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# STATE OF COLORADO

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Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department  
of Public Health  
and Environment

November 24, 2003

To Whom It May Concern:

Subject: Annual WRAP Report Update

In fulfillment of the requirements of C.R.S. 25-7-137, attached is the final annual report updating the Legislature on the activities of the Western Regional Air Partnership and the Regional Haze Program.

If you have any questions about this report, please contact Margie Perkins, Director of the Air Pollution Control Division, Colorado Department of Public Health and Environment at (303) 692-3115 or Steve Arnold, Deputy Director at (303) 692-3220.

Sincerely,

Douglas H. Benevento  
Executive Director

Attachment

cc: Margie Perkins, Director, Air Pollution Control Division, CDPHE  
Steve Arnold, Deputy Director, Air Pollution Control Division, CDPHE



# **A Final Report to the Colorado General Assembly**

**On the Activities of the State of Colorado and the  
Western Regional Air Partnership in Support of the  
Development of a Regional Haze State Implementation Plan  
Revision for Colorado**



Colorado Department  
of Public Health  
and Environment

**Submitted pursuant to CRS 25-7-137  
December 2003**

## 1.0 Overview

The purpose of this report is to provide the Colorado General Assembly pursuant to C.R.S. 25-7-137 a report on the activities of the successor to the Grand Canyon Visibility Transport Commission, the Western Regional Air Partnership (WRAP).

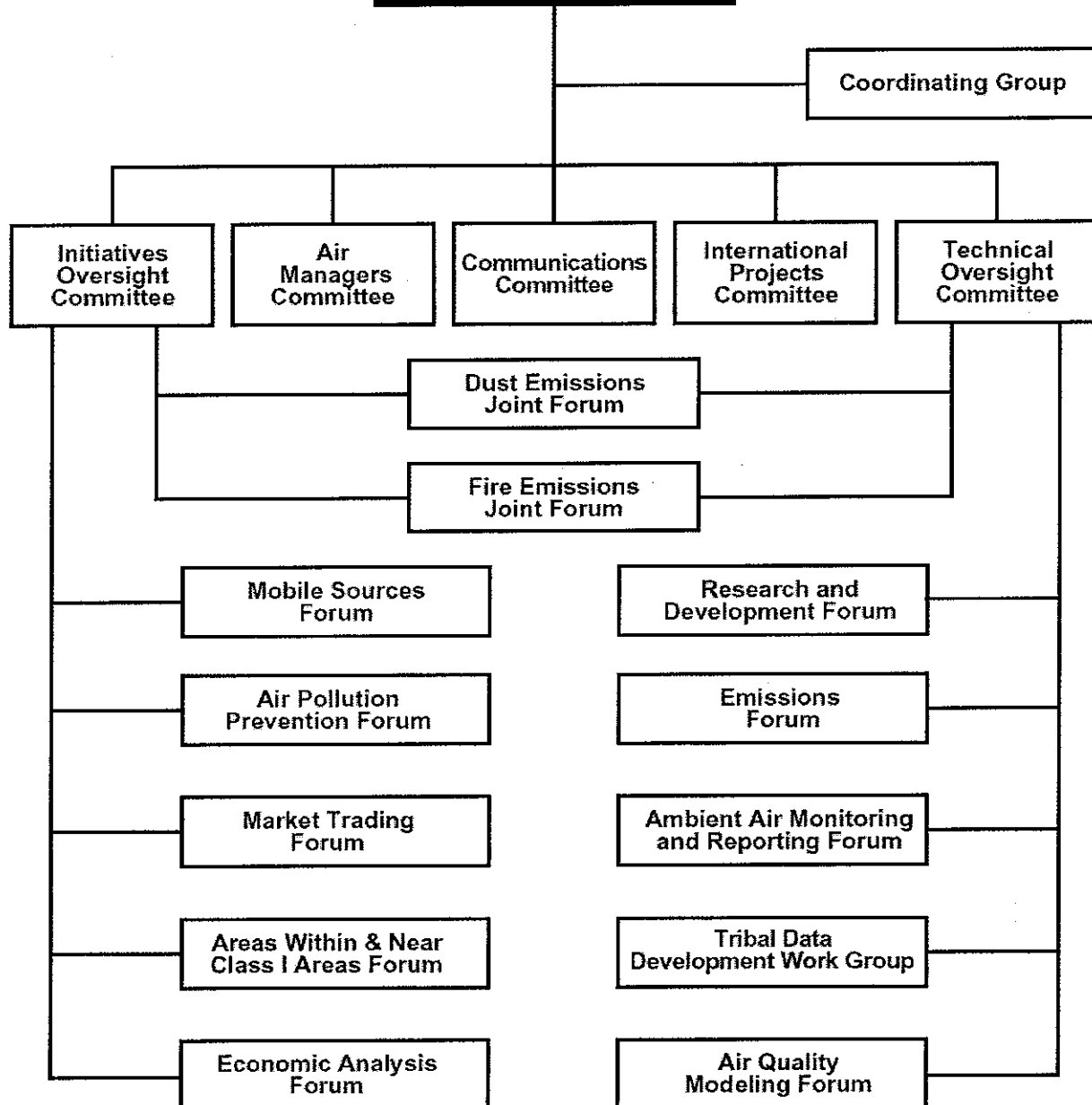
Amendments to the Clean Air Act in 1990 created the Grand Canyon Visibility Transport Commission (GCVTC). The Commission was given the charge to assess the currently available scientific information pertaining to adverse impacts on visibility from existing sources, potential growth in the region, identify clean air corridors, and recommend long-range strategies for addressing regional haze. The GCVTC completed significant technical analyses and developed recommendations to improve visibility in the 16 mandatory federal Class I areas on the Colorado Plateau. The Commission found that visibility impairment on the Colorado Plateau was caused by a wide variety of sources and pollutants. A comprehensive strategy was needed to address all of the causes of regional haze. The GCVTC submitted these recommendations to EPA in a report dated June 1996 for consideration in rule development.

