## Appendix A – Outreach Guidance One-Pagers

The following pages provide brief overviews of the key interactions between states and each of the partner agencies involved in regional haze planning. Each one-page overview is a stand-alone document intended to frame the outreach SIP developers will need to consider for key agency partners. Each page includes a list of discussion questions that may help guide internal conversations as well as outreach to external agencies. Guidance documents regarding the following key agencies are included:

* Local Air Agencies
* Neighboring States
* Tribes
* Federal Land Managers
* Environmental Protection Agency

#### Outreach Regarding Local Air Agencies

The WRAP recognizes that in some states, local air agencies may have authorities associated with measuring and reporting emissions, permitting sources of emissions, and/or other planning functions that impact emissions. For that reason, it is important that states consider whether collaboration with local air agencies will be necessary and, if so, at what level. The following questions may help states coordinate their outreach to local air agencies.

**Questions to Consider**

Describe the local air agency’s air management authority. What role do the local air agencies have in air quality management, including adopting rules and regulation of stationary and area sources in their jurisdictions? Is the agency independently structured or a regional office of the state air agency?

What planning functions are done at a local air agency level? How are those coordinated with planning at the state level? Is any local agency currently preparing an attainment or maintenance plan for any NAAQS?

What do your local agencies know about emission sources (stationary and area) and their existing control programs? What role do your local air agencies play in obtaining information about potential additional emission control measures including the cost and emission reductions for such controls?

Describe any other information your local air agencies have about future emissions.

Do your local air agencies submit NEI data to the EPA or to the state?

Do your local air agencies submit local emissions calculations or do they use EPA’s default numbers?

Do your local air agencies help prepare emissions projections? If not, do they have the capacity?

#### Outreach Regarding Neighboring States

The EPA requires states to determine what measures are necessary to make reasonable progress for Class I Areas within the state and for each Class I area outside of the state that may be affected by emissions from the state. Because Class I Areas are sometimes located near or on the border between states, it is important that neighboring states communicate with each other about their strategies for achieving reasonable progress. In addition, because emissions may travel long distances and have an impact on a Class I Area in more distant states, states contributing to visibility impairment at a common Class I area must communicate about control strategies even if they are not neighbors. The following questions may help states coordinate their outreach to neighboring and more distant states (together called upwind states).

**Questions to Consider**

**General questions**

Do you know who is the point of contact on Regional Haze in your neighboring states? Do they know who you are? Are you both participating in WRAP committees and conference calls?

At what step in the planning process are your neighboring states and more distant states, and are you at the same step?

How does your state plan to negotiate and document agreements with other states that one state or the other will adopt particular additional emission control measures? Who has authority to agree?

**Considerations for Downwind States**

Are any Class I Areas in your state potentially impacted by emissions from an upwind state?

If so, which pollutants are the pollutants of concern at the Class I Area?

Which sources in the upwind state(s) may be contributing to those pollutants? Do you know whether those sources have good existing controls?

What about sources in your own state?

**Considerations for Upwind States**

Are any large sources of emissions in your state located near the border and capable of being better controlled?

If so, is it possible that emissions from the source are impacting Class I Areas on the other side of the border? (A quick qualitative analysis of local wind patterns and geography may help with this preliminary assessment and future conversations.)

What has EPA or WRAP modeling indicated about transport from your state to more distant states?

What kinds of emission reduction measures are your neighboring states and more distant states identifying as being necessary to make reasonable progress in the mandatory Class I Area?

#### Outreach Regarding Tribes

It is important for states and tribes to collaborate with each other while preparing their State Implementation Plans (SIPs) and Tribal Implementation Plans (TIPs), especially where sources within their boundaries can affect visibility at the same Class I Areas. As laid out in the WRAP Regional Haze Principals of Engagement, the WRAP/WESTAR process requires that states and tribes participate significantly throughout the Regional Haze planning process to minimize any possible surprises upon submittal of Regional Haze SIPs/TIPs. This is a greater level of engagement than what is required by the Regional Haze Rule, but it serves to promote the WRAP objective of ensuring the fair and equitable treatment of all participating members. The WRAP recognizes its central role in facilitating collaboration between states and tribes in order to 1) improve communication regarding shared air quality issues, 2) enable the involvement of tribes with the states’ sister regulatory agencies, and 3) achieve shared environmental, cultural, and economic goals. The states should consider the following questions when reaching out to tribes during Regional Haze planning, whether independently or through coordination with the WRAP.

