
November 7, 2018

The Honorable William Wehrum
Assistant Administrator
U.S. Environmental Protection Agency
Office of Air and Radiation (6103A)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Assistant Administrator Wehrum:

Western Governors support the recent comments submitted by the Western States Air Resources Council (WESTAR) on the Environmental Protection Agency's (EPA) September 11, 2018 Regional Haze Reform Roadmap (Roadmap) and August 2018 draft exceptional events guidance. The letter highlights issues of significance to Governors regarding these regulatory activities. We appreciate that the Roadmap's key principles for implementation of the regional haze program include leveraging state leadership, reducing burdens on states, and supporting states in their implementation of the Clean Air Act. Furthermore, we are grateful for EPA's engagement with WESTAR on the exceptional events guidance.

The scheme of cooperative federalism embraced by the Roadmap requires adequate funding, timely guidance, comprehensive scientific research and data, and meaningful consultation with states as outlined in Western Governors' Policy Resolution [2018-05, Air Quality and Emissions Regulation](#). The Roadmap notes the importance of timely regional haze guidance yet indicates that guidance will not be completed until Spring 2019 – when many states will have already completed their technical analyses. Western Governors urge EPA to devote resources to finalize this guidance as soon as possible and to provide funding for state regional haze planning and implementation. If issuing the guidance earlier is not possible, it is of the utmost importance for EPA to consult with state air quality agencies and regional organizations on what the guidance will contain.

Additionally, EPA must ensure meaningful and substantive consultation with states before making determinations on the extent and scope of an exceptional events analysis. Exceptional events guidance, procedures and policies should encourage collaboration with states as co-regulators and eliminate one-sided, top-down decision-making. EPA should also advance the scientific understanding of the distinction of different sources of ozone through transparent, comprehensive research coordinated with state air quality agencies and regional organizations.

Please do not hesitate to contact Western Governors if we can assist in advancing the recommendations described above. Thank you for your continued commitment to cooperative federalism. We look forward to continuing to work with you to strengthen EPA's partnership with states.

Sincerely,



David Ige
Governor of Hawai'i
Chair, WGA



Doug Burgum
Governor of North Dakota
Vice Chair, WGA