

State to State Consultation

There are three places in 40 CFR Section 51.308 that specifically require consultation between states in the development of regional haze plans:

I.

40 CFR Section 51.308(d)(1)(iv) of the Regional Haze Rule requires that in developing reasonable progress goals, the State consult with those States which may reasonably be anticipated to cause or contribute to visibility impairment in the mandatory Class I Federal areas.

Pursuant to 40 CFR Section 51.308(d)(iv), the State of [] consulted with other states through a regional planning organization, the Western Regional Air Partnership (WRAP), in developing reasonable progress goals. The WRAP is a collaborative effort of tribal governments, state governments and various federal agencies to implement the Grand Canyon Visibility Transport Commission's recommendations and to develop the technical and policy tools needed by western states and tribes to comply with the U.S. EPA's regional haze regulations. The WRAP is administered jointly by the Western Governors' Association and the National Tribal Environmental Council. WRAP activities are conducted by a network of committees and forums composed of WRAP members and stakeholders who represent a wide range of viewpoints. The WRAP recognizes that residents have the most to gain from improved visibility and that many solutions are best implemented at the local, state, tribal or regional level with public participation. The following states: Alaska, Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming have agreed to work together to address regional haze in the western United States. The goals, objectives, management and decision making structure of the WRAP are described in more detail in the attached Appendix [].

This consultation effort began with all states in the WRAP region contributing information to a technical support system (TSS) which allows all states to better understand the causes of haze and the levels of contribution from all sources to each Class I area. This project has involved many hours of consultation between states on regional emission inventories, monitoring and modeling to determine the causes of visibility impairment in each mandatory Class I Federal area in the regional planning area. WRAP forums involved in the technical consultation between states are as follows:

*Air Pollution Prevention Forum
Dust Emissions Forum
Economic Analysis Forum
Emissions Forum
Fire Emissions Forum*

*Mobile Sources Forum
Sources In and Near Class I Areas Forum
Stationary Sources Forum
Technical Analysis Forum*

The next step in state consultation in the development of reasonable progress goals was through the Implementation Work Group (IWG) of the WRAP. The State of [] participated in the IWG which took the products of the technical consultation process discussed above and developed a

process for establishing reasonable progress goals in the western Class I areas. A description of that process and the determination of reasonable progress goals for each of the Class I areas in the State of [] is described in [Reasonable Progress Section of the State SIP]. The following states have agreed to work together through the IWG in the development of reasonable progress goals: Alaska, Arizona, California, Colorado, Hawaii, Idaho, Montana, Nevada, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming.

Opportunities for consultation on development of reasonable progress goals provided through the WRAP have been documented in more detail in Appendix [].

40 CFR Section 51.308(d)(1)(iv) of the Regional Haze Rule further requires that if the State cannot agree with another such State or group of States that a goal provides for reasonable progress, the State must describe in its submittal the actions taken to resolve the disagreement.

Pursuant to 40 CFR Section 51.308(d)(iv), the State of [] also gave opportunity for neighboring states to comment on the State of []'s reasonable progress goals for each Class I area located within in the State. Opportunity for comment from other states was offered through a public hearing on the State Implementation Plan (SIP), held in accordance with 40 CFR Section 51.102. The following states in the WRAP region were notified of the SIP public hearing: Alaska, Arizona, California, Colorado, Idaho, Montana, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, Nevada, and Hawaii. The following states in the neighboring Central States Regional Planning Organization (CENRAP) were notified of the SIP public hearing: Iowa, Kansas, Minnesota, Missouri, Nebraska, Oklahoma, and Texas. Comments were received from the following states, on the State of []'s reasonable progress goals for Class I areas located within the State of [].

If comments were received from other states indicating disagreement on reasonable progress goals established for Class I areas within your state:

The State of [] took the following actions to resolve the disagreement:

If no comments were received from other states indicating disagreement on reasonable progress goals established for Class I areas within your state:

The State of [] did not receive any comments from other states indicating disagreement on the reasonable progress goals established for the following Class I areas: Bridger Wilderness, Fitzpatrick Wilderness, Grand Teton National Park, North Absaroka Wilderness, Teton Wilderness, Washakie Wilderness, and Yellowstone National Park.