The GCVTC report, as well as the many research reports prepared by the GCVTC, contributed invaluable information to U.S. Environmental Protection Agency (EPA) in its development of the federal regional haze rule. The draft rule was issued in 1997 and the final rule on July 1, 1999 (40 CFR 51.308-51.309). The rule represents a major effort to improve visual air quality in the 156 mandatory federal Class I areas (i.e., national parks and wilderness areas) around the country. The final rule created two planning alternatives known as Section 308 and Section 309. Section 309 is an optional alternative for some western states with Class I areas on the Colorado Plateau area studied by the GCVTC. The GCVTC recommended a group of control strategies and EPA adopted them into the 309 option. The 308 alternative follows a more traditional State Implementation Plan (SIP) planning process. Each state will establish a reasonable progress goal for each of its Class I areas and demonstrate how the goal will be met from emission reductions from various sources and states. In April of 2002, the Colorado Air Quality Control Commission, after several months of meetings and technical and policy discussions, voted to pursue development of the 308 SIP Plan for Colorado. The information used to support the decision is incorporated in , "ISSUE PAPER: COLORADO'S REGIONAL HAZE SIP DEVELOPMENT PROCESS, final report April 2002". Colorado has indicated to EPA that it will be taking the Section 308 path as the state develops its regional haze SIP. Because the choice has been made, this current report fulfills the requirements under CRS 25-7-137(2) and is the final report to the General Assembly under this provision.

