



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 4 2004

OFFICE OF
AIR AND RADIATION

Mr. James A. Joy, III
STAPPA President
Mr. Dennis J. McLerran
ALAPCO President
444 North Capitol St. N.W.
Washington, DC 20001

Dear Sirs:

Thank you for your letter of August 20, 2004, requesting additional grant funds be directed to State and local training support.

Since FY 2001, \$1.8 million in grant funds have been allocated annually to support State and local training activities. In FY 2003, we received a request from STAPPA/ALAPCO stating that an additional \$325,000 was needed to support the training effort. STAPPA/ALAPCO requested that EPA provide half of the needed amount from EPA funds. The Office of Air and Radiation (OAR) agreed and provided \$162,500 in contract funds and also redirected \$162,500 in grant funds to support training. In FY 2004, STAPPA/ALAPCO made a similar request but since the FY 2004 grant funds had already been allocated to the Regions, it was determined that we could not redirect additional funds to training at that time.

Your current request is to redirect \$325,000 in FY 2005 grant funds to support increased training needs for this year and for FY 2006. Additionally, you request that EPA match one-half of this amount (\$162,500) in FY 2005. I discussed your proposal with Steve Page and members of his staff in light of the current Office of Air Quality Planning and Standard's project to benchmark the air pollution training program. Additionally, Steve Page recently had the opportunity to discuss the STAPPA/ALAPCO request with Jane Stahl, Environmental Council of the States (ECOS) Air Committee Chairperson. ECOS agrees with EPA's decision to support your request for FY 2005 of redirecting \$325,000 in FY 2005 grant funds to training and also in providing \$162,500 in FY 2005 EPA funds. We must point out that we plan to complete the benchmarking effort by November 2004, and plan to discuss with both STAPPA/ALAPCO and ECOS the results of this effort and how the training program may be made more efficient and effective. These decisions could affect FY 2006 funding levels.

In redirecting an additional \$325,000 to training from the current draft FY 2005 grant allocation, STAPPA/ALAPCO recommended that these funds should be withheld on a pro-rata basis using the same withholding formula used to obtain the current \$1.8 million amount. Actually, the \$1.8 million was not derived from a region-by-region pro-rata formula. In previous years, grant funds for Clean Air Act (CAA) training support were derived as a set-aside from increases in appropriated funds prior to being allocated to the Regions. OAR can apply a pro-rata approach to redirect the \$325,000 using the section 105 regional allotment percentages of the current FY 2005 draft allocation. Please let me know if you are in agreement with that approach or would prefer an alternative approach.

We look forward to continuing our work with STAPPA/ALAPCO, the Joint Training Committee, and ECOS in being responsive to and improving State and local training programs.

Sincerely,



Robert D. Brenner
Principal Deputy
Office of Air and Radiation

cc: Bill Becker
Jane Stahl
Steve Page
Bill Harnett
Jerry Kurtzweg