



August 22, 2016

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC)
1200 Pennsylvania Avenue, N.W.
Washington, DC 20760
Docket ID No. EPA-HQ-OAR-2016-0289

Dear Sir or Madam,

The Western States Air Resources (WESTAR) Council, an association of 15 western state air quality agencies, is pleased to comment on the *Draft Guidance on Progress Tracking Metrics, Long-term Strategies, Reasonable Progress Goals and Other Requirements for Regional Haze State Implementation Plans for the Second Implementation Period*. These comments are intended to complement our comments on the proposed regional haze rule changes *Protection of Visibility: Amendments to Requirement for State Plans*. WESTAR has previously commented extensively to EPA and provided specific recommendations to improve the regional haze program. The attachment represents WESTAR's detailed comments on the proposed guidance. This letter highlights some of the broad recommendations with respect to the guidance.

The regional haze Guidance is particularly significant to western state air quality agencies because over three-fourths of the Class 1 federal areas in the United States are located in the WESTAR member states. The current causes of regional haze in the western Class 1 areas are due largely to non-anthropogenic sources such as wildfires, volcanoes, and dust storms—distinctly different from the mostly anthropogenic sources of impairment in the east. In addition, the current levels of anthropogenic visibility impairment are significantly less in the west, and humanly-perceptible improvements in visibility will be more challenging.

WESTAR has advocated for a number of years that the focus of the state efforts to implement a regional haze program must be on anthropogenic emissions within state control. In the guidance, EPA is proposing to statistically manipulate the data in a uniform manner across the U.S. in an attempt to separate natural (fire and dust) from anthropogenic impacts to Class I areas. We believe that this, in concept, is a step in the right direction.

However, there are technical, as well as policy reasons to investigate the approach proposed by EPA in more depth than what is possible in the limited review time EPA has provided. Further review is needed to verify that the statistical approach proposed by EPA is robust and does not produce confounding results.

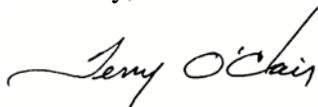
States must be able to retain the authority to determine the appropriate metric to track progress that best represents anthropogenic impacts at their Class 1 areas. For instance, the 95 percentile cutoff point for excluding wildfire impacts may not be appropriate for some Class I areas. Additional comments and questions on the analysis methods in the guidance are enumerated in the attachment.

Just as we have long advocated for focusing on anthropogenic emissions, we have similarly advocated for a fifth factor, visibility, to be a part of the four factors described in the Clean Air Act as part of the long term strategy development process. In previous comments to EPA, WESTAR has emphasized the necessity of establishing a link between control strategy decisions and demonstrated visibility improvements. We are pleased to see that EPA also recognizes this in the guidance in Sections 4.2 and 8.2, but believe that the process needs to be made less burdensome.

Finally, as we have commented previously, and in light of the expectation in the guidance that significant modeling efforts will be required in the second regional haze SIP planning period, additional federal funding must be forthcoming to support this unfunded mandate. We also believe that the monitoring data analysis efforts are best organized by regional planning organizations funded by the federal government.

Thank you once again for this opportunity to comment on the regional haze guidance, and for listening to western state concerns and suggestions to improve visibility in the west. We look forward to working with EPA to further refine the guidance. Please do not hesitate to contact WESTAR Executive Director Mary Uhl, if you have any questions or need additional information.

Sincerely,



Terry O'Clair
President, WESTAR Council

Attachment