

Alternative Fuels & Chemicals Coalition

Advocating for Public Policies to Promote the Development & Production of Alternative Fuels, Renewable Chemicals, Biobased Products, and Sustainable Aviation Fuels

AFCC'S FY2021 Appropriation Requests

Interior & Environment

11 Programs – 9 Industry-Critical Priorities

Introduction

he Alternative Fuels & Chemicals Coalition (AFCC) represents companies that make up the value chains for the development, production, and distribution of alternative fuels, renewable chemicals, biobased products, and sustainable aviation fuels (SAF). Its 40+ member companies include: Amyris, Cargill, Clariant, Calysta, Danimer Scientific, Green Life Can, Northwest Advanced Biofuels, Praj Americas, Red Rock Biofuels, Velosys, Vertimass, Virent, and more.

AFCC's FY2021 appropriation requests are **consistent with prior year appropriations**. AFCC's objective is to support robust funding opportunities to stimulate the development and production of alternative fuels, renewable chemicals, biobased products, and SAF.

Here's Why This Is Important

The development and production of these products

offers EVERY state and virtually

EVERY Congressional District an opportunity to

CREATE JOBS and STIMULATE ECONOMIC DEVELOPMENT

Here's How EVERYONE in the U.S. Benefits

- The programmatic funding levels and tax incentives for which AFCC is advocating make it possible for federal agencies to issue funding opportunities to carry out agency missions.
- Funding opportunities are available for each of the nine Technology Readiness Levels (TRLs), which move ideas from concept to commercial realization. These funding opportunities stimulate <u>ingenuity</u>, support <u>innovation</u>, prove out and validate <u>new ideas</u>, lead to the introduction of <u>new products</u> and <u>new technologies</u>, create <u>jobs</u>, <u>improve the quality of life</u>, <u>solve problems</u>, and <u>drive American competitiveness and global leadership</u>.
- These funding programs form a progressive ladder that moves new ideas successively forward, with each step building one upon the other, leading from an early concept (TRL-1), up through research and development, to testing and validation, then to prototyping and piloting, and finally to first commercialization (TRL-9), followed by further expansion and deployment, which is where local communities and everyone in the U.S. benefit.
- **Each TRL step is critical; reduce the funding for one and the others cannot occur.**
- A list of the federal funding programs that are available for each TRL level can be viewed and downloaded on AFCC's website at: https://www.altfuelchem.org/federal-funding-opportunities.



5 Key Points Re: AFCC's FY2021 Appropriation Requests

- 1. The focus of AFCC's appropriations requests is to ensure the continuation and where possible, the expansion of the federal funding opportunities that advance research and development, support testing and validation, and lead to the commercial deployment of new technologies, services, and products.
- 2. These funding opportunities have the potential to benefit every state and Congressional District and their constituents. For example, the majority of AFCC's 45 member companies use waste products to make their products (thus turning liabilities into assets); hence, they can locate new facilities in local communities almost anywhere. Moreover, they distribute and sell products throughout the U.S., which touch the lives of every American, support tens of thousands of indirect and induced jobs, and have a positive economic impact in every Congressional district.
- **3.** These funding opportunities <u>play a critical role in the market economy</u>. They stimulate innovation. They lead to the development of new technologies, services, and products.
- **4. Most importantly,** they prime the pump for private sector investment. They do this by providing the necessary validation and reduction of risk to give private sector investors and lenders the confidence that is needed to put their money into financing new technologies, services and products and deploying them widely throughout the marketplace.
- Without this validation and reduction of risk, very few, if any, private sector investors will take a chance on something that is new, innovative, or disruptive. Thus, the benefits that could accrue to the market economy and American public may never be realized and could be lost forever ... or leave a void for another country, such as China, to replace the U.S. as a global leader.

These funding requests are a top priority since they will have a direct impact on the constituents of every Congressional office

Contact Information

CJ Evans and Rina Singh, PhD
Executive Director and Executive Vice President for Policy
Alternative Fuels & Chemicals Coalition

1200 G Street, NW, Suite 800

Washington, DC 20005 **Telephone:** 202-922-0144

Emails: cj@AltFuelChem.org and Rina@AltFuelChem.org

Website: www.AltFuelChem.org



Alternative Fuels & Chemicals Coalition

Advocating for Public Policies to Promote the Development & Production of Alternative Fuels, Renewable Chemicals, Biobased Products, and Sustainable Aviation Fuels

