

***WESTERN REGIONAL
AIR PARTNERSHIP***

**March 18-19, 1998
SHERATON SAN MARCOS
CHANDLER, ARIZONA**

Western Regional Air Partnership

AGENDA WESTERN REGIONAL AIR PARTNERSHIP March 18-19, 1998 SHERATON SAN MARCOS CHANDLER, ARIZONA

MARCH 18

1. Welcome and Opening Remarks 9:00-9:05
2. Invocation and Memorial for Departed Colleagues 9:05-9:15
3. Introductions 9:15-9:25
4. Approval of Agenda 9:25-9:30
5. Approval of Minutes of September 30, 1997 **TAB A** 9:30-9:35
6. Election of Officers 9:35-9:45

A. Tribal Co-Chair

The tribes will nominate The Honorable Reginald T. Pasqual, Governor of the Acoma Pueblo for this position.

B. Secretary/Treasurer (Nominating Committee) **Section III, TAB B**

7. Clarification and Proposed Amendments to WRAP Charter (Bill Grantham) **TAB C** 9:45-10:00
8. Joint TOC/IOC Issues 10:00-10:20

A. Forum Guidelines and Process for Developing Forums **TAB D**

B. Joint Forums **TAB E**

BREAK 10:20-10:30

Governor Michael O. Leavitt
State of Utah, Co-Chair

Staffed by:

Western Governors' Association, 600 17th Street, Ste 1705 S., Denver, CO 80202, Ph (303) 623-9378, Fax (303) 534-7309
National Tribal Environmental Council, 2221 Rio Grande NW, Albuquerque, NM 87104, Ph (505) 242-2175, Fax (505) 242-2654

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|-----|---|-------------|
| 9. | Report from Technical Oversight Committee on Activities and Forums | 10:30-11:45 |
| | <p>A. Work Group Formation TAB F</p> <p>B. Forum Formation TAB G</p> <p>C. Monitoring Workshop TAB H</p> | |
| | Lunch | 11:45-12:45 |
| 10. | Report from the Initiatives Oversight Committee | 12:45-2:00 |
| | <p>A. Market Trading Forum</p> <p>B. Forum Formation TAB I</p> <p>C. Discussion of Approaches for Implementation of WRAP Strategies and Action Plans TAB J</p> | |
| 11. | Guidance for Forums and Work Groups on Addressing Issues Associated with visibility in Parks and Wilderness Areas Outside of the Colorado Plateau TAB K | 2:00-3:00 |
| | <p>A. Background</p> <p style="padding-left: 40px;">- Status of Regional Haze Rule (John Seitz, Director EPA Office of Air Quality Planning and Standards)</p> <p style="padding-left: 40px;">- Issues Arising from Market Trading Group</p> <p>B. Issues Associated with the GCVTC Transport Region</p> <p>C. Issues for States and Tribal Areas in WRAP Domain</p> <p>D. Opportunities for Synergy in Development of Technical Work Products</p> <p>E. Public Comment</p> | |
| 12. | Discussion of EPA Fund Distribution (Greg Green) TAB L | 3:00-3:30 |
| | Depart for Field Trip to Gila River Indian Community A Bus Will Be Available For Transport | 3:30 |

March 19, 1998

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|------------|---|-------------|
| 13. | Fire Management Issues | 8:30-9:15 |
| | A. Action on Request from Interior Columbian Basin Ecosystem Management Project (The IOC is reviewing this issue and will have a recommendation for the WRAP). TAB M | |
| | B. Presentation from EPA on Status and Principles of Its Fire Policy. | |
| 14. | Overview of Tribal Air Rule (David LaRoche EPA Office of Air and Radiation) TAB N | 9:15-9:50 |
| 15. | Travel Policy Hardship Waiver (John Leary/Bill Grantham) TAB O | 9:50-10:00 |
| 16. | Break | 10:00-10:15 |
| 17. | Report from the Nominating Committee TAB B | 10:00-10:45 |
| | A. Co-chairs for TOC and IOC | |
| | B. Public Advisory Board | |
| | C. Communications Committee | |
| | D. International Committee | |
| 18. | Approval of Budget (Coordinating Committee) TAB P | 10:45-11:00 |
| 19. | Public Comments | 11:00-11:30 |
| 20. | Other Matters | 11:30-11:50 |
| 21. | Benediction and Adjournment | 11:50-12:00 |

TAB

A

WESTERN REGIONAL AIR PARTNERSHIP

September 30, 1997

Jackson Lake Lodge, Wyoming

ATTENDEES

Rex G. Salvador, 2nd Lt. Gov., Pueblo of
Acoma NM
Dianne Nielson, State of Utah
Barry M. Aarons, State of Arizona
David Kelly, Navajo Nation
Patti Shwayder, State of Colorado
Greg Green, State of Oregon
Bob Raisch, State of Montana
Earl Havatone, Hualapai Tribe
Lew Dodgion, State of Nevada
Mark E. Weidler, State of New Mexico
Paul Johnson, USDA - Forest Service
Jan Miller, State of Utah
Jim Lyons, USDA
Kenneth Timbana, Northwestern Band of
the Shoshoni Nation
Farshid Farsi, Shoshone-Bannock Tribes
Patricia Mariella, Gila River Indian
Community
Cisney Havatone, Hualapai Nation
Lydelle Davies, Columbia River Inter-Tribal
Fish Commission
Christella Armijo, All Indian Pueblo
Council
Lewis A. McLeod, Confederated Salish &
Kootenai Tribes
Margie M. Perkins, State of Colorado
Susan Rieff, DOI
John Seitz, US EPA
Bill Yellowtail, US EPA
Stanley Paytiamo, Pueblo of Acoma
Dan Johnson, State of Washington
Orville Green, State of Idaho
Felicia Marcus, US EPA
Arnold Taylor, Hopi Tribe
Dan Olson, State of Wyoming
Ursula Trueman, State of Utah
Jack McGraw, US EPA

Larry Svoboda, US EPA
Sara Laumann, US EPA
Margaret Cook, Inter Tribal Council of
Arizona
Virgil Masayesva, ITEP/North AZ Univ.
Chris Shaver, DOI - NPS
Cece Bloomfield, EPA
Al Zemsky, EPA
Amy Zimpfer, EPA
Doug Young, State of Colorado
Bob Linnell, State of Utah
Roxanne L. Ellingson, Walker River Paiute
Tribe
C.V. Mathai, APS
Dave Wunker, State of New Mexico
John Gillen, TX NRCC
Pete Lahm, USDA, Forest Service
Bruce Polkowsky, US EPA
Scott F. Archer, USDI - BLM
Mike George, State of Arizona
William Auberle, No. Arizona Univ.
Shawn Kendall, Phelps Dodge Corporation
Mac McLennan, Tri-State G & T
Mark Fox, New Century Energies
Catherine Reheis, Western States Petroleum
Association
Maria Baier, State of Arizona
Lyle R. Nelson, Southern California Edison
Steve Schoen, Placer Dome U.S.
Paul Scheidig, NV Mining Association
Robert L. Geddes, Solution Chemical Co.
Marvin Sarracino, Pueblo of Laguna, NM
Maggie Gover, National Tribal
Environmental Council
Rachael Bill, Cortina Indian Rancheria
Mike Botsford, Kennametal Inc.
Ray Bacon, NV Mfgs. Assn.
Terry Ross, CEED
Greg Schaefer, ARCO Coal Co.
Steven Lipman, US EPA

Attendees (con't)

Nancy Sutley, US EPA
Dennis Arfmann, Holme Roberts & Owen
Jerry Pardilla, NTEC
John Leary, WGA
David Steele, West Assoc./SIMG
Nader N. Mansour, Southern California
Edison
Jim Schoning, CARB
John Dunlap, CARB

The meeting was called to order at 9:15 am by Co-chair Michael O. Leavitt, Governor of Utah. He spoke of his first trip to the Grand Canyon as an eight-year-old, and how impressed he was with how far he could see. Thirty-six years later he stood in nearly the same spot celebrating the work of the Grand Canyon Visibility Transport Commission to protect that view. He noted that there were moments in that process when it felt that it would never come together but a miracle happened and it did. He attributes the euphoria of that moment to the Commission's better solution which recognized that everyone is for clean air. That solution is cooperative, and gives incentives to exceed the system, not to beat it. He said that we are here today because we don't want that process to die, though there will be moments that will look like we'll go crashing into the rocks in flames. He said he is prepared to give considerable energy to this project.

Rex Salvador, the 2nd Lt. Governor of Acoma Pueblo, acted as co-chairman for Governor Ron Shitiva. He spoke of the need for industry as well as clean air. He said tribes have struggled to understand how they fit into federal laws, the Clean Water Act and the Clean Air Act. The WRAP process may be a way to sit down together and develop a government-to-government relationship.

Felicia Marcus, regional administrator for EPA Region IX, noted that this is hard work but beats the alternatives. She said it is easy to find slights and faults, but it is imperative to see why we are here and stay with the goals. She also welcomed back Bill Yellowtail as Administrator for Region VIII.

Membership

After introductions, Dianne Nielson took over as co-chair for Governor Leavitt. She asked John Leary to review the membership. Leary noted that 10 states have joined and voted 9 - 1 to accept the charter. They are: Washington, Idaho, Montana, Oregon, Nevada, Utah, Wyoming, Colorado, Arizona, and New Mexico. Jerry Pardilla of the National Tribal Environmental Council reported that, of more than 200 tribes in the area, 13 have returned ballots. The tribes have not yet chosen their 10 members for the WRAP, but have agreed that the four tribes represented on the Grand Canyon Visibility Transport Commission will continue as WRAP members. They are the Acoma Pueblo, the Navajo Nation, and the Hualapai and Hopi tribes. In addition, six additional representatives were chosen for this meeting: Campo Band, Cortina

Band, Shoshone-Bannock, Gila River, Laguna Pueblo, and Confederated Salish-Kootenai.

John Dunlap of the California Air Resources Board noted that California will be involved and supportive of the WRAP, though California has chosen not to join. The sheer volume of work needed to meet the new standards demands their attention, but they expect to work with technical committees. He urged that California stakeholders be included in the WRAP process.

John Gilliam of Texas said that Texas has chosen not to join because they have other priorities in regional planning. However, he said that the WRAP process has lots of potential. Texas will track WRAP progress and they wish us well.

Consideration of the Agenda

Dianne Nielson noted there are more nominees than slots available for industry representatives on the Technical Oversight and Initiatives Oversight Committees. Patti Shwayder of Colorado distributed a letter of nomination for James Martin for an environmental position on the IOC. Some tribal representatives did not believe they had been asked to make nominations; Dianne Nielson noted that the ballot has write-in spaces and that more names could be added before the voting this afternoon. She reviewed the makeup of the committees: 3 representatives from states, 3 from tribes, 1 federal, 2 industry and 2 environmental. She said that every name submitted was included on the ballot, even if received after the deadline. It was agreed that in preliminary balloting, members would vote for 2 industry and 2 environmental representatives for each committee. The top 4 names would be considered on a final ballot. Candidates were offered the opportunity to introduce themselves and briefly review their credentials.

Review minutes from Meeting of May 6 - 7, 1997

There were two corrections. Lou Dodgion of Nevada noted that the paragraph on page 4 should indicate that Nevada did not agree to federal representatives having a vote in the WRAP. Dan Johnson of Washington asked that he be added to the list of participants in the meeting.

Selection of Officers

Dianne Nielson noted that the by-laws have a nominating process, but the organization was not yet in place and a less formal process was used; states and tribes were asked to bring names forward.

Governor Salvador noted that the tribes have not really been involved in adopting the charter and haven't met to discuss it. He noted that today's meeting site is too far for many tribes to get to. The process of balloting to consider the charter is still ongoing. Margaret Cook of the Inter-Tribal Council of Arizona said she was on the committee to draft the charter and was on 2 phone calls but then changes were made and she was not included. Cecil Havatone noted that he can't represent 200 tribes; Lewis McLeod of the Salish-Kootenai also returned his ballot but can't represent 200 tribes.

Dianne Nielson noted that she chaired the coordinating committee to develop final wording after the meeting in Salt Lake City. The document was distributed with a request for any additional

changes. She noted that the tribes need time to reach out to additional tribes, and the work needs to continue, such as comments on the proposed regional haze regulation. She noted that the charter can be amended if necessary, and we can use the mechanisms in the charter to move forward while accommodating the remaining issues.

Governor Salvador noted that tribes need to be involved in putting together the agendas for the meetings. Barry Aarons of Arizona suggested that the co-chairs put together each agenda and then consult with other representatives on issues. It was agreed that the charter and by-laws be considered working documents until there is further consideration by additional tribes.

Members agreed to accept Governor Leavitt of Utah and Governor Shativa of Acoma Pueblo as co-chairs, and agreed that the nomination process specified in the charter will be used to identify a secretary-treasurer.

Proposed Regional Haze Regulation

Felicia Marcus noted that it is impossible to say anything definitive while still in the midst of the comment period on the regional haze regulation which was proposed on July 31. She said EPA wants a strong public comment record and encourages states, tribes and individuals to submit comments. She said EPA thought they were including the Commission recommendations in the proposal but apparently need to make that clearer, since EPA strongly supports the Commission's work.

John Seitz, director of EPA's Office of Air Quality Planning and Standards, summarized what EPA has heard so far in the public hearing on September 18 and otherwise. Procedurally, he noted that the comment period will be extended by 45 days. He asked that commenters provide specific suggestions as to how to amend the proposal.

Ursula Trueman of Utah, who chairs the Interim Committee for the WARP, reviewed the membership of the Interim Committee and the process used to draft comments on the proposal. There were meetings on August 15 and September 2, and conference calls on September 12 and 17. She encouraged states and tribes to submit their own comments as well. She asked how the comments would be submitted--would there be a cover letter from the co-chairs? David Kelly of the Navajo Nation asked that the statement be revised to specify that the comments are from "some members" of the WRAP, not the entire WRAP. Susan Rieff of the Department of the Interior asked if the intent is that any commission's work be accepted by EPA; the response was that any commission which includes EPA in its work and brings all stakeholders into the process could be expected to produce credible results. Patti Shwayder volunteered to help work on revisions for this section.

Discussion continued after lunch. Paul Johnson of the USDA Forest Service asked for changes in the section on prescribed fire and wildfire. Patti Shwayder recommended adding a paragraph stating what the WRAP states intend to do, and, rather than focusing on unfunded mandates, simply say that we need money for monitoring and other purposes. It was agreed that the Interim Committee would continue making revisions in the draft, and anyone else who wants to

participate should call Ursula Trueman. Tribal members Margaret Cook, Virgil Masayesva, and Chris Armijo asked to be included in the discussion.

Work Plan

John Leary reviewed elements and timetables in the work plan; it was approved.

Selection of Industry and Environmental Representatives on the TOC and IOC

There was discussion of several nominees who asked to be considered in both the industrial and environmental categories. Both environmental and industrial interests noted that it is important that the chosen representatives have credibility in the community they are supposed to represent.

Dianne Nielson announced state representatives and their terms. Jerry Pardilla announced tribal representatives; term length and co-chairs will be determined at a later date. After 2 rounds of ballots, industry and environmental representatives were chosen.

TECHNICAL OVERSIGHT COMMITTEE

| | | |
|----------------|--|------------------|
| State: | Nancy Wrona, AZ | 3 years |
| | Bob Raisch, MT | 2 years |
| | Lew Dodgion, NV | 1 year, Co-chair |
| Tribal | David Kelly, Navaho Nation | |
| | Jim Fletcher | |
| | Lewis McLeod, Salish-Kootenai | |
| | Alternate: Anthony Bynum, Yakima Nation | |
| | Dell West, Morongo Band of Mission Indians | |
| Federal | Kevin Golden, EPA Reg VIII | |
| | Donna Lamb, USDA | |
| | Alternate: Mark Scruggs | |
| Industry: | Shawn Kendall, Phelps-Dodge | |
| | C.V. Mathai, Arizona Public Service | |
| Environmental: | John Bartlit, New Mexico Citizens for Clean Air and Water | |
| | Mike Williams, New Mexico Citizens for Clean Air and Water | |

INITIATIVES OVERSIGHT COMMITTEE

| | | |
|-----------|--|------------------|
| State: | Greg Green, OR | 3 years |
| | Margie Perkins, CO | 2 years |
| | Ursula Trueman, UT | 1 year, Co-chair |
| Tribal: | Arnold Taylor, Hopi | |
| | Patricia Mariella, Gila River | |
| | Marvin Sarracino, Pueblo of Laguna | |
| | Alternate: Linda Williams, Nez Perce Tribe | |
| Federal: | Amy Zimpfer, EPA Reg IX | |
| | Chris Shaver, National Park Service | |
| Industry: | David Mills, PacifiCorp | |

Nader Mansour, Southern California Edison
Environmental: James Martin, Environmental Defense Fund
Rick Moore, Grand Canyon Trust

It was decided to establish a nominating committee as specified in the by-laws to create the Public Advisory Board, the Communications Committee and the International Projects Committee. States have nominated Orville Green of Idaho, and someone from Wyoming, probably Dennis Hemmer, to the Nominating Committee. Felicia Marcus will identify a federal representative and tribes were asked to submit 2 names to John Leary.

Reports from Current Forums

Lyle Nelson reported for the Market Trading Forum. Subgroups have been formed to address issues. They expect to have options ready for public outreach by May 1998, and final recommendations to the WRAP by June 1998. He noted that they have been unable to get any representative of small business to participate and have only one environmental representative.

Mike George reported for the Sulfur Dioxide Forum. Their goal is to ensure that the 1990 inventory is as accurate as possible. In contrast to GCVTC, they are looking at actual emissions, not allowables. By January 1998, they expect to be able to send letters to sources verifying their inventory numbers. They need more tribal representatives in their work; only one has appeared.

Financial Status

John Leary reported that \$94,780 had been received for federal fiscal year 1998, with another \$135,922 just awarded. He reviewed expenses, noting an intention to set up a home page on the Internet. For FY98, approximately \$369,298 is anticipated. Felicia Marcus encouraged the WRAP to seek other sources of funding as well.

Travel Policy

John Leary reviewed the travel policy used by the Grand Canyon Visibility Transport Commission, noting that representatives of non-profit organizations received reimbursement of 75% of their travel and hotel expenses, and there was a hardship provision for members of the Public Advisory Committee. A tribal representative asked if all tribal travel could be handled through NTEC instead of WGA; Leary replied that is fine and could be worked out. Leary, Paredilla and Felicia Marcus will discuss this and work out a solution.

There was discussion of the need to hold down costs for meetings; Dianne Nielson asked for suggestions of meeting sites.

