



**Western Regional Air Partnership  
2004 Work Plan**

**Adopted by the WRAP Board  
October 14, 2003**

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## EXECUTIVE SUMMARY

This work plan summarizes the activities and expenditures planned by the Western Regional Air Partnership (WRAP) for the calendar year 2004. These include activities initiated in earlier years receiving additional funds in 2004, as well as new activities.

The WRAP was formed in 1997 as a successor organization to the Grand Canyon Visibility Transport Commissions, established by the Clean Air Act Amendments of 1990. Since 1997, most of the WRAP's focus has been on implementing the Commission's recommendations. A major milestone in implementing these recommendations is the submission by the end of 2003 of state implementation plans (SIPs) to the U.S. Environmental Protection Agency (EPA) in accordance with Section 309 of the federal regional haze rule. Most of the work on Section 309 SIPs also supports the development of tribal implementation plans (TIPs) and the development of SIPs by the end of 2007 for states subject to Section 308 of the regional haze rule.

The completion of Section 309 SIPs (expected for five WRAP states) represents a significant accomplishment of the WRAP and will benefit all of its members in future haze control efforts. Nonetheless, legally, they only address the contribution of emissions from these states to the visibility impairment at 16 Class I areas on the Colorado Plateau. The contribution of these emissions to other Class I areas (there are over 100 other Class I areas in the WRAP region, including tribal ones), and the contribution of emissions from other WRAP states to all Class I areas remains to be addressed. This is the principal challenge for the WRAP over the next few years, made no easier by the diverse environment and variety of emission sources impacting each Class I area.

Recognizing this challenge, the WRAP recently completed a long-term strategic plan for the 2003 – 2008 time period<sup>1</sup>, which in turn has provided a strong basis for this 2004 work plan. Among other things, the strategic plan (1) identifies major products and milestones; (2) serves as an instrument of coordination; (3) provides the direction and transparency needed to foster stakeholder participation and consensus-based decision making, which are key features of the WRAP process; and (4) provides guidance to the individual plans of WRAP forums and committees.

In its grant guidance, the EPA identifies long-term planning issues that should be addressed by regional planning organizations (RPOs), such as an overall course of action, a vision of the planning process, the use of partnerships for joint planning, assessment of data and tool needs, and cooperation with other RPOs. The WRAP strategic plan and Sections II, and III, and IV of this work plan address most of these issues. With respect to the remaining issues, the WRAP will work with other RPOs through the technical discussion groups facilitated by the EPA, through regular participation in director-level calls and meetings, and as necessary on other issues (e.g., emission inventories and control strategies in border regions). The WRAP's needs for new and improved data and tools are generally assessed within its forums and is refined through the annual work plan development process. Participation in inter-RPO discussion groups provides further opportunity to identify and refine these needs.

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<sup>1</sup> See <http://www.wrapair.org>

On a more general level, the WRAP's planning process must accommodate a unique landscape of environmental, social, economic, and political issues. The WRAP region includes 116 (or 75 percent) of the nation's 156 mandatory federal Class I areas, half the land mass of the United States (not including Alaska), a very large portion of publicly-owned lands, and numerous tribal jurisdictions (many with large land areas). It also emits a minority of total U.S. emissions, borders both Canada and Mexico, and receives pollution from Asia. Most WRAP members will not have to contend with ongoing ozone and particulate matter nonattainment issues, which simplifies air quality planning to some extent, but many WRAP members are faced with rapid population growth and other challenges to preventing deterioration of air quality. Moreover, the WRAP must be sensitive to other regionally-important environmental issues, such as fire and drought. This presents a unique and challenging environment for long-term planning which is best addressed through a single, well-funded and well-organized institution at the appropriate political level. The WRAP, with the appropriate EPA financial support, provides such an institution, especially given its co-management structure shared between the Western Governors' Association and the National Tribal Environmental Council. For example, WRAP uses the WGA-developed environmental management principles known as Enlibra.<sup>2</sup> Use of the Enlibra principles has helped garner support from Western governors and other stakeholders as an example of how environmental issues should be addressed in the region. Such coordination is key to regional haze planning in the West.

Finally, the WRAP's long-term planning process must be prepared to deal with relevant events beyond its control, such as multi-pollutant legislation and the ramifications of legal challenges to the regional haze rule and the approval of SIPs and TIPS. One way the WRAP contends with these events is to have sufficient staffing to track the issues and to foster a constructive dialogue among its members.

**Table 1** provides a budget for all new and ongoing WRAP activities. A project coding system has been implemented for all new activities to facilitate project tracking and coordination. Each new activity, including some not shown in the budget because they are performed directly by WRAP staff or through in-kind support from WRAP participants, is described in Section V of this work plan.

**Table 2** provides a matrix of projects and forums. Its purpose is to maintain coordination among the many WRAP projects. The matrix highlights projects where a forum other than the one sponsoring the project should be involved or periodically updated. For example, the In and Near Forum should be keyed into the Mobile Sources Forum's retrofit demonstration project (MS1). The matrix also contains a column relating most of the new projects to specific points on the Strategic Plan timeline. A copy of the timeline is provided in **Figure 1**. A map of the WRAP region and its state, tribal, and federal members is shown in **Figure 2**. A map of all tribal lands and tribal Class I areas in the WRAP region is shown in **Figure 3**. An updated organizational chart for the WRAP is shown in **Figure 4**.

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<sup>2</sup> See <http://www.westgov.org/wga/initiatives/enlibra>

**Table 1. Status Report and 2004 Budget (September 30, 2003).**

Project Code	Project Title	WGA Acct. # 30-204 (as of 6/30/03)			CY04 Funding
		Projects Budgeted	Projects Underway	Expenditures to Date	
<b>Stationary Sources Joint Forum</b>					
	Analysis of NOx and PM for Section 309 & 308 (REI)		49,985	28,818	
	NOx and PM Study (Ted Russell)		6,500	6,500	
	SO2 Monitoring Protocols for Annex (Pechan)		71,110	71,110	
	ATS/ETS Specifications (PQ)		17,000	13,412	
SS1	Identification of BART-Eligible Sources	75,633			24,367
SS2	Preliminary Determination of Sources Subject to BART				100,000
<b>Fire Emissions Joint Forum</b>					
	Develop Basis for Enhanced Smoke Mgmt. Progs. (Reynolds)		63,704	56,457	
	2018 Fire Inventory (Air Sciences)		268,780	216,227	
	Alternatives to Wildland Burning (Jones and Stokes)		13,488		
	Evaluate Fire Emissions Estimation Systems	14,578			
	Model Assessment/Sensitivity Runs	50,000			
	2002 Inventory of Wx, Rx, and WFU for wildland, rangeland, ag	278,754			
	Modeling to Assess/Establish de minimus levels	100,000			
	Fire Emissions/Categorization Guidance - diff. Between restoration & maintenance	40,000			
	Guidance for implementation of FTS & AEG policies, including policy/tech. options	50,000			
FF1	Wildland Fire Emission Trade-Off Model Review				20,000
FF2	Feasibility Criteria/Technical Guidance for <i>Policy for Categorizing Fire Emissions</i>				20,000
FF3	Guidance on Nat/Anth Apportionment, including support for AMRF & TOC projects				50,000
FF4	Support for RMC analysis of fire emissions scenarios				25,000
FF5	Bridge for Fire Tracking System into WRAP EDMS				10,000
FF6	Refine 2018 fire emissions projections, include AK & HI, plus nat./anthro. Split				130,000
FF7	<i>2002 National Wildfire EI (from OAQPS, inter-RPO project)</i>				100,000
FF8	Technical Guidance on Use of Emissions Reduction Techniques (MACTEC)		54,918	12,631	25,000
FF9	Regional coordination of smoke management programs, including workshop				25,000
FF10	Co-Sponsor Fire Emissions Conference				60,000
FF11	Smoke Mgt Techniques to reduce regional haze impacts on Class I areas				10,000

Project Code	Project Title	WGA Acct. # 30-204 (as of 6/30/03)			CY04 Funding
		Projects Budgeted	Projects Underway	Expenditures to Date	
<b>Air Pollution Prevention Forum</b>					
	Tribal RE/EE (NAU)		4,905		
	Integration of RE and EE Strategies (Tellus)		25,000	25,000	
	Van Jamison 196977		552	552	
	AP2 Forum Meeting Assistance (ICF)		10,971	10,954	
PP1	Tech. Assistance to States/Tribes for SIPs/TIPs (GETF)	45,000			
PP2	Renewable Energy Tracking and Certificates (Center for Resource Solutions)		14,614	500	
PP2	Renewable Energy Tracking and Certificates	73,863			103,023
PP3	Transmission Reform	25,000			
PP4	Tracking and Reporting RE and EE Implementation and Impacts of Legislation	50,000			
PP5	Displaced Emissions Analysis				25,000
<b>Mobile Sources Forum</b>					
	Develop Baseline and 2018 Mobile Source Inventories, incl. updates (Environ)		88,499	88,056	
	Draft Guidance for Promoting Non-Road Demo Projects	20,000			
MS1	Support Non-Road Demonstration Projects	75,000			50,000
<b>Sources In and Near Class I Areas Forum</b>					
IN1	Emission Inventories Near Class I Areas (Environ)	34,600	70,008	63,678	65,400
	Gateway Community Demonstration Project	30,392			34,600
IN2	In/Near Strategies for Reasonable Progress				10,000
<b>Economic Analysis Forum</b>					
	Economic Forecasts & Evaluations (BBC)		59,600	59,516	
EA1	Framework Application Test	50,000			
EA2	Development of Baseline Economic Data	80,000			
EA3	Enhancement of Cost and Benefit Unit Values	45,400			54,600
EA4	Screening Tool	40,000			
<b>Air Quality Modeling Forum</b>					
	Emissions Processing Jump Start Contract (MCNC)		106,733	106,733	
	2002 Regional Modeling Center (UCR)		530,362	524,866	
MF1	2003 Regional Modeling Center (UCR)		675,000	201,152	600,000
	Training and Outreach Activities	85,000			
MF2	Alaska Modeling	175,965			100,000
<b>Tech-Wide Projects (TOC)</b>					
	Quality Management Plan	25,000			
	Geographic Data Display	25,000			
	Co-sponsor March 2004 Organic Aerosols Workshop		10,000		
TOC1	Attribution of Haze				50,000

