WESTERN STATES AIR RESOURCES COUNCIL

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WESTAR

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Air and Radiation Docket and Information Center
Docket Number A-2001-31
U.S. Environmental Protection Agency
401 M Street, SW
Room 1500 (Mail Code 6102)
Washington DC 20460

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I am pleased to provide comments on the implementation of the federal 8-hour ozone standard on behalf of the WESTAR Council. WESTAR represents 15 western states, including Alaska, Hawaii, Washington, Oregon, California, Nevada, Idaho, Montana, Utah, Colorado, Arizona, New Mexico, Wyoming, South Dakota and North Dakota.

While many individual WESTAR states will provide separate comments to address other important implementation issues, all of the states are in agreement on two important points.

1. To date, most of the approaches that have been discussed to address transported ozone have focused on the eastern portion of the country. Considering the large size of western states and the potential significance of international pollution transport, it is important to note that approaches that work for the east, may not work in the west. The U.S. Environmental Protection Agency (U.S. EPA) should ensure that the final interstate ozone transport policies do not preclude western states from pursuing the most effective and efficient solutions to address their own, unique circumstances.

2. It is critical that U.S. EPA settle on one preferred implementation option before asking states to recommend non-attainment area boundaries and classifications. A higher degree of certainty about the implementation guidance will minimize the chance that states will need to significantly alter their recommendations after having completed the public process associated with establishing non-attainment boundaries and classifications.

If you have any questions, or would like to discuss these comments further, please contact me at (916) 322-2739, or contact Mr. Dan Johnson, Executive Director, at (503) 387-1660 extension 8.

Sincerely,

Lynn Terry
President

cc: WESTAR Council Members

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