

9. FUTURE REGIONAL HAZE REQUIREMENTS

9.1 Introduction

This section addresses other future requirements specified in the Regional Haze Rule. In the future, the Regional Haze Rule requires states to:

- Include a monitoring strategy;
- Submit periodic reports evaluating progress towards the Reasonable Progress Goals (RPG), an assessment of significant changes in anthropogenic emissions, and adequacy of the Plan every five years; and
- Revise the Plan in 2018 and every ten years thereafter.

9.2 IMPROVE Monitoring Strategy

California will depend on the IMPROVE monitoring program to collect and report data for reasonable progress tracking as specified in the Regional Haze Rule for all Class 1 Areas in the State. The current IMPROVE monitoring network listed in Table 2-1 is adequate for analyzing California Class 1 Areas. Because Regional Haze is a long-term tracking program with a 60-year implementation period, California expects the configuration of the monitors, sampling site locations, laboratory analysis methods and data quality assurance, and network operation protocols will not change, or if changed, will remain directly comparable to those operated by the IMPROVE program during the 2000-2004 Regional Haze baseline period. Technical analyses and reasonable progress goals in this plan are based on data from these sites. California must be notified and agree to any changes in the IMPROVE program affecting the Regional Haze tracking sites, before changes are made.

California plans to use data reported by the IMPROVE program as part of the regional technical support analysis tools found at the Visibility Information Exchange Web System (VIEWS), as well as other analysis tools and efforts sponsored by the WRAP. California will participate in the regional analysis activities of the WRAP collectively to assess and verify progress toward RPGs, and support interstate consultation as the Regional Haze Rule is implemented.

California will depend on the routine, timely reporting of monitoring data by the IMPROVE program to VIEWS for the reasonable progress tracking sites. Further, California will continue to rely on U.S. EPA to operate the IMPROVE monitoring network.

9.3 Periodic Progress Reports

In 2013, California will initiate a mid-course review of progress in reaching the RPGs. During the mid-course review, California will:

- Report on additional emission reductions from post-2004 control measures not reflected in the 2018 Progress Strategy;
- Update natural conditions to reflect new information if available;
- Update the RPGs with latest WRAP modeling if appropriate;
- Re-evaluate the RPGs to determine if they should be adjusted to better reflect achievable improvements in visibility, as future control measures are adopted and implemented;
- Compare the actual deciview calculations against progress towards reaching the RPGs and the uniform rate of progress;
- Assess the impact at the monitors from BART-specific and post-2004 adopted and implemented measures; and
- Evaluate the adequacy of the existing Plan elements.

While California's 2018 Progress Strategy provides a comprehensive and aggressive basis for setting the RPGs in this Plan, attainment of new federal standards for ozone and particulate matter will require adoption of even more stringent measures as reflected in California's State Strategy adopted in 2007. These future measures go beyond the basic requirements for the regional haze program. However, the additional benefits realized from future control strategies implemented by 2012 will be evaluated in the context of the 2013 mid-course review.

9.4 Plan Revisions

As with the current Plan, California believes the elements needed for a Plan revision should be done on a regional basis. The regional process has been very effective in identifying issues that concern all of the western states and facilitating consultation. Two issues that should continue to be evaluated from a western regional perspective are natural conditions and visibility calculations. Natural wildfires tend to drive poor visibility in the West. However, currently, they are not excluded nor is their magnitude appropriately considered as part of natural conditions. The impact of wildfires needs to be accounted for so they are appropriately considered in achieving natural visibility. California plans to work with the WRAP and the Federal Land Managers in tracking wildfires to achieve a better understanding of the wildfire cycle near Class 1 Areas. Long term wildfire tracking will provide a solid foundation for incorporating wildfires into the natural conditions estimate. Also, as more information becomes available regarding how pollutants impact visibility, the western region should work together to update visibility calculations. This process has worked well in developing the Regional Haze II algorithm.

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Finally, as part of the western region, California will revise the Plan in 2018 and every ten years there after. The Plan revision will include:

- Current calculation methodologies for visibility;
- Evaluation of the appropriateness of natural condition levels and updates if appropriate;
- Current visibility conditions for most impaired and least impaired days;
- Progress towards natural conditions;
- Effectiveness of California's 2018 Progress Strategy;
- Affirmation or revision of reasonable progress goals;
- Updated emission inventories; and
- Re-evaluation of the monitoring strategy.

The Plan revision will also follow the appropriate inter-state and Federal Land Manager procedure consultations established in this Plan.

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