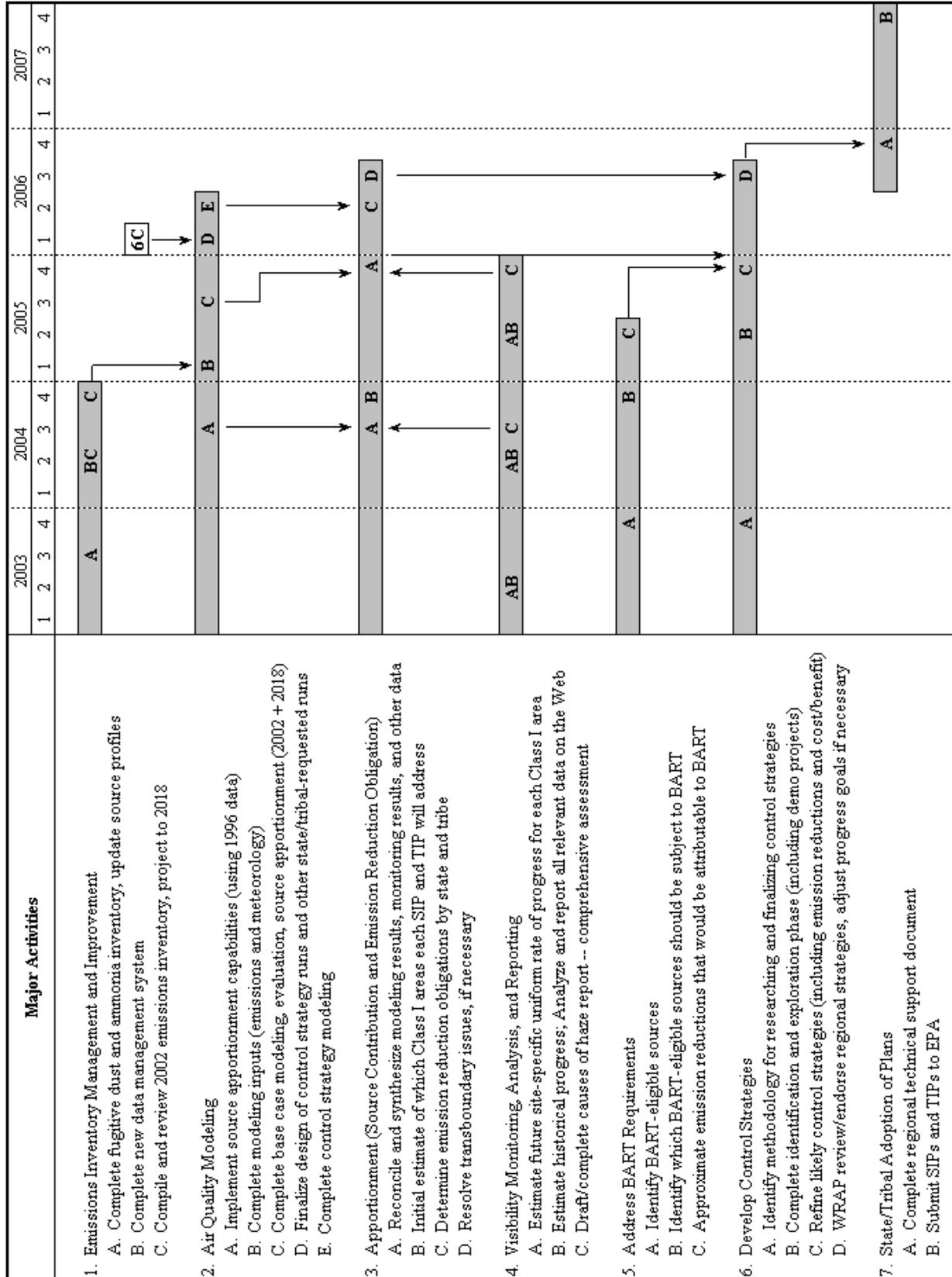
Project Code	Project Title	WGA Acct. # 30-204 (as of 6/30/03)			CY04 Funding
		Projects Budgeted	Projects Underway	Expenditures to Date	
<b>Emissions Forum</b>					
	2018 Inventory, Y2K SO2, 1996 QA Forecast (Pechan)		15,320	15,320	
	EI Data Base System - Needs Assessment (EA Eng)		35,000	20,290	
EF1	EI Data Base System (Development/User Access/Training/QA/Home)	162,496			475,000
	2002 Interim EI – for source apportionment/haze attribution exercise in 2004		24,451		
EF2	Phase 2 of Representative Community EIs (Phase 1 RFP under development)	175,000			50,000
EF3	Update non-road emissions projections to reflect proposed regulations				50,000
EF4	EI Improvements for Spatial and Temporal Allocations				25,000
EF5	Canadian & Mexican Emissions – to grow, QA, & prepare EI for 2002 base case				25,000
EF6	2002 Base EI (begin gap fill and QA work)				45,000
EF7	Alaska Aviation Inventory				50,000
<b>Tribal Data Development Work Group</b>					
	Tribal Inventory Gathering & Analysis + Tribal Smoke (ITEP/NAU)		139,177		
	Tribal Inventory Gathering and Analysis (ITEP/NAU)		345,573	130,613	
TW1	Emissions Data Development support (ITEP/NAU continuation)				200,000
TW2	Monitoring Data Analysis (addition to Causes of Haze)				100,000
TW3	Tribal TSD Guidance / Template Development				50,000
TW4	Program Enhancement				50,000
<b>Dust Emissions Joint Forum</b>					
	Fugitive Dust Workshop (Panelists)		14,800	14,800	
	Wind Blown Dust Inventory Improvement (Environ)		182,324	90,355	
DF1	Literature Review - Definitions (e.g., natural/manmade) and Emission Tools	40,000			
DF2	Agricultural Dust - Summary of Existing 2002 Inventories and Control Programs	100,000			
DF3	Construction Dust - Summary of Existing 2002 Inventories and Control Programs	13,255			86,745
DF4	Road Dust - Summary of Existing 2002 Inventories and Control Programs				100,000
<b>Ambient Monitoring and Reporting Forum</b>					
	IEWS Data Base 2003 (CSU)		249,724	126,361	
AMR1	IEWS Data Base 2004 (CSU) - CENRAP in current grant		50,000		200,000
AMR2	Causes of Haze Report (DRI)	225,000	190,000	64,874	
AMR3	<i>Natural Haze Levels Analysis (from OAQPS, inter-RPO project)</i>				75,000

Project Code	Project Title	WGA Acct. # 30-204 (as of 6/30/03)			CY04 Funding
		Projects Budgeted	Projects Underway	Expenditures to Date	
<b>309 Coordinating Committee</b>					
309a	Annex Implementation	50,000			
309b	309 Follow-Up				25,000
<b>Air Managers Committee</b>					
	STIP-II: Model Rule / MOU (WESTAR)		46,861	32,998	
	STIP-II: State Staff Support (OR)		115,000	86,250	
	STIP-II: Tribal Staff Support (NM)		28,763	28,763	
	STIP-II: Contractor Assistance	157,461			
AMC1	State Caucus Staff Support (WESTAR)		227,400	144,474	117,000
AMC2	AK Tribal Outreach Coordinator	50,000			65,000
AMC3	Health+Env. Assessment of Haze-Related Improvements				45,000
AMC4	Traditional Tribal Practices and Regional Haze				55,000
AMC5	308 Template				30,000
<b>Communications Committee</b>					
	Outreach Assistance (Pat Murdo)		30,827	1,786	
	Victor Wouters		1,559	1,559	
	Retool Web Site (Cobalt)		28,263	22,269	
	Public Outreach and Communication on WRAP Issues	50,550			
CC1	Web Site Maintenance (B. Bissey)		40,718	10,119	32,500
CC2	Continue and Expand Publications				8,500
CC3	Update Presentation Material to Tell the WRAP Story				8,000
CC4	Expand Speakers' Bureau				12,000
CC5	Support Forums in Conducting Public Meetings				10,000
CC6	Other Outreach Efforts to Reach Wider Audience				8,000
<b>Subtotal for Contractor Assistance</b>		<b>2,512,947</b>	<b>3,907,489</b>	<b>2,276,992</b>	<b>3,689,735</b>
	<b>Travel and Project Management</b>	<b>7/01-12/03 Budget</b>		<b>Expenses to Date</b>	<b>2004 Budget</b>
	Travel Reimbursed by WGA	400,185		271,835	139,749
	Conference Calls	89,419		55,107	23,291
	Meeting Expenses	135,716		95,168	55,216
	Other Expenses	38,879		22,337	11,180
	WGA Salaries and Benefits	739,522		467,178	289,789
	WGA Overhead	458,043		269,028	163,040
	NTEC (including \$75,000 for economic analysis)				403,000
	Subtotal for Travel and Project Management	1,861,764		1,180,651	1,085,265
	Subtotal for Contractor Assistance	6,420,436		2,276,992	3,689,735
	<b>Grant Total</b>	<b>8,282,200</b>		<b>3,457,643</b>	<b>4,775,000</b>
		<b>FY 2001 STAG Grant – \$3,962,200</b>			
		<b>FY 2002 STAG Grant – \$4,320,000</b>			
		<b>Total = \$8,282,200</b>			



Project Code	Project Title	Strategic Plan	Relation to Other Forums																
			IOC	SS	FF	PP	MS	IN	EA	MF	TOC	EF	TW	DF	AMR	309	AMC	CC	
	<b>Tribal Data Development Work Group</b>																		
TW1	Emissions Data Development support (ITEP/NAU continuation)	1C, 3A, 3B													X	X			
TW2	Monitoring Data Analysis (separate addition to Causes of Haze)	4C														X			
TW3	Tribal Regional Haze TSD Guidance/Template Development	1C, 2B, 3A, 3B	X																X
TW4	Program Enhancement	3B																	X
	<b>Dust Emissions Joint Forum</b>																		
DF1	Literature Review - Definitions (e.g., natural/manmade) and Emission Tools	1A, 3A	X													X			
DF2	Agricultural Dust - Summary of Existing 2002 Inventories and Control Programs	1A, 6B																	X
DF3	Construction Dust - Summary of Existing 2002 Inventories and Control Programs	1A, 6B														X			X
DF4	Road Dust - Summary of Existing 2002 Inventories and Control Programs	1A, 6B					X									X			X
	<b>Ambient Monitoring and Reporting Forum</b>																		
AMR1	IEWS Data Base 2004 Operations (CSU) - CENRAP in current grant	3A, 4B																	
AMR2	Causes of Haze Report (DR)	3B, 4C	X													X			
AMR3	Natural Haze Levels Analysis (from OACFS, national project) \$7.5,000	3A, 4B	X													X			X
309a	Annex Implementation																		
309b	309 Follow-Up	9A																	
	<b>Air Managers Committee</b>																		
AMC1	State Caucus Staff Support (WESTAR)	7A																	X
AMC2	AK Tribal Outreach Coordinator	7A																X	
AMC3	Health and Environmental Assessment of Haze-Related Improvements	2C, 4C, 6C	X																
AMC4	Traditional Tribal Practices and Regional Haze	6C																	X
AMC5	308 Template	7A																	
AMC6	TIP/FTP Framework	8A, 8B																	
	<b>Communications Committee</b>																		
CC1	Web Site Maintenance (B. Bissey)	7A																	
CC2	Continue and Expand Publications	7A																	
CC3	Update Presentation Material to Tell the WRAP Story	7A																	
CC4	Expand Speakers' Bureau	7A																	
CC5	Support Forums in Conducting Public Meetings	7A																	
CC6	Other Outreach Efforts to Reach Wider Audience	7A																	

Figure 1. Strategic Plan Timeline.



	2003				2004				2005				2006				2007			
	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
<b>Tribal-Only Activities</b>																				
8. Refine Framework for Tribal/Federal Implementation on Tribal Lands																				
A. Develop policy to determine when federal implementation is appropriate																				
B. Develop guidance on what elements of a TIP may be "reasonably severable"																				
<b>309 Activities</b>																				
9. Emissions Tracking																				
A. SO2 emissions for comparison to milestones																				
B. Fire emissions																				
C. Clean air corridor and mobile source emissions																				
10. Renewable Energy and Energy Efficiency																				
A. Report on programs and progress																				
B. Provide technical assistance for SIPs/TIPs (continuous)																				
C. Facilitate 10/20 goals through regional credit market development (continuous)																				
11. Compliance with all 308 requirements (except SO2 BART) for areas outside the Colorado Plateau																				

Figure 2. WRAP Region Members, and Federal Areas Covered by the Regional Haze Rule.

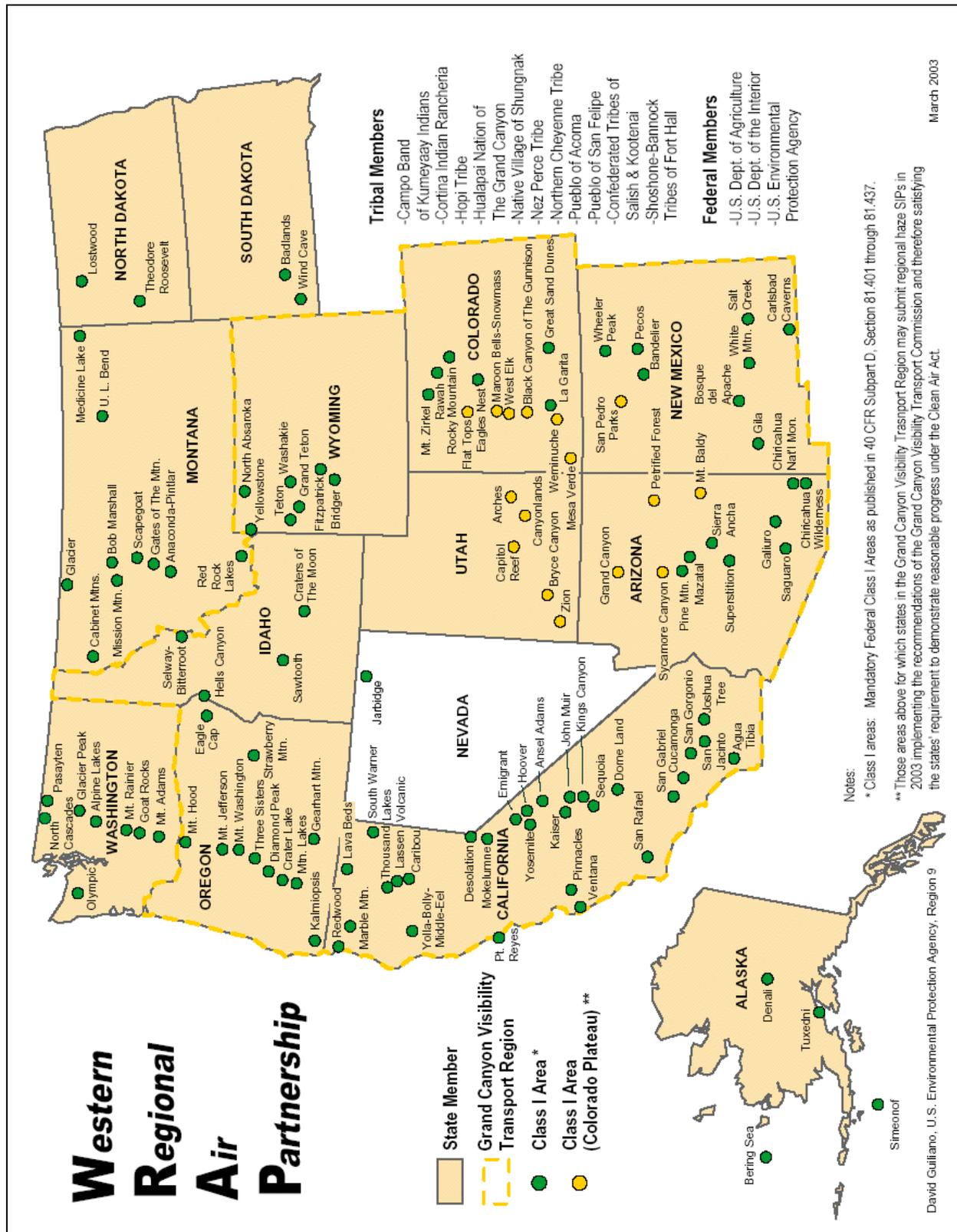


Figure 3. Map of Tribal Lands and Tribal Class I Areas in the WRAP Region.