AFCC's 2021 Appropriations Requests

HOUSE & SENATE APPROPRIATIONS SUBCOMMITTEES ON INTERIOR & ENVIRONMENT (I&E)

AFCC's priorities – the programs whose authorizations or appropriations have expired or not been renewed, or have been proposed for severe cuts or elimination in the President's Budget – **are indicated in red text**

Subcommittee: Interior & Environment

Agency: U.S. Department of Interior (DOI)

4 Programs – 2 Industry-Critical Priorities

Account / Program:	FY 2017 Appropriation	FY 2018 Appropriation	FY 2019 Appropriation	FY 2020 Appropriation	President's FY 2021 Budget	AFCC's FY 2021 REQUEST	Pending Actions				
DOI: Indian Affairs; Bureau of Indian Affairs; Operation of Indian Programs;											
Office of Indian B	Energy and Econon	nic Development									
Bill #:	H.R. 244 (P.L. 115-31)	H.R. 1625 (P.L. 115-66)	H.J. Res. 31 (P.L. 116-6)	H.R. 1865 (P.L. 116-94)							
Division:	G	G	E	D							
Title:	I	I	1	1							
Section:	N/A	N/A	N/A	N/A							
Page #:	pg. 165	pg. 750	pg. 206	pg. 165							
FY Appropriation	\$120,050,595 out of the \$1,577,110,000 appropriation for the Operation of Indian Programs	\$123,565,389 out of the \$2,411,200,00 appropriation for the Operation of Indian Programs	\$174,616,164 out of the \$2,414,577,000 appropriation for the Operation of Indian Programs	\$120,000,000 included in the \$1,577,110,000 appropriation for the Operation of Indian Programs	\$1,858,000,000 for the Operation of Indian Programs	\$175,000,000 out of the appropriation proposed by the Administration					



Agency: U.S. Department of Interior (DOI)

4 Programs – 2 Industry-Critical Priorities

Account / Program:	FY 2017 Appropriation	FY 2018 Appropriation	FY 2019 Appropriation	FY 2020 Appropriation	President's FY 2021 Budget	AFCC's FY 2021 REQUEST	Pending Actions	
Language:	FY2021 increase pro		nistration and the st	ed Appropriation Actipulation that, of this ent.	•			
Justification:	Affairs, U.S. Departi	ment of the Interior	to provide high-leve	Development (IEED) Il support for the Del creation and econon	partment's goal of so		**	
DOI: Indian Affai	rs; Bureau of India	n Affairs;						
Indian Guarantee	ed Loan Program							
Bill #:	H.R. 244 (P.L. 115-31)	H.R. 1625 (P.L. 115-66)	H.J. Res. 31 (P.L. 116-6)	H.R. 1865 (P.L. 116-94)				
Division:	G	G	E	D				
Title:	I	I	I	I				
Section:	N/A	N/A	N/A	N/A				
Page #:	pg. 449	pg. 755	pg. 208	pg. 167				
FY Appropriation	\$8,757,000	\$9,272,000	\$10,779,000	\$11,779,000	No line item	Restore to \$11,779,000		
Language:				Use bill language fro Appropriation Act	m pg. 167 of the FY	2020 Consolidated		
Justification: See pages 1 & 2. The purpose of the Indian Guaranteed Loan Program is to encourage eligible borrowers to develop viable Indian businesses through conventional lender financing. The guarantee helps lenders reduce risks on loans they make. That helps borrowers secure conventional financing that might otherwise be unavailable. Guaranteed loan program borrowers can use the loans for renewable energy, renewable chemical, biobased product, sustainable aviation fuel, and energy resources and job development projects that will increase the economic well-being of Tribes.								
	cean Energy Mana	gement,						
Ocean Energy Ma		II D 4625	II I D 24	U.D. 4065				
Bill #:	H.R. 244 (P.L. 115-31)	H.R. 1625 (P.L. 115-66)	H.J. Res. 31 (P.L. 116-6)	H.R. 1865 (P.L. 116-94)				



Agency: U.S. Department of Interior (DOI)

