



August 22, 2006

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Re: Program Operations and Regional Haze Planning Issues with the IMPROVE Site Reduction Plan

Dear Jerry and Rob:

On behalf of the Air Managers Committee (AMC) of the Western Regional Air Partnership (WRAP), we are writing to you jointly to express our concern about the plan by EPA and the IMPROVE Steering Committee to reduce the number of IMPROVE monitoring sites directly funded by EPA to track reasonable progress under the Regional Haze Rule (RHR). The AMC membership is a cross-section of air pollution control agency managers involved in WRAP regional haze planning and policy development activities (<http://wrapair.org/forums/amc/members.html>). We are sure you are aware that about 75% of the protected Class I areas are in the WRAP region and 83% of federally recognized tribes are in the West. The AMC's immediate concerns here relate to the importance of the IMPROVE monitoring network to development and implementation of regional haze plans. We have equally great concerns about the effects of the proposed site closures on several other air quality programs, and plan to provide additional detail on IMPROVE's importance to these other programs in the near future.

We also think this decision should not be made by the IMPROVE Steering Committee without additional consultation with the end users. We propose that these comments be a step toward further dialog on IMPROVE monitoring strategies among the IMPROVE Steering Committee, states, tribes, federal land managers and EPA staff involved in IMPROVE.

After reviewing the proposed priority list and the methodology used to produce the list, we think the whole idea of asking individual states and tribes to evaluate a list of sites to be closed in the IMPROVE network at this particular time will yield an uninformed choice for states and tribes in the West, as we work to make timely reasonable progress toward the national visibility goal defined in the RHR and the federal Clean Air Act. Our specific concerns are as follows:

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- In addition to the cuts proposed for the IMPROVE monitoring network, EPA has proposed similar funding reductions for tribal and state monitoring programs. The budget process is not concluded, and none of the interested parties responsible for collaborative IMPROVE network operations [States, Tribes, Federal Agencies] know at this time if, or where budget cuts might happen, nor the amount. It is premature to make any decisions about site-specific decommissioning for IMPROVE monitors, absent a more comprehensive critical evaluation of all air quality monitors and monitoring strategies, in light of any reductions of funding support for monitoring and other air program support.
- EPA rulemakings for particulate matter and regional haze identify the existing IMPROVE network as a vital component of the overall monitoring strategy in the West. The recently proposed cuts are not in keeping with EPA's 2000-01 decision on behalf of the states to expand the IMPROVE network in for reasonable progress tracking purposes required in the RHR.
- The present network is of particular importance at this stage of regional haze program development. We believe that cutting sites now is both shortsighted and ill timed. Haze implementation plans are in preparation for all 50 states for delivery to EPA in December 2007. The 110 IMPROVE sites are analogous to "design value" monitoring sites in nonattainment areas. The technical recommendation is never to close any monitoring site that is identified for tracking progress toward a federal Clean Air Act goal, and these 110 sites are the basis of analysis by states for the RHR progress metric in their State Implementation Plans. Analyses in Alaska and among tribes suggest that existing monitoring sites do not characterize air quality in a few Class I areas and there may be a need to add or modify siting in those areas. Please see Appendix A, attached for specific examples of impacts on regional haze program operations and planning.
- EPA should consider closing IMPROVE RHR progress tracking sites an extreme measure of last resort. We believe there may be cost-cutting measures and additional operation efficiencies among steps that should be explored and implemented before reductions in the IMPROVE 110-site RHR tracking network are to be made.

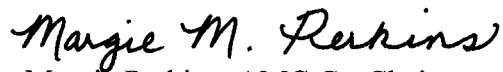
In summary, the AMC asks that the selection of where any cuts are to be made be based on solid analysis that fully incorporates and balances haze planning needs, RHR goals, additional air program benefits, opportunities for cost savings in the EPA direct-funded portion of the IMPROVE program, state and tribal monitoring programs needs, and technical criteria. Any reductions deemed critical by EPA should not be simply produced ad hoc, based on narrow technical arguments. This effort will necessarily have to include state, tribal, federal land management agencies and EPA staff involved in those issues along with the IMPROVE Steering Committee.


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We look forward to working productively with you and EPA to assume the continued operation of the IMPROVE network in its present configuration.

Please contact Tom Moore of the WRAP staff to act on our concerns.