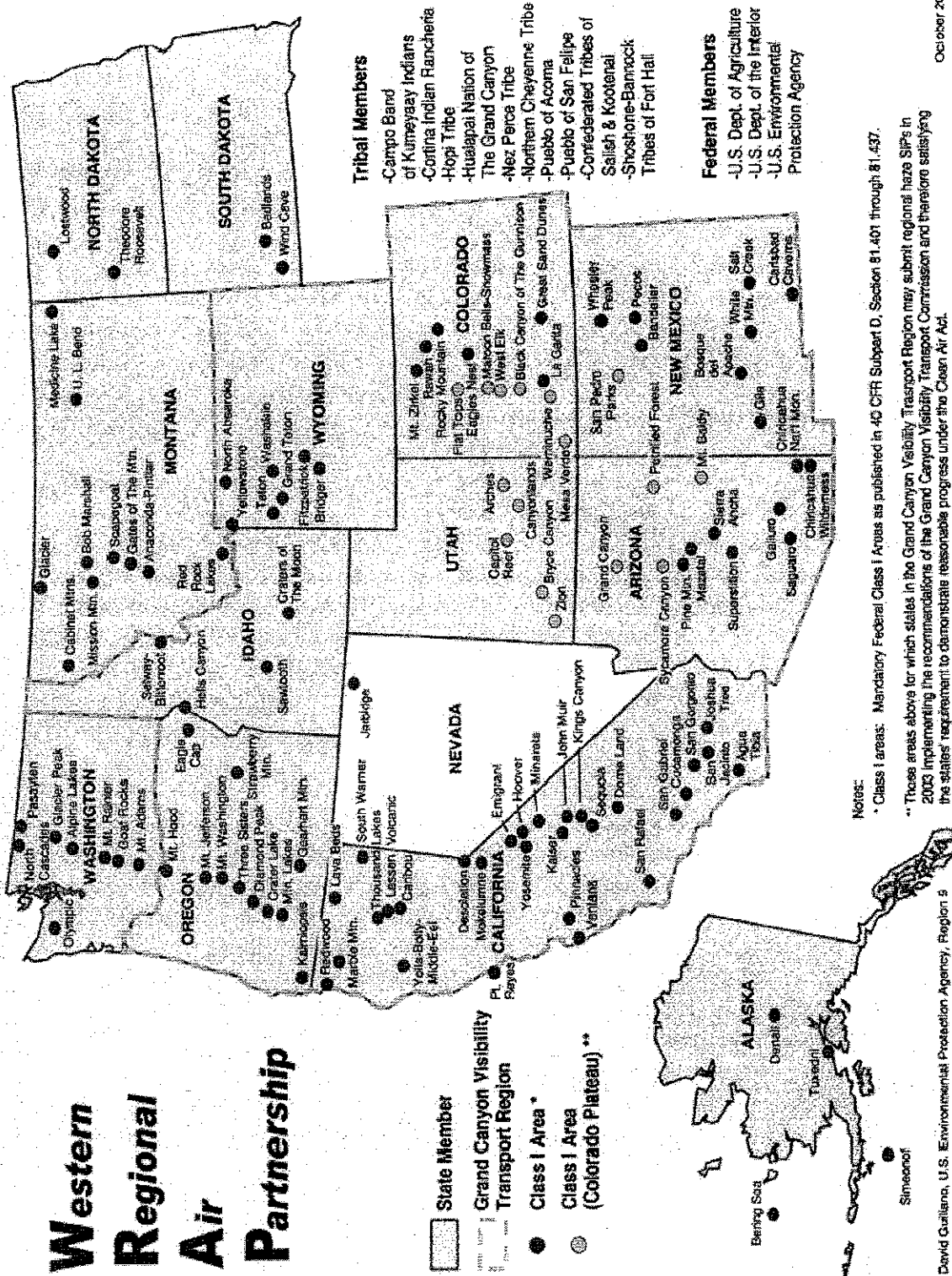
## **2.0 Current WRAP Activities and Structure**

As mentioned previously, after the Grand Canyon Visibility Transport Commission completed its responsibilities under the Clean Air Act, the WRAP was created to assist states in 1997. The WRAP Board represents all 13 states in the WRAP region. Its primary focus, as described in the "Strategic Plan of the Western Regional Air Partnership" is to implement the recommendations of the GCVTC (Section 309) and to develop the technical and policy tools needed by western states and tribes to comply with Section 308 of the regional haze rule (RHR) promulgated by the EPA. A chart showing the current organization of WRAP committees and forums is provided on the following page. Detailed information regarding the responsibilities of the various forums under the WRAP can be found at WRAP Web site at <http://www.wrapair.org/about/forumguide.htm>.

The Air Pollution Control Division of the Colorado Department of Public Health and Environment has committed staff to participate in, and monitor many of these activities including the Technical Oversight Committee (TOC) and the Initiatives Oversight Committee (IOC). Further, staff members are also monitoring and participating in a number of the WRAP Forums (standing committees) on the subjects of monitoring, modeling, emission inventories and fires. If additional necessary Forums are convened, staff will monitor those as well.