4 Programs – 2 Industry-Critical Priorities

Account / Program:	FY 2017 Appropriation	FY 2018 Appropriation	FY 2019 Appropriation	FY 2020 Appropriation	President's FY 2021 Budget	AFCC's FY 2021 REQUEST	Pending Actions	
Division:	G	G	E	D				
Title:	I	1	1	1				
Section:	N/A	N/A	N/A	N/A				
Page #:	pg. 460	pg. 780	pg. 218	pg. 163				
FY Appropriation	\$169,560,000	\$171,000,000	\$179,266,000	\$191,511,000	\$125,000,000	Restore to \$191,511,000		
Language:	Use the bill language from pg. 163 of the FY2020 Consolidated Appropriation Act							
Justification: See pages 1 & 2. The Bureau of Ocean Energy Management Bureau manages the development and exploration of the United States' offsh The Agency oversees the Office of Strategic Resources, the Office of Environmental Programs, the sales of Oil and Gas Lease Renewable Energy Programs.								
	rrace Mining Recia Reclamation Fun	mation and Enford	cement,					
Bill #:	H.R. 244 (P.L. 115-31)	H.R. 1625 (P.L. 115-66)	H.J. Res. 31 (P.L. 116-6)	H.R. 1865 (P.L. 116-94)				
Division:	G	G	E	D				
Title:	I	1	1	I				
Section:	N/A	N/A	N/A	N/A				
Page #:	pg. 446	pg. 748	pg. 205	pg. 164				
FY Appropriation	\$27,163,000	\$24,672,000	\$24,672,000	\$24,713,000	\$23,064,000	Restore to \$24,713,000		
Language:				Use the bill language Consolidated Appro				
Justification:	The Office of Surface Mining Reclamation and Enforcement husiness practices are directed to reclaiming abandoned m							



Agency: U.S. Environmental Protection Agency (EPA)

Account / Program:	FY 2017 Appropriation	FY 2018 Appropriation	FY 2019 Appropriation	FY 2020 Appropriation	President's FY 2021 Budget	AFCC's FY 2021 REQUEST	Pending Actions					
H.R. 1865 (P.L. 1	H.R. 1865 (P.L. 116-94) Title 1: Extension of Certain Expiring Provisions; Subtitle C: Incentives for Energy Production, Efficiency, and Green Economy Jobs											
Title 1: Extension	of Certain Expirin	g Provisions; Subt	tle C: Incentives for		on, Efficiency, and	Green Economy Jo	obs					
Bill #:				H.R. 1865								
				(P.L. 116-94)								
Title:	N1/A	N1/A	N1/A	C								
Subtitle:	N/A	N/A	N/A	Secs. 121-127,								
Section:				129-131, and								
Section.				Sec. 133								
Page #:				pgs. 697-700								
AFCC Request:				See below		Extend credits for Secs. 121- 127, 129-131, and Sec. 133 through 2023						
Notes:	See pages 1 & 2. Extended through 2022: Sec. 121 Biodiesel and Renewable Diesel Tax Credit and Excise Tax Extended through 2020: Sec. 122 Second Generation Biofuel Producer Credit, Sec. 123 Nonbusiness Energy Property, Sec. 124 Qualified Fuel Cell Motor Vehicles, Sec. 125 Alternative Fuel Refueling Property Credit, Sec 126 2-Wheeled Plug-In Vehicle Credit, Sec. 127 Credit for Electricity Produced from Certain Renewable Resources, Sec. 129 Energy Efficient Homes Credit, Sec. 130 Special Allowance for Second Generation Biofuel Plant Property, Sec. 131 Energy Efficient Commercial Buildings Deduction, and Sec. 133 Extension and Clarification of Excise Tax Credits Relating to Alternative Fuels											
Language:				opriations Act, pgs. 6								



Agency: U.S. Environmental Protection Agency (EPA)

7 Programs – <u>7 Industry-Critical Priorities</u>

Account / Program:	FY 2017 Appropriation	FY 2018 Appropriation	FY 2019 Appropriation	FY 2020 Appropriation	President's FY 2021 Budget	AFCC's FY 2021 REQUEST	Pending Actions			
Justification: See pages 1 & 2 These credits and incentives are key to spurring the development of alternative fuels and biobased products.										
	USDA: Hazardous Materials Management; Resource Conservation and Recovery Act (RCRA) EPA: Environmental Programs and Management; Resource Conservation and Recovery Act (RCRA) (42 U.S.C. 6901), RCRA Waste Management									
Bill #:	H.R. 244 (P.L. 115-31)	H.R. 1625 (P.L. 115-66)	H.R. 21 (P.L. 116-6)	H.R. 1865 (P.L. 116-94)						
Division:	Α	A	А	А						
Title:	1	I	I	!						
Section:	N/A	N/A	N/A	N/A						
Page #:	pg. 140	pg. 10	pg. 318	81						
(1) FY Appropriation	\$3,633,000	\$3,503,000	\$3,503,000	\$4,503,000	\$3,523,000	\$3,523,000				
Bill #:	H.R. 244 (P.L. 115-31)	H.R. 1625 (P.L. 115-66)	H.R. 21 (P.L. 116-6)	H.R. 1865 (P.L. 116-94)						
Division:	D	D	Е	D						
Title:	II	II	II	II						
Section:	N/A	N/A	N/A	N/A						
Page #:	pg. 469	pg. 789	pg. 222	pg. 182						
(2) FY Appropriation	\$58,277,000	\$58,439,000	\$58,728,300	\$66,819,000	\$50,399,000	Restore to \$60,000,000				

