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9.1 PLAN DEVELOPMENT

The Western Regional Air Partnership (WRAP) represents a collaboration of western states, tribal governments, federal agencies, and industry representatives. The WRAP was formed in 1997 as the successor to the Grand Canyon Visibility Transport Commission. The WRAP's primary focus is to develop and implement the technical and policy tools needed by western states and tribes to comply with the Regional Haze Rule (RHR). The WRAP is administered jointly by the Western Governors' Association and the National Tribal Environmental Council. WRAP activities are conducted by a network of committees and forums composed of WRAP members and stakeholders who represent a wide range of viewpoints. An initial long-term strategic plan was completed by the WRAP in 2003. Through the WRAP, states, tribes, USEPA and Federal Land Managers (FLMs), working with non-governmental organizations, including industry and environmental organizations, developed and implemented numerous air quality policies that have improved the environment in the western United States.

The initial strategic plan: (1) identified major products and milestones; (2) served as an instrument of coordination; (3) provided the direction and transparency needed to foster stakeholder participation and consensus-based decision-making, which are key features of the WRAP process; and (4) provided guidance to the WRAP forums and committees. In March 2008, the 2008-2012 WRAP strategic plan was adopted by the WRAP Board. The 2008-2012 strategic plan (http://wrapair.org/WRAP/documents/WRAP_2008-12_Strategic_Plan3_08final.pdf) addresses implementation of the regional haze (RH) SIPs and a one-atmosphere analysis in the west for the next five years. The 2008-2012 strategic plan also addresses refinement and development of analysis tools for evaluation of ongoing and future control programs for air quality planning focusing on:

1. Ongoing implementation of the regional haze program;
2. Technical and policy support related to other regional air quality issues, such as ozone and particulate matter National Ambient Air Quality Standards, mercury and nitrogen deposition impact on ecosystems, regionally-appropriate emissions management strategies; and
3. Technical and policy support on issues related to climate change and energy.

Through participation in the WRAP, a significant portion of the consultation process with FLMs, tribes and other states has been met. In the WRAP process, stakeholders participated in various forums and workgroups to help develop a coordinated emissions inventory and analysis of the impacts that sources have on regional haze in the West. Coordination and evaluation of monitoring data and modeling processes were also overseen by WRAP participants. Although not a formal member, Nevada has been an active participant in the WRAP since its inception and in the forums, workgroups and committees that were formed to address many elements of this SIP.

9.1.1 Past Coordination and Consultation with FLMs

40 CFR 51.308(i) of the RHR requires coordination between states and the FLMs. Nevada has provided agency contacts to the FLMs as required in 40 CFR 51.308(i)(1).

During development of this SIP, the FLMs were consulted in accordance with the provisions of

section 51.308(i)(2). Numerous opportunities were provided by the WRAP for FLMs to participate fully in the development of technical documents developed by the WRAP. This included the opportunity to review and comment on these analyses, reports and policies. Nevada provided additional opportunities for coordination and consultation with FLMs as the SIP was developed through local meetings and stakeholder workshops. The FLM consultation process included the opportunity to discuss their assessment of visibility impairment at the Jarbidge Wilderness Area (Jarbidge WA), and to provide recommendations on reasonable progress goals and the development and implementation of visibility control strategies.

This SIP was submitted to the FLMs on January 5, 2009 for a 60-day review and comment period. Comments were received from the FLMs on March 4 and 6, 2009. As required by 40 CFR 51.308(i)(3), the FLM comments and state responses are included in Appendix C.

A document summarizing the WRAP consultation process is provided on the WRAP web site (http://www.wrapair.org/forums/iwg/meetings/071115c/WRAP_posted_meetings_and_conference_calls_10-11-07.pdf). The purpose of the summary is to gather a consolidated list of each forum, committee and workgroup, its purpose, membership, significant work products and meetings in one place. The draft document, although not inclusive of all the meetings and conference calls held by the WRAP, demonstrates the extent of consultation among the WRAP partners and stakeholders since its inception.

9.1.2 Past Collaboration with Tribes

Nevada sent letters to the WRAP Tribal Caucus Coordinator on September 15, 2006 and March 26, 2008 providing the National Tribal Environmental Council (NTEC) with a contact person for the State of Nevada. These letters also stated that Nevada will work closely with the Nevada Division of Environmental Protection's tribal liaison. As described above, Nevada participated in the collaborative WRAP process where tribes were represented.