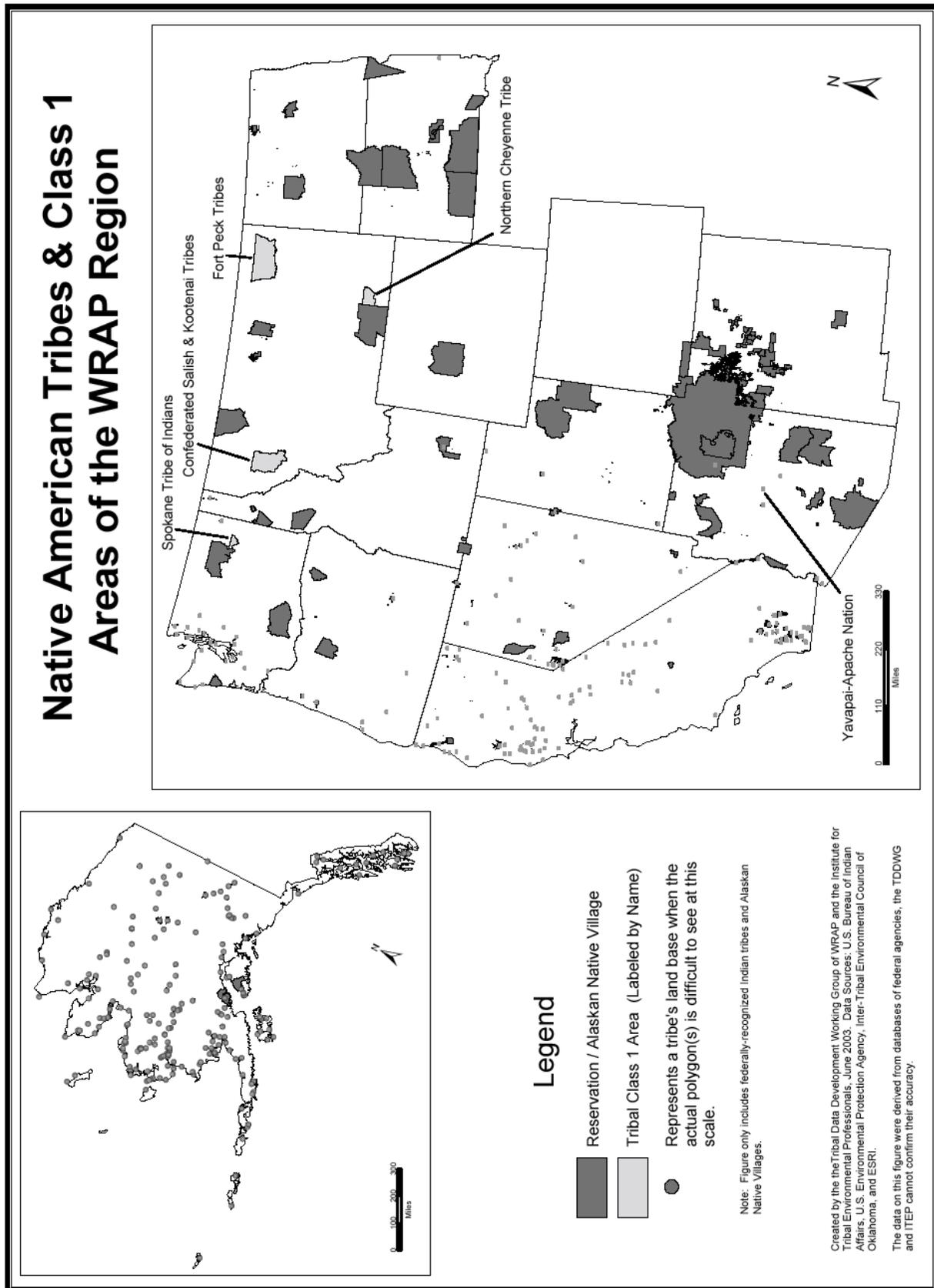
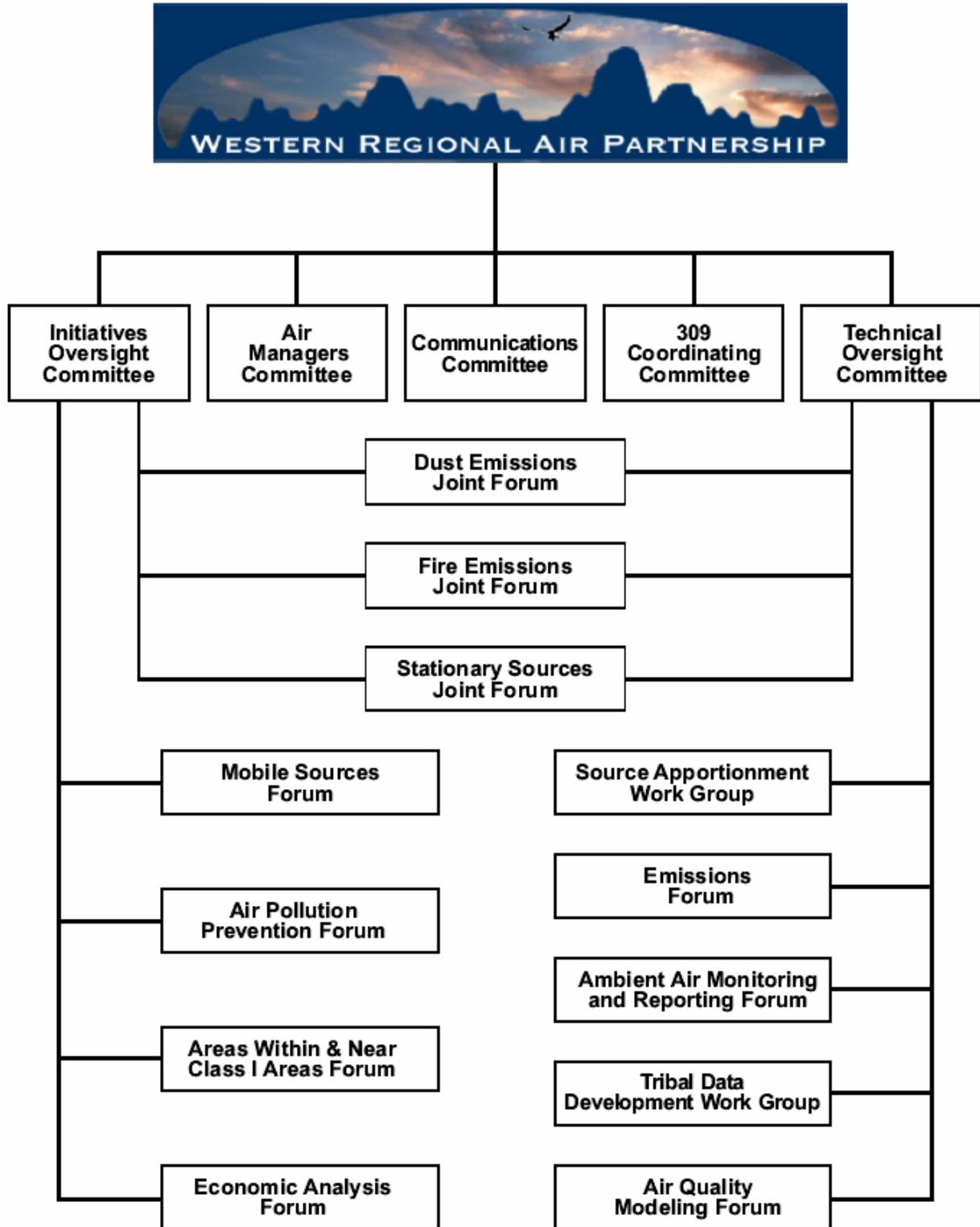


Figure 4. WRAP Organizational Chart (updated).



## **I. Background**

The 1990 Amendments to the Clean Air Act established the GCVTC, which in June of 1996 completed its original mission to recommend strategies for improving visibility in the Grand Canyon and other Class I areas on the Colorado Plateau. Recognizing the need for a process to monitor and coordinate the implementation of its final recommendations, the GCVTC members created the WRAP. The WRAP includes participants from industry, environmental groups, and other affected parties and operates in conjunction with regional organizations such as WESTAR, the Western Governors' Association, and the National Tribal Environmental Council. The work products of the WRAP are used by states and tribes in the preparation of their individual implementation plans to meet the requirements of the federal regional haze rule promulgated by the U.S. Environmental Protection Agency (EPA) in 1999.

While the initial focus of the WRAP was to implement the recommendations of the GCVTC in conjunction with federal visibility rules, the requirements of these rules also highlighted the need to implement other regional planning processes to improve visibility in all western Class I areas. In March 1999, the WRAP expanded its charter to address all regional air quality issues.

Section 308 of the regional haze rule contains a general requirement for states to submit an implementation plan on a schedule dependent on the attainment status of the fine particulate standard and participation in regional planning groups. Section 309 of the rule allows a state that is in the GCVTC transport region to submit an implementation plan conforming to the recommendations of the GCVTC if the state elects to submit the plan by December 31, 2003. Such plans would satisfy the state's obligation for planning for the 16 Class I areas in the jurisdiction of the GCVTC. The states would then be allowed to defer submittal of implementation plans for other Class I areas until December 2008. As described further below, tribes have the option of submitting implementation plans at their discretion and containing reasonably severable provisions they deem most appropriate.

## **II. Tribal Options for Implementation Plan Development**

Under the regulatory framework provided by the Tribal Authority Rule (TAR) (40 CFR 49.1–49.11) and the regional haze rule, tribal implementation of visibility programs through Tribal Implementation Plans (TIPs) is optional. The TAR authorizes but does not require tribes to receive delegation of authority to implement any program, or “reasonably severable elements” of a program, under the Clean Air Act. The preamble to the regional haze rule explains that “a tribal visibility program is not dependent on strategies selected by the State or States in which the tribe is located.” (64 Fed. Reg. 35714, 35756, July 1, 1999) The net result is that any tribe in the GCVTC transport region may apply for implementation of §308 or §309 in whole or in part.

The policy and technical work of the WRAP to assist states will simultaneously be designed to assist tribes in the same way. Tribal concerns are being addressed at every level within the WRAP. Tribal and state implementation plan needs may be different. As these differences are identified, project tasks and work plans will be updated to reflect the improved understanding of tribal needs.

To ensure that tribal needs are addressed, the active participation of tribal representatives on all forums has been and will continue to be sought and encouraged. The National Tribal Environmental Council (NTEC) is responsible for coordinating tribal participation in the WRAP and receives funds from EPA for this purpose. Since some tribes do not have the resources or expertise to participate in the WRAP, NTEC provides tribes with analyses and synopses of issues emanating from the WRAP forums and work groups and from sources outside the WRAP. NTEC also facilitates consensus building within the tribal caucus. The Institute for Tribal Environmental Professionals (ITEP) at Northern Arizona University also provides assistance and staff through the Tribal Data Development Working Group to address a key tribal need – the acquisition of data necessary to make informed policy decisions.

Finally, it should be noted that the WRAP organizational structure provides several checkpoints for tribal input. First and foremost, the WRAP has established equal representation for tribes and states within its management structure, including a tribal Co-Chair of the WRAP. Key positions are also reserved for tribal representatives on all standing committees, forums, and work groups. Public workshops for WRAP work products and travel support from the WRAP ensure that the broader tribal community has an opportunity for input prior to WRAP action.

### **III. WRAP Organization and Structure**

In September 1997 the WRAP was formed with a membership including states and tribes both within and outside of the GCVTC region. The WRAP established oversight committees and forums charged with developing work plans to implement the GCVTC recommendations.

#### **A. Membership**

The WRAP membership currently includes the Governor or his/her designee from 13 states and 11 tribes, two U.S. Cabinet Secretaries and the Administrator of the EPA or their designees:

<u>States</u>	<u>Tribes</u>
Alaska	Campo Band of Kumeyaay Indians
Arizona	Cortina Indian Rancheria
California	Hopi Tribe
Colorado	Hualapai Nation of the Grand Canyon
Idaho	Native Village of Shungnak
Montana	Nez Perce Tribe
New Mexico	Northern Cheyenne Tribe
North Dakota	Pueblo of Acoma
Oregon	Pueblo of San Felipe
South Dakota	Confederated Tribes of Salish and Kootenai
Utah	Shoshone-Bannock Tribes of Fort Hall
Washington	
Wyoming	
	<u>Federal Agencies</u>
	Department of the Interior
	Department of Agriculture
	Environmental Protection Agency

## **B. Charter and Bylaws**

The WRAP Charter and Bylaws set forth the basic operating goals, principles, and operating procedures and are posted on the WRAP website at <http://www.wrapair.org/about/index.html>.