Next Meeting Date

The group agreed to meet on November 14, probably in Las Vegas. Those unable to attend can be tied in by telephone. The primary purpose will be to discuss the comments to be submitted to EPA on the Regional Haze proposal.

There was discussion of later meetings, probably late in January. The co-chairs will work out the exact date.

Other Issues

Greg Green noted that there were communication issues with tribal representatives which came up during the Commission and were never settled and they are still with us and need to be settled. There are cultural issues and communication issues and we need to resolve the communication part. Dianne Nielson asked how we can feel comfortable here together. She noted that state ways and tribal ways are different, and we are respectful. Governor Salvador responded that tribes are lacking in communication too, and education of tribal people must continue. Lewis McLeod said tribes need one contact person; Jerry Pardilla at NTEC said it is in the work plan that he notify tribes. Barry Aarons suggested that state and tribal people need to sit down together and get a better understanding of tribal protocol and procedures; face to face discussions are best. Greg Green suggested we might have meetings on tribal grounds to help resolve the cultural issues. Stanley Paytiamo of Acoma noted that last month they had an all-day session with upper level EPA people which seemed quite successful; he suggested that NTEC of the Institute for Tribal Environmental Professionals at Northern Arizona University could arrange something along those lines.

The meeting adjourned at 4:00 pm.

WESTERN REGIONAL AIR PARTNERSHIP (WRAP) REPORT FROM THE NOMINATING COMMITTEE

COMMITTEE MEMBERSHIP

Felicia Marcus
Dennis Hemmer
Jay Littlewolf
Farshid Farsi
Orville Green

I. Public Advisory Board, International Projects Committee and Communications Committee

BACKGROUND

The Nominating Committee was created at the September 30, 1997, WRAP meeting for the purpose of recommending a slate of candidates for WRAP standing committees. At the meeting the WRAP also adopted a work plan that put into place an outreach processes for soliciting parties interested in serving on these standing committees. The outreach process produced thirty two individuals interested in serving on standing committees. Table 1 contains the names of these individuals.

The WRAP's by laws identify ten categories of interest groups needed to be represented on WRAP standing committees. The distribution of applicants by these categories is shown in Table 2.

REVIEW OF APPLICANTS AND RECOMMENDATIONS

A. Public Advisory Board. (Twenty four members needed). There are twenty applicants for the Public Advisory Board. As illustrated in Table 2, there is an insufficient number of applicants in several of the by law categories. Consequently, the Nominating Committee recommends that the selection of members to the Public Advisory Board be delayed until a full compliment of candidates can be found for each category. It is also recommended that members of the WRAP generate additional candidates and submit them to the Nominating Committee before the next WRAP meeting. It may be appropriate that WRAP members volunteer to generate candidates for specific categories.

B. International Projects Committee. (Approximately ten members needed). There were seven applicants for this committee. As Table 2 indicates, there are insufficient applicants by by law categories. The Committee recommends the same action as in A.

C. Communications Committee. (Size not prescribed in by laws). There are five applicants for the communications committee. The Nominating Committee recommends WRAP members

recruit additional members as above. However, many functions of the Communications Committee are critical to the success of the WRAP and cannot be delayed until the appointment of a committee at the next WRAP meeting. Although the WRAP has an Interim Communications Committee it does not have sufficient membership and expertise to carry out near term obligations. The Nominating Committee requests that WRAP members come to the meeting prepared to add membership to the Interim Committee. Former members of the Grand Canyon Visibility Transport Commission's Communications Committee would be excellent candidates for this group. The Nominating Committee also recommends that Pat Murdo, one of the Communications Committee applicants, be asked to serve on the Interim Committee because of her expertise.

II. Technical and Initiative Oversight Committee Cochairs

BACKGROUND

The WRAP by laws call for the appointment of Technical and Initiative Oversight Committee Cochairs by the WRAP. At its September 30, 1997, meeting, the WRAP appointed members to the TOC and IOC but did not appoint cochairs. Subsequently the TOC and IOC appointed acting cochairs. The TOC Acting Cochairs are Anthony Bynum of the Yakima Nation, Kevin Golden of EPA and Shawn Kendall of Phelps Dodge Corp. The IOC Cochairs are Patricia Mariella of the Gila River Community and Ursula Trueman of Utah.

RECOMMENDATION

The Committee nominates the Acting Cochairs as candidates for the TOC and IOC Cochairs.

III. Secretary/Treasurer

BACKGROUND

The WRAP By Laws have established a position of Secretary/Treasurer. This position is "responsible for creating a written record of all meetings, teleconferences and discussion of the WRAP; transmits this information to all members of WRAP; may receive assistance by staff or delegate to committees established by WRAP. Proposes annual budget to the members of WRAP, reviews audits and final reports of WRAP and committees receiving funds on behalf of WRAP."

RECOMMENDATION

The Nominating Committee will be soliciting a volunteer for this position at the WRAP meeting. Members are asked to strongly consider volunteering for this position.

| Table 1 STANDING COMMITTEE APPLICANTS | | | | | |
|---|---|--------------------------------------|---|---|--|
| Name | Affiliation | Public Advisory Board | Int'l Projects Committee | Communi- cations Committee | |
| Ellen Porter Plant Environ. Mgr. | Louisiana Pacific (MT) | x | | x | |
| Rebecca Watson Partner | Gough, Shanahan, Johnson & Waterman (MT) | x | | | |
| Robin Reints | General Public (WY) | x | | | |
| Miguel Flores Special Assistant | NPS Air Resources Division | | x | | |
| Charles R. Bazan forest Supervisor | Tonto National Forest (AZ) | x | | | |
| Gerry Gause Air Resource Program Manager | Pacific SW Region, Forest Service (CA) | | | x | |
| James K. Miller Manager of Environ. Affairs | Basin Electric Power Cooperative (ND) | x | | | |
| C. Paul Callahan Hydrologist | Land & Water Consulting Inc. (MT) | | 2 | 1 | |
| Al Zemsky | Region 9, EPA | | | x | |
| Amy Zimpfer | Region 9, EPA | | x | | |

| Table 1 STANDING COMMITTEE APPLICANTS | | | | | |
|---|---|--------------------------------------|---|---|--|
| Name | Affiliation | Public Advisory Board | Int'l Projects Committee | Communi- cations Committee | |
| Steve Lipman | EPA/OAR | x | | | |
| Pat Murdo Manager, MT Programs | Mansfield Center for Pacific Affairs (MT) | 2 | 3 | 1 | |
| Dan Heilig Associate Director /Staff Attorney | Wyoming Outdoor Council (WY) | x | | | |
| John L. Cox, Ph.D. Air Quality Coordinator | DNR, Confederated Tribes of the Umatilla Indian Reservation (OR) | 1 | 2 | | |
| Prem S. Bhardwaja Principal Scientist | Salt River Project (AZ) | | x | | |
| John Crouch Director of Gov't Relations | Hearth Products Assn. (CA) | x | | | |
| Dave Shilton, P.E. Senior Staff Engineer | PacifiCorp (OR) Environ. Svs. Depart. | | x | | |
| Joseph D. Thompson Director | Environ., Fire & Security Services Thiokol Propulsion Group (UT) | x | | | |

| Table 1 STANDING COMMITTEE APPLICANTS | | | | | |
|--|---|--------------------------------------|---|---|--|
| Name | Affiliation | Public Advisory Board | Int'l Projects Committee | Communi- cations Committee | |
| George L. Raymond Director of Real Estate & State Gov. Affairs | Cyprus Amax Minerals Company (CO) | x | | | |
| Richard A. Kester, Ph.D. V.P., Air Quality | CH2MHill (WA) | | x | | |
| Peter W. Hildebrandt | Environmental Consultant (WA) | 1 | 2 | | |
| Cathy Reheis Managing Coordinator | Western States Petroleum Assn. (CA) | 1 | | 2 | |
| Nina Dougherty Conservation Chair | Utah Chapter of the Sierra Club (UT) | x | | | |
| William M. Auberle Associate Professor, Civil/Environ. Engineering | Northern Arizona University, Director, American Indian Air Quality Training Program | | x | | |
| James A. Holtkamp Partner | LeBoeuf, Lamb, Greene & MacRae (UT) | 1 | 2 | | |
| David Feuerherd Program Director | American Lung Assn. (AZ) | x | | | |
| Ed Fox V.P. for Environ., Health & Safety | Arizona Public Service (AZ) | x | | | |

| Table 1 STANDING COMMITTEE APPLICANTS | | | | | |
|---|--|--------------------------------------|---|---|--|
| Name | Affiliation | Public Advisory Board | Int'l Projects Committee | Communi- cations Committee | |
| Walter L. Bouchard Principal | Bouchard & Associates, Inc. ..Environ. Consultants (AZ) | x | | | |
| Mark C. Green, Ph.D. Associate Research Professor | Desert Research Institute (NV) | x | | | |
| Dennis Arfmann Partner | Holme Roberts & Owen, LLP (CO) | | x | | |
| Paul T. Willhite, P.E., D.E.E. Regional Mgr. Environ. Svs. | Stone Container Corporation (GA) | x | | | |
| Clif Benoit Air Resource Mgmt Director | Intermountain Region of the U.S. Forest Service (UT) | x | | | |

Table 2 **Distribution of Standing Committee Applicants by Charter Categories**

| | Public Advisory Board | International Projects Committee | Communicaitons Committee |
|-------------------|-----------------------------|--|-----------------------------|
| 1. Industry | 6 | 2 | 1 |
| 2. Small business | 1 | | |
| 3. Mobile Source | | | |
| 4. Federal | 3 | 2 | 2 |
| 5. Tribes | 1 | | |
| 6. States | | | |
| 7. Local | | | |
| 8. Academia | 1 | 1 | |
| 9. Environmental | 4 | | |
| 10. Public | 1 | | 1 |
| 11. Other | 3 | 2 | 1 |
| Totals | 20 | 7 | 5 |

TAB

C

MEMORANDUM

To: Governor Michael O. Leavitt, WRAP State Co-Chair;
Members of the WRAP; Designees

From: Bill Grantham, NTEC WRAP Coordinator, for the WRAP Tribal
Partners.

Re: Clarification and Proposed Amendments to WRAP Charter

Date: March 4, 1998

Dear Governor Leavitt and WRAP Members:

This memorandum will serve as 10 day notice, as required by the WRAP Charter, Part 9, for the introduction of Charter amendments at the next WRAP meeting, March 18-19, 1998.

At this meeting, the Tribal Partners will seek the WRAP's consensus on an understanding of the provisions of the Charter regarding "designees" and "alternates," and may propose an amendment to these provisions, after consideration in a pre-meeting Tribal caucus. In addition, an amendment to the "Purpose" section of the Charter may also be proposed, to incorporate a recognition of the Federal Government's Trust responsibility towards tribes. Finally, a clerical amendment will be proposed to update the state membership list.

The proposed clarification and amendments are briefly explained below.

I. TRIBAL REPRESENTATION: DESIGNEES AND ALTERNATES

The Western Regional Air Partnership charter specifies that "Tribal participation shall be determined by the tribes located in the geographical region encompassed by the 12 states and shall be representative of the 12 state region." Additionally, it provides that initial tribal membership shall be based on the number of states choosing to join the WRAP. That number is currently 10.

Accordingly, interested tribes in the region, with coordination from NTEC, have undertaken a process to select 10 Tribal Partners. This effort culminated in a meeting in San Diego on February 18 and 19 at which consensus was reached on the identity of these Partners.

However, nearly all tribes present expressed misgivings regarding the fairness and

practicality of asking 10 tribes to represent the diverse interests of the over 200 tribes in the region, regardless of what criteria are used to select them. Therefore, in order to mitigate these concerns to the extent possible within the structure provided for by the WRAP Charter, the tribes made their selection with the understanding that four additional tribes would serve as “alternates” to the member (partner) tribes.

This could be achieved by interpretation or amendment of the following Charter sections:

A. Part 2, Section 2.d.:

“A tribal leader shall identify in writing a designee to WRAP. Designees shall serve at the pleasure of their respective leadership. Any Changes in such designation shall be made in writing to the WRAP.”

The tribes would interpret this as allowing designation of an individual from a different tribe, such as a member of one of the four “alternate” tribes. This would allow for the “designation” mechanism to be used to provide for alternative tribal representation in the event a partner tribe is unable to attend a WRAP meeting.

It is recognized that, in the context of the structure of the WRAP Charter, particularly the parallel section for states which provides that designees “serve at the pleasure of their respective governors,” there is an implication that tribal designees would be members of the designating tribe. However, though this structure is appropriate for states, the tribes believe that flexibility in the ability to designate is necessary in order to accommodate the charter to the very different political and logistical situation they face.

B. Part 4, Section 3 Alternates:

“A WRAP member or designee may designate an alternate from the member’s or designee’s organization that may vote in that members or designee’s absence, provided that the member or designee notifies the Co-Chairpersons in writing of the alternate designee’s status prior to the meeting”

An amendment may be proposed by one or more of the Tribal Partners to strike the words “from the member’s or designee’s organization” from this sentence, in order to provide maximum flexibility in securing tribal participation at each WRAP meeting. Thus, if a designee from one of the four “alternate” tribes were unavailable, he or she could look to additional non-Partner tribes in selecting an appropriate alternate.

II. RECOGNITION OF U.S. TRUST RESPONSIBILITY

The following sentence may be proposed for addition to the “Purpose” section of the Charter, preceding the last sentence of the first paragraph:

“The Partnership also recognizes the United State’s trust responsibility as carried out by the federal agencies to protect tribal resources from degradation.”

This would make explicit the Partnership’s understanding of the role of the Federal government in relation to tribal environmental resources.

III. CORRECTION TO STATE MEMBERSHIP LIST

An amendment will be proposed to strike “Nevada” from the Charter Part 2, Section 1.a., in recognition of that state’s decision not to participate in the WRAP.

TAB

D

WESTERN REGIONAL AIR PARTNERSHIP GUIDELINES FOR FORUMS (2/25/98)

PURPOSE OF FORUMS

Forums are a major tool to be used by the Western Regional Air Partnership (WRAP) to carry out its purpose. The purpose of the WRAP is to promote and monitor the implementation of the recommendations resulting from the Grand Canyon Visibility Transport Commission and, with the concurrence of its members, engage in other common regional air quality issues. Many of the Commission's recommendations require additional data or stakeholder discussion before they can be implemented. Forums are the major tool for stakeholder participation, gathering and reviewing data, and the development of detailed implementation tactics and action plans.

FORUM MEMBERSHIP

WRAP by-laws direct that forums should consist of principals from the following categories:

- * Industry (focused on production sector but excluding the mobile source sector)
- * Small business (focused on the service sector, including "green industry")
- * Mobile sources (including vehicle manufactures and transportation planners)
- * Federal government
- * Tribal government
- * State government
- * Local government
- * Academia
- * Environmental groups
- * General public

In all cases it may not be possible or appropriate to include each of the categories in stakeholder processes. However, whenever a category is not included, an explanation for the exclusion should be recorded. Forums are encouraged to have balanced geographic representation from throughout the WRAP area and contain diverse perspectives.

Forums are to contain 10-12 members.

HOW FORUMS ARE CREATED

The TOC and IOC have the responsibility of identifying issues to be addressed by their respective forums based on input, priorities and directions from the WRAP. The TOC and IOC will identify co-chairs for each forum. In consultation with respective co-chairs, the TOC or IOC will provide written objectives, expectations, and process requirements for each forum in the form of a forum charge. Forums will be formed on an ad hoc basis and will sunset upon completion of the work as defined by the TOC or IOC. The *Interim Work Plan* adopted by the WRAP on September 30, 1997, called for the establishment of forums To implement the Grand Canyon Visibility Transport Commission and for the establishment of a Research and Development forum.

HOW FORUM MEMBERSHIP IS DETERMINED

The TOC and IOC appoint co-chairs for the respective forums they create. The co-chairs are then responsible for appointing committee members following WRAP guidelines. The co-chairs will develop a

draft list of forum members for review by the IOC or TOC, as appropriate, to verify the membership conforms to WRAP guidelines. In addition, the WRAP reserves the right to review forum membership.

FORUM RESPONSIBILITIES

Based on the forum charge, forums are responsible for creating detailed work plans for achieving their objectives and expectations consistent with their process requirements. The work plan will include a schedule for progress reports and project completion. Forum members will determine their schedule of meetings and meeting locations. It is expected that some forums will complete their tasks within a matter of months and some will require more time.

Forums are responsible for translating technical materials into a form understandable by the general public and to appoint a liaison to the WRAP's Communications Committee.

FORUM PROCESSES

Forums are to conduct their business on a consensus basis. Consensus has the following parameters:

- * Consensus in agreement.
- * Consensus is selection of an option that everyone can live with.
- * Consensus may not result in the selection of anyone's first choice, but everyone is willing to support the choice.
- * Consensus is not a majority vote.

When a forum cannot reach a consensus on an issue it will be referred to the creating oversight committee (TOC or IOC). If the oversight committee cannot reach a consensus on the issue it will be referred to the WRAP for resolution.

Forum members are expected to represent the views of all stakeholders within their constituencies and are expected to communicate regularly with these stakeholders. Even if a member does not necessarily agree with the position of an associated stakeholder who is not a member, the forum member has a responsibility to raise this position to the other forum members during debate and discussion.

Forums are expected to communicate with the general public and are encouraged to hold public workshops as a tool to solicit public input.

All meetings shall be open to the public, and should include an opportunity for those members of the public who are observing the meeting to comment on or provide suggestions relevant to the committee's work. The chairs and forum members should use their discretion, but may restrict non-members' comments to specific time periods as necessary to ensure the forum discussions are not disrupted and to ensure the integrity of the forum process. Agendas should clearly indicate how and when the meeting will provide the opportunity for public discussion

Broad-based and open input and discussion is a critical factor to the success of all forums in developing work products for the WRAP. Each forum must establish processes to ensure that affected groups can provide input, either as members of the forum or during specific times set aside for public input. Such times may vary depending on the circumstances under discussion. A few possibilities include:

- I. setting aside time during the meeting to take comments from the public;
- II. setting up specific meetings, perhaps immediately before or after a forum meeting, to discuss

- specific topics with a broader group; and
- III. assigning specific forum members the responsibility of coordinating with specific individuals or groups who are not forum members.

All meetings shall be open to the public, and should include an opportunity for those members of the public who are observing the meeting to comment on or provide suggestions relevant to the committee's work.

When a forum takes a matter to the WRAP, the forum shall appoint members to participate in the WRAP's discussion of the matter.

Forums will submit work products to the IOC or TOC, as appropriate, to review and comment prior to PAB and WRAP consideration. The IOC or TOC will review the work products to assess consistency with the WRAP Charter and By-Laws, and with the forum charge. The IOC or TOC will refer issues and questions back to the forum for resolution. If the IOC or TOC subsequently cannot reach agreement with a forum on an issue, it will be forwarded to the PAB and WRAP for resolution.