9.1.3 Past Consultation with other States

Pursuant to 40 CFR 51.308(d)(1)(iv), Nevada consulted with other WRAP states in development of this SIP. Alaska, Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington and Wyoming agreed to work together to address regional haze in the western continental United States. The majority of state consultation in the development of the RH SIPs was conducted through the Implementation Work Group (IWG) of the WRAP. Nevada participated in the IWG, which took the products of the WRAP technical analysis and consultation process discussed above and developed a process for establishing reasonable progress goals in the western Class I areas. This consultation process ensures that states are aware of each other's reasonable progress goals and long-term strategies.

Nevada has reviewed and analyzed contributions from other states that reasonably may cause or contribute to visibility impairment in the Jarbidge WA. As discussed in Chapter Three, emission sources beyond the control of Nevada, other states or the FLMs include: emissions from outside the WRAP modeling domain; emissions from Canada and Mexico; emissions from wildfires, windblown dust and biogenic emissions; and emissions from offshore shipping. Nevertheless, Nevada anticipates that the long-term strategies adopted by other states in their SIPs and approved by USEPA will include emission reductions from a variety of sources that will reduce

visibility impairment in the Jarbidge WA.

9.2 FUTURE COORDINATION AND CONSULTATION COMMITMENTS

Nevada will continue to coordinate and consult with parties as summarized below.

9.2.1 Future FLM Coordination and Consultation

The RHR requires states to submit periodic SIP revisions and progress reports evaluating progress toward the reasonable progress goal for each Class I area. As required by 40 CFR 51.308(i)(4), Nevada will continue to coordinate and consult with the FLMs during the development of these future progress reports and plan revisions, as well as during the implementation of programs having the potential to contribute to visibility impairment in mandatory Class I areas. The progress reports are to occur at five year intervals, with the first report due five years from submittal of the initial RH SIP. Plan revisions are due every ten years beginning in 2018. The consultation process will provide on-going and timely opportunities to address the status of the control programs identified in this SIP, the development of future assessments of sources and impacts, and the development of additional control programs.

Nevada will provide the FLMs an opportunity to review and comment on future SIP revisions, the 5-year progress reports and other developing programs that may contribute to Class I visibility impairment. The consultation will be coordinated with the designated visibility protection program coordinators for the National Park Service, U.S. Fish and Wildlife Service, Bureau of Land Management and the U.S. Forest Service. At a minimum, Nevada will meet with the FLMs on an annual basis through the WRAP, as long as the WRAP continues to provide this forum. All SIP revisions will include a description of how the state consulted with and addressed any comments provided by the FLMs.

9.2.2 Future Tribal Coordination and Consultation

Nevada will continue to remain in contact, via the WRAP, with the NTEC to keep track of possible future impacts from tribes to visibility at the Jarbidge WA and to provide opportunity for consultation regarding any tribal Class I area that Nevada's emissions may reasonably be anticipated to impact.

9.2.3 Future Inter-state Coordination and Consultation

In accordance with 40 CFR 51.308(d)(1)(iv) and 51.308(d)(3)(i), Nevada commits to continue consultation with Arizona, California , Idaho, Oregon and Utah, and any other state which may reasonably be anticipated to cause or contribute to visibility impairment at the Jarbidge WA. Nevada will also continue consultation with any state for which Nevada's emissions may reasonably be anticipated to cause or contribute to visibility impairment in those states' federal Class I areas.

With regard to the established or updated goal for reasonable progress, should disagreement arise between another state or group of states and Nevada, Nevada will describe the actions taken to resolve the disagreement in future RH SIP revisions for USEPA's consideration. With regard to assessing or updating long-term strategies, Nevada commits to coordinate its emission management strategies with affected states and will continue to include in its future RH SIP revisions all measures necessary to obtain its share of emissions reductions for meeting other states' reasonable progress goals.

9.2.4 Future Regional Planning Coordination and Consultation

Nevada commits to continued participation in the WRAP, to the extent appropriate, and to coordinating future plan revisions with other WRAP member states in addressing regional haze. This involvement in the WRAP will contribute significantly to Nevada's inter-state and FLM coordination for future SIP revisions and progress reports.

9.3 COMMITMENT TO PROGRESS REPORTS

40 CFR 51.308(g) requires states to submit a progress report to USEPA every 5 years evaluating progress towards the reasonable progress goal(s). The first progress report is due five years from the submittal of the initial implementation plan and must be in the form of an implementation plan revision that complies with USEPA's public hearing and plan submittal requirements (40 CFR 51.102-103). At a minimum, the progress reports must contain the elements in paragraphs 51.308(g)(1-7) for each Class I area, as summarized below.

