

WESTERN STATES AIR RESOURCES COUNCIL



October 10, 2018

Mr. Peter Tsirigotis, Director
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail code: C404-04
Research Triangle Park, NC 27711

Dear Mr. Tsirigotis,

The Western States Air Resources (WESTAR) Council, an association of 15 western state air quality managers, appreciates the opportunity to provide information on western U.S. Regional Haze program analysis and planning efforts, and to comment on efforts to coordinate and collaborate across EPA. This letter represents the views of the 15 western states within the WESTAR Council.

Over the past several years, WESTAR has commented extensively to EPA on Regional Haze program design and objectives in the context of EPA's activities to revise the Regional Haze Rule (RHR) and the extensive efforts of western states to protect and improve visibility in our Class I areas; those go back well into the 1980s. Western states have significant concerns with Regional Haze planning efforts for the July 2021 Regional Haze implementation plan milestone to analyze sources and expectations of large additional reductions under the Regional Haze program. There have been significant emissions reductions of state-controlled sources already accomplished. Those are complemented by the efforts to date by EPA on mobile sources, even as changes for those emission control programs are considered – mobile engines remain the largest source of nitrogen oxides in the West.


In this letter, we share information about our regional analysis and planning work toward the July 2021 implementation plan submittal milestone, offer our comments on implementation issues, and identify needs for EPA assistance and collaboration - that are of concern to WESTAR members. We ask for your consideration of these points:

- Due to the number of Class I areas in the West (118 areas, 75% of Class I areas nationally) with regional source contributions, visibility protection under the Regional Haze program is a significant planning activity for our programs.
- While we understand that EPA is considering revisions to the RHR, we face ongoing implementation of our existing Regional Haze SIPs and have started work to meet the July 2021 SIP update submittal milestone. As such, we do not seek significant changes to the RHR at this time.

- Since there was no significant amount of funding from EPA for western Regional Haze planning toward the 2021 SIP submittal milestone, WESTAR states have fully funded the analysis and planning effort to fill the gap. WESTAR states do not have unlimited funds to continually conduct these types of analyses and will need additional federal funds to implement the Regional Haze Program in the future.
- The recently released Regional Haze Reform Roadmap lists a key principle of implementing the regional haze program with states in the lead and WESTAR looks forward to continuing to work with EPA through the Western Regional Air Partnership (WRAP) process to identify areas where EPA can support and assist states with their efforts to complete and obtain approval for regional haze SIPs.
- The Regional Haze Reform Roadmap memo states that OAR will issue a new, updated version of the RHR Planning Guidance by Spring 2019. The western states began regional haze technical analyses in earnest at the beginning of 2018 and must complete these analyses by the end of 2019 to allow states time to develop their Regional Haze SIPs due in 2021. By Spring of 2019, the western states will be approximately 75% of the way to completion of the regional technical analyses. Guidance provided that late in the process will be difficult to incorporate with resources available. We urge you to fast track the issuance of a second draft of the guidance for an earlier release date and address WESTAR comments submitted over the past several years. If EPA is not able to address any of our specific comments, we request interaction to discuss those items so we can align our 2021 planning efforts prior to EPA finalizing the Guidance.
- Similarly, the updated 2028 visibility modeling platform, documentation and results promised for delivery in Spring/Summer 2019 in the Regional Haze Reform Roadmap memo will come very late in the western regional technical analysis process and may have limited or no value for the western regional haze analysis. We urge EPA to work with western states in determining where EPA's extensive technical modeling expertise is best utilized to assist in the western Regional Haze analysis.
- Western states anticipate that natural, uncontrollable, and international sources will continue to impact regional haze to an increasing degree. We urge EPA to work with western states in determining where EPA's extensive technical expertise can be best utilized to assist in the western Regional Haze analysis on this particular issue.

WESTAR appreciates the opportunity to share information about the Regional Haze program in the West and our efforts to continue to improve and protect visibility in our Class I areas.

Sincerely,



Nancy Vehr, President

Western States Air Resources Council (WESTAR)