

WESTERN STATES AIR RESOURCES COUNCIL



November 16, 2015

Ms. Anna Wood, Director
Air Quality Policy Division
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code: C404-04
109 T.W. Alexander Drive
Durham, NC 27709
RE: Regional Haze Program Implementation

Dear Ms. Wood,

The Western States Air Resources (WESTAR) Council, an association of 15 western state air quality managers, appreciates the opportunity to share our thoughts regarding improvements to Regional Haze Program implementation. The western states, responsible for State Implementation Plans (SIPs) for visibility improvement in 118 of the nation's 156 Class I Areas, would like to share our lessons learned and our recommendations for improvements. The following summary and detail in the attachment build on previous recommendations on Regional Haze Program implementation to EPA from WESTAR.

In the West, states have been able to achieve the goal of maintaining baseline visibility on the best 20 percent of days. In fact, "Best Days" visibility has improved considerably at many western Class I Areas. This is no doubt a measure of success for state and federal regulatory actions in reducing visibility-impairing pollutants. On the other hand, demonstrating visibility improvements for the haziest days under the present regulatory structure is challenging for western states, largely as a result of wildfires, dust storms, and volcanic activity, all normal natural phenomena in the West. Additionally, international sources, especially their increases in anthropogenic emissions, impact visibility throughout the year and are among the sources that states cannot control.

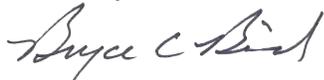
In our August 2013 suggestions to EPA, WESTAR emphasized several Core Issues¹, including: 1) Five-Year Progress Reports requirements; 2) Achieving Natural Conditions and Reasonable Progress; 3) Developing Long-Term Strategies after BART to Achieve Reasonable Progress; and 4) Integrated Air Quality Planning. We are pleased that EPA is moving forward to address some of these, including the need to simplify and streamline the Five-Year Progress Report and better integrate air quality planning. Western states also ask to be included in discussions of long-term strategies and methods for setting reasonable progress goals.

The WESTAR Council supports comments made this past summer by staff from western states regarding alternative approaches to addressing these Regional Haze Program implementation issues. Building on our experience, the attachment explains in detail the key points listed below as recommendations for tracking visibility improvements and guidance for preparing the upcoming Regional Haze SIPs.

- Visibility tracking metric guidance must allow states flexibility in adjusting and ranking monitored visibility data using site-specific and species-specific data.
- Revisions to what constitutes Natural Conditions are needed to account for extreme, episodic natural events and contributions from international emission sources, and must be done on a site-by-site basis.
- States cannot control all anthropogenic sources, but need to focus on controllable sources under state jurisdiction that have demonstrated contributions to visibility impairment.
- Reasonable Progress Goals (RPGs) must be achievable and based on realistic Natural Conditions or some appropriate alternative measure of visibility improvement.
- Western regional haze planning requires modeling support, and that modeling requires adequate funding.

In closing, while we continue to believe that ultimately a more substantial revision to the Regional Haze Rule will be required to make the program work effectively, we support efforts by EPA to evaluate the current program. We appreciate the opportunity to discuss improvements to the program with EPA, other federal and state agencies, and tribal representatives who share the common interest in improving visibility in the nation's Class I Areas.

Sincerely,



Bryce Bird, President
WESTAR Council

Attachment

¹ Regional Haze Workgroup Presentation to EPA/OAQPS - August 14, 2013: <http://www.westar.org/rhpage.html>,
Compiled summary of Core Issues.