

WESTERN STATES AIR RESOURCES COUNCIL



April 15, 2008

Mr. Stephen L. Johnson, Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue N.W.  
Washington, D.C. 20460

Subject: Funding for the Western Regional Air Partnership

Dear Administrator Johnson:

As state Air Quality Administrators charged with carrying out the mandates of the federal Clean Air Act, we are deeply troubled about the funding cuts sustained by the Western Regional Air Partnership (WRAP) beginning in 2007, and the prospect that funding will be eliminated in upcoming years. While the most intensive regional haze work will produce section 308 state implementation plans (SIPs) and 309 SIP revisions in 2008, our obligations under the regional haze rule will not be met once the SIPs are completed. Implementation of and required revisions to the SIPs will demand ongoing technical and policy capability, collaboration, and resources that are currently being provided by the WRAP, and that few if any states are able to provide on their own.

EPA has made a substantial investment over the last decade and a half implementing its mandatory duties under §§ 169A and 169B of the Clean Air Act to address human caused impairment of visibility in our natural cathedrals: the National Parks and Wilderness Areas. The WESTAR Council strongly believes that continued funding for the WRAP is needed and urges EPA to include funding for the WRAP in future budget proposals.

The regional haze rule acknowledges the need for multi-state and tribal consultation and cooperation to assess the causes of haze and develop suites of control strategies for improving visibility. Funding began with the Grand Canyon Visibility Transport Commission (GCVTC) and its successor organization, the WRAP. After the regional haze rule was promulgated, 4 other regional planning organizations (RPOs) began receiving funding. With this money, highly leveraged with in-kind contributions from participating states, tribes and stakeholders many times the federal grant amount, the WRAP established the organizational and technical tools needed by states and tribes to improve visibility in our parks and wilderness areas.

The payback for this investment has been well worth every dollar spent:

- The collaborative process guarantees participation in quality assurance of data and analyses increasing the ownership, comparability, utility, and reliability of the technical products needed for plans and tracking of reasonable progress.
- Significant cost savings exist for other federal agencies, including consultation by and with federal land managers, and increasing the consistency among state plans and related documents, reducing staff time for review and comment.
- These efforts have yielded substantial emissions reductions for controllable sources and resulting visibility improvements from these efforts including over 50% reduction in point source sulfur dioxide emissions since 1990 in the GCVTC region. WRAP currently projects that WRAP region sulfur dioxide emissions in 2018 will be 10% of that for the Eastern U.S. region covered under CAIR, even with full implementation of CAIR.
- The GCVTC process, with analysis and follow up by the WRAP, revealed the importance of sulfur dioxide, oxides of nitrogen and particulate matter emissions from both on-road and off-road mobile source engines and fuels as significant contributors to regional haze. The GCVTC recommended and WRAP expressed strong support for the standards that were ultimately adopted.
- Coordinated efforts between states, tribes, and federal land managers to analyze and implement smoke management programs for prescribed and agricultural fire impacting visibility and regional air quality, leading to emissions reductions by 2018 for the controllable fraction of fire emissions.

Over the last two years, EPA has declared its intention to stop funding the RPOs under the misperception that, once the regional haze SIPs are submitted, no further funding will be needed. This is wrong, particularly in the Western states – the WRAP region – where:

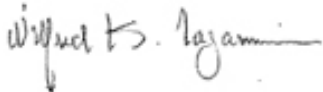
- 75% of the affected parks and wilderness areas in the U.S. are located;
- Regional haze is not dominated by coal-fired power plant emissions as it is in the East, which requires assessment and tracking of all haze causing emissions;
- The Clean Air Interstate Rule and Clean Air Visibility Rule will have no effect;
- Fire from federal lands is the largest emissions source category contributing to visibility impairment in many western Class I areas;
- Oil and gas development on federal lands is the fastest growing source of haze causing emissions;
- The fastest growing states in the nation are located;
- Tribal representation is equal to states and the tribes are nearly 100% dependent upon RPO funding to address their obligations under the regional haze requirements.

The SIPs are merely the beginning of a process that is designed to continue for 4½ more decades, during which states, tribes and their federal land management partners will be tracking progress for both visibility improvement and emissions reductions. The WRAP has created the data bases and tools necessary to accomplish this, the maintenance of which will require continued funding over and above the contribution of state and tribal resources to provide the data for these systems and assure implementation of the control strategies in their SIPs.

Finally, the new ozone standard is presenting a significant challenge to the WRAP states, as there are substantial indications that international and interstate transport of ozone precursors and ozone itself is occurring and has been increasing. For example, ozone levels at the Grand Canyon and Mesa Verde National Parks have increased since the mid 1990's about 5% and 11%, respectively, even in the face of substantial improvements in ozone levels in almost every urban area in the West. The technical tools and collaborative process established through the WRAP can serve as a springboard for EPA as well as the states to, at a minimum, achieve a better understanding of the causes of this phenomenon.

In summary providing RPOs funding to at least maintain the basic infrastructure needed to implement the regional haze rule will allow both EPA and the states and tribes to continue their partnership to implement the mandatory duties contained in §§ 169A and 169B of the Clean Air Act.

Sincerely,



Wilfred K. Nagamine, President  
Western States Air Resources Council

Cc: Marcus Peacock, Deputy Administrator  
Robert J. Meyers, Assistant Administrator for Air and Radiation  
Councilman Michel Kenmille, Co-Chair Western Regional Air Partnership  
Governor Janet Napolitano, Co-Chair Western Regional Air Partnership