## **C. WRAP Organization**

The WRAP is composed of several forums, committees, and work groups. These suborganizations and their relationships are shown in the organization chart in the Executive Summary. All the suborganizations include participation from the WRAP membership (states, tribes, and federal agencies) and interested stakeholders (industry, environmental groups, local governments, academia, etc.). Guidelines for forum procedures (creation, membership, processes, etc.) are posted on the WRAP Web site at <http://www.wrapair.org/about/forumguide.htm>.

## **D. Initiatives Oversight Committee (IOC) and Technical Oversight Committee (TOC)**

The IOC provides general oversight for the coordination and development of air quality strategies necessary to promote the implementation of federal visibility rules. The TOC provides general oversight of the technical activities of the WRAP. IOC and TOC members are appointed by the WRAP Board, which strives to manage a balance among tribes, states, federal agencies, the environmental community, and the industrial community. In turn, the IOC and TOC establish forums and work groups and appoint their co-chairs to conduct the specific work of the WRAP.

Presently, there are 11 forums and work groups. The IOC oversees the Air Pollution Prevention Forum, Economic Analysis Forum, Mobile Sources Forum, and Sources In and Near Class I Areas Forum. The TOC oversees the Emissions Forum, Air Quality Modeling Forum, Ambient Monitoring and Reporting Forum, and Tribal Data Development Work Group. The Fire Emissions Joint Forum, Dust Emissions Joint Forum, and Stationary Sources Joint Forum are overseen by both the IOC and the TOC, as they address both technical and policy issues.

## **E. Communications Committee**

The Communications Committee addresses communication among the members and groups of the WRAP as well as outreach and education of the public and interested groups on air quality issues.

## **F. Stakeholder Involvement**

The WRAP includes participation from industry, environmental groups, and other affected parties. The following categories of representatives are regularly considered for membership in committees, forums, and work groups:

- Industry
- Mobile Sources
- Tribal Governments
- Local Governments
- General Public
- Small Business (including “green industry”)
- Federal Government
- State Governments
- Academia
- Environmental Groups

Committee and forum members are expected to represent and communicate with their agencies and constituents. Forum and committee members are responsible for establishing mechanisms that will ensure this communication occurs. These mechanisms may involve working through trade groups, state and tribal organizations such as the Western States Air Resource Council (WESTAR Council), the National Tribal Environmental Council (NTEC), and intra- and inter-agency forums.

#### **IV. Project Management**

##### **A. Setting Priorities**

The WRAP members establish the strategic direction of the organization, setting overall priorities for action. Once the WRAP agrees on a direction, issues are further developed and priorities refined by the following process:

- The WRAP identifies issues and requests that one or more oversight committees address them, or asks that the oversight committees develop issues and work plans for review by the WRAP.
- Oversight committees examine the management and technical issues associated with the strategic direction and identify the major deliverables, skills required, and stakeholders most affected.
- Based on this examination, oversight committees may refer issues to existing forums or work groups or create forums and work groups to generate the deliverables. Oversight committees appoint co-chairs of forums and work groups and work with the co-chairs to develop a written charge, including objectives, expectations, and time frames for deliverables.
- Co-chairs of forums and work groups appoint members, taking into consideration stakeholder balance and the charge from the oversight committee(s).
- Each forum and work group is responsible for developing a detailed work plan to meet the work product and process guidance from its oversight committee(s) and they should issue bi-monthly reports to their oversight committee(s).
- Oversight committees review and approve detailed work plans to ensure that all WRAP time lines and process needs are addressed.

- Depending on the nature of the process, each forum and work group works with its oversight committee(s) to resolve deadline or budgetary conflicts that may arise in the plan development process.

## **B. Reconciling Conflicts**

If an issue arises on which a forum or work group can not reach consensus, the issue is referred to the oversight committee(s). If the oversight committee(s) can reach consensus on the issue, that decision is referred to the forum or work group for integration with the forum or work group's decisions on other issues. If the oversight committee(s) can not reach consensus, the issue may be referred to the WRAP Board for resolution, or it may be referred back to the forum for further debate. When conflicts over priorities and budgets can not be resolved by the individual forum, work group or committee, the issue may be referred to the WRAP Board.

## **C. Outreach and Peer Review**

The WRAP Communications Manual sets forth the process for reviewing work products and policy decisions. At each stage of review, relevant material will be posted on the WRAP Web site and comments will be solicited.

Work products must be presented to the appropriate oversight committees before being presented to the WRAP. The oversight committees may provide feedback to the forums or work groups; the forum or work group has the responsibility to decide whether or not to make changes. Changes the forums or work groups make to work products should be communicated to the oversight committees so recommendations from these groups to the WRAP can be fully informed.

Major work products are subject to public review through workshops and formal public comment periods. The forums and work groups are responsible for acknowledging public and peer reviewer feedback in the final presentation to the WRAP.

## **D. State and Tribal Coordination**

In addition to the extensive and ongoing communication and coordination that occurs directly between WRAP participants, the WRAP will work with the Western States Air Resources Council (WESTAR) and the National Tribal Environmental Council (NTEC) as important coordination points to ensure that state and tribal regional haze needs are clearly identified and addressed by the WRAP.

## **E. Administration and Staffing**

Members of committees and forums perform much of the work of the WRAP. The oversight committees monitor forum and work group activities to ensure that work products are developed in a timely manner and that stakeholder participation remains representative, balanced, and fair. Contractors hired with EPA grant funds are relied upon to expand the resources of the WRAP. Committees and forums direct the work of contractors.

Support services to the line functions of the WRAP come from the Communications Committee, the National Tribal Environmental Council (NTEC) and the Western Governors' Association (WGA). The Communications Committee has developed a Communications Manual for the WRAP's internal and external communications and assists committees and forums with outreach strategies for specific products and activities.

WGA and NTEC staff provide overall project management for the WRAP. WGA provides much of the basic logistical support for the WRAP by preparing and managing grant applications, funds, requests for proposals (RFPs), contracts, travel reimbursements, meetings, conference calls, public and media inquiries, press releases, Web sites, requests to participate in the WRAP, and report publications. Staff assistance includes providing a "sounding board" for stakeholders having concerns with the WRAP processes and relating concerns to forum co-chairs, oversight committees, committee co-chairs, facilitators, and the WRAP co-chairs.

During the period covered by the grant, WGA staff will be performing these activities. Additionally, WGA and NTEC staff routinely attend the meetings of the various committees and forums. WGA and NTEC jointly or separately perform tasks related to WRAP and serve as primary contact points by responding to media and public inquiries.

Under a separate EPA grant, NTEC assists tribal participation in the WRAP by arranging, facilitating, and providing reimbursement for tribal caucus meetings; providing coordination among tribal representatives of various forums; performing legal and policy analyses on WRAP issues; and securing contractor assistance for additional technical and policy analysis. This includes providing staff support to the tribal caucus within the WRAP.

This work plan identifies six staff support positions. The first two are the WRAP co-project managers. The co-project managers oversee other staff, share general management responsibilities, work with stakeholders to ensure the WRAP's processes are fair and equitable, and serve as the primary points of contact for EPA, the media, and the general public. Funding for one of the co-project managers is under the WGA line item, while funding for the other is under the NTEC line item. The third staff support position assists the state caucus of the Air Managers Committee. Funds for this position are identified in the Air Managers Committee budget and provided to the Western States Air Resources Council for management and oversight. The fourth position assists the tribal caucus of the Air Managers Committee. Funds for this position are identified in the NTEC line item. The fifth position assists the Technical Oversight Committee and its associated forums. And the sixth assists the Initiatives Oversight Committee and its associated forums. These two positions are identified in the WGA line item.

Other staff support will be sought as needed. Options include (1) contracting with a WRAP state or tribe to dedicate staff support for a defined period of time; (2) hiring temporary staff at WGA, NTEC, or WESTAR; and/or (3) entering into an agreement with an independent contractor to provide the needed staff support.

## **F. Contract Management**

WGA and forums jointly manage WRAP contracts. WGA, as the receiver of WRAP grants, retains the legal responsibility for signing and administering contracts and ensuring that work products are completed. These responsibilities are met with input from forums and work groups. Forums and work groups may create balanced subgroups for purposes of contract management.

It is the responsibility of the forums and work groups and their respective oversight committees to develop the scope of work for each contract. All contracts are to be developed in accordance with the work plans approved by the WRAP and submitted to the EPA. Once the scope of work has been properly developed, it is transmitted to WGA. WGA is responsible for developing an RFP or sole source justification. All RFPs are published in the Federal Business Opportunities publication, sent to appropriate contractors known to the WRAP, and posted on the WRAP Web site. Unless time is otherwise a constraint, bidders are provided 30 days to respond.

A review committee is established for the evaluation of RFPs. The review committee is responsible for scoring each RFP. Scoring is documented and retained by WGA to substantiate any selection. Once the committee has agreed upon selection of a potential contractor, a memorandum is transmitted to the WGA Executive Director along with any necessary supporting materials. The Executive Director makes the final contractor selection. The winning contractor and all losing bidders are notified in writing of Executive Director's decision.

Subsequent to contractor selection, WGA staff and the appropriate forum, work group, or committee negotiates a final contract with the winning bidder. All contracting is done in accordance with established federal guidelines. The standard contract form includes provisions for record keeping and audit requirements in accordance with OMB Circular 110.

It is the responsibility of the forum, work group, or committee to monitor the work of the contractor and to determine whether all work requirements are being met. When a bill is received, WGA will examine the invoice to match invoice items to requirements outlined in the contract. WGA requires documentation from the contractor regarding hours spent and expenses incurred. WGA also requires copies of any deliverables prior to rendering payment. If there is any question regarding whether the contractor has met the requirements in the scope of work, it is negotiated between the contractor, WGA, and the appropriate co-chairs. Once it has been agreed that all work has been completed in accordance with the requirements of the contract, payment is rendered by WGA.

WGA is responsible for maintaining all records and does so in accordance with all federal requirements. This includes submittal of quarterly status reports to EPA. As noted in the previous section, NTEC lets contracts for work done in support of tribal participation. These contracts are funded by a grant separate from the general WRAP grant, and are subject to the requirements of the single audit act and related compliance supplements.

## V. Regional Haze Work Plan

### Initiatives Oversight Committee

- IO1 Reasonable Progress Criteria – The regional haze rule requires states, when establishing reasonable progress goals, to consider the following statutory factors: the cost of compliance, the time necessary for compliance, the energy and nonair quality environmental impacts of compliance, and the remaining useful life of any potentially affected source. Furthermore, states must include a demonstration in their SIPs showing how these factors were taken into consideration in selecting each goal. The purpose of this task is to explore these factors (e.g., how they have been used or interpreted in other environmental programs) and to provide further definition and guidance with respect to using them in a regional haze SIP demonstration.
- IO2 Process for Identifying Control Strategies – The WRAP strategic plan identifies a “navigational challenge” identifying and selecting emission control strategies among the large number of those potentially available. It also provides some general ideas on how to “narrow the field.” The purpose of this task is to develop a process by which the most effective control strategies will be identified and refined.

### Stationary Sources Joint Forum

This is a new forum which is replacing the Market Trading Forum (MTF). It will focus more broadly on stationary source issues throughout the WRAP and their relationship to Section 308 SIP requirements. Several members from the MTF may participate on the SSJF, but several new members are likely and appropriate given the change in scope.

- SS1 Identification of BART-Eligible Sources – This identification is required for all visibility-impairing pollutants (SO<sub>2</sub>, NO<sub>x</sub>, PM, VOC, and NH<sub>3</sub>) and regardless of whether or not an emissions trading program or other alternative measure is implemented in lieu of the best available retrofit technology (BART). Several WRAP states have requested assistance to either identify BART-eligible sources, cross-check their procedures with those in other states, and/or coordinate identification across the region to meet the timing and other requirements specified in the regional haze rule and WRAP strategic plan. The Forum will hire a contractor to provide direct assistance to some states identifying BART-eligible sources, to consult with other states and tribes to ensure as much consistency as possible, and to develop and maintain a regional database of such information.
- SS2 Preliminary Determination of Sources Subject to BART – In its 1999 regional haze rule, the EPA said states should find that a BART-eligible source is reasonably anticipated to cause or contribute to regional haze, and therefore be subject to BART, if it can be shown that the source emits pollutants within a geographic area from which pollutants can be emitted and transported downwind to a Class I area. The U.S. Court of Appeals rejected this approach, saying it impermissibly constrains state authority – i.e., by forcing a state

to apply BART without any empirical evidence of the source's contribution. In April 2004, the EPA is expected to propose an alternative means by which states would determine which sources are subject to BART. The Forum will make a preliminary determination of sources subject to BART based on this proposal. The determination would be finalized sometime after April 2005, when the EPA is expected to finalize the rule. Waiting until April 2005 to initiate any of this work would not be prudent given the time needed to develop an alternative program to BART under 308(e)(2) and the possibility that the final rule may not change substantially from the proposed rule. Determination of BART and/or its equivalent regional emission reductions is planned for 2005, but could be initiated sooner if necessary by using the preliminary list of sources subject to BART and making adjustments after the rule is finalized.

- SS3 Addressing Changes to the BART Provisions of the Regional Haze Rule – This task will include discussions with the EPA about the approaches it is considering in response to the U.S. Court of Appeals decision. It will also include developing formal comments on the EPA's proposal.  
(No funding requested.)

