Dear Chairman Simpson and Ranking Member Pingree,

We submit this letter on behalf of Waterkeeper Alliance in connection with the Budget Hearing for Fiscal Year 2025 Request for the Environmental Protection Agency (“EPA”). We support a minimum funding level of $11,000,000,000 to the EPA to fulfill its mission to protect human health and the environment by ensuring the public has access to clean air, land, and water. In particular, we ask for:

1. $170,000,000 for the PFAS Strategic Roadmap;
2. $270,600,000 for the Surface Water Protection Program;
3. $1,500,000,000 for environmental justice efforts;
4. $100,000,000 for the Office of Science and Technology, housed within the Office of Water;
5. $509,500,000 million for Categorical Grants;
6. $300,000,000 for the Office of Pesticide Programs and Office of Pollution Prevention and Toxics, housed within the Office of Chemical Safety and Pollution Prevention;
7. $1,200,000,000 for the Office of Land and Emergency Management, which includes $60,000,000 for the Office of Superfund Remediation and Technology Innovation and, $60,000,000 for the Office of Resource Conservation and Recovery, and;
8. $700,000,000 million for Geographic Water programs;
9. $600,000,000 for the Office of Enforcement and Compliance Assurance, including a dedicated $40,000,000 for the Office of Site Remediation and Enforcement; and
10. Funding for Core Capacity at a minimum of 2,023 full-time equivalents.

Waterkeeper Alliance is a global movement uniting more than 300 community-based Waterkeeper groups around the world, focusing citizen action on issues that affect our waterways, from pollution to climate change. We collectively patrol and protect nearly six million square miles of rivers, lakes, and coastlines in the Americas, Europe, Australia, Asia, and Africa. In the United States, Waterkeeper Alliance represents the interests of more than 150 U.S.
Waterkeeper groups and their more than one million members and supporters that live, work, and recreate in or near waterways across the country, many severely impaired by pollution.

Water is life, and healthy watersheds connect and sustain us all. However, without adequate funding, EPA struggles to safeguard these crucial resources and adequately address pollution endangering our communities. Insufficient funding has led to tangible repercussions nationwide, such as heightened Per- and Polyfluorinated Substances (PFAS) levels in our drinking water, compromised food standards, and increased reports of illness. We urge you to prioritize funding for EPA to enable it to fulfill its mission effectively, as outlined below.

**PFAS Strategic Roadmap:** EPA acknowledges that regulating PFAS is a crucial task that requires a comprehensive and collaborative effort. These chemicals, found to pose health dangers even at extremely low levels of exposure, are estimated to be contaminating the drinking water for over 100 million Americans. The urgency of EPA's work to address this pervasive pollution cannot be overstated. By providing the requested additional funding, we can support a rapid response, potentially safeguarding the health and safety of millions of Americans. We therefore ask that EPA receive a minimum of $170 million for the work outlined in the PFAS Strategic Roadmap.

**The Surface Water Protection Program:** As a part of EPA’s mission, “all parts of society--communities, individuals, businesses, and state, local and tribal governments--have access to accurate information sufficient to effectively participate in managing human health and environmental risks.” The Surface Water Protection Program, which works to protect, improve, and restore the quality of coastal waters, rivers, lakes, wetlands, and streams throughout the country is essential to the agency’s mission. Funding for this critical program will support the implementation of water quality standards, effluent guidelines, impaired waters listing, water quality monitoring and assessment, water quality certification, National Pollutant Discharge Elimination System permitting, and management and oversight of the Clean Water State Revolving Fund. We therefore ask the Surface Water Protection Program receive a minimum of $270.6 million.

**Environmental Justice:** For too long, under-represented communities have unfairly borne the cost of impaired waterways and damaged environments. We therefore ask that EPA receive a minimum of $1.5 billion to support efforts to correct these inequities.

**Office of Science and Technology:** A chronic underfunding of the Office of Science and Technology has contributed to EPA’s inability to fulfill the congressional mandate of the Clean Water Act that requires the agency to develop and publish “criteria for water quality reflecting the latest scientific knowledge.” This ensures the water we use for drinking, recreation, and other purposes is safe for humans, animals, and the environment. In the last decade, EPA has only developed three new water quality criteria for aquatic life. Yet, we know dangerous chemicals like lead and PFAS are present at dangerous levels, and they are either underregulated or not at all. By fully funding this office, we will have water quality criteria that will reflect our scientific knowledge of the dangers of these chemicals. We therefore ask the Office of Science and Technology to receive a minimum of $100,000,000.
Categorical Grants: EPA’s budget includes several categorical grants, including National Nonpoint Source Management, Wetlands Program Development Grants, and Water Pollution Control Grants. These grants provide critical support for state, tribal, interstate, and local governments to implement water quality projects. All communities should be able to access critical funding to ensure they can meet water quality standards and protect local waters; however, these grants must be funded so that access exists. We therefore ask that EPA’s Categorical Grants receive a minimum of $509.5 million.

