



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

SEP 6 2006

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Ms. Stephanie Hallock
Director, Oregon Department of Environmental Quality
President, The Environmental Council of the States
444 North Capital Street, N.W.
Suite 445
Washington, DC 20001

Dear Ms. Hallock:

Thank you for your letter of August 17 to Administrator Johnson and for the support ECOS is providing the four regional environmental enforcement associations. Your letter forwards ECOS Resolution Number 03-10, which sets forth the ECOS recognition of the value and importance of the regional associations to the states' environmental regulatory and enforcement programs. We also recognize the value and importance of the regional associations and have long considered them our training partners with a strategic role in providing environmental training to state, local, and tribal environmental enforcement personnel. We also note and share ECOS' encouragement for the associations to incorporate training in compliance assistance into their work.

As you know, EPA has funded training provided by the state associations for nearly 20 years. In general, in recent years, the level of funding for compliance and enforcement training has declined as the compliance program matures and as we have had to make choices among programs competing for diminishing resources. Despite this, the associations have been awarded approximately 50% of the total National Enforcement Training Institute (NETI) expense budget for most of these years. This coming budget year, as in the past, we will give full and thoughtful consideration to continuing funding of training partnerships like the state associations.

In addition to focusing on the continuation of this program, we must look at our process for awarding funds. EPA's current policy regarding Federal assistance funding strongly favors open competition so that all qualified entities can apply for the limited available money. There are important public policy reasons for this approach. With competition, we improve transparency and are in a position to demonstrate our careful stewardship of public moneys. There are circumstances where the nature, geographic

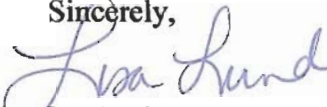
scope, or other aspects of existing grant and agreement assistance recipients can render those arrangements appropriate for consideration of non-competitive funding.

We continue to work through all the factors relevant to this issue as it affects compliance and enforcement cooperative agreements. We expect to develop our approach to this issue over the next two to three months.

We also commend the state funding, use of state and Federal settlement moneys, as appropriate, and other innovative funding methods which continue to provide financial support to the associations and allow them to provide training and other services to state, local, and tribal environmental enforcement personnel. We are very supportive of the quality and quantity of training provided by the associations. We continue to consider them an important component of the national environmental compliance and enforcement training program.

Please contact Marcia E. Mulkey, NETI's Director, for further information on the status of our deliberations on this program. She can be reached at 202-564-2430.

Sincerely,



for Michael M. Stahl

Director, Office of Compliance
Office of Enforcement and Compliance Assurance