration and partnership, and shared governance, are essential to protecting human health and the environment. ECOS today makes the state environmental agency position clear again – ***cuts to STAG categorical grants, or to EPA programs operated by states, will have profound impacts on states' ability to implement the core environmental programs as expected by our citizens.***

In a February 25 address, Administrator Pruitt said states and EPA are “partners, not adversaries” in carrying out the work of protecting natural resources and the environment, and that “help is on the way.” We appreciate your remarks, which are consistent with the fact that states have taken 96 percent of the delegable authorities under the Clean Water Act, Safe Drinking Water Act, Clean Air Act, and Resource Conservation and Recovery Act, as Congress intended. ***Today, states on average provide well over half – and in many cases, three-quarters – of the funds needed to run core delegated environmental programs. States continue to fill the gap created by declining federal funds through increased fees on the regulated community and from other funding sources.*** By combining federal STAG categorical grants and state matches, with fees assessed on regulated entities and other state revenue sources, state environmental agencies serve the American public.

States issue permits, support the construction of critical water and wastewater infrastructure, conduct regional and waterbody focused activities, gather and manage data, set standards, clean up contaminated sites, monitor ambient conditions, conduct inspections and enforcement, and provide information and data – among other tasks. Many of these activities serve to strengthen our economy as well as to protect human health and environment. States have implemented innovation efforts; business process improvements; and E-Enterprise for the Environment with EPA – all to provide improved service to the regulated community and citizens, eliminate waste, and enhance certainty around decision-making. STAG categorical grants and other state program cuts jeopardize the ability of EPA and the states' shared efforts to efficiently implement these essential core programs.

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We recognize and respect that you must evaluate EPA and its expenditures. At the same time, states and EPA together must continue our four-decade effort to preserve and protect our country's natural resources and Americans' health, while being nimble and effective enough to respond to new challenges and emergency situations. The time is now to meaningfully invest in state environmental agencies through robust – not reduced – STAG categorical grants. A robust request will ensure that states and EPA together will, in flexible, cost-effective, and accountable ways, deliver the clean and healthy environment all Americans value.

We look forward to the opportunity for a meaningful discussion about this important matter. Please contact me or ECOS Executive Director Alexandra Dunn with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John L. Stine".

Commissioner John Linc Stine  
Minnesota Pollution Control Agency  
ECOS President

cc: U.S. House of Representatives and U.S. Senate Appropriations Chairs and Ranking Members  
ECOS Members  
State Association Directors (NACAA, AAPCA, ASDWA, ACWA, ASTSWMO)