SUPPORT FOR FORUMS

An initial orientation session will be provided for each forum by the TOC or IOC for the purpose of providing background information, an opportunity to discuss the forum's charge and to cover administrative issues.

Forums may staff themselves, be staffed by trade groups, consultants, professional organizations, etc., as resources allow. The TOC and IOC will assist forums in identifying necessary resources.

Consistent with the WRAP Travel Policy, all or partial reimbursement for travel and lodging will be available for qualifying forum members. Each forum will distribute this policy to forum members. In general, state and tribal members will be eligible for 100% reimbursement of travel and lodging, non profit and local government 75% and individuals from "disinterested" organizations 50%. Federal agency personnel and private sector representatives are not eligible for travel reimbursement.

Forums are encouraged to make use of conference calls, e-mail and other technological tools to minimize travel. When possible, forums are encouraged to meet at a members office to minimize the expenses for meeting facilities, if adequate facilities can be arranged.

Draft 2/20/98 - For Discussion with Forum Co-Chairs
Fire Emissions Joint Forum Charge

Oversight: Joint by Technical Oversight Committee and Initiative Oversight Committee
Schedule: Anticipated Start Date - June, 1998

Mission

The Fire Emissions Joint Forum (FEJF) is to make recommendations to the WRAP and related WRAP forums on policies and methodologies for:

- estimating air pollution emissions and their effects on air quality and visibility due to smoke from various natural and human-caused fires
- developing a data set and associated tracking system for those emissions in the geographical area at least encompassed by the GCVTC states and tribes
- recommending strategies and methods to manage emissions from these sources.

This group will specifically cover wildland fire (wildfire, prescribed natural fire), and prescribed fire (silvicultural, rangeland, and agricultural). (Other types of burning such as residential wood combustion and open burning may be considered, but are not the primary focuses of this group.) This forum will coordinate with both the IOC and the TOC.

Background

The GCVTC recommendations lay out improvements in smoke management and the tracking and projecting of future emissions that are needed to protect visibility. The recommendations recognize the need to increase some kinds of burning in order to address other environmental goals. The recommendations also recognize the complexity of estimating the emissions and the impacts caused by the increase in burning.

Improvements made in emission factors based on research by federal land managers and others is not readily available to states and tribes, so outdated AP-42 numbers are used. There are ongoing efforts to update these factors and make them available. There are other efforts to standardize reporting of fires and prescribed burning to facilitate tracking. WESTAR, NWCG and others have held workshops to improve tools available for estimating emissions and effects of smoke. National efforts to assess similar technology issues including the EPA FACA group and the EPA wildland fire/air quality policy group and the agricultural burning FACA workgroup have developed policy and technology papers that may address some of the GCVTC recommendations with respect to fire. These efforts and others need to be reviewed and incorporated into the forum's recommendations where they further the development of plan for implementing the GCVTC recommendations relating to emissions from fire. Where there is not sufficient progress from other efforts, the forum will develop and implement the GCVTC recommendations (e.g. implementation of smoke management programs).

The use of fire on tribal lands is a significant management and cultural issue needing due consideration in the work of this forum.

Proper documentation is critical to the success of the current and future technical and policy processes, and the FEJF will develop such formal reports and progress reports as deemed necessary by the IOC and TOC jointly overseeing this forum's work. These are defined below.

Scope and Related References

The first charge of the FEJF is to address both the policy and technical recommendations of the GCVTC that are related to fire emissions. For those unfamiliar with the activities of the GCVTC it will be instructive for them to review the entire document, "Recommendations for Improving Western Vistas," but the following specific references should be reviewed from those recommendations that refer to fire emissions explicitly or emissions inventories in general p. 48, p. 55, p. 60, pp. 61-63, and pp. 85-87.

In additions, a GCVTC report, "Development of an Emissions Inventory for Assessing Visual Air Quality in the Western United States" should be reviewed for an understanding of what was done previously. For many sources, the 1990 baseline inventory is to be the starting point for emissions inventory development.

Because of the seasonal and yearly variations in fire emissions, a second GCVTC-related report "Wild and Prescribed Fire Emissions in the Grand Canyon Visibility Transport Region" should also be evaluated closely. This describes the data set used during the technical work, which may also be used as a base for the work of the FEJF.

Some familiarity with pertinent efforts by EPA and other groups dealing with fire activities is needed. In particular, some knowledge of the recent Express Team workshop would be beneficial. Also the efforts to update AP-42, the technical papers of the EPA fire policy workgroups, the new fire reporting systems under development by the federal agencies.

Finally, EPA's Emissions Inventory Improvement Project (EIIP) database has some broad-based potential to be used by several of the emissions inventory groups in some manner, so the FEJF should explore the potential of that resource.

Tasks and Deliverables

1. Develop work plan for including who will be responsible for what, when tasks will be completed, and how cooperation will be ensured. The FEJF will develop a work plan in consultation with the IOC and TOC that describes how the objectives and related tasks laid out here are to be achieved within the prescribed time frame. (The forum may form short-term workgroups of specialists to accomplish specific tasks.)

2. Review recent workshops and/or host a workshop to review the possibilities for estimating fire emissions and developing a database and tracking system for fires. A summary document of this task or workshop will be prepared as a guide to the ongoing work of the group.
3. Develop cooperative funding mechanisms between burners and regulatory agencies to implement smoke management programs and support cost of integrated assessment.
 - a) Identify current funding arrangements and costs
 - b) Assess potential funding mechanisms
 - c) Develop model cooperative funding agreements for use among two or more parties, on a jurisdictional or regional scale
4. Assess the progress of federal, state, tribal, and private prescribed fire programs to incorporate smoke effects in planning and application by the year 2000.
 - a) Evaluate progress of inclusion of smoke effects in burn planning and application
 - b) Evaluate progress of inclusion of smoke effects in programmatic planning
 - c) Evaluate progress of incorporation of smoke effects in air quality planning for regional haze
 - d) Report on progress and suggestions for improvement..
5. Integrated Assessment.
 - a) After thoroughly evaluating fire emissions estimating techniques, the FEJF will prepare a report for submittal to the TOC and IOC, the Public Advisory Board (PAB) and then to the WRAP. This paper will advise the adoption of such estimation methodologies as they deem most accurate and effective for improvement of the current assessment of fire emissions (which may or may not be appropriate for update in AP-42). (The paper may need to discuss the difference between methods for assessment on a broad scale as compared to project emission calculations - pros, cons, uncertainties, etc.)
 - b) Review and identify problems with the current fire emissions assessment and develop a process to address shortcomings by 1999. Once the methodologies are accepted by the WRAP, the FEJF will develop improved estimates of fire emissions (the assessment) for an area that at least includes the GCTVC transport region and may be larger with approval of the WRAP. The updated assessment will:
 - i) Identify specific areas where fire activities have or could have an adverse impact on health and/or visibility
 - ii) Identify areas where mechanical treatment could reduce emissions and associated health and welfare impacts
 - iii) Assess feasibility of alternatives to fire in identified areas, including biomass utilization, market development, and non-statutory administrative barriers
 - iv) Demonstrate for a specific area, the feasibility of using the fire emissions assessment for estimating ground level ???

- 134 c) Identify technical information and institutional needs, including
135 meteorological information, air quality monitoring, smoke dispersion
136 modeling, emission factor estimation techniques, interstate planning
137 mechanisms, and methods for comparing the economic, air quality and
138 other resource effects of wildfire and prescribed fire.
- 139 d) Once the assessment is completed the FEJF will host a workshop to
140 present all its findings. (Note: the FEJF is not limited to the number of
141 workshops it may have, but should include them in their work plan per
142 #2.)
- 143 e) The FEJF will draft a report considering the comments received during
144 and after the workshop, which summarizes all its work, research and
145 inventory development. That report is to be submitted to the TOC, IOC,
146 PAB, then the WRAP.
- 147 6. Smoke Management Programs.
- 148 a) After evaluating smoke management programs and the probable increases
149 of fire, the FEJF will prepare a report for submittal to the TOC and IOC,
150 the Public Advisory Board (PAB) and then to the WRAP. This paper will
151 summarize the adequacy of existing programs to handle additional
152 emissions and their effects on visibility, and the advisability of employing
153 enhanced smoke management.
- 154 b) Develop basic and enhanced requirements for smoke management
155 programs that can be adopted for all federal, state, tribal, and private
156 prescribed fire (including silvicultural, rangeland, agricultural) programs
157 by 2000.
- 158 i) Establish clearinghouse for existing smoke management plans and
159 smoke management MOUs
- 160 ii) Monitor progress and incorporate results of EPA Wildland Fire
161 Policy Committee (work about to be completed) and Agricultural
162 Fire Policy effort (in progress)
- 163 iii) Monitor and assess FLM, state, tribal and private parties progress
164 in developing and implementing smoke management plans
165 including training to field staff/burners
- 166 iv) Evaluate and track the improvement of tools, meteorological data
167 availability, etc.
- 168 c) Implement enhanced smoke management programs (including alternative
169 management practices) and emission reduction strategies in areas
170 identified in #5b.
- 171 i) Develop criteria for when enhanced smoke management practices
172 should be required
- 173 ii) Develop suggested requirements for enhanced smoke management
174 plans
- 175 iii) Recommend a schedule for incorporating such enhancements into
176 smoke management programs by 2000 (per #6b)
- 177 7. Emissions Tracking. Develop and implement an emissions tracking system for all
178 fire activities, wildland fire, silvicultural and agricultural prescribed burning. In

179 addition, the FEJF will develop a process whereby states and tribes can track
180 emissions from prescribed fire, wildfire, and agricultural burning. These systems
181 should address the amount, location, and time of smoke releases.

- 182 a) Evaluate/review existing methods for estimating emissions
- 183 b) Identify improved methods for estimating emissions, where needed
- 184 c) Develop model tracking system for potential use by individual states and
185 propose institutional mechanism for regional tracking
- 186 d) Establish use of common data elements for burners and air regulators.

187 8. Create public education program regarding role of fire in air quality to be
188 undertaken by land managers and other interested groups.

- 189 a) Establish clearinghouse of existing information (e.g. how smoke
190 management mitigates visibility and air quality impacts, risks of not using
191 prescribed fire, long-term and short-term risks/benefits, etc.) including
192 scope and method of distribution
- 193 b) Identify additional information needs and methods for presentation
- 194 c) Assign responsibility for development and distribution
- 195 d) Develop or suggest existing mechanisms for implementing educational
196 program

197 9. Assess the feasibility of and, where appropriate, develop recommendations for
198 annual emissions goals for all fire programs to minimize emission increases to the
199 maximum extent feasible. Involve states, tribes, state and federal land
200 management agencies and the private sector in the development of these goals.
201 (States and Tribes have the responsibility to adopt any goals.) Some period of
202 time will be needed to determine possible future emission goals. In the interim,
203 some alternative measures and strategies should be evaluated, including:

- 204 a) Use of reasonable alternatives to fire or alternatives to the amount of fuel
205 consumed to mitigate emissions where fire is critical
- 206 b) Use smoke management practices whenever and wherever possible.

207 10. Identify and remove non-statutory administrative barriers to emission reduction
208 strategies.

- 209 a) Determine barriers to use of non-burning alternative
- 210 b) Develop accountability mechanisms for ensuring consideration of the use
211 of alternatives in appropriate situations.

212 213 214 **Collaborative Requirements**

215
216 It is critical that the FEJF interact with the TOC and IOC, as well as other forums where
217 interfaces occur. In particular, the FEJF should:

- 218
- 219
- 220 • Coordinate with whatever IOC group is charged with dealing with control strategies
221 inside and near Class I areas.

- Work closely with the TOC forum charged with tribal data gathering in order to make sure that the group has the tools and resources necessary to acquire high quality information.
- Coordinate development with the Area Source Emissions Forum and the Stationary Source Emissions Working Group toward standard formats for area source emissions inventories and processes.
- Consult with the Tracking and Forecasting Forum to assure that the outputs of the FEJF are consistent with their direction.

Process Requirements

The FEJF should:

- Follow the general guidelines developed by the WRAP for all forums.
- Adhere to the objectives described above, and incorporate the deliverables into the process.
- Provide meeting minutes to the IOC and TOC, as well as short quarterly reports (no more than 5 pages).

Membership Criteria

Appointments to the FEJF will be based on credentials or interest in one or more types of fire being considered. The group will also be composed of a mix of technical and policy experts. Membership will adhere to WRAP guidelines.

Draft 2/16/98 - For Discussion with Forum Co-Chairs

Econometric Analysis Forum Charge

Oversight: Joint by Technical Oversight Committee and Initiative Oversight Committee

Schedule: Anticipated Start Date - August, 1998

Mission

The mission of the Econometric Analysis Forum is to provide the WRAP and WRAP forums with recommended methods for, and the results from, estimating the econometric parameters to be used to estimate changes in emissions over time, and for assessing economic effects on the region and subregions, including Tribes, of steps taken to reduce the emission of air pollutants in the past and in the future.

Background

In order to develop long-term forecasts of emissions in the region, the GCVTC utilized forecasts of population and industrial activity from an econometric model. In addition, the same econometric model was used to assess the secondary economic effects of changes in control costs expected under various emission management scenarios. In order to adequately characterize the projected changes in emissions associated with changes in population and economic activity it is necessary, in some cases, to augment standard econometric projections with more refined data. This will be particularly important for the proper characterization of emission trends in Indian Country and others subregions where standard econometric data may not be available or may not be a useful predictor .

Concerns about possible economic disbenefits of cleanup always temper the popular desire to enjoy clear air. Among Future Scientific and Technical Needs, the GCVTC Report of 1996 identified a need for improved economic analyses. Listed under ASSESSMENT TOOLS AND METHODOLOGY, Item No. 1 (p. 65) describes the need to undertake more detailed economic studies, as follows:

"More detailed economic studies are needed in order to determine more accurately the costs of controls and, of more importance, to understand the effects, both positive and negative, past and future, that these costs have on the local and regional economies and their growth. Potential economic effects needing more study include: economic benefits of cleaner air (such as to tourism), impacts of costs on companies and individuals that pay them (for instance, effects on profits, competitiveness and disposable income), and the feedback of control expenditures into other industries in the region (such as pollution controls, parts and services and electricity production to operate controls)."

In addition, the Grand Canyon Report acknowledged the need to understand the distribution of costs and economic impacts. In particular, the report acknowledged the need to ensure that distribution of costs and benefits needs to be fair. The Tribe report noted that it would be unfair if areas such as

Tribes which have not had the resources for development would have future growth constrained due to air quality control measures.

Scope and References

The work of the Forum has two schedule priorities--Phases I and II. The first work, in Phase I, must develop the outputs that most affect growth in the region as a whole, since other forums must wait for this information to complete the emissions forecasts. The Phase I outputs will include recommendations on econometric data and forecasting tools for use in developing emissions forecasts, and for developing estimates of the economic effects of the costs of control programs on those who pay the costs and those who earn the monies spent. Secondary economic effects also will be estimated. To fit the scheduling, Phase I analyses will not include many equally important considerations, such as the following: the human and cultural values of clean air; the equities of outlays and benefits as they affect subareas and their populations, down to individual tribes and towns; and the equities of air as a resource, and the residual effects on other users of the resource. Those factors not analyzed in Phase I will be included in Phase II.

The Forum should begin its work with the econometric models developed and used for the GCVTC Report of 1996 and their findings. A contact person for that work (and the REMI model that was used) is Anne Smith of Decision Focus, Inc. in Mountain View, CA. The next step should be to review and summarize the extensive literature on the general topic of the economic effects of pollution-control expenditures. The review should include references on general, theoretical analysis, and also specific studies of actual data and outcomes in specific cases. The review should include economic effects of clean air, such as on tourism and bringing new industries to the region. It is essential that sufficient statistical data be obtained that the information is not dominated by undocumented anecdotal citations. Research on tribal and rural economic indicators and analysis of the distribution of costs and benefits needs to be conducted by researchers who are familiar with tribal and rural economies and the sources of data.

Objectives and Deliverables

1. The Forum will select and develop economic models and methods for estimating and predicting the effects of control costs on the economic activity, jobs, and economic growth in the region and subregions (as outlined above per p. 65 of the 1996 GCVTC Report).
2. The Forum will acquire the best historical data related to the effects outlined above (per the 1996 GCVTV Report).
3. The Forum will use the model(s) and data to assess the past economic effects, on the region and subregions, of past control expenditures, and to estimate the future effects of recent and future expenditures. The assessment of past economic effects will be completed by March 1, 1999.
4. All Phase I tasks (per Scope, above) will be completed by November 1, 1999.
5. Phase II will begin while Phase I is being completed. Phase II will be completed by ????? In Phase II, the Forum will analyze those factors not included in Phase I (per Scope).

91 **Collaboration Requirements**

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93 The Forum must maintain close contact with other forums involved with economic data and effects.
94 At a minimum, these forums include: the Emissions Forecasting and Tracking Forum, the Tribal
95 Data Forum, and (later) the Controls Options Analysis Forum. Close contact is also required with
96 trade associations of emission-producing interests and those of emission-controlling interests.

97

98 **Process Requirements**

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100 The Forum will be overseen jointly by the TOC and IOC. Progress, issues, and problems of the
101 Forum will be reported to the TOC and IOC when appropriate, but not less often than every
102 six months. The Forum will acquire and maintain familiarity with the newest, most advanced, and
103 most effective econometric models and constructs potentially applicable to issues of the WRAP.
104 Toward this end, presentations will be solicited from economic researchers in relevant subjects from
105 academia, government, business and industry (including emission-producing industries, emission-
106 controlling businesses and industries, and air-related consulting businesses), and public interest
107 organizations. Based on these presentations, the Forum will select, develop, and use the soundest
108 methodologies to make the required assessments and forecasts.

109

110 **Membership Criteria**

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112 Appointments to the Econometric Analysis Forum will be based on credentials and research interests
113 and activities of the members. Membership will be consistent with the general criteria
114 outlined in the bylaws of the WRAP. The Forum membership should include experts in basic
115 economic theory and experts in building and using economic models and in assessing and
116 forecasting economic effects. Membership must include representation from academia, State
117 Government, Tribal Government or researchers familiar with tribal government and economies, US
118 EPA, business and industry (both from the emission-producing side and the emission-controlling
119 side), and environmental groups.

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121 air/jeconowp.doc

Draft 2/27/98 - For Discussion with Forum Co-Chairs

Emission Inventory Working Group

Oversight: Technical Oversight Committee

Schedule: Anticipated Start Date - Currently Active

Mission

The Emissions Inventory Work Group (EIWG) is to make recommendations to the WRAP and related WRAP forums with regard to methodologies for estimating emissions from both permitted and non-permitted stationary sources, and develop a comprehensive inventory of all emissions for the region at least encompassed by the GCVTC states and tribes.

