



June 5, 2007

Evans Paull, Senior Policy Analyst  
Northeast Midwest Institute  
50 F Street, NW  
Washington, DC 20001

THE  
ENVIRONMENTAL  
COUNCIL OF  
THE STATES

RE: ECOS Comments on Proposal for Recycling America's Brownfields Act

-----  
444 North Capitol Street, N.W.  
Suite 445  
Washington, D.C. 20001

-----  
Tel: (202) 624-3660  
Fax: (202) 624-3666  
Email: [ecos@ss0.org](mailto:ecos@ss0.org)  
Webpage: [www.ecos.org](http://www.ecos.org)

Thank you for the opportunity to provide comments from the ECOS Waste Committee on the National Brownfields Coalition's Proposal for Recycling America's Brownfields Act. As you know state governments have been and will continue to be very involved with the reclamation, redevelopment and cleanup of contaminated properties. As a result, the state environmental commissioners appreciate this chance to comment on your proposed changes to the legislation. The attached document provides all of the consensus comments of the Waste Committee but I would like to highlight a few of the higher priority items in this letter.

First, funding for state work on environmental programs is always an issue so we have suggested two new items specifically related to state funding for your consideration. One item suggests an increase in STAG funding for Brownfield programs which would help states clean up brownfield sites. The second item asks for Congress to provide clarification in allowing states flexibility in the use of 128a funding.

-----  
Robert W. King, Jr.  
Deputy Commissioner  
South Carolina Department of  
Health and Environmental  
Control  
PRESIDENT

David K. Paylor  
Director, Virginia Department of  
Environmental Quality  
VICE PRESIDENT

Stephen A. Owens  
Director, Arizona Department of  
Environmental Quality  
SECRETARY-TREASURER

Stephanie Hallock  
Director, Oregon Department  
of Environmental Quality  
PAST PRESIDENT

Three other priority items for states are already included in your proposal. These are:

- Facilitate petroleum/UST brownfield cleanups
- Grants for publicly-owned sites acquired before 2002
- Streamlining funding approvals by reducing redundant EPA reviews

Finally, one item in your proposal that generated a fair amount of discussion but no final consensus was the eligibility of non-profits to receive brownfields assessment, cleanup, revolving load fund, and job training grants. While there was some interest in expanding non-profits' eligibility, there was also significant concern about spreading the limited funding for Brownfields to additional grantees as there is already a funding shortfall within the current pool of grantees.

While ECOS is not prepared to sign on as a sponsor of this proposal at this point, addressing our comments will allow us to better support your proposal.

-----  
R. Steven Brown  
Executive Director

Thank you again for providing us the opportunity to comment on this proposal. Please feel free to contact me if you have any questions about these comments or if the ECOS Waste Committee can be of further assistance.

Sincerely,

A handwritten signature in black ink, reading "John V. Corra". The signature is written in a cursive style with a long, sweeping horizontal line extending to the right.

John V. Corra  
Director, Wyoming Department of Environmental Quality  
Chair, ECOS Waste Committee