

May 25, 2000

Robert Perciasepe
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
Ariel Rios Building North
Suite 5426/MC6101A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Bob:

On behalf of STAPPA and ALAPCO, we wish to continue our dialogue about working together with EPA to ensure the “strong, stable and forward-looking training program” you identified as our mutual goal and commitment in your November 18, 1999 letter to the associations. We appreciate your ongoing support for adequate training for state and local air agency staff and believe that the following comments and recommendations will move us closer to our mutual goal.

As you know, we are very supportive of EPA’s ongoing training programs, including the Air Pollution Training Institute (APTI). APTI’s stated mission is to “provide technical air pollution training principally to State and local air agency professionals,” and its goal is to “impart knowledge and information to develop and enhance skills necessary to understand and implement environmental programs and policies, emphasizing air quality.” APTI, along with local, state and regional training providers, has been extremely successful in delivering comprehensive air quality coursework to state and local air agency staff. However, the available APTI coursework is focused almost exclusively on general and administrative aspects of air quality programs, ambient monitoring, engineering, meteorology, modeling, compliance, air toxics, emissions inventories and permitting. Although training for these core stationary source air programs is very important, there currently exists a significant void in training courses and materials for mobile sources, fuels and transportation – which are equally important core components of the national air program. EPA must fill this training void.

To this end, STAPPA and ALAPCO strongly recommend that EPA’s Office of Air and Radiation 1) engage with representatives of the associations in a process to jointly define the mobile source, fuels and transportation training curricula needed by state and local air agencies and 2) move forward to develop and deliver this training. Further, as an immediate first step in this process, STAPPA and ALAPCO recommend

that EPA work with the associations and regional consortia to develop and provide appropriate training (i.e., structured curriculum and training materials) on the soon-to-be-released MOBILE 6 model. Future state and local air quality planning will be heavily dependent on MOBILE 6 and it is imperative that our staffs be appropriately trained in a timely manner with respect to the many complexities of this important technical tool. For example, because travel-demand modeling and many of the tools used in transportation planning and road building are new technical areas for air quality planners, it would be most helpful if the training developed for MOBILE 6 included basic information on the use of these transportation planning tools. Our associations would welcome the opportunity to work with your staff in meeting this training objective.

As we urge EPA to expand its training program we wish to reiterate our long-standing position that it is not appropriate for the agency to use Section 103/105 grant funds to fund the activities of APTI, including the development of the additional training we request. Congress appropriates these grants to state and local agencies to implement the innumerable regulatory programs required by the Clean Air Act. The associations believe that the provision of training for state and local air agencies implementing federally delegated air programs is EPA's fiscal responsibility and should be funded with EPA's own programmatic funds, *not* off-the-top Section 105 grant funds. The associations stand prepared to support EPA in seeking additional annual funding from Congress for training, and we encourage the agency to become proactive in ensuring that its own budget regularly receives adequate congressional support to fund the full array of training needed by state and local agencies to effectively implement the Clean Air Act.

Thank you again for your commitment to state and local air agency training curricula and materials and, on behalf of STAPPA and ALAPCO, we offer to work with you and your staff to achieve our mutual goal of a strong, stable, forward-looking and comprehensive training program for the national air program. We look forward to continued discussions and to your response to these recommendations. Please feel free to contact either of us if you have any questions or desire additional information.

Sincerely,

(original signed)
Ronald C. Methier
STAPPA President

(original signed)
Marcia T. Willhite
ALAPCO President

cc: Margo Oge
John Seitz