



NATIONAL COUNCIL OF EPA LOCALS #238

Gary Morton
President

Natasha Greaves
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Dear Member of Congress,

On behalf of the 7500 employees of the United States Environmental Protection Agency represented by American Federation of Government Employees Council 238, I write to urge your support for FY 2022 funding that will significantly increase the EPA's ability to protect human health and the environment in order to meet President Biden's ambitious enforcement goals for the agency.

EPA employees across the nation dedicate their lives to serving the American public to ensure that our air, water and land are clean and safe. These are the workers who every day are called on to fight to reduce emissions of harmful pollutants; clean up the nation's most contaminated land at superfund sites; and respond to environmental emergencies and natural disasters. The very wellbeing of our environment depends on their work.

As you are aware, President Biden in his FY 2022 discretionary request called for \$11.2 billion in funding for the EPA, a 21.3 percent increase from the 2021 enacted level. The President has identified the restoration of EPA staffing capacity as a top administration priority, noting that more than 1,000 staff members left EPA over the past four years, and proposing that \$110 million be invested specifically to bring back essential staff members. After years of budget cuts and staffing departures at EPA, on top of the relentless attacks by the Trump administration against EPA workers, President Biden's budget request is an important step forward and would significantly enhance the agency's ability to carry out its mission.

The President has requested the \$11.2 billion in EPA funding to tackle the challenges posed by climate change, deliver environmental justice, and address PFAS pollution. Although it is an increase in EPA funding over past years, it is not enough. Given the extensive climate challenges that our country and our planet are facing, along with EPA's existing responsibilities to carry out Congress' priorities as expressed through our environmental canon - from the Clean Water Act to Superfund - AFGE Council 238 is asking Congress to build off the President's budget blueprint and allocate funding needed to:

Increase EPA Workforce to 20,000 total full-time employees: EPA is facing a staffing crisis, resulting from budget caps and cuts over the past decade that were exacerbated over the past four years. The current EPA headcount is down to 14,172 full time employees (FTEs), its lowest level since 1988. For context, the population of the United States in 1988 was 242 million; today we are 328 million.



The loss of dedicated staff members has undercut the agency's ability to do its work effectively and compounded stress and frustration at work for our members. As the House Committee on Science, Space and Technology [found earlier this year](#),

“EPA has suffered nearly a decade of workforce cuts, and the agency is substantially diminished as a result. The 16.6% decline between FY 2009-2020 does not fully depict the extent of the Agency’s retrenchment. Since reaching its recent employment peak of 16,702 FTEs in FY 2011, EPA has lost 2,970 employees, a 17.8% (one-sixth) decrease in less than a decade. The most far reaching employment losses occurred during the second half of the Obama Administration, as sequestration and restrictive budgetary caps forced deep budget cuts at EPA and slashed the agency’s workforce sharply, resulting in a 13.2% employment decrease between FY 2009-2016. But the agency’s workforce decline continued through the Trump Administration with an additional 3.9% decrease from FY 2016-2020.”

President Biden’s funding proposal will only increase the EPA workforce headcount to 15,324 FTEs, roughly the equivalent of staffing levels in both FY 2014 and FY 2017. That is simply not enough hands to successfully achieve the EPA mission.

The President’s own ambitious and necessary climate agenda, coupled with the urgent need to take action to protect our environment, requires resources beyond just “a return to the status quo.” The EPA must have the resources needed to vastly expand its capacity to ensure employees can get the job done effectively--and that will take at least 20,000 FTEs.

Recruit talented and diverse new staff members: Recruitment of new staff members is vital to the future success of the EPA. The massive loss of experienced EPA staff in recent years has left the agency lacking the institutional knowledge and experience needed to get the job done. The House Committee on Science, Space and Technology report outlines in sobering detail how the loss of talented and experienced staff members -- engineers, researchers, scientists -- strikes at the heart of the agency and its mission and must be rectified in the years to come in order to meet our mission. As such, Congress must make funding for top-level recruitment a top priority.

On top of hiring talented staff, EPA must do a better job of recruiting diverse staff members. Over the past decade, the overall percentage of minorities working in the agency has declined substantially, a growing concern for our members and the agency as a whole. According to the House Committee on Science, Space and Technology:

“Racial and ethnic minority groups saw troubling workforce trends at EPA in recent years. Overall agency employment among minority groups fell 9.2% between FY 2009-2020. The agency STEM workforce was left with a larger diversity gap than the overall workforce: in FY 2020, EPA employed 2.4 white STEM employees for every 1 STEM employee from a minority group,



compared to just 1.9 white employees for every 1 employee from a minority group in the agency at large.”

It is not enough for the EPA to pledge to care about diversity amongst its staff, it's time for the agency to direct resources in order to follow through on that commitment.

Bring back and expand training programs for new hires: New employees will become the foundation at the EPA. However, as the agency prepares to add talented new hires to its ranks, we must ensure that proper training is available to reduce the learning curve and ensure each employee has the skills needed to succeed in their new role.

Bring current EPA salaries in line with the private sector: EPA needs competitive salaries and opportunities for career growth comparable to the private sector. The disparity between EPA and the comparable workforce has grown significantly over the past decade. Currently a starting GS-7 scientist or engineer who joins the Agency and starts working in Washington, D.C. would make \$48,670 per year; that is 20% lower than the lowest entry level salary of \$57,000 made by a DC environmental engineer at a private firm. This disparity increases as career employees rise in the ranks. Additionally, as the EPA workforce has shrunk and experienced workers have retired, lower-graded employees have had to take on the work of the retired employees but they have not been promoted to comparable GS levels as their retired colleagues. This has effectively downgraded compensation at the agency and hindered career potential. Importantly, this has severely affected morale and retention of the highly trained scientists, engineers, attorneys, and other environmental professionals needed for EPA to operate.

Additionally, most EPA regional offices are located in high cost-of-living areas, including Boston, NYC, DC, Chicago, Denver, San Francisco, and Seattle - and locality pay adjustments are not sufficient to make EPA jobs competitive with the private sector.

AFGE Council 238 thanks you for your support of our members during this critical time. The budgetary decisions you make at EPA will chart the course for what the agency can accomplish in the years to come.

Sincerely,



Gary Morton
President, AFGE Council 238