Background

The GCVTC recommendations lay out a set of recommendations relative to stationary sources. Much of this work is directed at the establishment of emissions targets and a backstop trading market is presently under way, where the EIWG is attempting to verify and amend sulfur dioxide emissions for the 1990 baseline year as needed. In addition, the group is trying to get a reasonably accurate mid-period benchmark between the 1990 baseline and the initial target in 2000. The EIWG is also attempting to provide the Market Trading Forum (MTF) with pertinent information for designing the backstop market (e.g. the relationship between measurement / estimation method and source category and source size). Finally, it is rerunning the 1990 through 2040 baseline forecast scenario from the GCVTC with updated baseline emissions.

Through the course of its work the EIWG has tried to accommodate the future expansion of emissions inventory activities to other pollutants, whether it attempted to do that in support of market trading or if it was done for the broader database effort. Since the needed skills and questions to be asked are much the same for the support of market trading and for the broader emissions inventory effort, the EIWG will undertake the stationary source inventory for all pollutants that were captured in the 1990 baseline. Finally, in order to facilitate development of an inventory that is consistent across all source types, the EIWG will take information from the Mobile Source Emissions Forum (MSEF), the Area Source Emissions Forum (ASEF), and the Fire Emissions Forum (FEF) in developing a comprehensive data set. The membership of the EIWG is most appropriate for this activity.

The EIWG already has a work plan which would have been submitted to the Technical Oversight Committee (TOC). It will use the work plan as a start. Expansion will involve inclusion of other pollutants in support of the broader tracking function in addition to market development activities. In addition, the EIWG will coordinate discussion of and agreement on common approaches to collecting and processing emissions information as a part of the complete

inventory effort.

Proper documentation is critical to the success of the current and future technical processes, and the EIWG will develop such formal reports and progress reports as deemed necessary by the Technical Oversight Committee (TOC). These are defined below.

Scope and Related References

The first charge of the EIWG is to address the technical recommendations of the GCVTC that are related to SO₂ emissions. For those unfamiliar with the activities of the GCVTC it will be instructive for them to review the entire document, "Recommendations for Improving Western Vistas", but the following specific references should be reviewed from those recommendations that refer to stationary emissions explicitly or emissions inventories in general pp. 32-37, p. 55, p. 60, and pp. 61 - 63. As discussed above, the bulk of the stationary source recommendations are related to the development of emissions targets and a backstop market trading program. The EIWG is certainly still charged with support of those activities as they pertain to sulfur dioxide emissions, as well as any possible expansion to nitrogen oxides and particulate. More broadly, the recommendations also call for improved stationary source emissions information for all pollutants, which the EIWG is also to pursue. In addition, a specific recommendation on p. 62 calls for the standardization of comprehensive data collection in part through addressing: "current inconsistencies in the ways states collect and quantify emissions data." With the extensive state membership in the EIWG, it seems as if it is best placed to initiate discussion of the means by which data-related processes might be made more consistent. In addition, the EIWG is to coordinate with all emissions-related forums to assure that all sources are incorporated into a comprehensive inventory.

A GCVTC report, "Development of an Emissions Inventory for Assessing Visual Air Quality in the Western United States" should also be reviewed for an understanding of what was done previously during the GCVTC work. In many cases, in particular for market-based programs, the 1990 baseline inventory is to be the starting point for emissions inventory development. Finally, some familiarity with pertinent EPA activities is needed. In particular, some knowledge of the Emissions Inventory Improvement Project (EIIP) would be beneficial, because of the broad-based potential of those data for a number of source categories.

Objectives and Deliverables

1. The EIWG will modify the work plan cited above in consultation with the TOC that describes how the tasks defined here will be performed in the prescribed time frame. In particular, the EIWG will consult with the MTF as to the technical work it foresees in order for those tasks to be incorporated into the amended work plan.

2. The EIWG will host a workshop to discuss the data collection and data management processes

(i.e. measurement, quality assurance, and reporting), and how those might be more standard for data used by the WRAP. That workshop should at least include members from the other emissions inventory and forecasting related forums and working groups. A portion of that workshop will be the review and discussion of the emissions related work plans for comprehensiveness, and the EIWG will report to the TOC any gaps that exist. A summary document will be drafted that is to be used as a guide for future work.

3. The EIWG develop guidelines to assure uniformity of inventory data throughout the GCVTC region (e.g. “leveling the playing field” from jurisdiction to jurisdiction and source to source), and prepare a report for consideration of the TOC and later the WRAP. That report will describe a strategy for processing and reporting stationary source data for the WRAP.

4. Once approval is achieved for the approach defined in #3 and necessary information received from the MSEF, the ASEF, and the FEF the EIWG will develop a comprehensive data set in consultation with the TOC and WRAP forums that make use of those data. Through the course of that activity, both current emissions and the baseline 1990 data set should be addressed.

5. The EIWG will then prepare a final report that describes the entirety of its work with appropriate references to documents that define preferred approaches emission inventory development. It may be necessary to reconvene periodically to address questions raised by various forums performing analyses to answer transport and control strategy questions.

Collaborative Requirements

It is critical that the EIWG interact with the TOC, as well as other forums where interfaces occur. In particular, the EIWG should:

Work closely with the IOC’s Market Trading Forum in order to assure that they have the technical information they need.

Coordinate with the FEF, ASEF, and the MSEF in development of the comprehensive inventory.

Work closely with the Tribal Data Development Forum in order to make sure that group has the tools and resources necessary to acquire high quality information.

Consult with the Tracking and Forecasting Forum and the Modeling Forum to assure that outputs are consistent with their direction.

Serve as a resource for all IOC forums who may require emissions information.

127 **Process Requirements**

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129 The EIWG should:

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131 Follow the general guidelines developed by the WRAP for all forums.

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133 Adhere to the objectives described above, and incorporate the deliverables into the process.

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135 Provide meeting minutes to the TOC, as well as short quarterly reports (no more than 5 pages).

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137 **Membership Criteria**

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139 Appointments to EIWG will continue with consideration of other interested participants.

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Draft 2/16/98 - For Discussion with Forum Co-Chairs

Research and Development Forum Charge

Oversight: Technical Oversight Committee

Schedule: Anticipated Start Date - April, 1998

Mission

The mission of the Research and Development Forum is to provide the WRAP with recommendations on techniques and methods suitable for use in technical analyses in support of WRAP activities, and to develop a research agenda which can be communicated to the Technical Oversight Committee, in addition to the academic and regulatory communities which will support the long term needs of the WRAP.

Background

The state of the science is continuously changing as new methods and techniques are researched and brought into practical application. As our understanding of the cause and effect relationships improves, additional areas are identified which require research in order to minimize the uncertainty and improve the quality of analyses utilized for policy decisions. This forum will be the focal point for the evolution of assessment tools and methods to support the WRAPs decision making process. The forum will be responsible for reviewing the techniques and methods which the WRAP is planning to or has been utilizing, the new applied tools and techniques which have been published in the literature and brought into practical application, and review the areas where additional research is needed in order to improve the quality or reduce the uncertainty of assessments performed by the WRAP.

Scope and Relevant References

The Forum will focus on methods and research needs for estimation of emissions, forecasting of emissions, meteorological modeling for regional scale modeling, regional and near field air quality modeling, estimation methods for visual air quality, and measurement systems for the above. The Forum will monitor developments in the academic and regulatory communities relevant to these areas. The Forum will review the work of the GCVTC Technical Subcommittees and Alternatives Assessment Committee related to modeling in order to become familiar with the needs of regional air quality studies for visibility.

Objectives and Deliverables

The forum will develop an annual report to the WRAP which will review:

1. The strengths and limitations of methods currently in use by the WRAP,
2. Recommendations on new and improved methods and techniques which should be considered for use by the WRAP in order to improve the quality of the WRAPs workproducts, and
3. A proposed research agenda for the WRAP which will identify a prioritized list of research areas of interest to the WRAP which can be communicated to the Technical Oversight Committee, academic community and the regulatory community to assist in focusing work to improve the quality of analyses performed by the WRAP.

The Forum may issue interim advisories to the TOC and WRAP based on the development and adoption of improved standard techniques which the Forum believes should be considered by the

WRAP prior to the preparation of the Forum's next annual report.

Collaboration Requirements

The Forum will monitor developments of the IMPROVE Steering Committee, the USEPA OAQPS and ORD, the CARB, and other groups with similar objectives. The Forum will establish a method for issues to be communicated to the Forum from other WRAP forums for consideration on the agenda of the Forum.

Process Requirements

The Forum will hold an annual week long workshop. At this workshop, presentations will be made to the Forum members reviewing the tools and techniques which are currently being utilized or are being developed by the WRAP. In addition, presentations will be accepted from researchers which have developed new techniques and methods for consideration in the Forum's deliberations. Based on these presentations, the Forum will develop an annual report as outlined above.

The forums work products will be presented to the Technical Oversight Committee and to the Public Advisory Board prior to the report being presented to the WRAP. The forum will be responsible for responding to public comment on the report during the presentation to the WRAP.

Membership Criteria

Appointments to the Research and Development Forum will be based on the credentials and research interests and activities of the members. Because of the nature of this forum, substantial representation from the academic community (up to six representatives) will be necessary, and the forum membership will be balanced to maintain a total membership of 12 members. Membership must include State Government, Tribal Government, US EPA, Federal Land Managers, an Industrial representative, and an Environmental organization. At least one member of the forum shall be a member of the Technical Oversight Committee.

Draft 2/16/98 - For Discussion with Forum Co-Chairs

Emissions Forecasting and Tracking Forum Charge

Oversight: Technical Oversight Committee

Schedule: Anticipated Start Date - April, 1998

Mission

The mission of the Emissions Forecasting and Tracking Forum is to oversee the development of a comprehensive emissions tracking and forecasting system which can be utilized by the WRAP, or its member entities, to monitor the trends in actual emissions and to forecast the anticipated emissions which will result from current regulatory requirements and alternative control strategies. In addition, this forum is responsible for the oversight of the assembly and quality assurance of the emissions inventories and forecasts to be utilized by the WRAP forums.

Background

The Grand Canyon Visibility Transport Commission assembled an emission inventory for use in the assessment of current conditions and projected conditions under various emission management scenarios. In order to accurately project the changes in visibility conditions which might be anticipated in the future, a comprehensive emission inventory is needed incorporating information from all source sectors throughout the region. In addition, controls which are being implemented as part of current regulatory programs to bring areas into compliance with the National Ambient Air Quality Standards (or State/Tribal standards) need to be reflected in the emissions forecasts. Several areas for improvement were identified in the GCVTC inventory. Some of these are related to uncertainties in emissions factors, an overall lack of data in some areas, and the lack of a methodology to incorporate and integrate the effects of current known control programs on future emissions. Many of the opportunities for improvement, however, center on the inability to interchange information between the regional work group and the States and Tribes. This will become increasingly important with the promulgation of the new Regional Haze Rules. In order to assist the member States and Tribes, this Forum will be responsible for developing a data interchange standard and identification (and or construction/adaptation) of the necessary computer software tools to allow for the assembly of an integrated region wide emission inventory from data provided by the State/Tribal entities. In addition, the system must provide the flexibility to incorporate econometric projections for growth and demand which will provide a basis for forecasting emissions in the future, and specialized micro-inventories in and near Class - I areas, and refined emission inventories for Indian Country.

The GCVTC recommendation related to stationary sources of sulfur dioxide requires the establishment of an accurate method of tracking sulfur dioxide emissions in the GCVTC region. The system must therefore provide for the ongoing monitoring of historical emissions in order to determine the status of emissions versus any projected targets or caps which might be appropriate.

Scope and Relevant References

The GCVTC recommendations contain a number of issues which will be focused on by this Forum. These include:

Develop an accurate emissions accounting system for stationary sources.

48 Develop a control technology reporting system and database.

49 1. Develop an accounting system for market-based urban mobile source programs.

50 2. Establish an emissions inventory methodology.

51 3. Develop a standardized comprehensive emissions data collection system.

52 4. Develop a means of tracking mobile source emissions.

53 5. Develop an emissions tracking system for all fire activities.

54 6. Improve regional tracking and monitoring toward:

55 - Identifying patterns of growth that cause significant emissions increases.

56 - Allow for continuing technical work to identify additional clean air corridors.

57 Develop and update a regional emissions inventory.

58
59 The forum will review the GCVTC work products from the Emissions Subcommittee, the work
60 products of the Alternatives Assessment Contractors, and the Integrated Assessment System
61 User's guide to develop a prioritized list of issues which must be considered in the development
62 of the regional emissions inventory forecasts.

64 **Objectives and Deliverables**

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66 1. The Forum will develop a report which describes the recommended methods and approaches used
67 for emissions tracking and forecasting. This report will include the standard data interchange
68 formats for assimilating and distributing information needed by a comprehensive emissions
69 inventory tracking and forecasting system. This report should be completed and submitted to the
70 TOC and PAB by October 1, 1998.

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72 2. The Forum will review available software tools and techniques which could be accommodated to
73 achieve the objectives of the report described in Objective (1) above and prepare a detailed plan and
74 budget for the development/adaptation of a software system which will provide the functionality
75 required by the system. The plan should include time tables and resource estimates for consideration
76 by the WRAP for funding. The plan is to be completed and submitted to the TOC and PAB by
77 December 1, 1998.

78
79 3. The Forum will oversee the development of the software system and perform the necessary quality
80 assurance and acceptance testing to assure the system is adequate and meets specification. The
81 software product must include the necessary interface and conversion programs to convert existing
82 emission inventories into the new format, as well as programs to convert the new emission
83 inventories into the formats used by States and Tribes and the Air Quality Modeling Forum. The
84 software development must be completed by October 1, 1999.

85
86 4. The Forum will be responsible for disseminating the software tools to member States and Tribes for
87 their use, and will assist the States and Tribes in developing the information for a comprehensive
88 inventory for regional assessments. The testing and validation of the software and production of a
89 comprehensive integrated test inventory will be completed by October 1, 2000 for data from the
90 most recent year which the State/Tribe has an emission inventory.

91
92 5. The Forum will be responsible for the assembly of a final year 2000 emission inventory for use in
93 final assessments by July 1, 2001.

Collaboration Requirements

This Forum will work closely with the Emissions Inventory Workgroup and other emissions related forums which are focused on inventory improvement. In order to accommodate the assessments of control strategies, a standard interchange format for control technology information and its use in emissions forecasting needs to be established in collaboration with the Control Options Analysis Forum. Finally, the format and content of files needed to support air quality modeling need to be coordinated with the Regional Air Quality Modeling Forum.

This Forum will also collaborate with USEPA's and CARB's groups working on emission inventory improvement and forecasting systems development.

Process Requirements

Related to objective 1 above, the Forum will hold an initial workshop to review current emission inventories and methods in use by the States, Tribes, and US EPA. Based on this the Forum will develop the report and hold a second workshop in order to disseminate information in the report and receive feedback from the professional and public community. The Forum will then refine the report which will be submitted to the TOC and PAB for comment prior to the Forum's presentation to the WRAP.

The Forum will hold workshops at the beginning and end of the work for remaining objectives. The purpose of the first workshop is primarily designed to assimilate information. The objective of the second workshop is to disseminate the draft work product and receive comment. The Forum will report back to the TOC and PAB on each major objective prior to final presentations to the WRAP. The Forum will issue quarterly status reports to the Technical Oversight Committee which will be primarily responsible for monitoring the progress of the development effort.

Membership Criteria

Appointments to the Emissions Forecasting and Tracking Forum will be based credentials and research interests and activities of the members. Membership will be consistent with the general criteria outlined in the bylaws of the WRAP. At least one member of the Forum must have expertise in economic projections as traditionally used for emissions forecasting, one member must possess expertise in the development of information systems, one member must possess expertise in emissions factors and forecasting, and one member must possess expertise in the use of emissions in air quality forecasting.

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Draft 2/27/98 - For Discussion With Forum Co-Chairs

Tribal Data Development Forum Charge

Oversight: Technical Oversight Committee

Schedule: Anticipated Start Date - April, 1998

Mission

This forum will provide the WRAP with much needed information on tribal air quality and help to improve the overall understanding of tribal protocols and processes for obtaining and using tribal data in its quest to implement the Grand Canyon Visibility Transport Commission (GCVTC or the Commission) recommendations. With the concurrence of the WRAP, the scope may be enlarged to include areas outside the original GCVTC area. The mission of the Tribal Data Development Forum is to assist the development of relevant and useful air quality data for Indian Country. The goal of the forum will be to develop a method for retrieving existing data and, where it does not exist, develop a plan or framework to gather that data.

Background

The Commissions recommendations require gathering and developing additional data. Additional stakeholder discussions will also lead to a consensus-based approach at carrying out the Recommendations. The GCVTC, the recent Air Quality Initiative (AQI), sponsored by the Western Governors' Association, and the WRAP all have identified "gaps" in air quality data for tribal lands. The gap is a result of inadequate or no air quality information about tribal lands.

In many areas of the West, Federal Class I areas and tribal lands, including tribal communities, and reservations are beside one another. Air pollution contributions from tribal lands and reservations and their impacts on Class I areas are not well known. The result is a "gap" which has resulted in a lack of understanding of both tribal contributions to air pollution and the impacts to tribal lands from off-reservation or non-tribal sources. Above all, it is certain that while air pollution is an issue across this Nation and now the world, little is known about air quality impacts to our indigenous populations and communities.

Because tribal representatives do not have data comparable to that available to the other stakeholders, they have been placed at a disadvantage in relation to the other stakeholders in the process. They are at an additional disadvantage because of the smaller number of Tribal representatives in comparison to other stakeholders. Effective air pollution management is essential. The Tribal data gap issue must be addressed if there is to be effective air pollution control in the West.

Additionally, for tribes with data, that data may be difficult to obtain for many reasons, there may

be no one to gather the data or the information may be sensitive and not open for public review. Other concerns are the use of the data by non WRAP organizations for purposes other than was intended. Cultural sensitivity, transboundary air quality issues, poor state and tribal relations, and protections of tribal sovereignty are all genuine concerns. Most projects where data development and acquisition have been a major component have generated similar concerns and questions. This forum may serve as a platform for discussion of these and other concerns related to tribal data and information.

Scope and Relative Reference

This forum will focus on filling the Tribal data “gap” as it has been identified in several recent air quality related studies. The GCVTC Recommendations, Western Governors’ Association-Air Quality Initiative, and the various EPA papers. A micro-inventory was created for the Grand Canyon National Park. This forum shall review the inventory methodology to determine its usefulness in the development of a tribal data.

