



August 24, 2006

Mr. Bill Wehrum, Acting Assistant Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Ariel Rios Building, Room 3000
Washington, D.C. 20460

Subject: Funding for the Western Regional Air Partnership

Dear Mr. Wehrum:

As state Air Quality Administrators charged with carrying out the mandates of the federal Clean Air Act, we are deeply troubled about the funding cuts sustained by the Western Regional Air Partnership (WRAP) in 2007, and the prospect that funding could be cut even more in 2008. While the most intensive regional haze work will produce section 308 state implementation plans (SIPs) and 309 SIP revisions in 2008, our obligations under the regional haze rule will not be met once the SIPs are completed. Implementation of the SIPs will require ongoing technical and policy capability, collaboration, and resources that are currently being provided by the WRAP, and that few if any states are able to provide on their own. The WESTAR Council strongly believes that continued funding for the WRAP is needed and urge EPA to include funding for the WRAP in future budget proposals.

The WRAP grant is money well spent. The funds spent regionally are highly leveraged with state in-kind work and provide far greater results than any state could possibly accomplish on its own. Even though the funding provided to the WRAP is restricted to regional haze-related activities, the value of the products and tools provided by the WRAP will benefit states in many ways beyond regional haze. For example, the WRAP's emission inventory system includes current emissions data that is consistent and comparable across state and tribal boundaries, and that is accessible to everyone. Regional-scale modeling provided by the WRAP provides significant insight into pollutant transport, meteorological fields, and basic source-receptor relationships that are also needed to address criteria pollutants such as fine particulates and ozone. Having already invested in the infrastructure, including equipment, tools, and staff expertise, and developed the capabilities to provide products and services that are critically needed by the states, it would be irresponsible not to provide the on-going funding needed to maximize the return on the investment.

We believe that the use of WRAP's products and tools by individual states to address multiple pollutants is entirely consistent with recommendations made in a 2004 report on Air Quality Management in the United States, the National Research Council, namely:

- *Strive to take an integrated multi-pollutant approach to controlling emissions of pollutants posing the most significant risks.*
- *Strive to take an airshed-based approach by assessing and controlling emissions of important pollutants arising from local, multi-state, national, and international sources.*

WRAP funding has thus far been provided as a supplement to the existing state grant assistance programs, and must continue as a supplement so as not to jeopardize core programs. As important as continued funding for the WRAP is, states are also concerned about the level of grant funding provided to implement core programs, such as monitoring, permitting, and compliance. Maintenance of these core programs, coupled with increasing workloads to implement new, unfunded mandates such as the Clean Air Mercury Rule and New Source Review reforms, will require more funding than is currently being provided through EPA's grant assistance programs.

In summary, WRAP funding must continue to enable states to implement regional haze SIPs - plans that states are required under federal regulations to periodically update and revise in the years to come. The products and tools developed by the WRAP may also be used by states to address air pollution challenges on a multi-pollutant, airshed basis, an approach recommended by the National Research Council. The funding provided to the WRAP is highly leveraged and is a very efficient investment that addresses all of the NRC's recommendations related to EPA's air program management. The WESTAR Council urges EPA to include continued funding for the Western Regional Air Partnership in future budget proposals.

Respectfully,

A handwritten signature in black ink, appearing to read 'Dan Johnson', is written over a vertical red line.

Dan Johnson, Executive Director
Western States Air Resources Council