

WRAP Public Hearing Testimony
Proposed Amendments to the Regional Haze Rule
June 1, 2016
Denver, Colorado

My name is Tom Moore. I am the Air Quality Program Manager for the Western Regional Air Partnership or WRAP at the Western States Air Resources Council or WESTAR. WESTAR has also testified at this hearing; the WRAP testimony is complementary to that of WESTAR. WESTAR hosts the WRAP, a voluntary membership association conducting cooperative regional technical analyses for regional haze and other air planning indicators across the West for the same 15 states, as well as tribes, local air agencies, federal land managers, and the U.S. EPA. WRAP was formed in 1997 and now has more than 65 active member agencies. To appropriately and effectively comment on the effects of the proposed rulemaking, this testimony and the opinions expressed in these comments are not those of the federal employees, or their agencies, who provide WRAP technical advice.

The Regional Haze Rule proposal is particularly significant to the WRAP membership due to the pioneering and massive collective effort to develop and implement the first round of Regional Haze Rule implementation plans between 1999 and 2009, with limited implementation support continuing through the present. The shared responsibility and commitment to steady visual air quality improvement among the diverse WRAP membership comes from the 1991 through 1996 foundational work of the Grand Canyon Visibility Transport Commission. Of the 156 visibility-protected National Parks, Forests, Monuments, Seashores, Wildlife Refuges, and Wilderness Areas across the country, 118 are located within the WESTAR-WRAP region. 446 of the 566 federally recognized tribes are located in this same region and five of the six tribes with Class I area status under the Clean Air Act are in the West. All WRAP member agencies share in particular, the vision and goals listed in the WRAP Charter and the WRAP Strategic Plan, which support analysis, planning, and implementation of reductions in manmade air pollution to improve visibility within and across these national treasures and homelands.

Much of the visibility protection framework in the existing Rule and the basis of western haze planning was formulated in the West by the Grand Canyon Commission. The WRAP was formed to further verify the causes of western haze to help states, tribes, local governments, and federal agencies to meet Clean Air Act obligations as codified in the Rule. The requirements of the Rule's administrative framework provide assurance to EPA, federal land managers, and the public that progress continues toward the national visibility goal. However, the complex technical analyses and degree of inter-agency consultation necessary to meet the Rule requirements are beyond the capability of many individual WESTAR-WRAP states and tribes – WRAP is the regional venue through which resources can be leveraged and common needs can be addressed. WRAP's successes in delivering comprehensive well-documented regional analyses, providing an inclusive and thoughtful process, and making key policy recommendations and planning deliverables available for the Haze plans was the first and only truly regional analysis of the nature and causes of air pollution across the West. As WESTAR has noted, continued federal financial support for the WRAP, commensurate with the number of Class I areas and complexities of western sources, will be essential for the upcoming haze analysis and planning effort.

The laudable national visibility goal adopted in the Clean Air Act requires feasible ways to set reasonable planning goals and demonstrate progress. We are concerned that the detailed and complete regional work of the WRAP in the initial round of haze planning may be set aside, depending on what EPA proposes in guidance for creating a new baseline in the yet unseen guidance to accompany the rule amendments. The existing WRAP technical analyses and projected

future visibility improvements were integral to the successes of the first planning period. The relative increase in average visual range is already being seen, with the most progress at locations nearest large population centers with the ability to control manmade emissions. (see Figure 1.) However, we see increasingly frequent, and more severe, impacts from wildfire and dust storms, natural sources of regional haze in the West, impairing visibility on days when emissions controls have reduced the man-made impacts. It makes sense to account appropriately for these changes as we plan from present conditions to improving future conditions.