Objectives and Deliverables

The objective is to develop a formula or framework for filling the data “gap” for Indian Country.

The first task of the Forum will be to review the GCVTC Recommendations. Next it will review and summarize the emissions inventory (EI) for tribal lands and near tribal lands, created during the GCVTC process. The forum will evaluate the completeness and accuracy of the EI and determine to what extent the information is, or is not complete. They shall also qualify the representativeness of the data and its form. They will produce a report recommending what data is necessary too more accurately account for emissions from tribal lands. (August 1998)

This forum will develop a usable method for data gathering, use, and management. The Forum will be responsible for assisting tribes and other entities in the development of a scientifically sound approach to assessing air quality contributions and impacts for tribal lands. Any method must consider tribal demographics, cultural values, and be designed to work more closely with individual tribes. This emphasis will insure that data be, current, reliable, and accurate. The EI data will likely be used in future modeling. The data represents a condition or sets of conditions that, for the WRAP, may be considered “average,” “normal,” or “representative” of other tribal reservations. Therefore, it is imperative that the information is up-to-date and accurate. (December 1998)

Tribal air quality related data, once obtained according to the guidelines and the protocol developed by this forum, will serve as the backbone for the development of tribal air programs as authorized by the recently promulgated Tribal Authority Rule. The lack of such data has frustrated decision making in the past, both by individual tribes and by the GCVTC, and threatens to undermine the practical ability of tribes to participate in the WRAP process.

This forum, through its input to other WRAP forums, will create an administrative and institutional structure for continuing to identify and address tribal air quality data needs throughout the life of the WRAP. The data and data collection protocol development will also be invaluable to non-WRAP tribal and inter-governmental air quality efforts, and to address other tribal environmental resource issues.

Collaboration

The forum will collaborate with the Emissions Inventory and Tracking Forums and other related forums focused on data. Some contact with the IOC forum may necessary in order to define more clearly policy matters. This forum will also collaborate with the developers of the GCVTC Emissions Inventory; the Western Governors' Association - Air Quality Initiative (AQI); the Northern Arizona University's - Institute for Tribal Environmental Professionals (ITEP), "Strategies to Address the Tribal Data Gap;" the various EPA regions and contractors under regional agreements; Individual Tribes; the National Tribal Environmental Council (NTEC), the Intertribal Timber Council (ITC), Affiliated Tribes of the Northwest Indians (ATNI); Council of Energy Resource Tribes (CERT).

Close collaboration with the ITEP is critical to the success of this forum. The ITEP is currently addressing similar issues. Close collaboration will eliminate duplication and enhance the overall outcome and success of the Tribal Data Forum.

Process Requirements

The Forum will meet to review the current EI. This can be in cooperation with the Emissions Forecasting and Tracking Forum as they have a similar requirement. It will hold a second workshop to review and report on its findings and recommendations. It will then prepare an option report on how best to fill the Tribal data "gap." After the report is submitted to the TOC, the Tribal Forum will be reauthorized or dismissed. This will be based on a consensus and the recommendations of the forum and other participants of WRAP.

Membership Criteria

Appointments to the Tribal Data Forum will be stakeholders based. This forum will consist of individuals from Indian Country, who work for Tribal Governments, and other organizations who are involved in the operation of an air pollution source, or who may have useful knowledge of air pollution sources on and around Indian Reservations. Participants should be drawn from a range of backgrounds and have some affiliation or well-developed recognition and understanding of Tribal Government. Due to the unique status of Tribal Nations, all Executive Branches of the US Federal Government have a trust responsibility to Tribes to ensure the protection of Tribal rights and resources. While federal participation on this forum is necessary, it should not be considered a substitute for Tribal participation.

air/tribalwp.doc

Draft 2/27/98 - For Discussion with Forum Co-Chairs

Mobile Source Emissions Forum Charge

Oversight: Technical Oversight Committee

Schedule: Anticipated Start Date - June, 1998

Mission

The Mobile Source Emissions Forum (MSEF) is to evaluate emissions estimation techniques consistent with the recommendations of the Grand Canyon Visibility Transport Commission (GCVTC).

Background

The GCVTC recommendations lay out a set of technical recommendations. A portion of the recommendations defines a set of tasks that would require various analyses, including modeling. Before those tasks can be undertaken, basic emissions data must be acquired, which include the construction of comprehensive emission inventories, including mobile sources. Mobile sources include both on-road and non-road activities. Road dust is often dealt with as a mobile source, but the GCVTC included that source type in the area source section. Those who understand dust entrainment often research different surfaces, e.g. roads, agricultural fields, or desert, so it made sense to incorporate the study of the range of dust emissions into one forum, the Area Source Emissions Forum (ASEF). However, the calculation of road dust emissions is more akin to mobile sources since it is based on vehicle use and roadway characteristics. Therefore, the ASEF will complete its work on emission factors for dust, and will forward that to the MSEF for use in reviewing and approving a methodology. There is a range of other mobile source emissions that are also focused on in the recommendations, including lawn and garden equipment, off-road vehicles, airplanes and trains. Emission estimation approaches for all types of mobile sources should be evaluated, and recommendations made.

Once the methods are recommended and approved for the range of mobile sources, the EIWG will use that information in developing the comprehensive inventory. The MSEF will need to work closely with the EIWG to assure that it is provided information in a form that allows it to efficiently develop an inventory.

The bulk of the analyses described in the GCVTC recommendations involve some sort of control strategy, and the needs of these should be remembered when the MSEF is performing its work. It is not known at this time whether the MSEF or the control technology group will be best placed to perform those analyses.

Proper documentation is critical to the success of the current and future technical processes, and

the MSEF will develop such formal reports and progress reports as deemed necessary by the Technical Oversight Committee (TOC). These are defined below.

Scope and Related References

The first charge of the MSEF is to address the technical recommendations of the GCVTC that are related to mobile source emissions. For those unfamiliar with the activities of the GCVTC it will be instructive for them to review the entire document, “Recommendations for Improving Western Vistas”, but the following specific references should be reviewed from those recommendations that refer to mobile sources, pp. 38 -45. It is the task of the MSEF to define the information used and how to use it in developing an inventory of mobile sources, while it is up to the EIWG to actually develop the inventory following processes that are consistent for all source types, mobile, area, and stationary.

The MSEF should also review a GCVTC report specific to emissions inventories called “Development of an Emissions Inventory for Assessing Visual Air Quality in the Western United States.” This report describes how the baseline inventory was developed.

The MSEF will certainly work closely with the TOC. In addition, the MSEF should be knowledgeable of and connected to ongoing EPA activities relative to mobile sources.

Objectives and Deliverables

1. The co-chairs of the MSEF will host a workshop for discussion of various issues related to the estimation of emissions from the range of mobile sources. The results of the workshop will be used in guiding the future work of the group.

2. Based on the workshop, the MSEF should draft a work plan for consideration by the TOC describing the tools and methodologies for developing the inventories.

3. Once the work described in #2 is completed, the MSEF should prepare a report defining their recommendations for common emissions calculation methodologies. This report is to be reviewed by the TOC and the Public Advisory Board (PAB) for comment, and the WRAP for review and approval. It will then coordinate with the Emission Inventory Working Group (EIWG) to assure appropriate data transfer to facilitate efficient inventory development. It may be necessary for the MSEF to reconvene if questions arise during the various analyses related to transport and control strategies.

Collaborative Requirements

It is critical that the MSEF interact with the TOC. In addition, the MSEF should:

85 Coordinate with the IOC's Mobile Source Forum, and serve as a resource in their deliberations.

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87 Work closely with the Emissions Forecasting and Tracking Forum and the Modeling Forum to
88 be sure that information it needs is being acquired.

89

90 Coordinate with the EIWG to be sure that it receives information in the appropriate form to
91 efficiently develop an inventory.

92

93 Work closely with the ASEF toward acquiring and using recommended emission factors for road
94 dust.

95

96 Coordinate with the Tribal Data Development Forum to make sure information it acquires is
97 used in the process, and assist them as needed.

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99 **Process Requirements**

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101 The MSEF should:

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103 Follow the general guidelines developed by the WRAP for all forums.

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105 Adhere to the objectives described above, and incorporate the deliverables into the process.

106

107 Provide meeting minutes to the TOC, as well as short quarterly reports (no more than 5 pages).

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109 **Membership Criteria**

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111 Appointments to the MSEF will be based on credentials, research interests, and related activities.

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Draft 2/16/98 - For Discussion with Forum Co-Chairs

Ambient Monitoring and Reporting Forum Charge

Oversight: Technical Oversight Committee

Schedule: Anticipated Start Date - June, 1998

Mission

The Ambient Monitoring and Reporting Forum (AMRF) is to make recommendations to the WRAP with regard to approaches for enhancing the collection of ambient pollutant and meteorological data, as well as addressing its reporting.

Background

The GCVTC recommendations lay out a set of technical recommendations, parts of which talk about ambient data collection. In fact, the group who developed the stationary source section thought the problem of such magnitude that they included a specific recommendation for improved monitoring.

The world of visibility monitoring will be much more complex with the pending implementation of regional haze rules and associated data collection, as well as the new National Ambient Air Quality Standards for PM_{2.5}. As such, it will be increasingly difficult to deal with the ambient monitoring situation for states and tribes in the WRAP independent of these other processes in attempting to accomplish the GCVTC recommendations. At a minimum, the AMRF will need to serve a coordination function with groups such as EPA, the IMPROVE (Interagency Monitoring of PROtected Visual Environments) Steering Committee, and state PM_{2.5} and visibility programs. The IMPROVE program has been instrumental in researching and developing methodologies, as well as managing a monitoring network to characterize long-term, regional trends in visibility.

The AMRF will coordinate expansion of visibility monitoring for the WRAP, as well as working with groups like IMPROVE to be sure that methods and procedures recommended by that group meet the needs of the various state and tribal programs. In addition, the AMRF should work closely with the Tribal Data Development Forum (TDDF) to make sure they have needed expertise for their activities.

Proper documentation is critical to the success of the current and future technical processes, and the AMRF will develop such formal reports and progress reports as deemed necessary by the Technical Oversight Committee (TOC). These are defined below.

Scope and Related References

The first charge of the AMRF is to address the technical recommendations of the GCVTC that are

related to visibility monitoring. For those unfamiliar with the activities of the GCVTC it will be instructive for them to review the entire document, "Recommendations for Improving Western Vistas", but the following specific references should be reviewed from those recommendations that refer to monitoring, p. 37 and p. 63. In addition, familiarity with technical issues raised by tribes in that document is necessary (pp. 72-73).

At a minimum, the AMRF should work closely with the IMPROVE Steering Committee and EPA in developing an appropriate approach to visibility monitoring and reporting in the West. In addition, support should be provided to the TDDF for its activities.

It will be important to review and be knowledgeable of the various IMPROVE materials with regard to network operation and instrument protocols.

Objectives and Deliverables

1. The potential co-chairs of the AMRF will host a workshop for discussion of various issues related to WRAP monitoring, as well as relationships between the WRAP and other organizations. Based on the discussions during the course of the workshop, they will propose membership of the AMRF for consideration. Considerable effort should be devoted to assuring that the appropriate mix of state and tribal staff, IMPROVE participants, and EPA are present on the AMRF based on the discussions during the workshop. That workshop will serve as the basis for future activities of the AMRF.

2. Once the AMRF is created, it should develop a work plan for consideration by the TOC based on the scope and deliverables defined through the course of the workshop.

3. Once the work described by the work plan is completed, the AMRF will host a workshop to present their findings and receive comment. Once that is done, a final report will be prepared based on comments received and forwarded to the TOC and the Public Advisory Board (PAB) for review, and to the WRAP for approval.

Collaborative Requirements

It is critical that the AMRF interact with the TOC. In addition, the AMRF should:

Coordinate with the IOC forum charged with tracking progress of the overall recommendations of the GCVTC.

Work closely with the IMPROVE Steering Committee and EPA, as described above.

Consult with the forum(s) charged with modeling transport once they're created to attempt to be sure that the various networks meet their needs to the best degree possible.

85 Coordinate with the TDDF to ensure that they have any monitoring expertise that it may need.

86

87 **Process Requirements**

88

89 The AMRF should:

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91 Follow the general guidelines developed by the WRAP for all forums.

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93 Adhere to the objectives described above, and incorporate the deliverables into the process.

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95 Provide meeting minutes to the TOC, as well as short quarterly reports (no more than 5 pages).

96

97 **Membership Criteria**

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99 Appointments to the AMRF will be based on credentials, research interests, and related activities.

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Draft 2/27/98 - For Discussion with Forum Co-Chairs

Area Source Emissions Forum Charge

Oversight: Technical Oversight Committee

Schedule: Anticipated Start Date - August, 1998

Mission

The Area Source Emissions Forum (ASEF) is to make recommendations to the WRAP and related WRAP forums with regard to methodologies for estimating emissions from area sources with the exception of permitted stationary, mobile, and fire sources, i.e. sources not specifically covered by the Fire Emissions Forum (FEF), the Emission Inventory Working Group (EIWG), and the Mobile Source Emissions Forum (MSEF).

Background

The GCVTC recommendations for area sources discuss a substantial weakness in its technical work related to the emissions of dust from paved and unpaved roads. This emphasis on road dust is certainly significant based on the questionable results obtained during modeling for the GCVTC. However, road dust is not typically dealt with as an area source, but as mobile because activity information for estimating emissions is based on vehicular activity and road surface characteristics. On the other hand, experts who deal with dust entrainment do so for a range of activities, mobile and area. The ASEF is then charged with researching and making recommendations on how all geologic material is entrained into the atmosphere, including road dust, in close consultation with the MSEF. Once emission factors are recommended, the MSEF will ultimately recommend the appropriate methodology using that information.

The ASEF will do the same type of research for other area source emissions, which include dust from other sources (e.g. natural, agricultural, windblown, or background), residential activities (e.g. woodburning, lawn maintenance, or garbage management), or small unpermitted commercial endeavors, including construction.

The ASEF is to support the activities of whatever forum the WRAP's Initiative Oversight Committee (IOC) creates to deal with area sources. In so doing, the ASEF will develop priorities consistent with the needs of the IOC forum. They will also work closely with the Emission Inventory Working Group, toward providing it with emission factor and activity data in an appropriate form to allow it to develop an inventory efficiently, and do the same thing with regard to the MSEF in providing it with results of dust emission research.

Area source emissions and their control are of significant interest for tribes, thus it is critical that the ASEF interact with the Tribal Data Development Forum (TDDF) in ensuring its information

is utilized.

Emissions from prescribed fire (forestry, silvicultural, and agricultural) and wildfire are to be addressed by a separate forum, and thus are to be excluded from this work.

Proper documentation is critical to the success of the current and future technical processes, and the ASEF will develop such formal reports and progress reports as deemed necessary by the Technical Oversight Committee (TOC). These are defined below.

Scope and Related References

The first charge of the ASEF is to address the technical recommendations of the GCVTC that are related to dust emissions. For those unfamiliar with the activities of the GCVTC it will be instructive for them to review the entire document, "Recommendations for Improving Western Vistas", but the following specific references should be reviewed from those recommendations that refer to dust emissions explicitly or emissions inventories in general p. 46, p. 55, p. 60, and pp. 61 - 63. Although dust emissions from paved and unpaved roads were specifically cited by the GCVTC as needing special attention, the need to develop an accurate comprehensive inventory means that estimates for all significant area sources must be reviewed. That exploration will include natural sources of particulate like emissions from ocean surfaces and intercontinental transport. The broader range of area source emissions from residential and commercial activities need to be addressed, as well. Who addresses several of these source categories should be coordinated with the EIWG, since small facilities that might be considered area sources in some states are being permitted in others and thus available for inclusion by the EIWG. Tribes expressed concern about the range of area sources and their control in the GCVTC report (p.72), and these issues should also be reviewed.

In addition, a GCVTC report, "Development of an Emissions Inventory for Assessing Visual Air Quality in the Western United States" should be reviewed for an understanding of what was done previously. In many cases, the 1990 baseline inventory is to be the starting point for emissions inventory development.

Some familiarity with pertinent EPA activities is needed. In particular, some knowledge of the Emissions Inventory Improvement Project (EIIP) would be beneficial, because of the broad-based potential of those data for a number of source categories.

The ASEF is to define the information used and how to use it in estimating area source emissions, which the EIWG will use to develop the inventory following processes that are consistent for all source types, area, mobile, and stationary.

Objectives and Deliverables

1. The ASEF will host an exploratory workshop to get the research process started, which will review the problems with existing inventories and possible improvements for estimating emissions of particulate from disturbed and undisturbed surfaces, including roads. Other area source emissions, as from small commercial enterprises and residential activities, are also to be considered. A summary document of that workshop will be prepared as a guide to the ongoing work of the group.
2. The ASEF will then develop a work plan in consultation with the TOC that describes how the tasks defined here will be performed in the prescribed time frame, with consideration for how information is submitted to the EIWG for inventory development.
3. After thoroughly researching the methods for estimating area source emissions plus road dust (except fire), the ASEF will prepare a report for submittal to the TOC and Public Advisory Board (PAB) and then to the WRAP. This paper will advise the adoption of such estimation techniques as they deem most accurate and effective. It may be necessary for the ASEF to reconvene to address questions raised by those performing analyses of transport and control strategies.

Collaborative Requirements

It is critical that the ASEF interact with the TOC, as well as other forums where interfaces occur. In particular, the ASEF should:

- Work closely with the IOC's Area Source Forum in order to assure that they have the technical information they need in developing dust control policy.
- Coordinate with whatever IOC group is charged with dealing with control strategies inside and near Class I areas.
- Work closely with the TDDF in order to facilitate inclusion of its information in the work of the ASEF, as well as to make sure that group has the necessary tools and resources.
- Coordinate with the EIWG toward providing it emission factor and activity data in the appropriate form.
- Consult with the Tracking and Forecasting Forum and the Modeling Forum to assure that the outputs of the ASEF are consistent with their direction.
- Coordinate with the MSEF in providing them with the appropriate information for estimating road dust emissions.

Process Requirements

The ASEF should:

Follow the general guidelines developed by the WRAP for all forums.

Adhere to the objectives described above, and incorporate the deliverables into the process.

Provide meeting minutes to the TOC, as well as short quarterly reports (no more than 5 pages).

Membership Criteria

Appointments to the ASEF will be based on credentials, research interests, and related activities.

