

WESTERN REGIONAL AIR PARTNERSHIP TESTIMONY FOR EPA PUBLIC HEARING ON  
PROPOSED RULEMAKING FOR NONROAD ENGINE AND FUEL STANDARDS

Los Angeles, CA

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Good morning. My name is Lee Alter, and I thank you for this opportunity to comment on EPA's proposed rule for new nonroad engine and fuel standards. I am an employee of the Western Governors' Association and serve as a policy analyst for the Western Regional Air Partnership's (WRAP). I am here today to provide some comments on behalf of the WRAP.

The WRAP is a collaborative effort of 13 Western states, Western tribes, federal agencies, environmental advocacy groups, and business interests working to implement EPA's regional haze regulations and address other regional air quality issues of concern to the West. The WRAP was formed as the successor organization to the Grand Canyon Visibility Transport Commission (GCVTC), which first began studying regional haze on the Colorado Plateau in 1991.

Research by the Grand Canyon Commission, the WRAP, and the EPA have consistently found that, due to a variety of pollution sources, visibility in the West is about one half the distance it would be under natural conditions. Emissions of fine particles, nitrogen oxides, and sulfur dioxide from nonroad engines are a significant contributor to regional haze in the West. The WRAP's analysis shows that in the absence of new federal standards, future emissions from nonroad sources will exceed emissions from onroad cars, trucks, and buses.

In January, the WRAP sent a letter to EPA Administrator Whitman encouraging the adoption of rigorous new engine and fuel sulfur standards for nonroad sources, similar in stringency to those already in place for onroad sources. The WRAP believes that this type of action by EPA is necessary if the West is to make reasonable progress towards improving visibility as required by the Clean Air Act and EPA's regional haze regulations. This action is also important to those areas of the West that are working to meet health-based air quality standards and reduce health risks associated with toxic air pollutants.

The WRAP appreciates the Agency's response to its January 2003 letter and is encouraged by EPA's proposed rule. The WRAP is undertaking a review of the proposal with the goal of providing specific, written comments by the close of the public comment period. Thank you for the opportunity to comment today. The WRAP looks forward to continuing to work with EPA on this important rulemaking.