1. Implementation status of the current SIP measures for achieving reasonable progress goals;
2. Summary of emissions reductions achieved;
3. Assessment of most and least impaired days;
4. Analysis of emission reductions of pollutants contributing to visibility impairment from all sources within the state based on the most recent updated emissions inventory, with estimates projected forward to account for emission changes during the applicable 5-year period.
5. Assessment of significant changes in anthropogenic emissions that have occurred during the 5-year period that have limited or impeded progress in reducing pollutant emissions and improving visibility;
6. Assessment of the current SIP sufficiency to meet reasonable progress goals; and
7. Review of visibility monitoring strategy and any modifications to the strategy as necessary.

In accordance with the requirements listed in section 51.308(g) of the RHR, Nevada commits to submitting a report on reasonable progress to USEPA every five years following the initial submittal of the SIP. The reasonable progress report will evaluate progress made towards the reasonable progress goal for the Jarbidge WA and in each mandatory Class I area located outside Nevada, which may be affected by emissions from Nevada. Nevada's mid-term review will address each of the required elements listed above, including a reassessment of the uncertainty in the data. The state will also evaluate the monitoring strategy adequacy in assessing reasonable progress goals.

9.4 DETERMINATION OF CURRENT PLAN ADEQUACY

40 CFR 51.308(h) requires a state to make a determination of the adequacy of the current implementation plan as part of its five-year progress report. Based on the findings of the five-year progress report, the state must take one or more of the actions summarized below at the same time the state submits its five-year progress report.

1. If the state finds that no substantive SIP revisions are required to meet established visibility goals, the state shall provide a negative declaration that no implementation plan revision is needed.
2. If the state finds that the implementation plan is or may be inadequate to ensure reasonable

progress due to emissions from sources in another state that participated in a regional planning process, the state shall notify USEPA and the other contributing state(s). The plan deficiency shall be addressed through a regional planning process to develop additional strategies through the planning efforts described in the progress report(s).

3. If the state finds that the implementation plan is or may be inadequate to ensure reasonable progress due to emissions from another country, the state shall notify USEPA and provide the available supporting information.
4. If the state finds that the implementation plan is or may be inadequate to ensure reasonable progress due to emissions from within the state, the state shall revise its implementation plan to address the plan's deficiencies within one year.

Nevada commits, in accordance with 40 CFR 51.308(h), to make an adequacy determination of the current SIP at the same time its five-year progress report is due and to comply with the requirements of 51.308(g). If Nevada determines that the current implementation plan is or may be inadequate due to emissions from within the state itself, Nevada will develop additional strategies to address the plan deficiencies and revise the SIP within one year from the date that the progress report is due. If, on the other hand, Nevada determines that the plan is or may be inadequate due to emissions from other states, Nevada will address the deficiency through a regional planning process.

9.5 COMMITMENT TO FUTURE SIP REVISIONS

In addition to a SIP revision made for plan inadequacy, 40 CFR 51.308(f) requires a state to revise and submit a comprehensive regional haze implementation plan revision to USEPA by July 31, 2018 and every ten years thereafter. Future SIP revisions must evaluate and reassess all of the elements required under 40 CFR 51.308(d) and specifically address the items listed in 51.308(f)(1-3). The plan revision must take into account improvements in monitoring data collection and analysis, control technologies and other relevant factors. Nevada's commitments to comply with RHR requirements for future plans follow.

By July 31, 2018 and every 10 years thereafter, Nevada commits to completing and submitting a comprehensive RH SIP revision to USEPA, evaluating and reassessing all of the elements required under 40 CFR 51.308(d). In evaluating and reassessing these elements, Nevada commits to:

1. Determining current visibility (most recent five year period preceding the required date of the SIP submittal for which data is available) conditions for the most impaired and least impaired days and determine the actual progress made towards natural conditions.
2. Determining the effectiveness of the long-term strategy for achieving the reasonable progress goals for the prior SIP period as well as include enforceable emission limitations and compliance schedules.
3. Affirming or revising the current reasonable progress goals based on assessment of new or updated information, improved technologies and on-going legislation. If the reasonable progress goal is found to be insufficient to attain natural conditions by 2064, Nevada will look at additional or new control measures that may be adopted considering compliance cost, compliance time, the energy and non-air quality environmental impacts of compliance and the remaining useful life of the affected source(s).