Membership will adhere to WRAP guidelines. It is suggested that the co-chairs try for a mix of dust emission researchers (e.g. from paved and unpaved roads, from agricultural lands, or from natural surfaces), particle scientists, and area source experts.

air/areasrcw.doc



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Governor Jane Dee Hull

Russell F. Rhoades, Director

March 3, 1998

Mr. John Leary
Western Governors' Association
600 17th St.
Suite 1705, South Tower
Denver CO 80202

Dear John:

Recently, the IMPROVE Steering Committee asked the Arizona Department of Environmental Quality (ADEQ) to host their next meeting. IMPROVE is a national interagency visibility monitoring group comprised of four federal land management agencies, two EPA representatives, two regional and one national air quality organizations.

In considering the Steering Committee's request, it became apparent that there would be great benefit in scheduling the IMPROVE meeting to coincide with a proposed WRAP visibility monitoring workshop that the Technical Oversight Committee (TOC) has recently discussed. Therefore, in the interest of forging a stronger partnership and facilitating communication between all parties with a stake in the results of collecting visibility data, ADEQ is offering to coordinate and host both the WRAP workshop and the IMPROVE Steering Committee during the same week in Phoenix. An attachment describes proposed arrangements. In general, the first two days would be comprised of the WRAP workshop with some or all IMPROVE members in attendance making presentations and participating in discussion. A short outing to visibility monitoring sites in the Phoenix area would be arranged to introduce attendees to a full range of data collection. Mid-week, ADEQ would lead a field trip to several existing Class I sites, as well as possible new locations, in order to engender discussion about siting issues like representativeness and topography. The IMPROVE Steering Committee would then meet the remainder of the week with WRAP participants invited to attend.

This same offer is being made to IMPROVE. Although ADEQ is willing to host both independently, we believe the integration of both meetings to be of great benefit. Thus, we have tried to select two dates that seem to have less conflicts and are putting them forward as options. These are April 27 through May 1 where the WRAP workshop would be April 27 - 28, or June 1 through 5 with the WRAP workshop occurring June 1 - 2. For a number of reasons, ADEQ prefers April 27 to May 1.

With either date, it will be necessary to get started with planning soon. Therefore, I ask that the WRAP consider this offer at its next meeting on March 18 - 19, 1998 during the time allocated for discussing visibility monitoring, and let us know your decision at that time, if possible. ADEQ will : briefly summarize the proposal then.

Sincerely,



Nancy C. Wrona, Director
Air Quality Division

NCW:MHG:mhg

Attachment

cc: Gary Neuroth, ADEQ

**Proposal for:
Visibility Monitoring Meetings & Nearby IMPROVE Monitoring Site Visits**

Phoenix, Arizona: April 27 - May 1 (ADEQ preference) or June 1-5, 1998

**Hosted by the:
Air Quality Division of the Arizona Department of Environmental Quality**

Monday 1 PM to 5 PM - Proposed Western Regional Air Partnership (WRAP) Visibility Monitoring Scoping Workshop per proposal (ADEQ or hotel-hosted meeting). Workshop participants would be planning and technical staff from organizations interested in learning about or exchanging information about visibility monitoring.

- Programmatic presentations of regional haze rule proposal and planned visibility monitoring network implementation by EPA, describing schedule, logistics, and data collection plans.

Tuesday 9 AM to 3 PM - WRAP Visibility Monitoring Workshop (conclusion).

- Informational presentations by IMPROVE Steering Committee members and other state / tribal / FLM / industry technical staff, with discussion.
- Review of existing and proposed network design, siting guidance, and changes to IMPROVE optical and aerosol samplers planned by the Steering Committee.

3 PM to 5 PM - Urban Visibility Monitoring Site Visit Workshop participants can view and ask questions about sampling technologies used in both the Phoenix Urban Haze Network and at IMPROVE sites, including a nephelometer, aethalometer, transmissometer system, and particulate samplers.

Wednesday 7 AM to 5 PM - Class I Area Visibility Monitoring Site Visits. Field trip to IMPROVE and "look-a-like" Class I Area monitoring sites near the Phoenix metropolitan area. Trip route is designed to allow discussion of network design and siting representativeness with respect to topography, emission sources' strength, and meteorological issues. Both high and low-elevation sites will be included in the field trip, with operational and technical instrument presentations and discussions at the sites. Field trip transportation from the meeting site is included; lunch arrangements can be made in advance by sponsors.

Thursday & Friday - IMPROVE Steering Committee Meeting (ADEQ or hotel-hosted meeting site). Agenda by Steering Committee.

ADEQ Contacts: Mike George 602-207-2274 or Tom Moore 602-207-2353

Draft 2/20/98 - For Discussion with Forum Co-Chairs

Pollution Prevention Forum Charge

Oversight: Initiatives Oversight Committee

Schedule: Anticipated Start Date: April, 1998

Mission

The mission of the Pollution Prevention Forum is to develop programs for the WRAP to implement that will reduce pollution from traditional energy production through alternative approaches to energy use, generation, and marketing.

Background

As the demand for energy increases, and the region's power base evolves, there is a tremendous opportunity to realize substantial benefits from energy efficiency, as well as to integrate cleaner, sustainable energy technologies into all aspects of our society. The West enjoys high potential for renewable energy production, especially electrical energy generation employing solar and wind power. However, as has been the case with the transition from regulated energy production to competitive marketing, programs will be needed to support the transition to increased energy efficiency and the development of economically viable sources of energy that are clean, renewable, and environmentally sustainable.

Scope and Relevant References

The Pollution Prevention section of the GCVTC contains brief summaries of key issues¹ that provide a starting point for the development of implementation programs by the Pollution Prevention Forum. Given the enormous scope of potential programs to be developed by this particular forum, the co-chairs are encouraged to establish work groups to develop specific deliverables that will be used by the Forum as it develops its programs. The Land and Water Fund's report, *How The West Can Win: A Blueprint For A Clean and Affordable Energy Future* contains valuable information and ideas that may assist Forum members in their work.

Objectives and Deliverables

1. The Forum is charged with identifying economic incentives for pollution prevention and developing programs for the WRAP to implement. At a minimum, the Forum will review and evaluate for inclusion in the program: 1) Rewarding efforts that go beyond compliance with air

¹ Although education on pollution prevention is included in the GCVTC Pollution Prevention section, developing such a program calls for an entirely different set of skills than will be required for members of the Pollution Prevention forum. I would suggest that public outreach and education be approached in a more comprehensive way that captures all of the WRAP's efforts.

quality laws and programs; 2) Supporting the creation and relocation of zero and near-zero and low-emission industries within the region; 3) Retooling businesses within the region to increase energy efficiency; 4) Developing renewable energy generation, and; 5) Reducing residential energy use through building practices that encourage energy conservation and the inclusion of PV in new construction.

2. The forum is charged with developing and analyzing the economic, environmental, and social costs and benefits of an emission fee program for the WRAP to implement. Emission fees have the potential to encourage people and industry to reduce pollution in the most efficient manner possible, and such fees could help level the playing field between polluting power production and clean, renewable sources, while generating critically needed funds for air quality programs.

3. The Forum is charged with developing a program for implementation by the WRAP for achieving the GCVTC goal of generating 10 percent of the region's electricity from renewables by 2005 and 20 percent by 2015. At a minimum, the Forum will review and evaluate for inclusion in the program: 1) A region-wide portfolio standard that requires electricity suppliers to generate a minimum percentage of their electricity from renewable energy sources; 2) The use of wire charges, collected by transmission and distribution companies to fund renewable energy investments and programs; 3) Eliminating transmission fees for renewable resources, and; 4) Requiring state and federal agencies to act as "buyers of last resort" for renewable projects selling into competitive markets.

4. The forum is charged with developing a program for implementation by the WRAP to conserve energy through increased efficiency of its use. At a minimum the Forum will review and evaluate for inclusion in the program: 1) Adopting the California energy standards; 2) Reinstatement of the incentives for energy efficient buildings similar to those in place during the 1970s; 3) Continuation of demand side management programs, and; 4) System benefit charges to fund conservation programs.

5. The Forum is charged with developing a market-based approach to pollution prevention and energy conservation and efficiency through green pricing. At a minimum, the Forum will review and evaluate for inclusion in the program: 1) Disclosure on electricity bills of power sources and air emissions; 2) A voluntary labeling program with incentives for companies that label their products, followed by required labeling, and ; 3) The creation of a clearinghouse for product information that would be easily accessible to consumers.

Collaboration Requirements

It is critical that the Pollution Prevention forum collaborate with other forums within the WRAP, particularly those Forums either impacted by the Pollution Prevention Forum's programs, or when the Pollution Prevention Forum needs technical expertise from TOC forums. The Forum will collaborate with Pollution Prevention programs in state and federal agencies and the other participants in these programs.

84 **Process Requirements**

85

86 The pollution prevention forum shall:

- 87 • Follow the general guidelines developed by the WRAP for all forums.
88 • Adhere to the objectives described above, and incorporate the deliverables into the process.
89 • Provide meeting minutes to the IOC, as well as short quarterly reports on the progress that the
90 Forum is making.

91

92 **Membership Criteria**

93

94 Appointments to the Pollution Prevention Forum will be based on expertise relevant to preventing
95 pollution caused by energy production, use, and marketing. Forum membership will be balanced
96 by including representatives of all stakeholders invested in developing pollution prevention
97 programs. Workgroups will be similarly balanced and comprised of experts with knowledge in
98 specific fields critical to the workgroup's focus area.

99

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Draft 3/4/98 - For Discussion with Forum Co-Chairs

Stationary Sources Forum Charge

Oversight: Initiative Oversight Committee

Schedule: Anticipated Start Date - Currently Active

Mission

The mission of the Stationary Source Forum is to track and implement the recommendations made specifically for stationary sources in the Grand Canyon Visibility Transport Commission (GCVTC) recommendations document presented to the member Governors and EPA on June 10, 1996. The recommendations includes the development of a market trading system that could be used to bring emissions back on track with the Baseline Forecast Scenario (BFS) should the emissions target for sulfur dioxide be exceeded.

Background

The Initiatives Oversight Committee (IOC) as a part of the Western Regional Air Partnership (WRAP) is expected to lend general oversight to the activities, called initiatives, that will be developed to implement the Grand Canyon Visibility Transport Commission recommendations. The IOC and the various forums within and standing jointly with the Technical Oversight Committee (TOC), will rely on the technical information developed by the work groups and forums of the TOC. The IOC will maintain contact with the various standing committees and forums through mentors assigned to each from the IOC and/or TOC.

The specific functions of the IOC as they relate to the Stationary Source Forum (SSF) are:

Provide general direction to the SSF and as technical information and public, private and governmental input emerges and provide policy guidance to the SSF which will lead to the implementation of the GCVTC recommendations for stationary sources of visibility impairing emissions.

Coordinate the activities of the SSF to assure that the implementation initiatives provided by the SSF are not in conflict with initiatives provided by other WRAP committees or forums, and in so far as possible, compliment each other in achieving the goals of the WRAP.

Provide assistance in fund raising coordination with the WRAP, and coordination with the TOC, Public Advisory Board (PAB) and Communications Committee.

Assist with meeting arrangements for the IOC committees and forums and, where needed, provide assistance with report preparation.

Scope and Related References

The scope of the SSF is to focus on those recommendations in the GCVTC recommendations for stationary sources (GCVTC, June 10, 1996, pp. 32-37). These recommendations relate specifically to those major point sources located within the Commission States. The recommendations call for the development of a market trading system that could be used to achieve emission reductions should the emissions target be exceeded. These recommendations have been developed by what has heretofore been known as the Market Trading Forum (MTF). This Charter explicitly includes all previous work of the MTF and the work of the MTF will now be included in and part of the work of the SSF. The specific deliverables projected for the MTF are listed below.

Objectives and Deliverables

A major part of the recommendations of the GCVTC are related to stationary sources. The objectives of these recommendations were:

to achieve significant reductions in sulfur dioxide emissions in the near term;

to ensure reasonable progress toward the national goal through continuing decreases in sulfur dioxide emission over the long term; and

to avoid increases of other visibility-reducing pollutants within the Transport Region as a whole from stationary sources.

The purpose of the combined Stationary Source Forum and the Market Trading Forum is to develop specific proposals for implementing the GCVTC recommendations for stationary point sources. The role of the SSF associated with each of the GCVTC recommendations are as follows:

1. Implement existing Clean Air Act requirements through the year 2000: As stated in the GCVTC's Stationary Source Recommendations, implementation of existing Clean Air Act requirements is expected to result in a significant decrease in sulfur dioxide emissions. States and tribes have the primary role of reviewing uncontrolled pollution sources and making determinations regarding the need for additional pollution controls pursuant to the Clean Air Act. However, the GCVTC recommendations encouraged states and tribes to review the visibility impacts at Class One sites on the Colorado Plateau of uncontrolled pollution sources and to make expeditious determinations regarding the need for additional pollution controls pursuant to the Clean Air Act. The SSF will assist in that effort.
2. Establish stationary source emission targets as regulatory triggers: An initial initiative for the SSF is to "true up" of the 1990 baseline inventory, using the Integrated Assessment System (IAS) Baseline Forecast Scenario (BSF) for the specific purpose of establishing both a year 2000 and "an ultimate SO₂ emissions target for the visibility Transport Region." This includes establishment of needed "interim targets" between the years 2000 and 2040 to ensure steady and continuing emission reductions. It also requires the setting the year 2000

SO2 target at a level midway between the projected year 2000 SO2 emissions and the actual reported year 2000 SO2 emissions as stipulated in the recommendation.

3. Develop a plan for allocating trading credits under a regulatory program emissions trading cap: The initial principal responsibility of the SSF is to design a plan for allocation of emission trading credits under a regulatory program emissions cap, should the SO2 Target be exceeded by actual emissions in the future. Coincident to this effort the SSF is to design economic/market incentives for sources to make early reductions, and to fully account for such early reductions in the design of a regulatory program. Included are methods to prevent new sources from causing the target to be exceeded.
4. Review compliance with targets and establish incentives: Another initiative for the SSF is to design methods by which states and tribes can review compliance with the SO2 Target in the year 2000 and at five-year intervals thereafter. Included are mechanisms to reward sources that achieve early reductions or reductions beyond compliance requirements. Of primary focus for the SSF, is the actual design of a "regulatory program (most likely an emissions cap and incentive-based market trading program)" which will be implemented if the regional emissions target has been exceeded. This will ensure that non-complying facilities can be identified and brought into compliance within no more than five years.
5. Complete source attribution studies at the Mojave Power Plant pursuant to EPA's schedule for completion, and take action consistent with the results of the study within twelve months. While this was one of the GCVTC's principal recommendations with respect to stationary sources the lead responsibility for completing this task lies with the U.S. Environmental Protection Agency. However, the SSF should carefully monitor this process, assist where appropriate and requested, and should factor into its SO2 Target development, and design of the regulatory trading program, any relevant emissions reduction information resulting from this effort.
6. Develop an improved monitoring and accounting system. The role of the SSF in this recommendation is to design the minimally acceptable emissions measurement, monitoring, and reporting (MMR) requirements to track compliance with the SO2 target by stationary sources (utilities, industrial sources, and other point sources in the 1990 inventory, and subsequent IAS BFS runs). This includes design of the minimum MRR requirements for participation in and compliance with an emissions cap and trade market based regulatory program in the event such a program is triggered.

Other mention of initiatives associated with the recommendations, beyond the scope and role of the SSF as defined above, are also included in the over-all scope of the SSF. However, it will receive less attention initially, but will be undertaken as enhancements to the base program described above concurrent with the development of the base program as time and resources allow, as well as part of a later phase effort. Examples of concurrent enhancements as resources allow, and later phased initiatives included in the GCVTC's Stationary Source Recommendations include, but are not limited to:

exploring various emissions management options for stationary sources of NOx and PM,
streamlined permitting for sources achieving early reductions,
bench marking existing visibility conditions against which to measure progress by including other
Class I areas beyond Hopi Point, as receptors in visibility modeling,
and enhancement of visibility monitors at other Class I sites.

All the Stationary Source goals of the GCVTC are related to emissions reductions rather than a
visibility ambient air standard because it was concluded by the GCVTC that such a standard could
not be applied in a way that made administrative sense for an area such as the Colorado Plateau.
Once final regional haze regulations have been adopted, the SSF may have to re-evaluate methods
for assessing reasonable progress that make this process compatible with Federal regional haze
requirements.

Based on the GCVTC's Stationary Source Recommendations, the starting point for the SO2 Target
in the year 2000 is to be established using actual emissions for 1990 and 2000. Emissions for a
projected baseline in 2000 estimated during the GCVTC technical work are also to be used in
calculating the initial target. Assuming that the actual reduction from 1990 to 2000 is greater than
was projected in that Baseline Forecast Scenario (BFS), as was expected, the initial target will be
established at the midpoint between the two. The 2040 endpoint target is to be established based on
a 50% to 70% emission reduction from the 2000 target. The establishment of the 2040 endpoint and
the line between that and 2000 must be considered in this undertaking, in cooperation with the
WRAP Emissions Inventory (EI) Working Group.

The EI is performing required corrections to missing or erroneous emissions data in the 1990
Baseline Inventory, and may re-run the Integrated Assessment System model (IAS) using the
corrected 1990 inventory to establish a final BFS SO2 Target. This will produce the final
benchmark for determining the year 2000 start-point, interim year targets, and year 2040 endpoint
for the BFS SO2 Target.

If the target is exceeded at any point between the years 2000 and 2040, then a regional SO2 market
will be established as a mandatory regulatory program. The emissions inventory would then also
be used in allocating allowances and supporting the ongoing market trading program. This work
plan sets out how the Stationary Sources/Market Trading Forum (SS/MTF) will develop the specific
requirements of such a program. Once this project has been completed, the IOC will work with the
Forum to identify the next steps that need to be taken.

The following draft schedule, subject to adjustment based on work realities, is proposed:

August 20, 1997 – MTF meeting to orient members to Forum objectives, market trading design
options, discussion of work plan content, and establish initial work assignments

September 26, 1997 – MTF meeting to finalize Work Plan, address common and cooperative Work Task areas with the EI Working Group, and discussion of principles and options for each design element of the regulatory trading program

October, December 1997 -- Development of scope of the program options

January, February, March, & April 1998 – Conclude scope consensus; Re-run IAS Baseline Forecast Scenario (BFS) based on 1990 Baseline Inventory “true-up”, and Develop and select recommended program elements for Credit Allocation; New Sources & Opt-in Sources; Design of Trading Credit; Timing/Trigger Mechanism that Implements Trading Program, and Methods for Banking Unused Credits

May & June 1998 – Develop and select recommended options for early reduction incentives and disincentives for “busting” the SO₂ target

July & August 1998 – Develop and select recommended options for Trading Program Administration

September & October 1998 – Conduct public outreach workshops on trading program options and recommendations to the WRAP

November & December 1998 – Market Trading Forum makes recommendations of preferred market trading program design and options to the full WRAP for their consideration.