⁽¹⁾ FY2017-FY2020 appropriations for the Resource Conservation and Recovery Act (RCRA) were made to the Department of Agriculture via the Consolidated Appropriations Acts for these years.

(2) Appropriations for the RCRA Waste Management program are not broken out separately in the Consolidated Appropriation Acts of FY2017-FY2020 but are instead included under the appropriation for Environmental Programs and Management. Appropriated and budget amounts for the RCRA have been listed in the EPA Budget in Brief for each fiscal year. These appropriations and appropriation requests are shown in (2) above. See the FY2021 EPA Budget in Brief, pg. 79, for the amounts from the FY2019-FY2020 appropriations that were dedicated to RCRA Waste Management, along with the FY2021 budget request.

Languago		Use the report language from the FY2020 Consolidated	
Language:		Appropriations Act for Environmental Programs and	



Agency: U.S. Environmental Protection Agency (EPA)

Account / Program:	FY 2017 Appropriation	FY 2018 Appropriation	FY 2019 Appropriation	FY 2020 Appropriation	President's FY 2021 Budget	AFCC's FY 2021 REQUEST	Pending Actions				
				Management to sti for RCRA Waste Ma							
Justification:	the disposal of solid and hazardous waste. It gives EPA the authority to control hazardous waste from the "cradle-to-grave." Congress passed RCRA on October 21, 1976 to address the increasing problems the nation faced from its growing volume of municipal and industrial waste.										
EPA: Environmen	ital Programs and I	Management;									
Leaking Undergro	ound Storage Tank		m (LUST)								
Bill #:	H.R. 244 (P.L. 115-31)	H.R. 1625 (P.L. 115-66)	H.J. Res. 31 (P.L. 116-6)	H.R. 1865 (P.L. 116-94)							
Division:	G	G	E	D							
Title:	II	II	II	II							
Section:	N/A	N/A	N/A	N/A							
Page #:	pg. 471	pg. 793	pg. 224	pg. 184							
FY Appropriation	\$91,941,000	\$91,941,000	\$91,941,000	\$91,941,000	\$48,218,000	Restore to \$91,941,000					
Language:				Use the bill languag Consolidated Appro	e from pg. 184 of the priation Act	e FY2020					
The Leaking Underground Storage Tank Trust Fund Program addresses petroleum releases from federally regulated underground storage tanks. The Trust Fund provides money to oversee cleanups of petroleum releases by responsible parties; enforce cleanups by recalcitrant parties; pay for cleanups at sites where the owner or operator is unknown, unwilling, or unable to respond, or which require emergency action; and conduct inspections and other release prevention activities.											
	ital Programs and		king Underground	Storage Tank Trus	t Fund Program						
Underground Sto	orage Tank Progran	• •									
Bill #:	H.R. 244 (P.L. 115-31)	H.R. 1625 (P.L. 115-66)	H.J. Res. 31 (P.L. 116-6)	H.R. 1865 (P.L. 116-94)							
Division:	G	G	E	D							



Agency: U.S. Environmental Protection Agency (EPA)

Account / Program:	FY 2017 Appropriation	FY 2018 Appropriation	FY 2019 Appropriation	FY 2020 Appropriation	President's FY 2021 Budget	AFCC's FY 2021 REQUEST	Pending Actions			
Title:	II	II	II	II						
Section:	N/A	N/A	N/A	N/A						
Page #:	pg. 471	pg. 793	pg. 224	pg. 184						
FY Appropriation	\$11,273,000; included under appropriation for the Leaking Underground Storage Tank Trust Fund (per amount identified in EPA 2018 Budget Justification, pgs. 591 and Budget in Brief, LUST/UST, pg. 35)	\$11,218,000; included under appropriation for the Leaking Underground Storage Tank Trust Fund (per amount identified in EPA 2019 Budget Justification, pgs. 638 and Budget in Brief, LUST/UST, pg. 51)	\$11,089,800; included under appropriation for the Leaking Underground Storage Tank Trust Fund (per amount identified in EPA 2020 Budget Justification, pg. 591 and Budget in Brief, LUST/UST, pg. 61)	in Brief,	\$6,863,000	Restore to \$11 million				
Language:				Use report language Storage Tank Trus Appropriation Act million consistent of the storage of the						
Justification:		nelps underground s m from natural disas		and operators prepar	re for, prevent, or les	sen catastrophic effe	ects and			
	Technology; Clear									
Federal Vehicle a	Federal Vehicle and Fuel Standards and Certification									
Bill #:	H.R. 244 (P.L. 115-31)	H.R. 1625 (P.L. 115-66)	H.J. Res. 31 (P.L. 116-6)	H.R. 1865 (P.L. 116-94)						
Division:	G	G	Е	D						



