



## **GROUP AGAINST SMOG & POLLUTION**

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November 5, 2019

**VIA EMAIL (Paul.Klein@alleghenycounty.us)**

Councilmember Paul Klein  
Allegheny County Council  
County Courthouse  
436 Grant Street – Room 119  
Pittsburgh, PA 15219-2497

### **Re: Budget for Allegheny County Health Department's Air Quality Program**

Dear Councilmember Klein,

We are writing to you today with two purposes in mind.

First, we want to convey to you how much we appreciate your support of Councilwoman Prizio's Motion of Council on August 20, 2019. The undersigned groups work diligently in a number of different ways to support, protect, and improve air quality in our region but we all recognize that we cannot succeed in our mission(s) without the good work of the Allegheny County Health Department's Air Quality Program. That is why we were heartened and encouraged to know you voted to support the Air Quality Program's efforts.

The second reason for this letter is that we are hoping you will continue your support of the Air Quality Program by considering an increase in funding for the critical services it provides throughout the County. Specifically, we would like to see Allegheny County invest in efforts to:

- Attract and retain top-tier air permitting experts by increasing salaries and reduce unreasonable burdens placed on them by hiring additional permitting engineers;
- Strengthen ACHD's efforts to stop illegal pollution by hiring more facility-specific and complaint-response inspectors as well as additional legal staff to litigate enforcement actions;
- Improve our understanding of local health impacts of air pollution and how to design programs to protect the public through hiring more public health researchers and epidemiologists; and
- Better educate and communicate with the public by hiring community liaisons to explain air quality data and address community questions.

This request stems from the fact that the County budget provides funding for the Health Department in a number of ways generally but the Air Quality Program in particular receives very little direct support.

Some budgetary constraints are required by law. For example, the federal Clean Air Act requires a majority of the Air Quality Program's work on so called "Title V" or "Major" sources – roughly the largest 30 emitters of pollutants in the County – to be funded exclusively by fees levied on those facilities.

However, federal guidelines are very narrowly tailored in this regard, which we believe leave room and need for Allegheny County to support at least a portion of the Air Quality Program's work on all facilities it regulates. County support also would be appropriate for non-facility-specific work the Air Quality Program conducts such as studies examining particular health impacts to populations or communities and researching emerging issues.

Perhaps of greatest concern is that we have heard – anecdotally – that the Air Quality Program has had difficulty retaining and recruiting staff due to salaries being below what is offered by the Pennsylvania Department of Environmental Protection ("DEP"). It is a strange and unfortunate situation but the fact is DEP's Bureau of Air Quality staff on Washington's Landing do nearly identical work to ACHD's Air Quality Program staff in Lawrenceville. With both the work and the offices being so close, DEP's higher salaries put the County's Air Quality Program at a significant disadvantage.

The Air Quality Program simply cannot afford to lose talented staff to the state when Allegheny County's air quality in general continues to rank poorly as compared to urban areas across the country and fails to meet federal health-based standards. Depending on your district, this issue might be of greater or lesser concern to your constituents but make no mistake: poor air quality exists in every corner of our county. Air pollution gives the County's role as the region's leader a black eye and it has costs we all bear from missed work days to critical health impacts like cancer and heart disease.

As air quality advocates, we believe now is the time for the County to invest in clean air by equipping the Air Quality Program with the staff and resources necessary to fulfill its mission. Given the numerous and varied ways air pollution jeopardizes public health, we believe such an investment will provide a significant and meaningful return on the dollar for Allegheny County residents.

As we continue to research these issues and learn more about the budget process, we hope that you will begin examining the Air Quality Program's funding in greater detail as well. Our request for now is that you do not simply accept the County Executive's proposed budget as written and begin to ask tough questions about the resources the Air Quality Program actually needs to improve our air quality. You might decide the budget as proposed is adequate but your concern for and support of the Air Quality Program here is critical.