Sincerely,


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Cc: Steve Page
Tom Curran
Bill Harnett
Peter Tsirigotis
Marc Pitchford

Appendix A

Program Operations & Regional Haze Planning Issues With the IMPROVE Site Reduction Plan

Program Operations Issues

- The analysis suggests that IMPROVE “protocol” sites could be substituted for existing RHR tracking sites; this recommendation is ill-advised as the “protocol” sites are located by and funded through individual arrangements for reasons other than RHR tracking and likely would not have the long-term continuity as the RHR tracking network.
- EPA has made a huge monetary and operational investment in the present 110-site network during the period 2000-04 on behalf of states’ regional haze plans due December 2007.
- Given EPA’s complete discretion to fully fund any existing monitoring program, closure of any of the 110 RHR tracking sites before 45 states submit §308 haze SIPs and 5 WRAP region states resubmit §309 haze SIPs in December 2007 is ill-timed; i.e., control programs and strategies have to be adopted and implemented before reasonable progress can be measured at the monitoring sites.
- The RHR requires each state to adopt a long-term strategy element in their 2007 haze SIPs addressing visibility monitoring; as EPA has pre-designated the 110-site IMPROVE RHR tracking network for the 2000-04 baseline conditions, states have no funding or other practical alternative to IMPROVE for demonstrating reasonable progress at each Class I Federal area.
- A stable, long term data record is a requirement of the RHR; the 110-site network must be preserved as is, given EPA’s commitment on behalf of the states to expand the IMPROVE network during 2000-01.
- Studies by the WRAP Tribal Data Development Workgroup identify that the current IMPROVE network configuration provides data representative of regional aerosol impacts on many tribal lands in the West, see: <http://coha.dri.edu/tribal/task2/index.html> and offers specific areas where additional IMPROVE monitoring could be added to assist tribes, see: <http://coha.dri.edu/tribal/task3/index.html>.
- Analysis by the State of Alaska indicates that existing IMPROVE sites are not representative of the impacts that could reach large remote Class I areas, see: <http://www.dec.state.ak.us/air/anpms/as/doc/FDhazesum.pdf>

Regional Haze Planning Issues

- Data collected at these sites has been extensively analyzed and is the basis for analyzing control strategies for regional haze.
- Any analysis of the apparent redundancy of a particular monitoring statistic is limited to historic conditions and cannot account for “yet-to-be-adopted” control strategies.
- States and tribes in the West have developed and will be crafting unique long-term control programs oriented to the 110-site network.
- A CAIR-like control program is not available for western states to apply to improve visibility at the 100+ Class I Federal areas in the West; i.e., controls on coal-fired electrical generating

units will vary by state and facility, requiring the most complete RHR tracking network available.

- BART controls are also not going to be uniform in emissions reductions achieved or the resulting visibility improvement across the West by state or facility; at a minimum, the existing 110-site RHR tracking network used for the source-by-source analysis required in EPA's BART rule across the country should be maintained.
- Emission patterns (magnitude and composition) will be changing over the next 10 years, if for no other reason than population growth in the West, and therefore the Class I Federal areas most and least affected will change. With emission patterns and the nature and cause of visibility impairment at Class I Federal areas both changing, perhaps greatly, over the next 10 years; the present 110-site RHR tracking network must be continued and perhaps augmented. The outcome to avoid is that sites that were closed may be the ones that should have been retained.
- The RHR tracking network needs to be stable, representative of the visibility impacts on each Class I Federal area, and complete in terms of data quality and quantity over the long-term; i.e., following the same approach used for urban nonattainment area "NAAQS design value" monitoring sites – every site and monitor in the RHR tracking network must be fully operational until the area reaches the national visibility goal.
- For the West, a complete long-term data record accurately representing each Class I Federal area from a stable network configuration is needed, in light of the fact that expected visibility improvement over the 10-year planning periods specified in the RHR will often be within the range of year-to-year variability and/or measurement uncertainty.
- Use of the IMPROVE 110-site RHR tracking network for a complete and representative analysis of all Class I Federal areas as required by the RHR for the December 2007 SIP submissions include the 2000-04 establish baseline conditions and the 20 percent best and worst days for each Class I Federal area. In the next 10 years, subsequent haze SIP updates (2013) and revised haze SIPs (2018) will need data from the same and/or additional IMPROVE RHR tracking sites to re-assess the 20 percent best and worst days over time, to evaluate whether the long term control strategies have been effective.
- The RHR tracking network will also be used to re-evaluate the natural conditions estimates at each Class I Federal area in future haze SIP analyses.
- Tracking of data trends from a complete and representative network, to document steady Class I Federal area visibility improvement over the long-term is the intent of the RHR. Absolute values over a few years are not so important for the RHR program, and short-term data analysis should not be used to adapt a long-term trends network and achieve an arbitrary cost savings.