Agency: U.S. Environmental Protection Agency (EPA)

Account / Program:	FY 2017 Appropriation	FY 2018 Appropriation	FY 2019 Appropriation	FY 2020 Appropriation	President's FY 2021 Budget	AFCC's FY 2021 REQUEST	Pending Actions		
Title:	II	II	II	II					
Section:	N/A	N/A	N/A	N/A					
Page #:	pg. 474	pg. 668	pg. 236	pg. 182					
FY Appropriation	\$93,070,000	\$90,650,100	\$94,240,000	\$94,790,000	\$80,900,000	Restore to \$94 million			
Language:	Use the bill language under Science and Technology on pg. 182 of the FY2020 Consolidated Appropriation Act, adding report language that stipulates the amount of funding to be appropriated for Federal Vehicle and Fuel Standards								
Justification:	on: The National Vehicle and Fuel Emissions Laboratory (NVFEL) tests a portion of all new cars and trucks to confirm complia exhaust emissions standards, and to verify the accuracy of fuel economy test.								
EPA: State and Tr Pollution Prevent	·	Risk Review and I	Prevention;						
Bill #:	H.R. 244 (P.L. 115-31)	H.R. 1625 (P.L. 115-66)	H.J. Res. 31 (P.L. 116-6)	H.R. 1865 (P.L. 116-94)					
Division:	Е	E	E	D					
Title:	VII	VII	VII	II					
Section:	N/A	N/A	N/A	N/A					
Page #:	pg. 474 (8)	pg. 802 (8)	pg. 227 (8)	pg. 187 (15)					
FY Appropriation	Included under State and Tribal Grants appropriation of \$1,066,041,000 for pollution prevention, control, and	Included under State and Tribal Grants appropriation of \$1,076,041,000 for pollution prevention, control, and	Included under State and Tribal Grants appropriation of \$1,077,041,000 for pollution prevention, control, and	Included under State and Tribal Grants appropriation of \$1,075,907,000 for pollution prevention, control, and	\$0 per FY2021 EPA Budget in Brief, pg. 79	Restore to \$11,127,000			



Agency: U.S. Environmental Protection Agency (EPA)

Account / Program:	FY 2017 Appropriation	FY 2018 Appropriation	FY 2019 Appropriation	FY 2020 Appropriation	President's FY 2021 Budget	AFCC's FY 2021 REQUEST	Pending Actions	
	abatement;	abatement;	abatement;	abatement;				
	FY2019 EPA	FY2019 EPA	FY2021 EPA	FY2021 EPA				
	Budget in Brief,	Budget in Brief,	Budget in Brief,	Budget in Brief,				
	pg. 51, shows a	pg. 51, shows a	pg. 79, shows a	pg. 79, shows a				
	FY2017	FY2018	FY2019	FY2020				
	appropriation of	appropriation of	appropriation of	appropriation of				
	\$11,338,100 for	\$12,194,000 for	\$11,657,500 for	\$11,127,000 for				
	this program	this program	this program	this program	e from pg. 187, subp	aragraph (1E) of		
						•		
Language:				the FY2020 Consolidated Appropriation Act; use report language to stipulate that, of this amount, \$11,127,000				
					ution Prevention Pro			
	This program promo	otes environmentally	sound business pra	ctices and the develo		<u> </u>	ologies, and	
Justification:	processes. The prog	ram also funds two-	year Pollution Preve	ntion (P2) assistance	agreements for proj	ects expected to be	performed in each	
	EPA region that pro-	vide technical assista	ance and/or training	to businesses/faciliti	es to help them ado	pt source reduction a	approaches.	
EPA: Science and	Technology;							
Science to Achiev	ve Results (STAR) R	Research Grants						
Bill #:	H.R. 244	H.R. 1625	H.J. Res. 31	H.R. 1865				
Dili π.	(P.L. 115-31)	(P.L. 115-66)	(P.L. 116-6)	(P.L. 116-94)				
Division:	G	G	E	D				
Title:	II	II	II	II				
Section:	N/A	N/A	N/A	N/A				
Page #:	pg. 468	pg. 662	pg. 233	pg. 182				
	\$40,958,000		\$28,536,000	\$28,600,000				
FY	included in		included in	included in		Restore to		
Appropriation	Science and	\$0	Science and	Science and	\$0 (eliminated)	\$28.6 million		
	Technology		Technology	Technology		\$20.0 mmon		
	appropriation		appropriation	appropriation				