### **Fire Emissions Joint Forum**

The FEJF projects identified in the existing 2003 WRAP Workplan, and the proposed FEJF projects for the 2004 WRAP Workplan, fall into three main categories:

- 1) The first category provides analyses of technical and policy information needed for further action on Categorization/Policy topics.
- 2) The second category addresses existing and future Technical Needs, specifically emissions inventory development and related modeling analyses.
- 3) The third category of projects is designed to assist WRAP members with Coordination and Implementation of existing fire policies and programs.

The relationship amongst the 2003 and 2004 FEJF projects, and the remainder of the WRAP Work Plan is also presented schematically below, at the end of the FEJF work plan.

#### Categorization/Policy

- FF1 Wildland Fire Emissions Trade-off Model Review - As fire management programs evolve, and as directed by the GCVTC, the applicability of the Wildland Fire Emissions Trade-off Model will be reviewed for use in applying existing and future WRAP policies and guidance pertaining to smoke management of fire. Recommendations from this assessment have possible linkage to both the Enhanced Smoke Management Program and the Annual Emissions Goal policies.
- FF2 User Guidance and Review of Feasibility Criteria for *Categorizing Fire Emissions* - Further user guidance will be developed to support the existing WRAP *Policy for*

*Categorizing Fire Emissions*, to refine differences between Restoration and Maintenance prescribed burn types, for elements such as vegetative structure, fuel loading, fuel size classes, ecosystem function, and fire resilience. Also, to further understand implications of the feasibility criteria developed by the FEJF, as used in the various fire policies, a needs assessment for further technical and policy guidance will be developed.

- FF3 Guidance On Apportionment of Natural and Anthropogenic Emissions - The Ambient Monitoring & Reporting Forum's Causes of Haze Analysis project, and the Technical Oversight Committee's Attribution of Haze project, will be supported by the FEJF through development of technical approaches to apportioning the impact of fire emissions between natural and anthropogenic source categories.

#### Technical Needs

- FF4 Modeling Assessment of the Impact of Various Fire Emissions Scenarios - Provide support to the Regional Modeling Center to assess the impact of various fire emissions scenarios, using modeling runs conducted by the WRAP RMC.
- FF5 Fire Tracking System Bridge to the WRAP Emissions Data Management System - Implementation of the Fire Tracking System policy includes development of a software bridge for fire activity data into the Emissions Data Management System.
- FF6 Refinement of Existing 2018 Fire Emissions Projections - Existing 2018 fire emissions projections for the contiguous WRAP region for wildfire, prescribed fire, and wildland fire use on wildland, rangeland, and agricultural lands will be refined, while also including Alaska and Hawaii fire emissions. This refinement also includes categorization of natural and anthropogenic fire sources.
- FF7 2002 National Wildfire Emissions Inventory (separate \$100,000 from OAQPS, national project, WRAP has lead RPO responsibility) - The 2002 emissions inventory for wildfire will be developed through an inter-RPO effort funded by EPA, based on a scope of work discussed amongst the RPOs. The FEJF has lead RPO responsibilities for this project.

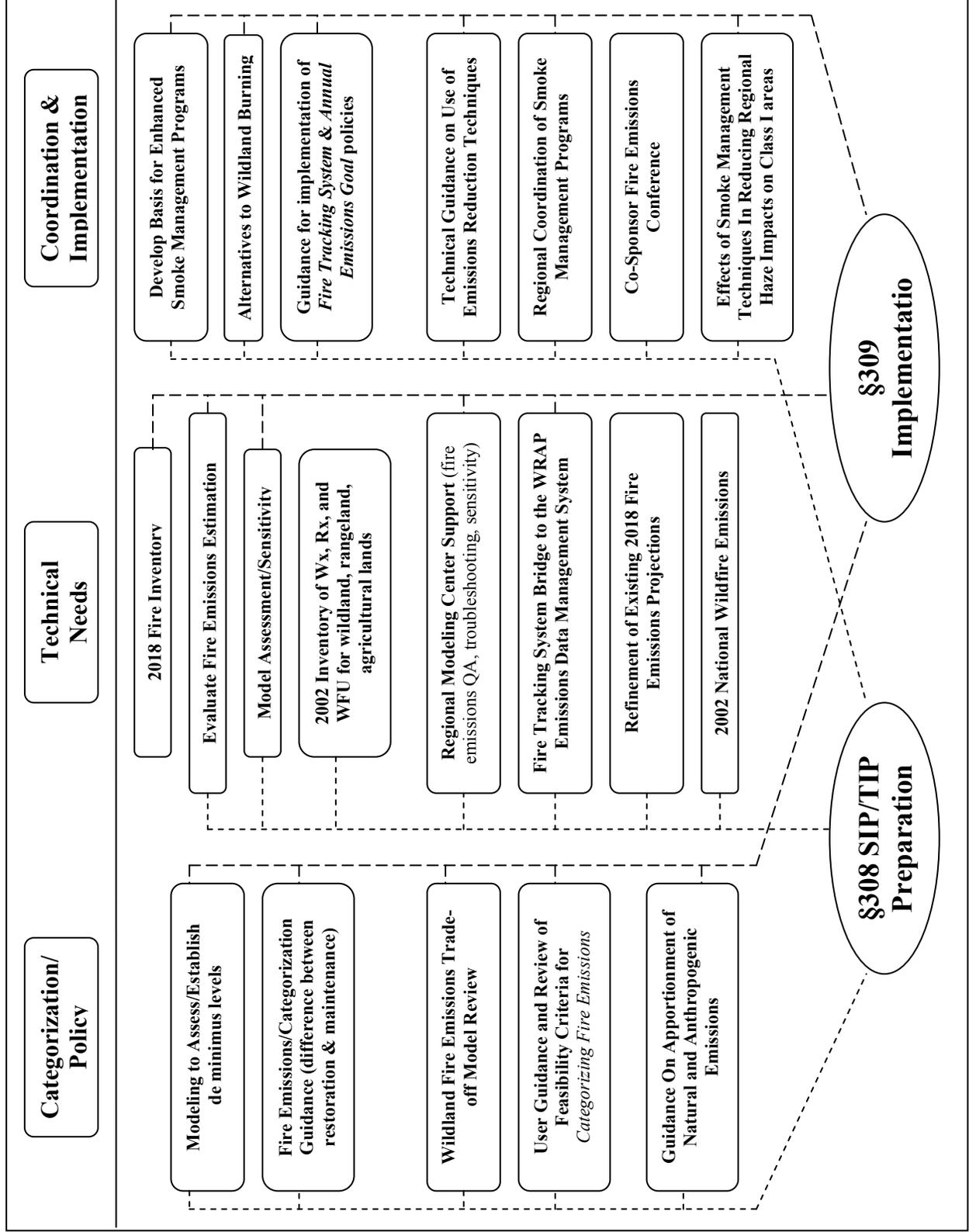
#### Coordination & Implementation

- FF8 Technical Guidance on Use of Emissions Reduction Techniques – This project was funded and started in 2003, and requires additional funding to complete in 2004. The project report directly supports Annual Emissions Goal reporting requirement in §309.
- FF9 Regional Coordination of Smoke Management Programs - Options for implementing regional coordination of wildland and agricultural prescribed fire smoke management programs, information sharing, and public notification will be developed, and then presented and reviewed at a facilitated conference, to be held in 2004.
- FF10 Co-Sponsor Fire Emissions Conference – As fire emissions are particularly important to understand for regional haze planning in the WRAP region, the FEJF has identified the

need to host a fire technical conference to include national fire emissions experts in 2004. Conference topics include, but are not limited to: 1) Methods to assess plume rise characteristics; 2) Technical assessment of fire parameters used for regional modeling; 3) Methods to assess and track emission reduction techniques; 4) Use of technical tools to assist in tracking burning activity for emission inventory purposes, including remote sensing; 5) Treatment of fire sources in regional modeling (expectations versus reality); and 6) Fire emissions structure for SMOKE processor. Initial discussions with EPA and national fire experts via EPA-facilitated conference calls are being conducted in 2003 to refine the topics and prepare material for the conference.

- FF11 Effects of Smoke Management Techniques In Reducing Regional Haze Impacts on Class I Areas - As smoke management techniques are used across the WRAP region, and are useful and economic methods for reducing smoke impacts on Class I areas, an analysis of these techniques and their benefits in reducing haze will be conducted.

**Fire Emissions Joint Forum Work Plan Activities**



## Air Pollution Prevention Forum

The AP2 Forum's work plan is based largely on the renewable energy and energy efficiency policy adopted by the WRAP Board<sup>3</sup> and on its subsequent management directive to the IOC and AP2 Forum.<sup>4</sup> Specifically, the management directive states:

- Forward the recommendations and reports of the Air Pollution Prevention Forum to states and tribes for their consideration and use in the development of State/Tribal Implementation Plans for regional haze;
- Provide states and tribes who follow the 309 path with technical assistance (including data, information, analytical tools) and policy assistance (including model legislation, rules, and policies) needed to incorporate the renewable energy and energy efficiency recommendations of the AP2 Forum into the Pollution Prevention section of their regional haze SIPs and TIPS;
- Monitor the Transport Region's progress towards achieving the GCVTC 10/20 renewable energy goal and implementation of the renewable energy and energy efficiency recommendations of the AP2 Forum; and
- Assist the efforts of Western states and tribes to establish a single institution in the WRAP region that will register, certify, issue, track, and oversee trading of renewable energy certificates in the West.

PP1 Technical Assistance – This task will allow the continuation of technical assistance (including data, information, evaluation of analytical tools) and policy assistance (including model legislation, rules, and policies) needed by states, tribes, and air quality agencies to incorporate the renewable energy and energy efficiency recommendations of the AP2 Forum into the Pollution Prevention section of regional haze SIPs and TIPS. Funding for this task will support state energy offices, tribal authorities, and air agency efforts to compile and develop:

- Renewable energy resource inventories of existing and planned generation capacity; resource assessments of the most cost-effective renewable energy opportunities in a state, and documentation and description of programs relied on to achieve the GCVTC 10/20 goal;
- Program descriptions of existing and planned energy conservation and efficiency programs states will rely on to reduce emissions;
- Methodologies for applying results of the AP2 Forum's regional modeling of energy costs, emissions reductions, and economic impacts of adopting the Forum's renewable energy recommendations and energy efficiency "best practices" at the state

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<sup>3</sup> WRAP Policy: Renewable Energy and Energy Efficiency As Pollution Prevention Strategies For Regional Haze; April 2003; pg. 1-2.

<sup>4</sup> Ibid.; pg 3.

level. This will allow states to comply with section 309(d)(8)(iv) that requires states to develop short and long term projections of emissions reductions, visibility improvements, energy cost savings, and secondary economic benefits associated with the GCVTC renewable energy goals and energy efficiency activities.

- Identify or develop model rules or legislation for renewable energy and energy efficiency policies to ensure consistent treatment between states and tribes within the WRAP region.

PP2 Renewable Energy Tracking and Certificates Project – Under this task, the Forum will work with the Western Governors’ Association to convene a regional meeting of stakeholders to collaboratively develop a “blue print” that will define the critical features needed to:

- Conduct a needs assessment and develop a single set of functional requirements for a certificates-based renewable generation tracking and accounting system in the Western Interconnect;
- Develop a standard set of market design and operating guidelines for trading RECs within the Western Interconnection to support establishment of a single institution in the West responsible for registering, issuing, tracking, and verifying renewable energy certificates; and
- Create of an independent, regional generation tracking system to provide data necessary to substantiate the number of megawatt hours generated from renewable energy sources and to support verification, tracking, and trading of RECs.

PP3 Transmission Reform – Participate in regional proceedings and planning processes to promote policies and rules that eliminate transmission access, pricing, and interconnection barriers to renewable energy resources and support development of renewable energy generation in the region. Tasks include:

- New transmission products under FERC Order 888. Work with interested parties and stakeholders who may be considering developing alternative transmission products beyond firm and non-firm products that would be more favorable to wind power and reflect the intermittent nature of wind resources;
- Interconnection standards and rules that do not discriminate against wind power in these areas. Intervention in WAPA proceedings for setting rules for renewable interconnection. Participation in FERC interconnection rules and standards proceedings; and
- Planning and construction of new transmission. Participate in SSG-WI and sub regional transmission planning processes. Develop renewable scenarios to be included in transmission modeling scenarios that identify the most cost effective generation and transmission additions for the Western Interconnect. Also work with transmission-owning organizations to evaluate how much wind can be integrated into the grid (PacifiCorp IRP/transmission).