**Questions to Consider**

Have you determined which tribes have sources producing Regional Haze that have the potential to affect Class I Areas within your state?

Do you know who is the point of contact on Regional Haze for tribes within your state? For tribes in adjacent states that have sources with the potential to affect Class I Areas within your state? Do they know who you are?

Have you already connected with representatives from tribes to establish a working relationship and begin a dialogue about Regional Haze? Has this been through WRAP facilitation? Independently?

To your knowledge, are there any tribes within your state or nearby that are working on preparing Tribal Implementation Plans (TIPs)?

Are any Class I Areas in your state potentially impacted by emissions from nearby tribes?

If so, which pollutants are the pollutants of concern at the Class I Area?

Which sources from within the tribal boundaries are most responsible for those pollutants? Do you have any information about the level of controls currently in place at these sources?

Do you plan to utilize, or have you already begun utilizing the tiered approach to communication as described in the *WRAP Communication Framework for Regional haze Planning* for communication with tribes?

How do you plan to negotiate and document agreements with tribes that either your state or the tribes will adopt particular emission control measures? Who has authority to agree?

Are any large sources of emissions in your state located near the border of a tribe? Are these capable of being better controlled?

#### Outreach Regarding Federal Land Managers

[overview – why do states need to include outreach to FLMs]

**Questions to Consider**

Which federal land manager is the FLM for each Class I area in your state and for each Class I area that may be affected by emissions from your state? Who is the designated contact? Who are the informal contacts?

The EPA’s Regional Haze Rule requires a state to offer an opportunity for in-person consultation on an implementation plan for regional haze. What process did your state use for consultation in the first implementation period?

How does your state work with each FLM in the planning of prescribed fires in the Class I areas and in other federal areas that are not Class I areas?

For what stationary sources in your state are the FLMs most interested in seeing more effective emission controls put in place?

What information will the state share with the FLMs while it is doing the technical analysis for the next SIP and while it is deliberating internally on what additional emission controls are necessary to make reasonable progress? How and when will that information be shared?

What ideas does your state have for what FLMs could do to reduce emissions from within the federal areas in the state?

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#### Outreach Regarding the Environmental Protection Agency

Although states are not required to consult with EPA before submitting SIPs, EPA strongly recommends that states work closely with EPA when developing their SIPs. Communicating with EPA during SIP development does not substitute for the statutorily requisite submission, review, and approval of the SIP by EPA but it can help with early identification and possibly resolution of complex technical, policy, and legal considerations. These questions are intended to provide ideas of topics for discussion between states and EPA.

**Questions to Consider**

Do you know who is the Regional Haze contact at your EPA regional office?

How and when does your EPA Region want to be involved during the SIP development process?

What does the state expect EPA to provide during the SIP development process?

Is your state considering any approach to its SIP that may appear to depart from the Regional Haze Rule or EPA guidance? What and why?

How, if at all, is your state planning to use modeling results, or modeling platform pieces, provided by EPA? Are there obstacles to that or questions for EPA about the pieces or results?

Do you know what sources EPA thinks should be considered for more effective control?

If your state is dealing with specific issues during SIP development, is EPA aware of other state plans that face similar issues? If so, can EPA share any examples or lessons learned from action on those plans?

What states in other EPA regions are, or are likely to be, co-contributors at a Class I area?

When is your state planning to formally submit its SIP?

Will it work for both sides for your state to provide EPA with a preliminary draft of the SIP for comment? Will the preliminary draft SIP and those EPA comments be made available to the public, and if so when and how?

If there are any regional haze FIP provisions in effect, does the state plan to replace them as part of the next SIP? With what?

Are state decisionmakers aware of the possible consequences of failure to submit a SIP and of EPA disapproval of SIP?