



United States Department of the Interior



FISH AND WILDLIFE SERVICE
National Wildlife Refuge System
Branch of Air Quality
7333 W. Jefferson Ave., Suite 375
Lakewood, CO 80235-2017

IN REPLY REFER TO:
FWS/ANWS-AR-AQ

August 21, 2013

Mr. David Brymer,
Director, Air Quality Division
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Dear Mr. Brymer:

On June 18, 2013, the State of Texas provided its draft 5-year progress report for the State's Regional Haze State Implementation Plan (SIP). Overall, the draft and appendices included most of the information and necessary elements needed to adequately address regional haze progress. In reviewing the draft, additional information is required to fully assess program progress or adequacy.

1. In several areas, the draft presents improvements to Class I area visibility impairment achieved from the original base year SIP period. Data is presented for both in-State and out-of-State Class I areas. Information comparing improvement to the uniform rate of progress, State (or out-of-State) derived reasonable progress goals, or long term natural condition goals was not provided. Because this report is intended to provide progress based on the previously submitted SIP, we think that comparisons to established reference points are necessary.

In the State's regional haze SIP submittal to EPA, modifications to natural condition estimates from EPA defaults were proposed. Since these modifications have not been approved, we request that all comparisons continue to be presented for both EPA default and Texas derived natural condition estimates. Separating this information does not properly inform the reader on regional haze related progress.

2. In assessing whether the State's regional haze plan is making sufficient progress, the State must consider its status as the largest contributor to visibility impairment at several neighboring Class I areas. Simply stating that visibility is improving is not sufficient in determining whether improvements are either the result of Texas controls or if Texas controls are contributing at an appropriate level.



This letter acknowledges that the U.S. Department of Interior, U.S. Fish and Wildlife Service (FWS), has conducted a substantive review of the draft Regional Haze SIP in fulfillment of the requirements identified in 40 CFR 51.308(i). Please note, that only the U.S. Environmental Protection Agency (EPA) can make a final determination regarding the document's completeness and, therefore, ability to receive federal approval from EPA.

We compliment you on your hard work and dedication to the significant improvement in our nation's air quality related values and visibility.

Sincerely,



Sandra V. Silva
Chief, Branch of Air Quality

cc:

Joe Kordzi, EPA Region 6
Bret Anderson, National Air Quality Technical Coordinator, US Forest Service
Carol McCoy, Chief, Air Resources Division, National Park Service
Meredith Bond, Deputy Branch Chief, FWS Branch of Air Quality