

US EPA ARCHIVE DOCUMENT

Regional Planning: Important principles derived from past experiences

Introduction

EPA recognizes the need for air quality management planning on a regional scale. Two significant efforts covering broad geographic regions (Grand Canyon Visibility Transport Commission and Ozone Transport Assessment Group) demonstrate the importance of these types of efforts. There is significant commonality among the ozone, particulate matter (PM_{2.5}), and regional haze programs in the pollutants which contribute to air quality problems; and these precursors can be transported long distances, often crossing State boundaries. For these reasons, we emphasize the need for air quality management planning that integrates efforts among PM_{2.5}, and regional haze programs and addresses these programs on a regional scale. Therefore, EPA is encouraging States and Tribes to engage in regional scale planning efforts to address the new PM_{2.5} NAAQS and regional haze. In planning and implementing regional planning, we recommend that these efforts be organized based on the following set of principles.

Organization and Representation

Regional planning efforts should be a product of State and Tribal leadership and thus should be led by the States and Tribes. Representatives should have the authority to speak for their organizations.

Regional planning efforts need to reflect the interests of not only all appropriate levels of government, but also the diversity of interests within the region, including tribes, environmental organizations, industry groups, and others, as appropriate.

Public outreach and communication is a critical need, and responsibilities for conducting such outreach should be clearly delineated and assigned.

Federal agencies' roles should be clearly delineated in the early organizational planning stages.

The internal organization of regional efforts should recognize and accommodate important functional needs, e.g., technical analyses, information gathering, public outreach and communication, and process oversight.

Any geographic areas of special need or focus (e.g., Class I areas, other important areas for PSD, etc.) should be defined early.

A process should be clearly established by which the States and Tribes will follow up on unresolved issues, track regional progress, and implement contingency provisions or alternative actions.

Work Plan and Schedules

States and Tribes should be prepared to make strong early commitments to implementing the outcome of the regional process to ensure that SIP/TIP dates are met. This means allowing time for formation and conclusion of the regional planning process, SIP/TIP development and review by appropriate levels of government and the public before submission to EPA.

The EPA should be prepared to adjust schedules and deliver appropriate guidance to reflect regional planning needs. However, EPA should also set a clear endpoint to these efforts, consistent with CAA deadlines for SIP submissions.

Participants in regional planning efforts should set up a workplan to carry out their work. The workplan should contain clearly stated products of the process, dates for completion of those products and mechanisms for funding the needed analyses. EPA would not consider funding all or part of a regional planning effort (beyond initial seed monies) without a completed workplan.

Consistency with Regional Planning Effort and Between Regional Planning Efforts

Regional efforts need to be planned in such a way as to ensure that the essential elements, e.g., emissions inventories for modeling purposes, are consistent across the region to support regional analyses.

All sources of emissions need to be accounted for across a transport region and treated in a consistent manner in analyses.

Regional planning efforts should establish how emissions transported from outside of the members' region will be quantified and considered (e.g., international transport).

Regional planning efforts should establish a process for selection of baselines, strategy and control technology options, and selection process, including any optional alternatives.

Principles for EPA's Participation in Regional Planning

EPA needs to be a participant in the regional planning processes, providing immediate input and demonstrating a willingness to reflect outcomes of the regional planning process in its national policies.

EPA's role in regional planning should provide for:

- Early Issue Identification - active participation in regional planning, and identification and communication of issues early to minimize disruptions that can occur when issues are raised for the first time during formal EPA implementation plan review
- Adequate Support in Resolving Technical Issues - provide appropriate expertise, technical and financial support to help resolve technical issues

- Incentives for Participation - work with stakeholders to develop policies that create incentives for active, broad, and balanced participation in regional planning
- Timely Implementation Plan Review - make every reasonable effort to review implementation plans within the timeframes set out in section 110(k) of the CAA
- Identification of Inconsistencies and Consultation - identify and communicate any inconsistencies with regional planning efforts during review of implementation plan revisions and provide opportunities for public comment before final actions
- Retention of EPA's Independent Oversight and Review Role. EPA has a legal obligation to independently review the adequacy of implementation plans in public rulemaking processes, and to consider all public comments received on a plan in determining whether it meets applicable requirements