PP4 Tracking and Reporting – Pursuant to interest expressed by the IOC and the WRAP, the Forum will maintain activities associated with tracking and reporting of AP2 activities. Funding for this task will support:

- Forum meetings at least two times a year to consider needed changes in the tracking and reporting function and potential advice to the WRAP on how to best enable renewable energy and energy efficiency to contribute to achieving haze and other air quality goals in the West, including NO<sub>x</sub><sup>5</sup>;
- Reports: Support the completion of the AP2 Forum’s final reports for distribution to states and tribes who are considering using renewable energy and energy efficiency measures as pollution prevention strategies in their regional haze SIP filings under either Section 309 or 308;
- Tracking and Monitoring: Monitor and report developments in the region that impact the AP2 recommendations – e.g., federal Renewable Portfolio Standards, carbon constraints, etc. Provide WRAP members up-to-date information on progress being made in implementing the renewable energy and energy efficiency recommendations, and the success of incorporating such measures into SIPs. It would also ensure that the recommendations remain relevant given changing external circumstances; and
- Provide to the WRAP web site updated information on actions that have been taken to implement the AP2 Forum recommendations.

PP5 Displaced Emissions Analysis and Time-Specific Marginal Emissions Rates – The Forum will host a series of meetings with experts to identify renewable energy and energy efficiency data collection and measurement protocols in western states and evaluate available emissions displacement tools that could be used by states to help energy offices and air quality managers develop credible, state-specific estimates of emissions displaced by adopting different renewable energy programs and energy efficiency best practices found in the AP2 reports. The Forum’s analysis, to date, has focused only on regional-scale impacts. Emissions displacement tools similar to those developed by OTAG for NO<sub>x</sub> could help individual states establish reporting, monitoring, evaluation, and modeling protocols that would enable them to meet potentially higher verification standards required by EPA for Section 308 SIPs and other types of SIPs

### **Mobile Sources Forum**

MS1 Continued Support for Nonroad Demonstration Projects – Funds for this task will be used to directly support a demonstration project(s). A portion of the funds may also be used to hire a consultant to advise, coordinate, and evaluate nonroad retrofit projects being funded throughout the region.

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<sup>5</sup> Washington DC regional government body has proposed that wind energy purchases be included as one option to reduce ozone emissions that contribute to smog. The Metropolitan Washington Air Quality Committee decided to include wind energy purchases from the Allegheny region as a contingency measure in the June 2, 2003 draft of its State Implementation Plan for ground-level ozone.

- MS2 Nonroad Retrofit Credits – The MSF will work with the EPA and other stakeholders to implement a program that uses retrofits of existing sources to generate credits for compliance with new engine emission standards under the forthcoming Tier IV nonroad diesel regulations, should it include such a compliance option.
- MS3 Review of EPA Analyses and Proposals – The MSF will review and where appropriate recommend WRAP comments on EPA technical analyses (e.g., for small nonroad diesel engines) and regulatory proposals (e.g., advanced notice of proposed rulemaking for ocean-going vessels and locomotives).

### **Sources In and Near Class I Areas Forum**

- IN1 Update Near Inventory and Displays – The In/Near website will be updated with new features and new maps and data for 2002 (in lieu of 1996). Funding is also needed to compensate for higher-than-expected costs for developing the 1996 in/near inventory in 2003.
- IN2 In/Near Strategies for Reasonable Progress – Since some of the in/near strategies may be voluntary, episodic, seasonal, or of such size that would not be "captured" in a regional-scale air quality model, how could states/tribes take credit for such strategies in their regional haze plans? This analysis may involve legal, technical, and policy issues, and should be done in close consultation with the IOC.

### **Economic Analysis Forum**

- EA1 Framework Application Test – The forum, in consultation with the IOC, will select one or more potential or historical emission control strategies as a basis for a realistic “application test” of its recently completed economic analysis framework. The test will include assessment of impacts on a cross section of tribes.
- EA2 Development of Baseline Economic Data – Baseline economic and demographic data (2002 and 2018) are needed by the Forum to assess economic impacts of proposed strategies. A particular challenge will be the collection of tribal baseline data. This portion of the effort must be coordinated with the Tribal Data Development Work Group, and the overall effort must be coordinated with the Emissions Forum since its emissions baseline should be predicated on the same economic and demographic data as used in the economic assessments.
- EA3 Enhancement of Cost and Benefit Unit Values – The net benefit calculated for an air pollution policy will depend heavily on the cost unit values (e.g., \$/ton) and the benefit unit values (e.g., \$/deciview). These values are often available from only a limited number of studies, partly because of the expense of conducting such research. Under this task, the Forum will seek partners to support an effort at improving its cost and benefit unit values, especially with respect to visibility benefits. Any revised unit values will be

incorporated into the economic analysis framework.

- EA4 Screening Tool – The economic analysis framework discussed above involves a relatively comprehensive analysis. It will most likely be applied on occasion to assess “packages” of control strategies. As a complement, the Forum will develop a screening tool based on the framework (e.g., a light-weight version of the framework) to be applied more routinely and cost-effectively for assessing and ranking a variety and number of individual potential control strategies.
- EA5 Coordination and Outreach – An ongoing and inherent task of the Forum will be the coordination with other forums. As noted above, the Emissions Forum and Economic Analysis Forum should co-develop and share a common set of economic and demographic baseline data. In addition, the Economic Analysis Forum will need air quality model outputs from the Air Quality Modeling Forum and it should use GIS data in concert with the Areas Within and Near Class I Areas Forum. A critical area of coordination will be with tribal issues (e.g., baseline data, distributional impacts, and alternative values). The EAF may also be asked to help the IOC compile and rank available control strategies. Finally, Outreach to other WRAP forums and stakeholders (including the public) is important to ensure proper use and understanding of economic principles and analytical results, especially since formal, comprehensive (e.g., both costs and benefits) economic analysis is not typically a part of WRAP member activities. To improve coordination and outreach, the Forum will host a one-day workshop which will include results from Tasks 1 and 4 above.

### Air Quality Modeling Forum

The Air Quality Modeling Forum has two major areas of activity planned for 2004. The Regional Modeling Center will continue operation, to implement many of the tools and improvements developed in 2003, and using the same team of contractors. A list of tasks is provided below, with a final RMC workplan to be prepared by December 2003 for calendar year 2004. The final workplan will be amended into the existing RMC contract. The second major area of activity is to initiate modeling for Class I areas in Alaska. The Alaska modeling work in 2004 will build upon the results of the meteorological modeling project slated to begin in 2003. Also, the RMC will plan to conduct some fire emissions sensitivity analyses funded by the Fire Emissions Joint Forum.

- MF1 Regional Modeling Center (continue in 2004) – The RMC has completed \$309 modeling for regional haze plans due December 2003, is implementing improvements to existing modeling tools, and is developing and testing new analysis tools. Based on work to be completed in 2003, example projects under consideration for the 2004 RMC workplan include:
- Preparation and reporting of geographic source apportionment results based on modeling the “Interim 2002” emissions inventory;
  - Further analysis of model performance in regard to the contribution of natural emissions to visibility impairment;

- Further improvement of WRAP region chemical speciation and temporal allocation profiles for point and area sources;
- Development of a Quality Assurance Project Plan for RMC activities;
- Testing and improvement of the windblown dust emissions modeling methodology;
- Sensitivity modeling runs for aircraft cruising emissions from aircraft;
- Further improvement of source apportionment techniques in the emissions and air quality models;
- Further improvement of QA/QC functions in the emissions and air quality modeling computer codes; and
- Integration of global-scale estimates of model domain boundary conditions into WRAP modeling analyses.

MF2 Alaska Modeling – Based on the results of a 2003 project evaluating the performance of modeled estimates of meteorological parameters, for a region thought to affect 3 of the 4 Alaskan Class I areas, air quality modeling to estimate the impact of various source categories will be completed in 2004.

MF3 Fire Emissions Sensitivity Modeling (funded by FEJF) – This project is described, and the associated funding needs are identified, in the Fire Emissions Joint Forum 2004 budget request. No funds are requested by the Air Quality Modeling Forum for this project.

### **Tech-Wide Projects (TOC)**

The Technical Oversight Committee (TOC) has completed the preparation of the §309 Technical Support Document in 2003, and plans to begin providing technical analyses in 2004, to support the activities described WRAP Strategic Plan. To begin providing information for the multi-year process outlined in the Strategic Plan, the TOC requests funding in 2004 to complete an Attribution of Haze analysis for all Class I areas in the WRAP region. This project will be the first step in a process that will be complemented by 2005 analysis activities of both the Initiatives Oversight Committee (IOC) and the TOC. Then, during late 2005 and the first half of 2006, significant collaborative analyses and discussions among the TOC, IOC, the Air Managers Committee, all Forums, and the WRAP Board are anticipated to occur, to result in consensus on needed emissions reductions by source sector, to achieve reasonable progress toward the national visibility goal for the planning period to end in 2018.

TOC1 Attribution of Haze - This project envisions a team of cross-disciplinary group of experts, from both within and exterior to the WRAP organization, integrating and synthesizing three major types of information – monitoring, modeling, emissions inventory – to describe the extent of the geographic and source type contributions to visibility impairment at each Class I area in the WRAP region. The project, directed by a TOC-lead workgroup, would accomplish the following:

Identify the:

- geographic source areas of emissions that contribute to impairment at each mandatory federal Class I area (also including existing and potential tribal Class I areas);
- mass and species distributions of emissions by source categories within each contributing geographic source area; and
- amount of natural and manmade emissions affecting each Class I area.

Integrate and synthesize the above data into clear explanations of the estimated causes of impairment for each Class I area, including:

- Document the assumptions, methods, and uncertainties used in the integrated analyses of modeling, monitoring, and emissions data; and
- Provide succinct, clear summaries suitable for policy makers, of the estimated areas and sources of impairment for each Class I area, including the extent of uncertainty about the estimates.

The TOC requests funding for contractor support to execute this project. It is anticipated that the contractor will need to:

- Attend initial Workgroup meetings and distill members' opinions and results of discussions into a schedule and methodology to accomplish the tasks outlined above;
- Possibly subcontract with independent experts for analytical work;
- Gather and format the resulting information and data from WRAP Forums, independent experts, and other related air quality analyses, all for review by the Workgroup;
- Draft a "Attribution of Haze Report" for review and comment by the Workgroup; and
- Complete and publish a "Final Attribution of Haze Report".

The need for this type of analytical approach is well-articulated in the NARSTO PM Science Assessment for Policy Makers (Primary Recommendation #6):

*"Develop a more systematic approach for integrating knowledge gained from measurements, receptor models, and chemical transport models to make optimal PM management decisions.*

*Rationale. The policy maker is faced with an increasingly complex array of information to use in managing PM. Informed judgment is required to know how best to use this information, which may arise from methods with which the policy maker has no direct personal experience and which may even appear to be contradictory. Systematic approaches for integrating diverse information from measurement networks, receptor models, and chemical transport models would help to ensure that optimal use is made of existing knowledge when establishing PM management strategies. These approaches must account for inherent uncertainties in each type of information."*

## Emissions Forum

The ongoing objective of the Emissions Forum is to provide the WRAP with all emissions data and support information necessary to analyze the need for emissions reductions, develop implementation plans, and enable adoption of regulatory programs for the applicable provisions of the federal Regional Haze Rule. This includes compiling emission inventories for mobile, point, and area source emission sectors, for the WRAP region and adjacent areas of Canada and Mexico. The Emissions Forum will also collect emission inventory data from other WRAP forums and combine them, in order to provide a complete inventory of all emissions of visibility-impairing pollutants within the WRAP region. The Emissions Forum will work closely with the Tribal Data Development Workgroup to assure compatibility of information coming from tribal data sources, and to minimize duplication of effort between these similar efforts.

A major focus of the 2004 work plan is to carry out emission inventory projects consistent with the WRAP Strategic Plan, starting with the development of a website-hosted, Emissions Data Management System (EDMS). Also, a Phase I Interim Emission Inventory for 2002 will be prepared to facilitate geographic source apportionment and attribution of haze analyses. The Emissions Forum will also compile or estimate emission inventory information annually, to facilitate tracking of various emission-related regulatory commitments under the Regional Haze Rule. Projects outlined below will describe the efforts needed to carry out these activities.

EF1 Emission Data Management System (Development/User Access/Training/QA/Home) – To be constructed and on-line by late 2004, the EDMS will undergo thorough testing prior to use. The EDMS is to be housed in a location to be determined, and operated by a Data Base Administrator (DBA) with the assistance of an Analyst. The DBA and Analyst will provide specified quality assurance checks of input and output, coordinate with users to ensure data accuracy and consistency, assist with training and protocol development, prepare scheduled and unscheduled reports and data queries, ensure security, and provide estimates of emissions for non-reporting years. The EDMS hardware and server will be internet-capable to allow inputs and outputs by users. User training will be provided for states, local agencies, and tribes. A user manual and protocol will be developed to enable consistency of input, quality assurance, and missing data procedures. The development plan for the EDMS is based upon a needs assessment project completed in July 2003.

Once the database has been brought completely on-line in late 2004, it will be necessary to have a long-term maintenance agreement with an entity to ensure quality control, assistance to states and tribes and to answer database queries. States and tribes, through a web-based database, are expected to populate the database with inventory updates. The data will be used:

- To allow §309 states to track SO<sub>2</sub> emissions against milestones;
- To allow emissions monitoring in the Clean-Air Corridor;
- To allow §308 and §309 states to measure reasonable progress; and
- To provide input for visibility modeling.

