



July 3, 2002

Air and Radiation Docket and Information Center (6102)
Attention: Docket No. A-2000-51
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

The Western Regional Air Partnership (WRAP) is pleased to submit the attached comments on the Environmental Protection Agency's proposal to incorporate into the regional haze rule the WRAP's Annex to the Report of the Grand Canyon Visibility Transport Commission (GCVTC) that was submitted to the Environmental Protection Agency (EPA) on September 29, 2000. The WRAP supports the EPA's proposal, with the revisions discussed in the attached comments, which will allow nine Western states and tribes within those states to implement a critical portion of Commission's strategy to reduce regional haze in the West. By incorporating the Annex into the Regional Haze Rule, EPA not only builds upon many years of hard work by the Commission and the WRAP, but also fosters constructive governmental partnerships to protect environmental resources.

The WRAP would like to thank EPA for its assistance in this collaborative process, first through the GCVTC and later through the numerous Forums and Committees of the WRAP that have been working to address regional haze issues in the West. EPA's on-going participation in the WRAP is critical to ensure that the work of the WRAP can be adopted into state and tribal implementation plans.

The WRAP requests that EPA consider the attached comments on the proposed revisions to the Regional Haze Rule to ensure that the proposal is consistent with the Annex.

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In addition, it would be helpful if in the near future EPA would provide the WRAP and other interested parties with a more detailed explanation regarding why the Agency believes the recent U.S. Circuit Court of Appeals decision does not impact the ability of Western states and tribes to move ahead with implementation of the Annex and the Section 309 provisions of the Regional Haze Rule (per June 7 letter from Lydia Wegman).

Also, in recent conversations with Western state and tribal officials, EPA has indicated that it will accept and consider comments regarding the court decision and its impact on the Regional Haze Rule after the July 5, 2002 deadline for comments on the Annex rulemaking. We appreciate this opportunity, as there will undoubtedly be ongoing discussions within the WRAP and in other forums on this topic. However, we do not believe that this should prevent EPA from moving forward with final approval of the Annex.

Sincerely,



Michael O. Leavitt
Governor of Utah
WRAP Co-Chair



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Governor of Pueblo of Acoma
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