January, February, & March 1999 – Development of “Model Rule” language for use by states and tribes

April & May 1999 – Refine and Implement Emissions Tracking Mechanisms with states & tribes to monitor actual emissions compared with the BFS target(s).

June 1999 – Begin comprehensive design work on trading program enhancements to “plug in” to Base Program (e.g., additional pollutants; additional sources and categories, etc.)

January - July 2001 – Aggregate actual emissions from states and tribes to determine first program “check point” compared against the BFS SO₂ Target.

Collaborative Requirements

The SSF will coordinate extensively with many of the other forums, work groups and committees. Certainly, the SSF will need input from the TOC on emissions inventory, modeling and economic impacts.

221 **Process Requirements**

222
223 The SSF will follow the general guidelines for forums developed by the WRAP and will supply
224 minutes of meetings to the IOC and TOC Co-chairs.

225
226 **Membership Criteria**

227
228 Member should be appointed on the basis of experience and qualifications including a demonstrated
229 ability to communicate in writing and orally. Demonstrable ability to bring negotiations to a central
230 focus and reasonable compromise is also very important. Additional expertise in market trading
231 mechanisms and business in general will be considered to be very helpful.

232
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Draft 2/16/98 - For Discussion with Forum Co-Chairs

**Emissions Within and Near Class I Areas
Forum Charge**

Oversight: Initiative Oversight Committee

Schedule: Anticipated Start Date - TBA

Mission

This forum is charged with developing an approach for implementing strategies to reduce and prevent air pollution from emission sources located within and near Class I areas on the Colorado Plateau, as outlined in the pertinent section of the GCVTC recommendations.

Background

Emissions from sources within and near Class I areas contribute to impaired visibility. Transportation-related emissions, emissions from other types of energy and fuel use, and prescribed fire – emissions are of greatest concern. Specific strategies need to be developed and implemented for reducing and preventing pollution from the many diverse sources and activities in Class I areas and in communities surrounding these areas, including, “gateway” communities and a substantial amount of tribal property. Accountability mechanisms are needed to ensure that appropriate actions are taken, reported and incorporated into visibility protection plans and land management plans. Some of the emissions sources of concern –e.g., road dust and prescribed fires -- are being addressed by other forums; this forum will need to coordinate its activities with those forums to insure that comprehensive strategies are developed and implemented to address all the key emissions sources within and near Class I areas.

Scope and Related References

This forum will focus on the recommendations contained in the GCVTC report related to emission sources within and near mandatory Class I areas on the Colorado Plateau, working in cooperation with other forum identified below. As noted in the GCVTC report, some strategies and guidelines developed by this forum may be applied consistently throughout the Transport Region, thereby affecting additional states and tribes. However, the initial focus of this forum is emissions sources within and near mandatory Class I areas on the Colorado Plateau. A significant amount of Tribal property is located near these Class I areas. Tribal concerns will need to be thoroughly addressed as strategies are considered or developed for emissions sources near these Class I areas.

42 Objectives and Deliverables

43

44 Develop pollution control and prevention strategies for emission sources within mandatory
45 Class I areas on the Colorado Plateau.

46

47 Review land management plans for affected Class I areas to assess whether they include
48 strategies to limit and reduce visibility-impairing emissions

49

50 Survey Class I areas to identify strategies under consideration, proposed for implementation
51 or already undertaken that might not be include in management plans.

52

53 Develop guidelines for what type of information should be reported by FLMs to regulatory
54 authorities during the consultation process that occurs when state/federal/tribal agencies are
55 developing or revising visibility SIPs. For example, FLMs could be asked to report on
56 actions and strategies taken to (1) assure emissions growth from human-caused sources
57 within the Class I area does not cause visibility to deteriorate; (2) prevent or reduce pollution
58 from human-caused sources within the Class I area (or that result from activities within the
59 area); and (3) minimize emissions and visibility impacts from prescribed fire programs
60 through smoke management and emissions reductions measures, including considering and
61 applying non-fire alternative whenever possible.

62

63 In coordination with the appropriate technical forum on emissions inventories, review the
64 micro-inventory prepared for the Grand Canyon NP and evaluate the feasibility and
65 advisability of preparing similar inventories for other Class I areas on the Colorado Plateau;

66

67 In coordination with the TOC or technical forum on modeling, assess the adequacy of
68 models for predicting visibility impacts associated with emissions reductions within Class
69 I areas, taking into account the relative magnitude and location of those emissions.
70 Determine whether modeling adds value to decision making in light of adequacy of tools.

71

72 Based on currently available information (including the GVNP micro-inventory), identify
73 key emissions sources within Class I areas, investigate costs and relative effectiveness of
74 pollution control and prevention options for those types of sources (e.g., fuel change,
75 operations and use practices, or add-on technologies), and disseminate complied information
76 to Class I area managers;

77

78 Explore funding sources for implementing/constructing/operating pollution control projects
79 for in-park sources, including suggesting potential demonstration projects.

80

81 Develop pollution control and prevention strategies for emission sources near mandatory
82 Class I areas on the Colorado Plateau

83

84 Develop systematic method for inventorying, tracking, and prorating all significant emission
85 sources or combination of sources near Class I areas.

86

87 Develop guidelines for incorporating near-park emissions inventory and enforceable
88 emission management strategies for these sources into visibility protection plans. Develop
89 criteria for these plans that are consistent across the Transport Region as well as mechanisms
90 to promote adherence to these guidelines and criteria by all states and tribes within the
91 Transport Region.

92

93 In developing strategies, special consideration will need to be given to impacts on tribal
94 nations. Equity-related concerns – such as relative contribution to visibility impairment and
95 disproportionate effects on any one population – must be considered, as should the need to
96 provide exemptions for tribal ceremonial practices and people who are dependent on a single
97 source of heating or cooking.

98

99 Review state compliance with existing regulatory requirements for periodic (every 3 year)
100 review and revision of visibility SIPs and develop mechanisms to ensure that the
101 requirement is enforced.

102

103 Identify and recommend institutional mechanisms for community involvement in
104 developing, implementing, and enforcing emission management strategies in areas near Class
105 I areas (e.g., identify relevant planning authorities/zoning commissions and how/when/what
106 decisions are made at local level; explore cooperative decision making approaches that could
107 be used by tribal, state, local and federal land management officials in conjunction with
108 private and local public interests.

109

110 Examine FLM's role in external planning arenas, including what action FLMs have taken
111 and how effective they have been in the following activity areas: (1) reviewing permit
112 applications for new or modified stationary sources proposed for construction and operation
113 near Class I areas: (2) working with regulatory authorities responsible for developing and
114 implementing visibility SIPs to assure that local area emissions are inventoried, tracked, and
115 reported; (3) requesting that appropriate regulatory authorities propose emissions reduction
116 strategies for nearby sources that contribute to existing visibility impairment, either during
117 the development of visibility SIPs or during their required periodic review of such SIPs; and
118 (4) participating in other planning arenas where decision making could have effects on
119 visibility in nearby Class I areas. Develop recommendations to increase FLM involvement
120 or effectiveness, if necessary, through, e.g., more specific consultative regulatory
121 requirements, incentive approaches, and/or greater state/tribal accountability for addressing
122 FLM concerns.

123

124 **Collaboration Requirements**

125

126 This forum will monitor activities of the Fire Forum to ensure that prescribed fire-related
127 emissions – from activities within and near Class I areas—are being addressed. Coordination
128 with technical forums on emissions (e.g., with respect to road dust, micro-inventories),
129 modeling (e.g., with respect to micro-scale modeling capabilities), control

130 technology/options (e.g., with respect to types of pollution control and prevention strategies
131 that could be implemented) and tribal issues (if formed as separate forum) will also be
132 needed on specific activities, as identified above or in subsequent forum discussions. This
133 forum will refer technical issues to appropriate technical forums for resolution or input.

134

135 **Process Requirements**

136

137 This forum should: (1) follow the general guidelines developed by the WRAP for all forums;
138 (2) adhere to the objectives described above, including, the tasks and deliverables; and (3)
139 provide meeting minutes to the IOC, as well as short quarterly status reports (no more than
140 5 pages).

141

142 **Membership Criteria**

143

144 Appointments to the “Emissions In and Near Class I Areas” with stakeholder-based, with
145 particular emphasis on representation from each of the federal land managing agencies,
146 Tribal representatives from Tribal Nations whose property is located next to or very near
147 Class I areas on the Colorado Plateau, community officials from gateway communities, and
148 economic/business representatives from both in-park concessionaires and bordering
149 communities. States will also need to be well-represented because of the implications for
150 visibility protection plans.

151

152 air/inparkwp.doc

Draft 3/4/98 - For Discussion with Forum Co-Chairs

Mobile Sources Forum Charge

Oversight: Initiatives Oversight Committee

Schedule: Anticipated start date - April 1998

Mission

The mission is to develop an emission management objective, establish a regional emissions budget, develop a system for tracking emissions, and suggest targeted local action for mobile sources.

Background

The Mobile Sources Forum is charged with completing development of the strategies outlined in the mobile sources section of the Grand Canyon Visibility Transport Commission's Recommendations. A broad range of strategies has been outlined, including several options for addressing national, regional and local mobile source emissions. The forum may want to consider subgroups with expanded membership to work on specific issues since the Recommendations cover such a wide variety of possible control strategies. The forum may also want to prioritize these issues and focus on those most likely to yield the greatest benefits. The forum should also review the complete GCVTC Recommendations, especially the section dealing with mobile sources.

Scope and Approach

Three levels of strategies are listed below along with recommended approaches, objectives and deliverables for Forum action.

National Strategies - These strategies deal with issues that are currently being addressed at various levels on a national basis. The forum should consider ways of ensuring WRAP participation as EPA develops national strategies and establishing other methods of ongoing communication. Such participation may take a variety of forms, including have a representative participate in national workgroups and the submittal of WRAP comments as national strategies are proposed.

Regional Strategies - For each of the strategies listed below, determine what, if any, clearinghouses may exist that provide relevant information, build on those clearinghouses as necessary, and serve as a referral source for such information. Evaluate the feasibility of expanding existing state- or tribal-based policies to a regional level and of initiating strategies on a regional basis that may not be feasible for a single state or tribe. Provide such information in a clear and understandable way for use by western agencies.

Objectives and Deliverables

1. *Establish clean fuel demonstration zones* - The forum should develop various policy options for this strategy and work with the TOC as technical information is needed.
2. *Analyze pricing and incentive approaches* - Develop a list of strategies. Work with the TOC as appropriate. Also work with the market trading forum to ensure strategies don't conflict.
3. *Explore an inspection program for heavy-duty vehicles* - Evaluate those programs that are currently ongoing. Identify policy implications with those programs. Work with the TOC to develop supporting technical information.
4. *Promote vehicle maintenance* - Evaluate ongoing programs. Serve as a "clearinghouse" for such information and develop a list of options.
5. *Identify and evaluate strategies targeting mobile sources on or near tribal lands* - Consider educational programs explaining the need for controls and demonstrating vehicle maintenance methods for minimizing vehicle emissions. Evaluate concerns about emissions from federal vehicles and air traffic in these areas. Strategies should address tribal lands located in rural areas and those near metropolitan areas.

Local Strategies

Objectives and Deliverables

1. *Promote incentives for innovative and effective approaches and encourage better integration of transportation, land use and air quality planning* - The forum should look at the current efforts ongoing in different states and tribes and serve as a "clearinghouse" for information regarding programs and incentives. Successful programs should be publicized. Also determine if there are existing clearinghouses that could be useful to states and tribes. The forum should be able to serve as a reference resource to states and tribes on an as-requested basis. Suggest additional actions as appropriate.
2. *Establish mobile source emissions budgets for selected urban areas* - Determine if this is still necessary. Consider the need for subregional emissions budgets to address the transport of urban plumes. Determine if this is being done in some states/regions. Work with the TOC and the market trading forum as necessary.
3. *Suggest retiring high-emitting vehicles* - Evaluate current efforts to determine their effectiveness. Determine if this strategy, perhaps in conjunction with an effort to repair high emitters, would be effective. Consider potential equity impacts on persons or population groups without the economic means to purchase low-emitting vehicles.

Collaboration

The Mobile Sources Forum should provide the IOC and TOC with clear and timely requests for information or input on forum matters. The oversight committees may establish a Mobile Sources Emissions Work Group to provide technical support to the Mobile Sources Forum. The forum also needs to coordinate with the Pollution Prevention Forum where mobile sources are related to pollution prevention issues (e.g., zero-emitting vehicles).

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DISCUSSION PAPER
APPROACHES FOR IMPLEMENTATION OF
WESTERN REGIONAL AIR PARTNERSHIP
STRATEGIES AND ACTION PLANS
March 4, 1998

Background

The Western Regional Air Partnership (WRAP) is a voluntary effort of a broad range of stakeholders to promote and monitor implementation of the recommendations of the Grand Canyon Visibility Transport Commission. The WRAP is also committed to developing joint approaches to air quality issues of general concern to the participants. Although the WRAP is responding, in large part, to a direct federal mandate under the Clean Air Act, a major incentive for participation is a recognition that many air quality issues are best addressed through a multijurisdictional, regional approach. Consequently, the active participation of States and Tribes, the federal EPA and land managers, as well as environmental organizations, industry and other stakeholders is necessary to achieve air quality improvements. As each of these entities has its own authorities and interests, coordinated actions require a process to develop strategies that each stakeholder can and will support.

The Clean Air Act requires that regional haze problems be addressed. They can be addressed through a regional approach such as WRAP. The WRAP and its activities do not, by themselves, result in regulatory action. It is by virtue of each state, tribal, local and federal entity utilizing their individual authorities that implementation of the GCVTC recommendations is achieved, and regional haze and visibility is addressed under the CAA. Further, as there are local interests that may not be represented in the WRAP, additional public input may be needed prior to individual members taking action.

Although the authorities to implement the strategies remain with the individual stakeholders, the power of the process is the recognition of the need for coordinated action, the ability to develop consensus through dialogue and the commitment to follow-through by each participant. A strength of the WRAP process is that many stakeholders, such as industry and the environmental community, are participants. Achieving consensus through the WRAP will provide a basis for effective action at the federal, tribal and state level as well as in the private sector as the recommended strategies are implemented.

Approaches for Achieving Results through the WRAP:

A significant effort will be expended by participants in the WRAP process in development of consensus recommendations. Based on experience from the GCVTC process, this will amount to thousands of hours of effort from stakeholders, all of which will be donated as an in-kind contribution to the process. Without the participation of ALL stakeholders, the value of the consensus recommendations will be weakened. These participants, in volunteering their time and effort, expect that the work products will provide a basis for the development of effective long-term strategies required to remedy existing and prevent future visibility impairment in the mandatory Class-I Federal areas. As such, the WRAP members are committed to utilizing consensus work products in the development of their SIPs, TIPs, and federal emissions management programs. In

reviewing the WRAP members long term strategies for visibility in their SIPs/TIPs, the EPA will take into consideration the degree to which the member's long-term strategies incorporate components derived from WRAP consensus work products. Those WRAP members who heavily rely on WRAP components in their strategies expect that their long-term strategies will meet the requirements for demonstrating reasonable progress toward the national goal. (Above paragraph subject to continued discussion/review)

As the WRAP is a voluntary, consensus based effort, members make an implicit commitment to participate in good faith and to make concerted efforts to implement recommendations. However, early clarification of expectations could significantly facilitate the level of commitment from all parties and increase the likelihood of developing consensus.

As most participants in the WRAP have their own decision-making structure that may actually implement WRAP recommendations (e.g., Tribal Councils, State Legislatures) each participant needs to commit to informing policy-makers and local stakeholders of WRAP issues on a regular basis. This process would be facilitated by the development of periodic progress reports by WRAP staff and participants and issued by the Communications Committee. In addition, members could provide regular progress reports to the full WRAP on actions taken to implement GCVTC and WRAP recommendations.

The level of commitment of each participant is increased by the likelihood that other participants are also committed. One measurement of commitment is the resources offered to the WRAP process, such as staff support. Another tool could be a joint statement or resolution, formally approved by the policy-makers of each WRAP member (e.g., Legislature, Council), to make a good faith effort to advance implementation of WRAP recommendations. The commitment statements could include a list of implementation options that participants acknowledge as possible outcomes, including, but not limited to:

- enforceable measures in Tribal and State Implementation Plans;
- legislation, at the federal, state and tribal level
- regulation, at the federal, state and tribal level
- Intergovernmental Agreements with mutually enforceable components
- industry initiatives.

WRAP and Forum work plans need to contain specific and measurable objectives with target time lines. WRAP recommendations need to contain specific action plans with independent steps for implementation by members. WRAP recommendations may also include the development of Memoranda of Agreement or Intergovernmental Agreements, as necessary.

3/4/98

**AGENDA ITEM: Guidance for Forums and Work Groups on Addressing Issues
Associated with Visibility in Parks and Wilderness Areas Outside of the Colorado Plateau**

ISSUE:

A. Background

1. Impacts of the proposed regional haze rule.

John Seitz, Director of EPA's Office of Air Quality Planning and Standards, will be present to provide an update on the proposed regional haze regulation.

EPA has proposed a regional haze rule that will require visibility protection for all mandatory Class I areas in the U.S. This means that in the next few years plans will have to be developed for hundreds of parks and wilderness areas in the west to ensure that visibility in these parks is meeting the Clean Air Act requirement of making reasonable progress towards the national visibility goal of no manmade impairment. As was the case of the Grand Canyon Visibility Transport Commission (GCVTC), states, tribes and federal agencies will have to work together to develop plans for addressing both near source impacts and impacts from long range transport.

2. Issues Arising from the Market Trading Group

The Stationary Sources Forum (Market Trading) has developed a number of issues related to the scope of a market trading program. Among these issues are questions of whether program benefits for additional receptors (parks and wilderness areas) should be considered and whether the program should be expanded beyond the nine state GCVTC transport region. (The Forum recognizes that before a decision could be made to expand the trading program significant analysis would have to be done to determine whether it would be in the interest of non GCVTC states to opt into the market and whether it would be in the interest of the GCVTC states to expand the program).

This brings up a broader issue regarding geographic scope and membership on forums. Some WRAP participants may benefit from the forum, but will not be able to make this judgment unless analysis in their areas are included in the forums studies. In selecting membership, forum co-chairs will need guidance on when they should involve individuals from areas outside the GCVTC transport region. This decision needs to be made in two contexts, first should non GCVTC areas be involved in forums performing technical analysis, and second, should they be involved in parallel policy development forums.

Forum representatives will make a presentation on these issues as part of this agenda item.