II.

40 CFR 51.308(d)(3)(i) of the Regional Haze Rule requires that where the State has emissions that are reasonably anticipated to contribute to visibility impairment in any mandatory Class I area located in another State or States, the State must consult with other States in order to develop coordinated emission management strategies. Furthermore, the State must consult with any other State having emissions that are reasonably anticipated to contribute to visibility impairment in any mandatory Class I Federal area within the State.

Pursuant to 40 CFR 51.308(d)(3)(i), the State of [] has participated in regional planning and coordination with other states in developing emission management strategies if emissions from within the State contribute to visibility impairment in a mandatory Class I Federal area outside the State, or if emissions from another state, regional planning organization, country, tribal area, or offshore location contribute to visibility impairment in any Class I Federal area within the State. This participation was through the Western Regional Air Partnership (WRAP). A more detailed description of the goals, objectives, management, and decision-making structure of the WRAP has been included in Appendix []. The following WRAP forums have provided consultation opportunities between states on emission management strategies:

*Air Pollution Prevention Forum
Dust Emissions Forum
Economic Analysis Forum
Emissions Forum
Fire Emissions Forum*

*Mobile Sources Forum
Sources In and Near Class I Areas Forum
Stationary Sources Forum
Technical Analysis Forum*

Opportunities for consultation on emission strategies provided through the WRAP have been documented in more detail in Appendix [].

A description of the selected emission management strategies for the State of [] is described in [Long-Term Strategy Section of the State SIP]. The State of [] views the development of coordinated emission management strategies to be a long-term commitment, and therefore, the State of [] agrees to continue to participate in the WRAP in developing coordinated emission management strategies for SIP revisions in 2013 and 2018.

III.

40 CFR 51.308(h)(2) of the Regional Haze Rule requires that if the State determines that the implementation plan is or may be inadequate to ensure reasonable progress due to emissions from sources in another State which participated in a regional planning process, that State must provide notification to the Administrator and to the other State which participated in the regional planning process with the States. The State must also collaborate with the other States through the regional planning process for the purpose of additional strategies to address the plan's deficiencies.

If the State makes a determination of adequacy:

Pursuant to 40 CFR 51.308(h)(2) the State of [] has determined this first state implementation plan is adequate to ensure reasonable progress for the first planning period of the regional haze long-term planning effort which extends out to the year 2064. While emissions from sources outside of the State of [] have resulted in a slower rate of improvement in visibility than the rate that would be needed to attain natural conditions by 2064, most of these emissions are beyond the control of any state in the regional planning area of the WRAP. The emission sources include: emissions from outside the WRAP domain; emissions from Canada and Mexico; emissions from wildfires and windblown dust; and emissions from offshore shipping. A more detailed description and quantification of these uncontrolled emissions is included in [The Reasonable Progress Section of this SIP]. Some additional strategies to address emissions

beyond the control of any state in the WRAP under the jurisdiction of EPA are explained in a document attached in Appendix [].

With respect to addressing emissions from sources in another state:

Through the WRAP consultation process the State of [] has reviewed and analyzed the contributions from other states that reasonably may cause or contribute to visibility impairment in [State]'s Class I areas. [State] acknowledges that the long-term strategies adopted by [State A], [State B], [State C] in their SIPs and approved by EPA will include emission reductions from a variety of sources that will reduce visibility impairment in [State]'s Class I areas.

APPENDIX <###>
STATE AND FEDERAL LAND MANAGER CONSULTATION
SUMMARY OF WRAP MEETINGS AND CONFERENCE CALLS

APPENDIX <###>
STATE AND FEDERAL LAND MANAGER CONSULTATION
SUMMARY OF STATE MEETINGS AND WORKSHOPS