



Chet Wayland, Director  
Air Quality Assessment Division  
Mail Code C304-02  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
Research Triangle Park, NC 27711

June 11, 2014

Dear Mr. Wayland,

On April 9, 2014, the Western States Air Resources (WESTAR) Council, an association of 15 western state air quality managers, submitted comments regarding the 2011 and 2018 modeling platforms under development by EPA. WESTAR appreciates the significant effort by EPA to improve these modeling platforms, as well as the opportunity to provide comments specific to conditions in our states. Our April comments focused on seven topics of concern to the western states with an emphasis on the 2011 platform development although many of our comments are also relevant to the 2018 platform. We appreciate EPA consideration of our April comments and anticipate EPA incorporating refinements to the platforms based on those comments or an explanation as to why they will not be incorporated into the modeling platforms.

Western states have expended considerable time, effort, and capital in developing regional inventory improvements that have resulted in a much better understanding of key modeling platform issues and in significantly improved western U.S. modeling. We again urge EPA to build upon the existing WRAP tools used to develop emissions inventories specific to the western U.S. and incorporate these tools into the transport modeling platforms. Use of the WRAP tools for modeling platform development for the western U.S. will help EPA and WESTAR members avoid duplication of effort and relieve workload burdens in the development and review of the modeling platform data.

Modeling platform development that addresses western states' concerns regarding the best temporal and spatial representation of emissions, as well as utilizing inputs and tools specific to the western states, will give WESTAR members greater confidence not only in the transport modeling results, but also the application of these results by EPA to regulatory assessments and other actions.

Pollutant transport into western States likely has a profound impact on ozone levels, and it will become increasingly important if more stringent ozone standards are promulgated.

In times of scarce resources, it is critically important that elected officials, regulators and the public generally agree that the next round of plans is based on our very best current understanding of atmospheric conditions, including background concentrations.

We look forward to your response to our suggested improvements to the modeling platforms and once again make a request to arrange a time for you or your staff to discuss the recommendations. If you have any questions or require further clarification about our recommendations or request, please contact WESTAR Executive Director Dan Johnson at 206.254.9145 or [djohnson@westar.org](mailto:djohnson@westar.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Massey".

Eric Massey, President  
WESTAR Council

cc: Anna Wood, Director  
Air Quality Policy Division