B. Issues Associated with the GCVTC Transport Region

Parks and wilderness areas within the GCVTC transport region fall into two categories with respect to the expected regional haze regulations. Some Class I areas may have benefits from the

GCVTC recommendations that are near or equal to those on the Colorado Plateau. In these cases the GCVTC plan may (when approved by EPA) satisfy the requirements for reasonable progress for these areas.

A second category is parks and wilderness areas that may benefit from the GCVTC plan, but may have impacts from source regions not covered by the GCVTC. In these cases additional work may have to be done to meet the reasonable progress requirements.

The IOC and TOC will discuss the implications of these situations for WRAP forums and working groups and seek guidance on how to address these evolving issues.

C. Issues For States and Tribal Areas Not in the GCVTC Transport Region

A number of possibilities exist for non GCVTC areas for addressing the new haze requirements. Among them are: 1) States and tribes could develop separate plans for subregional air sheds, developing new technical tools and decision making processes. 2) States and tribes could develop distinct subregional plans using WRAP support and tools developed by the GCVTC and refined by the WRAP. 3) States and tribes could develop plans with both subregional elements and selected GCVTC strategies using GCVTC/WRAP tools and processes.

The IOC and TOC will discuss the implications of these situations for WRAP forums and working groups and seek guidance on how to address these evolving issues.

D. Opportunities for synergy in development of technical work products

The Technical Oversight Committee forums related to emissions inventory, air quality modeling, and monitoring and reporting will need to be regional in scope. In order to reconcile model predictions to measurements in the Class-I areas, the GCVTC relied on a comprehensive emission inventory from the 11 western states, Texas, Canada, and Mexico. The emission inventory system contemplated for the WRAP will allow for consolidation of State/Tribal inventories on a routine basis for regional scale modeling. The air quality models will be able to provide predictions of visibility conditions at any Class-I areas. These tools will provide the basis for future regional studies, but can also be used by the WRAP members in refining the long-term strategies that will be required under the new regional haze rules. Because of the significant cost associated with developing high quality analytical tools, it would be a significant benefit to the WRAP members to pool their technical talents/efforts to develop tools which will be more robust than those which could be developed by an individual member. Synergy between the WRAP members staff's and stakeholders will yield products that all participants will feel represent a sound basis for policy analyses.

Western Regional Air Partnership Discussion Paper on Funding Issues

The purpose of this agenda item is to make the WRAP membership aware of national issues concerning the allocation of federal funds for air quality programs, and if the membership deems it necessary, to weigh in as a regional organization on how these funds are to be distributed.

At this time, the Environmental Protection Agency (EPA) is developing a new allocation formula to be used in FY 99 to allocate Section 105 funds to the EPA regions and ultimately, to the states. Working with STAPPA/ALAPCO and ECOS, the EPA developed several guidelines or principles that would be used to guide this allocation process. Included within these new principles are a recognition of the need to:

- allocate the limited funds to those areas with the most severe environmental problems
- reinforce joint strategic approaches
- target resources to the entity that can most effectively achieve the desired result

John Seitz of the EPA has been invited to this meeting to review a draft of the EPA's allocation proposal for FY 99 to allow WRAP members an opportunity to review the allocation and to see how the western region fares as a whole with the rest of the country. As part of this discussion, the membership should discuss the need for some type of process to remain aware and involved with funding issues in the future.



Please reply to:

Interior Columbia Basin Ecosystem Management Project

☐ 112 East Poplar Street
Walla Walla, WA 99362
(509)522-4030 Fax:(509) 522-4025
TTY:(509)522-4029

☐ 304 N. Eighth Street
Room. 250
Boise, ID 83702
(208)334-1770 Fax:(208)334-1769

REC'D 1/22 2 1998

Reply To: (FS) 1920
(BLM) 1630

Date: February 27, 1998

Jim Souby, Executive Director
Western Governors' Association
600 17th Street
Suite 1705, South Tower
Denver, CO 80202-5442

Sandra Lopez, Executive Director
WESTAR Council
1001 S.W. 5th Avenue, Suite 1100
Portland, OR 97204

Dear Mr. Souby and Ms. Lopez:

The purpose of this letter is to request your review of possible impacts to air quality in the western United States from land management strategies contemplated in two Draft Environmental Impact Statements (DEISs) currently available for public comment in the Pacific Northwest.

The Interior Columbia Basin Ecosystem Management Project (ICBEMP) was initiated by the Bureau of Land Management (BLM) and Forest Service in 1993 to develop a scientifically sound ecosystem-based management of lands administered by the Forest Service and the BLM. Two Draft EISs were published in June 1997 for public comments. These Draft EISs examine several alternative land management strategies, from which a final decision is expected to amend the land use plans for approximately 50 National Forests and BLM Districts. The Draft EISs are strongly based in a set of science documents which were developed, subject to peer review, and published in the past 18 months. The public comment period runs until April 6, 1998.

One area of particular interest is the use of prescribed burning to help achieve ecological objectives for vegetation, fish and wildlife habitat, and also to lessen the risk of uncharacteristic fires on Federal forests and rangelands. The preferred alternative, Alternative Four, contemplates an increase of two to three times the use of prescribed burning in the forests and rangelands managed by the BLM and Forest Service.

At a January 23, 1998 hearing of the Nevada Legislature's Committee on Public Lands, questions were raised by members of the Committee about the possible impacts of the proposed prescribed burning levels on air quality, visibility, and transport issues affecting not only the Pacific Northwest, but the western United States. This question was raised because the Committee had

just heard an update that same morning from the Grand Canyon Visibility Transport Commission (a group now succeeded by the Western Regional Air Partnership).

Impacts to air quality and visibility from the alternative strategies were examined in the ICBEMP Draft EISs, but the documents did not examine impacts outside the Project area. In response to the interest expressed at that meeting, Andy Brunelle, of my staff, responded that we would attempt to identify and contact the proper entities who would be able to provide a review of the impacts which may reasonably result from increased prescribed burning.

We believe the Western Governors' Association and the Western Association of State Air Quality Agencies (WESTAR) are the entities which may help explore the issues associated with air quality and visibility impacts outside the Project area, which may result from implementation of increased prescribed burning.

We are sending under separate cover a copy of the draft EIS with the request that your staff review the pertinent areas and provide us with comments and any guidance to address the impacts which may result from the proposed increased use of prescribed burning. If you have additional questions, you may contact Peter Teensma at (503) 808-6968.

Thank you in advance for your attention to this matter.

Sincerely,



SUSAN GIANNETTINO

Project Manager

Enclosure (under separate cover- UCRB DEIS)

cc:

Nevada Legislature Committee on Public Lands

Peter Teensma, R6

Jeff Walter

TAB

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FACT SHEET

CLEAN AIR ACT FINAL RULE

INDIAN TRIBES: AIR QUALITY PLANNING AND MANAGEMENT

OVERVIEW

- The Clean Air Act (CAA) authorizes EPA to issue regulations specifying the provisions of the CAA for which Indian Tribes may be treated in the same manner as States.
- This final rule implements the provisions of section 301(d) of the Act to authorize eligible tribes to implement their own tribal air programs.

HIGHLIGHTS OF THE RULE

Applicable CAA Programs

- The rule provides that Tribes will be treated in the same manner as States for virtually all CAA programs.
- The rule grants Tribes -- with approved CAA programs -- authority over all air resources within the exterior boundaries of a reservation (including non-Indian owned fee lands). For off-reservation areas, Tribes must demonstrate the basis for jurisdiction.

Eligibility

- Criteria for eligibility include demonstrating that the Tribe: (1) is Federally recognized; (2) has a governing body carrying out substantial governmental duties and powers; (3) is capable of implementing the program consistent with the CAA and applicable regulations. The Tribe must also identify the exterior boundaries of the reservation and, for off-reservation areas, must demonstrate the basis for jurisdiction.
- A Tribe previously determined eligible (or meeting "Treatment in the same manner as a State" criteria) under another EPA program will simply have to note such determination has been made in order to demonstrate that it is Federally recognized and has an adequate governing body.
- EPA will simultaneously review Tribal applications for eligibility and CAA program submittals.

Flexibility

- The rule authorizes Tribes to submit CAA programs; however, it does not require Tribes to develop CAA programs.
- Tribes may implement those programs, or even portions of programs, that are most relevant to the air quality needs of Tribes.

Federal Requirements

- All Tribal CAA programs submitted to EPA for approval must meet the CAA requirements for that program.
- Tribes will have the same authority as States do under the CAA to impose more stringent requirements.

Financial Assistance

- Financial assistance for Tribes will continue to be available under section 103 for studies and air quality assessments and section 105 for support of air pollution control programs. In addition, Tribes can apply for funding assistance for developing environmental programs under the Agency's Indian Environmental General Assistance Grants Program.
- The rule establishes an initial tribal match of 5% for federal assistance under section 105 authority, with the possibility of a waiver for demonstrated financial hardship. After two years, EPA may raise the match to 10% if EPA determines (based on objective criteria) that the tribe can afford the increased match. EPA commits to review the experience of the program to determine appropriate long-term cost share rates within five years of the promulgation of the rule.

For more information

- Please direct your questions to:

David R. LaRoche
Office of Air & Radiation (6102)
U. S. Environmental Protection Agency
401 M St. SW
Washington, DC 20460
Telephone: (202) 260-7652

Agenda Item #15

Amendment to Travel Policy

The Initiative Oversight Committee has recommended that the WRAP Travel Policy be amended to have its financial hardship clause extended to all individuals eligible for travel assistance. Currently the clause applies only to members of the Public Advisory Board.

The hardship clause allows individuals who are currently eligible for 50 or 75% reimbursement of lodging and travel costs to receive 100% in hardship cases. Individuals most frequently falling into the category are representatives of non profit organizations, e.g., environmental groups, and representatives from academia. In some cases individuals have to pay the “match” with personal resources.

The current policy reads:

Travel Policy Amendment

The Western Regional Air Partnership Project Manager has the discretion to provide full reimbursement for travel and lodging for members of the Public Advisory Board, when in the judgment of the Project Manager, the Travel Policy creates an undue financial hardship on the Public Advisory Board member, the member's employer or the interest group represented by the member.

It is proposed to be amended to read:

Hardship Policy

The Western Regional Air Partnership Project Managers have the discretion to provide full reimbursement for travel and lodging for members forums or standing committees, when in the judgment of the Project Managers, the Travel Policy creates an undue financial hardship on the forum or standing committee member, the member's employer or the interest group represented by the member.

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Agenda Item: Budget Approval

Enclosed find a summary budget table and summaries of expected committee and forum activities. A complete grant application package will be forwarded under a separate cover.

WESTERN REGIONAL AIR PARTNERSHIP - FY'98 BUDGET SUMMARY

(Note: FY-98 based on Forecast January through September)

Projected Operating Expenditures Expenditures

| | |
|---|---------|
| Current Un-Reimbursed Travel (Est) | 15,000 |
| WGA Staff Support (Leary, Halvey, Deike) | 52,000 |
| Web-Site Support (Contingent) | 5,000 |
| WGA Overhead (Office/Phone/Computers) | 28,000 |
| Travel | 199,444 |
| Meeting Facilities | 26,175 |
| Printing | 8,000 |
| Postage | 5,000 |
| Contractor Support (contingent on Work Plan Approval) | |
| Facilitation Services | 20,000 |
| Technical/Policy Analysis Contractors | 41,581 |
| Hardware | |
| Notebook Computer | 4,000 |
| Computer Projector Panel | 3,500 |
| Shipping Case | 300 |
| TOTAL EXPENDITURES | 408,000 |
| FUNDING | |
| CARRY-OVER - FY-97 | 39,000 |
| REMAINING FY-97 TO BE REQUESTED | 69,000 |
| FY-98 GRANT | 300,000 |
| TOTAL FUNDS AVAILABLE | 408,000 |

Table 1. Oversight and Policy Committees

| Group | Role/Key Deliverable FY98 | # FY98 Meetings |
|-------|--|--------------------|
| WRAP | Policy Direction to Committees, Prioritization of Issues, Action on Work Products | 2 |
| COORD | Coordination Committee: Budgets and overall plans, Process Management, Conflict Resolution | 8 conference calls |
| TOC | Technical Oversight Committee: Establish/Oversee Technical Forums, Prioritize Workplan Activities | 5 |
| IOC | Initiative Oversight Committee: Establish/Oversee Policy Analysis Forums, Prioritize Workplan Activities | 5 |
| COMM | Communicating Committee: Coordinate Communications/Outreach for WRAP (Deliverables: Comm. Plans, Work Plan) | 2 |
| INTL | International Committee: Coordinate International Initiatives with Canada and Mexico (Deliverables: Work Plan) | 1 |
| PAB | Public Advisory Board: Provide feedback to WRAP on Work of Committees and Forums and Process Issues | 1 |

Table 2. Initiative Oversight Committee and Joint IOC/TOC Forums

| Over-sight | Forum/Workgrp Title | Mission | Start Date #FY98 Meetings/WS Workplan done in FY98 |
|----------------|--|--|--|
| IOC | Pollution Prevention Forum | To develop programs for the Western Regional Air Partnership to implement that will reduce pollution from traditional energy production through alternative approaches to energy use, generation, and marketing. | April, 1998 2 meetings/ 0 ws Yes |
| IOC | Stationary Sources Forum Charge | Achieving significant reductions in SO ₂ emissions in the near term; ensuring reasonable progress toward the national visibility goal through continuing reductions in SO ₂ emissions over the long term; and avoiding increases in emissions of other visibility-reducing pollutants within the region as a whole from stationary sources | Active 5 meetings/ 1 ws Yes |
| IOC | Emissions Within and Near Class I Areas Forum Charge | To develop an approach for implementing strategies to reduce and prevent air pollution from emission sources located within and near Class I areas on the Colorado Plateau, as outlined in the pertinent section of the GCVTC recommendations. | April, 1998 2 meetings/ 0 ws Yes |
| IOC | Mobile Sources Forum Charge | Completing development of the strategies outlined in the mobil sources section of the GCVTC's Recommendations. These include options for addressing national, regional and local mobile source emissions. | April, 1998 2 meetings/ 0 ws Yes |
| Joint IOC/ TOC | Fire Emissions Forum | To make recommendations to the WRAP and related WRAP forums on policies and methodologies for: 1) estimating air pollution emissions and their effects on air quality and visibility due to smoke from various natural and human-caused fires 2) developing a data set and associated tracking system for those emissions in the geographical area at least encompassed by the GCVTC states and tribes, 3) recommending strategies and methods to manage emissions from these sources. The group will specifically cover wildland fire (wildfire, prescribed natural fire), and prescribed fire (silvicultural, rangeland, and agricultural). (Other types of burning such as residential wood combustion and open burning may be considered, but are not the primary focuses of this group.) This forum will coordinate with both the IOC and the TOC. (TOC Liaison/Member: Donna Lamb) | June, 1998 2 meetings/ 0 ws Yes |
| Joint IOC/ TOC | Econometric Analysis Forum | To provide the WRAP and WRAP forums with recommended methods for, and the results from, estimating the econometric parameters to be used to estimate changes in emissions over time, and for assessing economic effects on the region and subregions of steps taken to reduce the emission of air pollutants in the past and in the future. (TOC Liaison/Member: John Bartlit) | August, 1998 1 meeting/ 0 ws No |

Table 3. Technical Oversight Committee Forums/ Working Groups

| Over-sight | Forum/Workgrp Title | Mission | Start Date #FY98 Meetings/WS Workplan done in FY98 |
|------------|--|---|--|
| TOC | Emissions Inventory Working Group | To make recommendations to the WRAP and related WRAP forums with regard to methodologies for estimating emissions from various stationary sources, and develop a data set of those emissions for the area at least encompassed by the GCVTC states and tribes. (TOC Liaison/Member: Lewis McLeod) | Active 5 meetings/0 ws Yes |
| TOC | Research and Development Forum | To provide the WRAP with recommendations on techniques and methods suitable for use in technical analyses in support of WRAP activities, and to develop a research agenda which can be communicated to the academic and regulatory communities to support the long term needs of the WRAP. (TOC Liaison/Member: C.V. Mathai) | April, 1998 1 meetings/ 1 ws Yes |
| TOC | Emissions Forecasting and Tracking Forum | To oversee the development of a comprehensive emissions tracking and forecasting system which can be utilized by the WRAP, or its member entities, to monitor the trends in actual emissions and to forecast the anticipated emissions which will result from current regulatory requirements and alternative control strategies. In addition, this forum is responsible for the oversight of the assembly and quality assurance of the emissions inventories and forecasts to be utilized by the WRAP forums. (TOC Liaison/Member: Shawn Kendall) | April, 1998 3 meetings/ 1 ws Yes |
| TOC | Tribal Data Development | To provide the WRAP with much needed information on tribal air quality and help to improve the overall understanding of tribal protocols and processes for obtaining and using tribal data in its quest to implement the GCVTC's recommendations. With the concurrence of the WRAP, the scope may be enlarged to include areas outside GCVTC area. The mission is to assist the development of relevant air quality data for Indian Country. The goal of the forum will be to develop a method for retrieving existing data or where it does not exist, develop a plan or framework to gather that data. (TOC Liaison/Member: Tony Bynum) | April, 1998 3 meetings/ 1 ws Yes |
| TOC | Mobile Source Emissions Forum Charge | To evaluate emissions estimation techniques and develop an inventory of those sources for the WRAP, as well as establish criteria and perform analyses consistent with the recommendations of the GCVTC in consultation with the Mobile Source Forum of the IOC. (TOC Liaison/Member: Nancy Wrona) | June, 1998 3 meetings/ 0 ws Yes |
| TOC | Ambient Air Monitoring and Reporting Forum | To make recommendations to the WRAP with regard to approaches for enhancing the collection of ambient pollutant and meteorological data, as well as addressing its reporting. (TOC Liaison/Member: Lewis McLeod) | June, 1998 3 meetings/ 1 ws Yes |
| TOC | Area Source Emissions Forum | To make recommendations to the WRAP and related WRAP forums with regard to methodologies for estimating emissions from area sources with the exception of those from source categories covered by other forums (such as Fire), and develop a data set of those emissions for the region at least encompassed by the GCVTC states and tribes. (TOC Liaison/Member: Bob Raisch) | August, 1998 1 meeting/ 0 ws No |
| TOC | Air Quality Modeling Forum | Draft Charge to be developed: Forum to focus on Meteorological and Air Quality Modeling issues including short term and long term support, and model reconciliation. (TOC Liaison/Member: Kevin Golden) | August, 1998 1 meeting/ 0 ws No |
| TOC | Control Options and Costs Forum | Draft Charge to be developed: Forum to focus on enhancement of control option and cost data used in assessments originally developed by ANL and DFI for the GCVTC based on design of emissions forecasting and tracking system and policy analysis needs. (TOC Liaison/Member: To Be Named Later) | October, 1998 0 meetings/ 0 ws No |