Agency: U.S. Environmental Protection Agency (EPA)

7 Programs – <u>7 Industry-Critical Priorities</u>

Account / Program:	FY 2017 Appropriation	FY 2018 Appropriation	FY 2019 Appropriation	FY 2020 Appropriation	President's FY 2021 Budget	AFCC's FY 2021 REQUEST	Pending Actions			
Language:				Use the bill language on pg. 182 of the Fadding: "Provided under this heading Achieve Results (ST						
Justification:	edge technologies human and ecolog	Achieve Results (STAR) grants;" See pages 1 & 2. The Science to Achieve Results (STAR) program is EPA's primary funding mechanism to support the development of innovative and cutting edge technologies by the nation's leading academic scientists and engineers on topics of high programmatic relevance. Topics include human and ecological health impacts of emerging contaminants, environmental fate, monitoring and treatment technologies for air an water pollution, and predictive models of human exposure and health effects.								

AFCC has grave concerns about EPA's policy direction and its devaluation of science and climate change.

AFCC STRONGLY RECOMMENDS the agency's reorganization plans must be submitted to the House and Senate Committees on Appropriations for approval. The agency is spending time, effort, and expense in renaming existing offices instead of working on environmental issues important to all aspects of public health and the environment. The most recent budget request, for fiscal year 2021, cuts research, eliminates all investments in fighting climate change, and eliminates longstanding programs with proven records at improving the environment.

<u>AFCC STRONGLY OPPOSES</u> these budget cuts and urges the administration to reinstate the programs cut in FY2020 and proposed for further cuts in FY2021, since cleaning the environment, both air and water, require serious investments, and provide the agency resources to meet its mission.

Congress and its appropriators have rejected these drastic cuts to EPA for three years in a row, and unknown to policy makers and the public, EPA has lost 8 percent of its workforce since fiscal year 2016, and several EPA offices have suffered even larger losses.



The Office of Enforcement and Compliance Assurance has lost 19 percent of its staff. Region 6 which provides services to several states including New Mexico, has lost 12 percent of its staff. AFCC urges the agency leadership to follow the direction of Congress by focusing on hiring and retaining qualified staff rather than allowing drastic losses.

The President's FY2021 Budget proposes steep cuts to EPA's Atmospheric Protection Program. The mandatory greenhouse reporting program covers thousands of industrial emitters and feeds the emissions inventory required under the U.N. Framework Convention on Climate Change.

The budget would fund it at just \$14.5 million, compared with \$103.2 million in fiscal 2020. The 90 percent cut will eliminate a long list of climate change-related partnership programs. The plan would also cut the air and energy research program, which includes climate research by about two-thirds, from \$95 million fiscal 2019 to \$35.5 million.

<u>AFCC STRONGLY RECOMMENDS</u> that EPA reconsider its restructuring goals and immediately put a stop to eliminating programs which were authorized by Congress to meet the agency's mission to protect public health and the environment. Therefore, AFCC recommends that EPA develop a workforce plan which has a timeline to achieve the staffing levels provided for in the fiscal year 2019 enacted appropriations set by Congress.

All agency staff should be hired and provided appropriate travel budget at appropriate levels which would provide current and future staff to fully conduct their work and inspections as needed for safe operations and worker safety. And, as current EPA leadership considers future reorganizations and cuts to existing programs to states, tribes, and/or EPA staff, that the EPA leadership obtain feedback from these groups prior to any reorganization or cuts to any of these programs. Furthermore, EPA leadership should provide the needed training, work schedules and performance assessments which are consistent with signed agreements for both, the staff employees and union.

In addition, should the agency leadership consider other reorganization to programs and staff, that these be submitted for Congressional Appropriations Committee for approval and a federal register be submitted for public comments consideration.