



Regional Haze Principles of Engagement

Adopted unanimously on the WRAP Board call of April 4, 2018

Background

- The WESTAR Council is a partnership of 15 western states formed to promote the exchange of information between the western states, serve as a forum to discuss western regional air quality issues of common concern and share resources for the common benefit of the member states.
- The WRAP is a voluntary partnership of states, tribes, local air agencies, federal land managers and EPA. The Partnership recognizes the unique legal status and jurisdiction of tribes and seeks to promote policies that ensure fair and equitable treatment of all participating members of the WRAP. The Partnership also recognizes state, tribal and local air agency authority and responsibility to develop, adopt, and implement individual air quality plans within their jurisdictions.
- Western states are committed to submitting regional haze SIPs for the second planning period by the 2021 SIP deadline, if not before the deadline. Adoption of a regional haze TIP is optional for tribes. Tribes may adopt TIPs that include all provisions of the regional haze rule or only those provisions that they believe applicable, and that both EPA and the tribe find to be reasonably severable for their specific circumstance. Any consideration of potential FIP adoption in the regional haze planning context would require early and comprehensive notice to all affected WESTAR/WRAP members, especially as it concerns interstate transport and reasonable progress goals.

Principles of Engagement

- A. WESTAR/WRAP will provide close coordination between states, tribes, local governments, EPA and FLMs to provide transparency and ensure efficient and effective program administration and implementation. This approach is needed since funding for regional haze analysis and planning in the second round was not made available at the federal level. WESTAR members have made contributions that will provide for comprehensive regional haze analysis and planning, but funding available is substantially less than in the first round of planning. State funding provided for regional haze will be expended and tracked in a transparent manner.
- B. While states and tribes are ultimately responsible for the development and content of regional haze SIPs and TIPs, respectively, the WESTAR/WRAP process requires that states, tribes, federal agencies and local governments (as appropriate) must participate significantly in the entire planning process to ensure that there are no surprises at SIP or TIP submittal. This engagement effort is well beyond what is required of states and tribes by the Regional Haze Rule.
- C. EPA regional haze rule and guidance must be finalized and made available early in the process (early 2018 for WESTAR/WRAP). Any revised rule must provide a stable framework for the SIP/TIP development process and should be finalized as timely as possible. EPA guidance is valuable to the western states and tribes in the planning process, but only if the guidance is timely. Western states must move ahead with initiating technical analysis in early 2018 to meet a 2021 SIP deadline. Western states do not have resources or time available to backtrack and redo analyses for the second planning period now, based on western states' considerable collective experience and knowledge of the regional haze planning process.

- D. EPA technical tools, data and assistance in the regional haze planning process is highly valued. These tools, data and assistance must be available in time for western planning occurring in 2018-2019 in accordance with the WRAP regional haze workplan. If tools are not available within the timeline, WESTAR/WRAP may choose to incorporate the use in a more limited way or not at all, depending on the impact any delay would have on the timeline.
- E. While regional planning suggests a high level of coordination among western states and there may be some aspects of a western plan that can easily be shared, individual states and tribes must have flexibility within the regional plan to craft a SIP/TIP that addresses unique state/tribal needs and conditions and state/tribal needs for innovation. Other states, tribes, local governments, EPA and FLMs should strive to work together in cases where states/tribes need flexibility to meet regional planning goals to ensure that the flexibility can be understood and accommodated.
- F. EPA and FLMs will work with WESTAR/WRAP to ensure that tribes have funding and support to participate in the regional haze planning process in a meaningful way. In addition, EPA and the FLMs understand that interactions with WESTAR/WRAP do not substitute for government-to-government consultation, which can only be achieved directly between the federal government and Indian Tribes.
- G. Engagement with Tribes in the WRAP region for Regional Haze planning presents an opportunity to: a) improve communication about shared air quality issues, b) enable involvement of Tribes with sister regulatory agencies in planning and managing air quality, and c) enable interaction through the Regional Haze planning process to achieve shared environmental, cultural, and economic goals.
- H. The public and regulated entities in the West should be engaged by the states or as part of a broader regional effort early and often in the process.
- I. The WESTAR/WRAP regional haze planning process is owned by the WESTAR/WRAP membership and is dependent on member contributions, participation, and discussion. Members and ex-officio members are obligated to raise concerns and comment as issues arise to promote a transparent and trustworthy partnership among all involved.
- J. To successfully complete the Regional Haze plans, the WRAP Board will prepare an annual progress report on the Regional Haze Analysis and Planning milestones/ work products to assist in tracking progress.
- K. Roadmap to applying these Principles of Engagement to support WRAP 2018-19 Workplan development
- Phase 1 - Regional Planning Analysis Activities and Milestones - early 2018 through early 2020
 - Phase 2 – Making Regulatory Decisions for SIPs and Drafting Documents - early 2019 through early 2021
 - Phase 3 – Communication and Official Consultation to Review Documents and Finalize Submittals - early 2020 through mid-2021

