

July 24, 2003

Robert Brenner
Deputy Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Brenner:

On behalf of STAPPA and ALAPCO, thank you for your efforts to maintain stable funding for the PM_{2.5} monitoring network, as described in your memorandum of June 27, 2003 to the EPA Regional Air Division Directors, which contained the preliminary allocations for FY 2004. As you point out in the memorandum, state and local particulate monitoring networks are shifting to meet today's needs, causing costs to go up in some areas (e.g. continuous monitoring) and down in other areas (e.g. discretionary filter-based monitoring). Because staffing is the largest cost for state and local programs, and because we do not expect staffing needs to change greatly as we retool our networks, your emphasis on stable funding is very much on target.

While we support the increase in the nationally administered portion of the program resulting from the new contract for the chemical speciation analysis, it is important to note that this reduces the regional allocations for state and local operations by approximately \$1 million. We believe that state and local agencies will manage to absorb this reduction by reallocating funds originally targeted to other activities. However, we are committed to working with you to maintain and increase federal support for state and local programs in the future as our costs continue to increase.

We believe that the shift in the preliminary allocations from Federal Reference Method samplers to continuous monitors is appropriate and timely. At the same time, we recommend that the EPA Regional offices have the flexibility to work with their state and local agencies to determine the exact mix of monitoring that will occur within the Regional Allocation subtotals. We feel that this will result in the optimal network and the greatest efficiency.

Thank you again for emphasizing funding stability in your memorandum. We would be happy to discuss this matter further, if you wish.

Sincerely,

Lloyd Eagan
President of STAPPA

Cory Chadwick
President of ALAPCO