Office of Chemical Safety and Pollution Prevention: Pollution prevention is the best way to safeguard human health and our environment while avoiding costly cleanup efforts. Under the Federal Insecticide, Fungicide, and Rodenticide Act and the Toxic Substance Control Act, EPA is responsible for evaluating risks presented by new and existing chemicals. At a time when innovation and advancement occur quickly, this office needs to be fully staffed to maintain pace. We therefore ask that the Office of Chemical Safety and Pollution Prevention receive a minimum of $300,000,000.

Office of Land Emergency Management: EPA is responsible for managing hazardous waste facilities under the Resource Conservation and Recovery Act and its remediation and response to abandoned, uncontrolled hazardous waste sites through the Superfund program under the Comprehensive Environmental Response, Compensation, and Liability Act. However, funding is required to safeguard against deficiencies in the Superfund budget so that vulnerable communities are not left to bear the full consequences of poisoned plots. While EPA may suggest tax receipts are adequate to cover these costs, they fall short of the budgetary amounts needed for ongoing cleanup projects. Given the nature of these environmental disasters, these communities should not sacrifice their health due to insufficient budgeting. We therefore ask that the Office of Land Emergency Management receive a minimum of $1,200,000,000.

Geographic Water Programs: EPA also has specific geographic work that critically supports iconic watersheds. By supporting accelerating ecological restoration and sustainable management, the agency can protect ecosystems and give them a chance to recover. We therefore ask that the Geographic Water Programs receive a minimum of $700 million to be allocated, in part, as follows: $93 million for the Chesapeake Bay, $57 million for Puget Sound, $27 million for the Gulf of Mexico, and $500 million for the Great Lakes Restoration Initiative.

Office of Enforcement and Compliance Assurance: EPA’s enforcement capacity has declined almost a third in the last decade. This office must be fully staffed to ensure our laws are enforced, and polluters are accountable for their violations. A modest increase in funding will reverse this trend and ensure that all communities are adequately protected. We therefore ask that the Office of Enforcement and Compliance Assurance receive a minimum of $769,000,000.

EPA Core Capacity: It has been well reported over the last few years that EPA has faced difficulties retaining staff to meet its congressional mandate and fully carry out all water programs. It is essential that the agency has the requisite number of staff. EPA needs to be able to modernize its hiring, and Congress should ensure locked-in budget increases to secure workforce levels while guaranteeing pay increases for employees. We therefore ask that EPA’s core capacity receive a minimum of 2,023 full-time equivalents, focusing on ensuring proper staffing levels for
positions in management, oversight, enforcement, and science, such as those working in water quality models and grant managers.

EPA’s mission to protect human health and the environment is essential, but can only be achieved with sufficient funding and accountability. Without it, the well-being of every community in the nation is threatened and at risk.

Sincerely,

Alamosa Riverkeeper Baltimore Harbor Waterkeeper Bayou City Waterkeeper
Black Warrior Riverkeeper Calusa Waterkeeper Cahaba Riverkeeper
Choctawhatchee Riverkeeper Choptank Riverkeeper Coastal Carolina Riverwatch
Friends of Casco Bay Hackensack Riverkeeper Humboldt Waterkeeper
Hurricane Creekkeeper Lake Erie Waterkeeper Los Angeles Waterkeeper
Lower Susquehanna Riverkeeper Association Miami Waterkeeper Milwaukee Riverkeeper
Missouri Confluence Waterkeeper Mobile Baykeeper Northsound Waterkeeper
NY/NJ Baykeeper Orange County Coastkeeper Peconic Baykeeper
Potomac Riverkeeper Network Puget Soundkeeper Rogue Riverkeeper
San Antonio Bay Waterkeeper San Antonio Bay Estuarine Waterkeeper Santa Barbara Channelkeeper
San Diego Coastkeeper Seneca Lake Guardian Suwannee Riverkeeper
Snake River Waterkeeper Spokane Riverkeeper Tualatin Riverkeepers
Twin Harbors Waterkeeper Wabash Riverkeeper Network Waterkeeper Alliance

West Virginia Headwaters Waterkeeper