- EF2 Second Phase of Representative Community Emissions Inventories (Phase 1 RFP under development) – Phase I of this project will collect as much local activity and source type data and information as possible, to develop an emission inventory for rural Alaska native villages, to be based on the emissions sources within “representative” communities. The Alaska emission inventory would then be expanded by using data from the representative communities as surrogates for other similar communities. Specifically, the activity information collected within these representative areas could then be used as surrogates for other similar-sized communities as appropriate, or to improve EPA top-down estimates for many source categories. In 2004, once Phase 1 is well underway, Phase 2 of this project will expand to include other rural areas, including tribal lands, within the contiguous WRAP region. For tribal emissions, this project will be coordinated with implementation of the TEISS tool. For small communities in the more rural portions of the contiguous WRAP region, additional communities that might benefit include those on tribal lands, as well as “In-and-Near” communities adjoining Class I areas.
- EF3 Update Non-Road Emissions Projections to Reflect Proposed Regulations - The existing emissions inventory for non-road mobile sources does not include the recently proposed non-road emissions standards. These new standards will reduce emissions projections already conducted for the years 2008, 2013 and 2018 and, to some extent, 2003. The 2003 emission estimate will be used as a surrogate for the 2002 base year emissions.
- EF4 EI Improvements for Spatial and Temporal Allocations - SCC profile investigations and updates being performed by the RMC in 2003 may reveal the need to amend profiles for large area source categories and for specific large point sources if it is shown that default profiles contained in SMOKE are inappropriate for these WRAP region sources. For categories identified by RMC, new profiles will be compiled, based on existing source information available for Western sources. This is necessary to properly model visibility impacts, perform source apportionment analyses, and develop effective control strategies. Work on this project in 2003 involves the assessment of the accuracy and appropriateness of SCC profiles currently used in SMOKE. Sources with incorrect SCCs will be corrected. Inappropriate profiles will be identified for replacement in the 2004 phase of this project.
- EF5 Canadian & Mexican Emissions (QA and prepare EI for modeling) - Emissions inventories from Canada (1999) and Mexico (1999) will be available soon. These data will require quality assurance review and preparation for the emissions processor in order to be incorporated as surrogate 2002 emissions inventories. In addition, if possible, growth factors will be applied to grow the emissions to 2002 levels. Other RPOs may have an interest in this work, and cost-sharing opportunities may develop.
- EF6 2002 Base Year Emission Inventory (begin gap fill and QA work) - In order to follow EPA guidance and meet §308 requirements, a complete inventory of 2002 emissions for point, area and mobile sources must be prepared. It will include updates of dust and ammonia emissions as inputs to the modeling process. States are expected to compile and submit these data to the EDMS and NEI beginning in mid-2004, although a final inventory may not be available until mid-2005. The mobile source projections for 2003

will be used to fulfill the needs of a 2002 emissions inventory. Point and area source inputs from states and tribes will require a full evaluation for accuracy, completeness and consistency. Data gaps are expected and must be addressed. These tasks, preparation of model-ready files, and an emission inventory from major SO<sub>2</sub> sources in §309 states must be performed in accordance with Annex requirements, all to be completed in 2004.

- EF7 Alaska Aviation Inventory - With terrain conditions that are often inhospitable to motor vehicle travel, a scarcity of roads, and large distances between communities, travel by aircraft is commonplace in Alaska. There are about 600 public airports and more than 3,000 airstrips throughout the state. Because of this, emissions from aircraft can have a substantial effect on the total emissions inventory of Alaska. This project would inventory a subset of the airports and airstrips within the state. The focus would be on facilities most likely to impact Class I areas.
- EF8 Joint Projects and Coordination with Other RPOs - The Emissions Forum will participate in two joint inter-RPO projects, both of which are expected to begin work in 2003 and be completed in 2004. The first project is the development of a new ammonia model capable of better temporal and spatial resolution. The existing model uses default nationwide emissions factors. The new model will recognize geographic differences in ammonia emissions, principally from livestock and poultry operations. There is no budget requested for this joint project in WRAP Workplan, as EPA OAQPS is providing funding to the Midwest RPO as the lead RPO. The work will be coordinated with the ammonia emissions inventory improvement project being conducted by WRAP Regional Modeling Center in 2003.

The second joint project is the development of a new Open Emissions Model (OPEM). OPEM is a new emissions processor, to have distinct advantages over the two existing models, EMS and SMOKE. The best features of EMS and SMOKE will be incorporated into OPEM to produce a more open, usable, and readily accessible emission processor. OPEM will be Linux-based with a focus on quality assurance, which will reduce the errors and reruns that have plagued the RMC modeling work. There is no budget requested for this joint project in WRAP Workplan, as EPA OAQPS is providing funding to the Midwest RPO as the lead RPO. The Midwest RPO project manager has included state emissions modeling experts from the WRAP region to assure a coordinated product usable by the RMC.

- EF9 Cruising Height Aviation Inventory - Typically, airport and aircraft emissions are estimated below the default mixing height of 3,000 feet in the EDMS model. While this may be appropriate for a nonattainment area inventory, regional haze is focused on transport of pollutants over long ranges at altitude. The exclusion of emissions at cruising altitude may considerably underestimate the aircraft emission inventories. Little has been done on analyzing cruising emissions from aircraft. The 1997 California Air Resources Board's Southern California Ozone Study (SCOS97) looked at cruising emissions from aircraft and found that emissions for SO<sub>x</sub> and NO<sub>x</sub> were higher than the emissions below the mixing height. The Emissions Forum has requested that the Modeling Forum consider undertaking a sensitivity analysis to help determine the

potential impact that cruising emissions from aircraft could have on visibility in the WRAP region. If these emissions appear to be worth characterizing in greater detail a project would be developed to estimate the emissions with work expected to be performed in 2005. No budget resources are requested for 2004.

### **Tribal Data Development Work Group**

The purpose of the Work Group is support the development, collection, and appropriate use of technical air pollution data for tribes in the WRAP region. The Work Group coordinates the preparation and review of technical tools for use by tribes, and acts as a clearinghouse for technical information used by WRAP Forums and Committees. Under the Regional Haze Rule, and in accordance with the Tribal Authority Rule, tribes are not required to implement any particular provisions of the Rule, but have the option to submit visibility implementation plans or “reasonably severable” elements thereof. Tribes are encouraged to participate in Regional Planning Organizations, EPA is committed to supporting tribal involvement, and tribes have been actively engaged in specific TDDWG and general WRAP activities. While tribes within the 9-state GCVTC transport region have the option of submitting §308 or §309 implementation plans, independent of the state in which the tribe is located, the focus of WRAP activities is now migrating toward development of §308 plans.

For many issues, more information regarding air quality and emissions on tribal lands is needed in order for tribes to participate in a meaningful way in the WRAP decisions, and to better determine what, if any, regulatory actions are needed by individual tribes. Thus the mission of the TDDWG is to assist the tribes and the WRAP in acquiring the information, and building the tribal capacity, which will be needed for tribes to make informed decisions regarding whether and how to implement TIPs. Although SIP deadlines do not apply, EPA encourages tribes to coordinate any TIP submittals with states to the extent practicable. Given the less-advanced state of tribal air program development, this means there is a need to develop tribal data capacity as quickly as possible in order to achieve consistency with the 2004 to 2008 time frame.

The 2004 TDDWG workplan proposes to continue developing technical tools and information for WRAP region tribes, but expand the support to allow interested tribes to prepare TIPs addressing the impacts of air pollution on their lands. The workplan has 4 major elements:

TW1 Emissions Data Development Support - In 2003, the development of the Tribal Emissions Inventory Software Solution (TEISS) was completed. For 2004, the TDDWG is proposing to continue the contract with ITEP for the implementation and training on TEISS, and to test the software before making it available to the Tribes to compile their respective emissions inventory data. Also, training sessions will be offered for the Tribal Professional by ITEP. Project elements of the 2004 ITEP effort include:

- TEISS Software Support (software distribution to interested tribes, promotion, technical assistance by phone and E-Mail);
- Ongoing contact with the tribal users (to monitor how well TEISS is meeting tribal needs, and software upgrades as needed);

- Alaska tribal support (ITEP will work the state of Alaska, and interested Alaskan Native Corporations to distribute, and provide voice and electronic support, for the use of TEISS in Alaska);
- TEISS Software User Workshops (Two workshops, designed for both new [3.5 days] and experienced [2.5 days] TEISS users, will be developed and conducted at the Tribal Air Monitoring Support (TAMS) Center's training facility in Las Vegas, NV or at an EPA facility that can provide a computer lab free of cost for the training); and
- Emission Inventory Technical Support and Outreach (ITEP will maintain a comprehensive website to provide information on the technical aspects of EI work that are unique to tribes).

TW2 Monitoring Data Analysis - The Ambient Monitoring & Reporting Forum's (AMRF) existing Causes of Haze Analysis project is analyzing data from an extensive list of regional haze monitoring sites. The AMRF contractor will be analyzing data from all speciated monitoring sites which are helpful to explaining the answers to the Causes of Haze questions detailed in the existing multi-year contract. The answers will be prepared for each WRAP region mandatory Federal Class I area (not all of which have on-site monitoring data). Answers about Causes of Haze at each WRAP region mandatory federal Class I area will have the benefit of:

- 1) "In or next to the Class I area" IMPROVE data;
- 2) Data from relatively nearby, representative IMPROVE monitors (including tribal IMPROVE sites) which are not "In or next to the Class I area"; and/or
- 3) Data from nearby non-IMPROVE monitoring locations, where those speciated data are helpful in explaining Causes of Haze.

A separate proposal and contract between the existing AMRF contractor and the TDDWG will be prepared to provide "answers for the Causes of Haze questions on tribal lands". The AMRF contractor will be asked to provide "answers to the Causes of Haze questions" at the other reservations without monitoring data, based on expert judgment. This will not be possible for all reservations, as the IMPROVE network is aimed at the Regional Haze Rule reasonable progress tracking at mandatory Federal Class I areas. The TDDWG requests funding to issue an RFP with the following tasks:

- 1) Answer Causes of Haze questions at the WRAP region tribal IMPROVE monitoring sites and tribal Class I areas;
- 2) Identify reservations where source category impacts can be quantified using the data analyzed for Causes of Haze from nearby monitoring sites, and answer the Causes of Haze questions for those reservations, based on expert judgment; and
- 3) Analyze the need and identify representative locations for additional regional haze monitoring sites on reservations which the IMPROVE and other, related monitoring networks do not cover adequately.

TW3 Tribal Regional Haze TSD Guidance/Template Development – In order for tribes to develop TIPs for regional haze, WRAP technical work will have to provide sufficient data resolution in appropriate formats for individual tribes. To date, state- and county-level emissions data have been used to analyze visibility improvements associated with various control strategies. When submitting a TIP, the tribe would need to provide a Technical Support Document (TSD) with the TIP, or have future WRAP regional TSD work products provide sufficient data resolution in the proper formats. The purpose of this project is to describe the TSD data and proper formats needed by an individual tribe to support TIP preparation, particularly for those tribes that have never previously prepared a TIP.

TW4 Program Enhancement - This is a set-aside for projects that cannot be anticipated at this time. Following are some potential projects that could be initiated in 2004:

- 1) A collaborative project with the Economic Analysis Forum to form a valid and reliable database in the Indian Country;
- 2) Contractor support for tribal data needed by the Emissions Forum;
- 3) Collaboration with the Technical Oversight Committee (TOC) as it relates to their 2004 “Source Apportionment” project in Indian Country; and
- 4) The Tribal Data Development Work Group will also be fully supportive of efforts to address the “Tribal Traditional Practices and Regional Haze”. These practices have been exempted by the WRAP so that the Indian Nations could exercise their religious and ceremonial practices without being regulated by the Regional Haze Rule.

### **Dust Emissions Joint Forum**

The Dust Emissions Joint Forum is a new forum whose mission is to (1) improve the WRAP dust emissions inventory, including the magnitude and spatial, temporal, and particle size distribution of dust emissions; (2) coordinate interpretation of modeling and monitoring results with respect to dust, including the apportionment of haze to natural and anthropogenic sources of dust; and (3) identify the most appropriate strategies for reducing anthropogenic sources of dust affecting Class I areas. At its discretion, the Forum may also develop a research agenda to guide and coordinate efforts within the air quality community and may evaluate the usefulness of existing monitoring and modeling techniques for quantifying the contribution of dust to haze in Class I areas.

DF1 Establish Dust Definitions and Identify Dust Emission Tools – The Forum will develop a consensus definition(s) of dust. Issues to be resolved will likely include the definition of natural versus man-made dust and whether or how to define dust according to source types, particle attributes, or operational attributes, such as those used in routine monitoring and modeling analyses. Under this task, the Forum will also identify

alternative dust emissions tools that could be used by the WRAP. Both parts of this task will be supported by a literature review done under contract.

The following three tasks are aimed at improving the WRAP's understanding of emissions from the three largest anthropogenic source categories, their control options, and the effectiveness of such controls. For each category, state, tribal, and local inventories (especially locally-generated inventories, inventories for PM nonattainment areas, and year 2002 inventories) will be summarized and compared. The same will be done for control options and effectiveness. The objective is to identify areas or sectors within the regional inventory that could be substantially improved and to develop a regional menu of control options and performance characteristics based on actual experiences in the West. Most of the data collection and synthesis would be done under contract. The forum may also carry out additional work to improve the WRAP's wind-blown dust inventory, especially as it may relate to the source categories below.