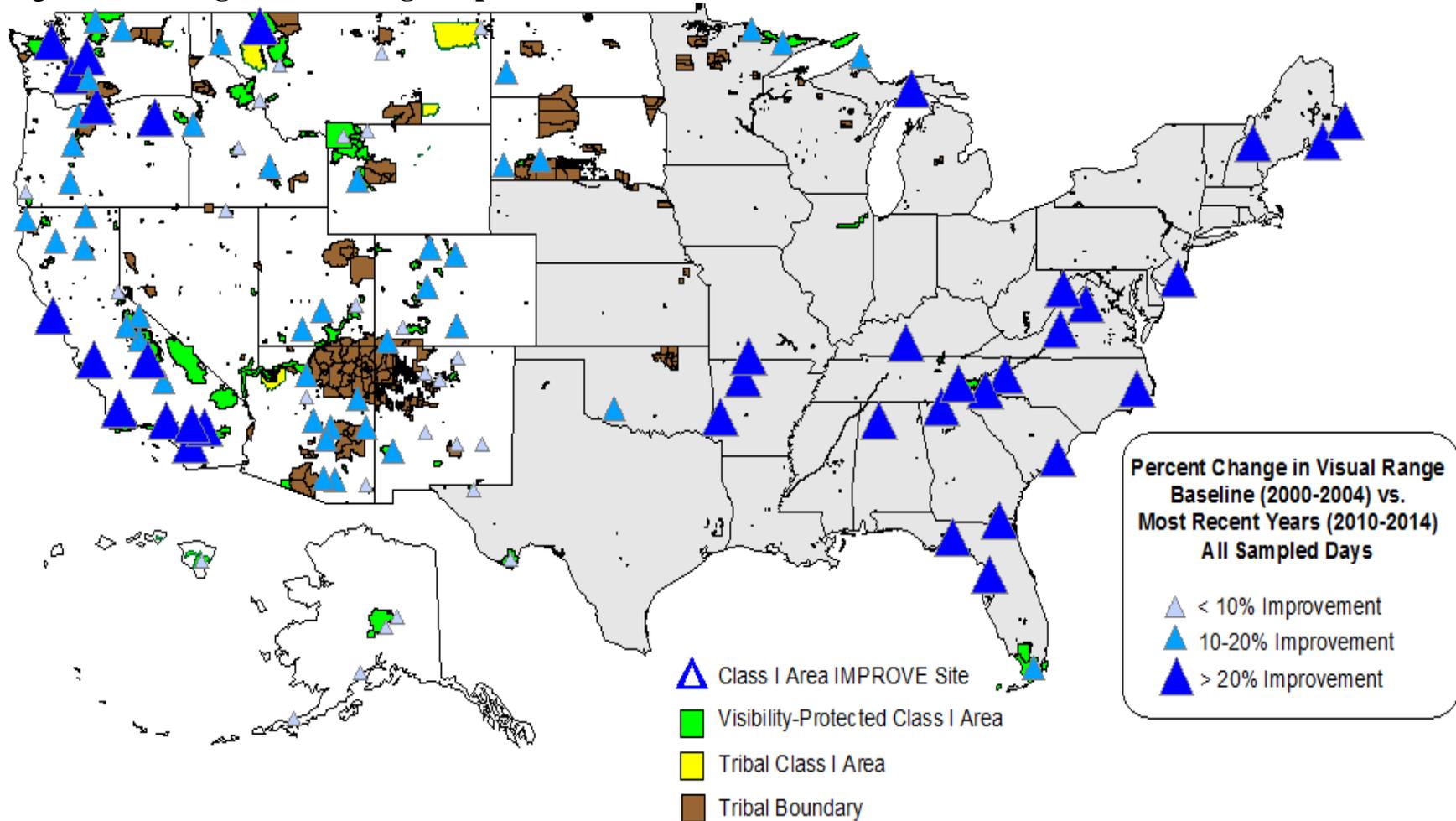
In planning toward “Natural Conditions” decades in the future, which imply no human impacts, we face considerable uncertainty regarding the quantity and trends of natural sources of haze in the West. Natural haze, along with internationally-transported pollution, causes impacts together that are often significant and complicate planning to further control state-managed sources affecting western Class 1 areas, which are already quite clear on many days. With timely availability of sufficient resources, the necessary analyses can be completed to prepare plans for the 2028 milestone to further reduce controllable man-made pollution. The focus on continued assessment of controllable anthropogenic sources causing visibility impairment is a step in the right direction. The challenge will be the actual analysis and planning to further identify controls on existing sources contributing to impairment and demonstrate in the plans that visibility will perceptibly improve.

As reflected in the WRAP Charter, we support the assertion that visibility protection planning should more fully incorporate the multi-pollutant elements of pollution control analyses across the U.S., as also noted by WESTAR, and we support EPA’s proposal to extend the due date for the plans, given the amount of work to be done. It has long been recognized in the WRAP analysis and planning process that the better we integrate planning to take account of federal control measures, and by identifying which and what kind of additional federal control programs can be promulgated to effectively and uniformly address regional haze, the more efficient our regional work to help our members with their regulatory development processes will be.

WRAP expects to make further detailed comments on the proposed rule revisions and favors many of the changes proposed in this rulemaking for the reasons mentioned, but the benefit of the rule revisions for the complex and detailed planning process depend much more on the proposed guidance to be released soon by EPA. Resources for regional analysis and planning are critical. The availability of resources and the impacts of the rule and guidance changes need to be understood together to fully appreciate the impacts and our ability to make future visibility improvements in the West.

Thank you for holding a hearing in the West to receive our comments and for recognizing the value of the cooperative collaborative analysis process developed by WRAP for the many western Class I areas.

Figure 1. Average Visual Range Improves



Five-year Average of Annual Averages for ALL IMPROVE SAMPLING DAYS shows relative improvement in Visual Range per individual site conditions. Averages based on ~120 days of data collected annually. Averaging ALL sampled days minimizes skewing by natural extreme episodic events (wildfires & dust storms) in the top quintile (20% Worst Days.)