# Western Regional Air Partnership



## Tribal Members

- Campo Band of Kumeayay Indians
- Confina Indian Rancheria
- Hopi Tribe
- Hualapai Nation of The Grand Canyon
- Nez Perce Tribe
- Northern Cheyenne Tribe
- Pueblo of Acoma
- Pueblo of San Felipe
- Confederated Tribes of Salish & Kootenai
- Shoshone-Bannock Tribes of Fort Hall

## Federal Members

- U.S. Dept. of Agriculture
- U.S. Dept. of the Interior
- U.S. Environmental Protection Agency

## Notes:

\* Class I areas: Mandatory Federal Class I Areas as published in 40 CFR Subpart D, Section 81.401 through 81.437.

\*\* Those areas above for which states in the Grand Canyon Visibility Transport Region may submit regional haze SIPs in 2003 implementing the recommendations of the Grand Canyon Visibility Transport Commission and therefore satisfying the states' requirement to demonstrate reasonable progress under the Clean Air Act.

The WRAP is the EPA designated regional planning organization for western states. States submitting a Section 309 SIP include: Wyoming, Oregon, Utah, Arizona and New Mexico. The remaining states in the WRAP region will be developing 308 SIPs.

### **3.0 Regional Haze SIP Development under Section 308**

In Colorado, there are twelve mandatory Class I areas that will be covered under the 308 Plan submitted by Colorado. These mandatory Class I areas include: Black Canyon of the Gunnison National Monument, Flat Tops Wilderness Area, Eagles Nest Wilderness Area, Great Sand Dunes National Park, La Garita Wilderness Area, Maroon Bells Wilderness Area, Mesa Verde National Park, Mount Zirkel Wilderness Area, Rawah Wilderness Area, Rocky Mountain National Park, Weminuche Wilderness Area, and the West Elk Wilderness Area. Figure 1 shows the location of Colorado's mandatory Class I areas and Class I area in other states in the WRAP region.

The WRAP has developed and funded a detailed and comprehensive plan of work to assist the states in developing and submitting Regional Haze SIPs by the required deadline. The WRAP Board has approved a five-year Strategic Plan and an annual Work Plan. These documents include work effort that will address the Section 308 Regional Haze Rule requirements. Since the development of this Plan is a multi-year effort the Air Division will continue to participate in these Forums and Committees to ensure the Colorado SIP process is based upon best scientific knowledge and that stakeholders are kept informed of all relevant actions and decisions.

The Colorado 308 SIP is due to the EPA on December 31, 2007. Table 1 summarizes the major requirements of Section 308 of the rule. The Colorado Air Quality Control Commission will be the forum for communication of information and technical findings relating to the Regional Haze SIP. As key information relating to the requirements shown below are developed the Air Division will utilize the regular Commission meetings, the Commission sub-committee process or specific work group presentations to address the technical basis of the major requirements of the rule.

***Table 3.1 Overview of Section 308 SIP Requirements***

#### **Visibility Goals**

- ◆ Prevent degradation of the 20% cleanest days
- ◆ Determine a uniform rate of progress for each Class I area needed to return the 20% dirtiest days to natural conditions by 2064
- ◆ Establish a reasonable progress goal for each Class I area for 2018



- Cost of compliance
- Time necessary for compliance
- Energy and non-air quality environmental impacts of compliance
- Remaining useful life of affected sources

#### **Apportionment**

- ◆ Determine which Class I areas the state's emissions may affect
- ◆ Determine the state's share of emission reduction obligations

#### **Control Measures**

- ◆ Must achieve the state's share of emission reduction obligations
- ◆ Must consider construction and fire activities
- ◆ Should consider all other sources
- ◆ Must include BART or superior alternative
- Cost of compliance
- Energy and non-air quality environmental impacts of compliance
- Existing pollution control technologies in use at affected sources
- Remaining useful life of affected sources
- Degree of improvement

#### **Consultation, Documentation, and Future Commitments**

- ◆ Consultation with other states, tribes, and Federal Land Managers
- ◆ Visibility monitoring strategy
- ◆ Technical basis of SIP/TIP (analysis of emission, monitoring, modeling data)
- ◆ 5-year progress reports and 10-year SIP and TIP revisions