DF2 Agricultural Dust – (See above description.)

DF3 Construction Dust – (See above description.)

DF4 Road Dust – (See above description.)

### **Ambient Monitoring and Reporting Forum**

In 2003, the Ambient Monitoring & Reporting Forum continued to provide access to regional haze monitoring data through operation of the inter-RPO VIEWS website, and has initiated the comprehensive, multi-year Causes of Haze Analysis project. These projects are ongoing. Also, the Forum has received separate funding from EPA to analyze Natural Haze Levels on behalf of all 5 RPOs, to better understand the accuracy of default EPA Natural Conditions Estimates. Work planned on these three projects in 2004 is described next:

AMR1 IEWS Data Base 2004 Operations (CENRAP portion in current grant) – The Visibility Information Exchange Web Site (IEWS) began operation in 2002, building from the earlier WRAP Ambient Monitoring Database. IEWS receives joint, annual funding by all 5 RPOs, each contributing \$50,000, through a WGA contract. A Steering Committee composed of RPO representatives, EPA, and Federal Land Managers oversees the operation of the database and website, and tracks deliverables from the annual IEWS workplan. IMPROVE and other visibility-related data are displayed and available for analysis and/or downloading at:  
<http://vista.cira.colostate.edu/iews/> .

AMR2 Causes of Haze Analysis - The Causes of Haze Analysis project began in early 2003, and is designed to provide as much as information as can be estimated using monitoring data concerning the aerosol species and source categories that contribute to haze. These reports will also document the use of spatial and meteorological analysis methods to estimate the impacts from within and outside the WRAP region. These assessments of monitoring data will be used in refining EPA default estimates of natural contributions to haze (i.e., natural visibility conditions for the §308 glide paths),

and will be documented in this report. Deliverables from this analysis project will directly support the TOC's Attribution of Haze project.

- AMR3 Natural Haze Levels Analysis (separate \$75K from OAQPS, national project, WRAP has lead RPO responsibility) – This project is designed to analyze default natural conditions values listed in EPA guidance, and identify refinements to these estimates of natural conditions at mandatory federal Class I areas.

### **309 Coordinating Committee**

This is a new committee being formed to coordinate the post-submittal implementation of Section 309 SIPs and TIPS, if applicable. This includes tracking emissions for the backstop SO<sub>2</sub> trading program and addressing issues related to that program (e.g., expansion to other states under Section 308). After the SIPs are submitted (by December 31, 2003), the EPA expects to conduct a six-month completeness review, followed by an 18-month process to review the substance of the SIPs, propose approval, take public comment, and take final action. This process may require interactions between the EPA and the 309 states, potential revisions/updates to certain SIP elements, and coordination among the 309 states themselves. All these activities would be conducted under the purview of the 309 Coordinating Committee. Committee members will be comprised primarily of states submitting Section 309 SIPs and tribes interested in submitting Section 309 TIPS.

- 309a Annex Implementation – The Committee will be responsible for (a) the annual regional emissions report (for comparison to the milestones) and periodic audits of emissions tracking, (b) addressing any remaining or new issues related to the backstop trading program (e.g., tracking and supporting state rule adoptions, consideration of allowance price disclosure, etc.), and (c) addressing issues related to other states or tribes interested in opting into the program.
- 309b 309 Follow-Up – As the EPA reviews and takes action on submitted SIPs, issues are likely to arise that will require some ongoing effort by the WRAP to help resolve in a coordinated fashion.

### **Air Managers Committee**

The year 2003 was the second year of activity for the Air Manager's Committee (AMC). The AMC has served a point of coordination among the state and tribal air managers, to assure needs of air agency managers are met as the various policy and technical forums perform their work. Much of the focus of AMC over the last two years has been to ensure, as much as possible, that essential elements of 309 SIPs and TIPS are identified and addressed, to create a framework for increased participation by tribes, and to identify and address several state/tribal issues. This work has been implemented through support of state and tribal caucus staff, via WGA, WESTAR, and NTEC. The AMC identified a number of unresolved questions regarding EPA interpretation of the Regional Haze rule, and worked with EPA to gain some level of consistency among the EPA regions as they begin their review of submittals at the end of the year. The

AMC sponsored the preparation of enhanced templates for 309 SIPs and TIPs (STIP-II), and provided shared oversight with MTF on other projects related to BART.

2004 will mark the beginning of the 308 planning process in earnest. The AMC will continue to support the state and tribal caucus staff, to sponsor or oversee projects related to air managers' interests and needs, and to supplement the work of the WRAP forums program enhancements as needed.

AMC1 Caucus Staff Support – Each caucus has staff support: the Tribal Caucus through NTEC (with additional support directly from WRAP) and the State Caucus through a WGA contract with WESTAR. The caucus staff positions are generally responsible for disseminating information between WRAP committees and forums and their respective caucuses, and to facilitate communication between the two caucuses and with the AMC as a whole. They are also responsible for issue definition, outreach, and coordination.

AMC2 Alaska Tribal Outreach Coordinator Position – An individual will be hired to conduct a variety of outreach activities for the 229 tribes located in Alaska. A number of activities, in addition to those typically associated with employee recruitment, will be conducted as part of this hiring process to assure long-term success of the position. First, an assessment tool (e.g., questionnaire) will be sent to Alaskan Natives and to determine what role the Coordinator should be playing. For example, there are jurisdictional issues that are of concern to Alaskan Natives due to the Alaskan Native Settlement Claims Act (1971) and the Alaska National Interest Lands Conservation Act (1980). Because of such issues, not all Alaskan Natives are sure of what areas that they have jurisdiction over. Second, collaboration will be sought with Alaskan Native organizations to build a pool of individuals who can advise and participate in the hiring and management process of the Coordinator. Third, Native Village visits will be important to give a firsthand look at the issues facing Alaskan Natives.

AMC3 Health-Based Effects of Regional Haze – Within the WRAP, little attention has been given to the health effects of air pollutants associated with haze, yet information on the health consequences of haze pollution and the health benefits of haze controls could be gleaned from on-going WRAP activities, such as those related to air quality modeling, ambient monitoring, and socioeconomic analysis. Distilling health-related information from WRAP activities will provide added value to WRAP members and may generate further interest from individuals and organizations that may not otherwise be compelled to participate, such as some public interest groups, tribes, and members of the general public.

The AMC will attempt to boost the health-relevance of the WRAP's haze-related activities by first recruiting an expert in the area of air quality and health to draft a report which (a) summarizes what the available literature implies about the health significance of various PM constituents and PM precursors which may pose a health risk in the West (b) identifies WRAP data that can be used to assess health effects, (c) identifies data gaps in the WRAP region (particularly on tribal lands) which could provide significantly more health-related information, and (d) recommends ways in which the WRAP can use its

current and forthcoming data (including filled data gaps) to estimate the health effects of haze and the health benefits of haze controls. Next, WRAP staff will conduct a workshop to disseminate the information in the report – a group of speakers will be on hand to offer their own interpretation of the material in addition to providing some additional insights – and discuss next steps for the WRAP with respect to regional haze and health.

AMC4 Traditional Tribal Practices and Regional Haze – Tribal traditional practices (e.g., ceremonial, cultural, religious) are regularly affected by regional haze or the policies intended to curb such haze. On the one hand, tribes are concerned with protecting their traditional practices from the air pollutants that obscure visibility. For instance, some tribal members have noted the importance of being able to see nearby icons for religious purposes. On the other hand, tribes engage in traditional practices that involve such activities as burning. In some cases, the WRAP has acknowledged these practices and exempted them from policies adopted by the organization (see, for example, “Enhanced Smoke Management Plan” policy document produced by the Fire Emissions Joint Forum and adopted by the WRAP Board).

No comprehensive documents currently exist that address the traditional practices of Indian tribes throughout the WRAP region and how these practices interact with regional haze and the policies adopted to address such haze. Documents that address these issues will serve to meet the needs and concerns of the tribes within the WRAP region and also help the organization develop effective policies on regional haze.

The first document will describe why tribes need to be concerned with regional haze and how their involvement in the WRAP serves to reduce the haze that interferes with their traditional practices. This document, among other things, will highlight some of the traditional tribal practices that are affected by visibility in the west.

The second document will discern what some of the traditional tribal practices are that utilize fire and other activities which may contribute to regional haze. This document will help WRAP participants to understand these traditional practices and their importance to tribes. In understanding the importance of such practices, WRAP participants will be better equipped to draft policies that meet the need and concerns of all involved with the process of addressing regional haze.

Both documents will serve as educational tools for WRAP participants (and members of other regional planning organizations) who regularly work with and/or live near tribal lands. These documents will be a compilation of published and unpublished information about tribal practices and cultural values. Inclusion of unpublished information in the documents will necessitate tribal review and approval. In addition to the two documents, there could be additional versions, directed at specific audiences, such as other tribes and non-tribal audiences. It is anticipated that the documents will be professionally developed into a bound document for distribution to WRAP participants and others in the WRAP region.

AMC5 308 Template Development – To date WRAP efforts have focused primarily on section 309 of the Regional Haze Rule, to accommodate the SIP submittal deadline for transport states. Tribes are not subject to specific deadlines to submit TIPs. Much of the WRAP’s 309 work will also be applicable for states and tribes meeting the 308 requirements, but considerable foundation work remains, and must be accomplished prior to the next SIP submittal date of 2007 (or 2005, if Congress does not reauthorize TEA-21, including the 2007 date). In view of the time constraints states and tribes within the region should begin collaborative discussions soon to determine what is needed to support WRAP activities in the near term, and what they will need later on to implement control strategies

This project envisions an ad hoc workgroup, made up of key planners from states, tribes and EPA and with AMC oversight. The workgroup would develop a set of understandings about what the states and tribes must do near-term to support the information and expertise needs of the WRAP, and later to successfully develop and implement their individual 308 SIPs and TIPs. Differences between state and tribe requirements would be incorporated into a final work product, which would include development of one or more outlines, or templates upon which states and tribes could construct their individual SIPs and TIPs. The workplans and reports from the other forums, committees and workgroups would feed into this process. This project is supportive of the WRAP strategic plan.

Prospective workgroup members would be identified and a final workplan for the project would be ready at the beginning of the calendar year. AMC would ensure adequate representation on the workgroup, including state, tribal and EPA staff, and other appropriate stakeholders. The workplan and budget for 2004 would have been developed by an earlier workgroup.

AMC6 TIP/FIP Framework – Underlying many issues for tribes in the WRAP has been an uncertainty about EPA policy for implementation of the haze rule on tribal lands. Although the Tribal Authority Rule provides an overall framework, many details remain to be filled in. These may include policies for determining when federal implementation is necessary or appropriate; decisions on whether to use a regional FIP or tribe specific FIPs for particular provisions; and guidance on which elements of 309 or 308 TIPs may be “reasonably severable.” During the STIP-II process, many such questions were brought into sharper focus. Some were answered while others remain open.

Under the oversight of the AMC, a tribal workgroup will work with EPA to develop a policy to determine when federal implementation is appropriate, and guidance on reasonable severability. This effort will be coordinated with any national efforts within EPA to develop implementation policy in a broader context. (Note that publicly available drafts of EPA’s 2003 GPRA strategic plan have included a target of developing similar policies nationwide by 2008). No funding is currently requested for this task. If contractual needs are identified, a funding request may be made to the AMC or to the next WRAP work plan, depending upon the timing.

## Communications Committee

- CC1 Web Site Maintenance - primary communications tool for the WRAP. Consider additional funding for transition to new Operations/Maintenance Contract for improved performance.
- CC2 Continue and Expand Publications – This work is intended for both internal and external audiences and includes the following:
- Collect inputs, draft and publish The WRAP Sheet on the Web site;
  - Print, mail, and/or fax hard copies of The WRAP Sheet to selected recipients; and
  - Produce brochures, fact sheets, and other handout materials for conferences, exhibits, and public meetings.
- CC3 Update Presentation Materials to Tell the WRAP Story:
- Tailor the WRAP 301A, 401 and Tribal version presentations to meet needs of various forums/committees; and
  - Convert presentations to various video formats (CD, VHS, 35mm, etc.) and make copies for multiple venues.
- CC4 Expand Speakers' Bureau – Assure exposure of WRAP story to state and tribal general audiences throughout the WRAP region. Tailor to individual audiences as appropriate:
- Develop and maintain data base of prospective audiences;
  - Work with state and tribal air directors/forum and committee chairs and follow up on contacts to schedule presentations; and
  - Coordinate presentation and support materials for all scheduled events.
- CC5 Support WRAP Forums and Committees in Conducting Public Meetings – Inform and obtain public input on WRAP products and related SIP/TIP development efforts:
- Assist with arrangements for meeting venues; and
  - Coordinate presentation and support materials for all scheduled events.
- CC6 Other Outreach Efforts to Reach Wider Audience - Investigate partnering with other agencies/programs with shared goals – e.g., Pollution Prevention Roundtable for AP2 presentation:
- Identify potential partnerships and follow up to develop cooperative ventures; and
  - Participate in joint ventures with mutual benefit.