
Date: Oct. 25, 2019

To: Environmental Quality Commission

From: Richard Whitman, Director

Subject: Item P: Regional Haze Program Update (Informational)
Nov. 14-15, 2019, EQC meeting

Why this is important EPA adopted the Regional Haze Rule in 1999 to improve and protect visibility in 156 national parks and wilderness areas across the country. This rule requires states to adopt regional haze plans and provide updates to these plans every 10 years. The EQC adopted the first regional haze plan in 2009 and DEQ is in the process of developing recommendations for the plan for the second 10-year regional haze planning period, for 2019-2028. Development of the plan must include consultations with Tribes, federal and local governments, and affected stakeholders. DEQ must submit its updated plan to EPA by July 2021.

Prior EQC involvement The commission adopted the first regional haze plan by rule in 2009. OAR 340-223. The plan included a comprehensive review of visibility conditions in each of Oregon's 12 Class 1 areas, with a projection of statewide emissions and visibility conditions in 2018, a summary of DEQ's Best Available Retrofit Technology (BART), evaluation of the PGE Boardman coal-fired power plant and other sources potentially subject to BART, and a reasonable progress demonstration for the best (clearest) and worst (haziest) visibility days, related to the 2018 milestone benchmark. In 2010, DEQ updated the Regional Haze Plan to incorporate rules that included new emission controls for PGE Boardman.

In 2017, the commission approved the Regional Haze five-year progress report, with updates and minor revisions to the Regional Haze rule and state implementation plan.

Background The federal Regional Haze rule requires states to address visibility protection for regional haze in Class 1 Areas in each state. In Oregon there are 12 mandatory federal Class 1 areas, including Crater Lake National Park and 11 wilderness areas. Oregon includes the Columbia River Gorge National Scenic Area in our Regional Haze analyses (see Figure 1). EPA requires states to adopt regional haze plans that would improve Class 1 area visibility on the most impacted days, the worst 20 percent with some proportion of wildfire-impacted days removed; and ensure no degradation on the clearest days over the next 60 years. The goal

of the regional haze rule is to return visibility in Class 1 areas to natural background levels by the year 2064.

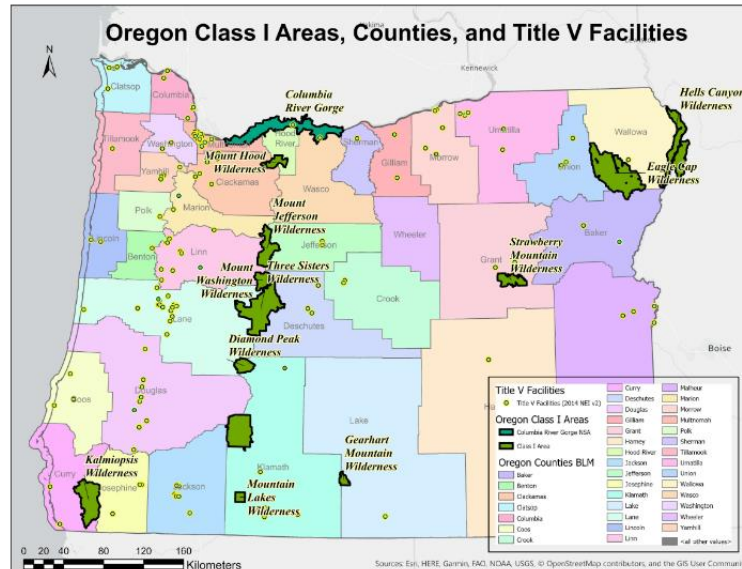
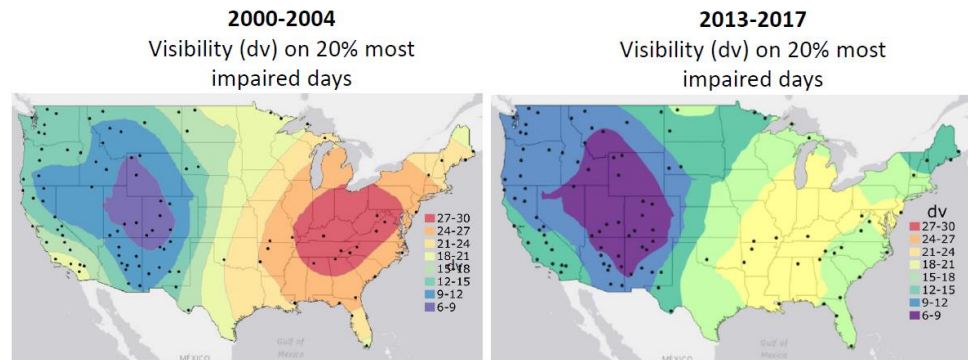


Figure 1. Map showing Oregon's Class I Areas and Title V facilities, counties provided for reference.

Under the federal Regional Haze Rule, states are required to develop five-year progress reports showing the latest visibility trends analysis and the current status for meeting reasonable progress milestones since the last submission of the plan. The 2017 progress report summarized changes in monitoring and emissions data since the plan was last adopted in 2010 and evaluated the adequacy of the current State Implementation Plan to meet the progress goals. The 2017 report concluded that visibility was continuing to show positive improvement, the plan was meeting the reasonable progress milestones, and no substantive revision was needed.

First Planning Period: Visibility is Improving



The National Park Service estimates that as of mid-2014, emission controls established under the first planning period led to approximately 500,000 tons/year of SO₂ and 300,000 tons/year of NO_x reductions. EPA estimates that visibility has improved significantly with the average visual range increased by 20 – 30 miles in Class I areas.

Figure 2. Maps from the EPA showing visibility on the 20 percent most impaired days improving from the baseline period (2000-2004) to the most recent five-year period (2013-2017).

Additionally, the Regional Haze Rule requires States to update their Regional Haze Plans every 10 years. The revised plan must show how the State will continue to implement its plan to reduce haze, while meeting both short-term and long-term progress goals to achieve natural visibility conditions by 2064. It requires states to consult with federal land managers during the plan development process, including the U.S. Forest Service, National Park Service, and others.

The revised Regional Haze Plan will include the following key requirements:

- **Calculations of visibility conditions in each of Oregon's 12 Class 1 areas**
 DEQ must conduct a comprehensive review and technical assessment of visibility conditions in each of Oregon's 12 Class I areas, showing major pollutants and source categories in Oregon and other states causing haze, and a projection of visibility.
- **Long-term strategy for regional haze**
 The long-term strategy must include ongoing efforts and new measures to improve visibility over the next 10 years and commitments for future year updates. The long-term strategy for regional haze should also include state-to-state consultation, and document the technical basis on which states are determining emissions reduction measures.
- **Reasonable Progress Goals**
 Reasonable progress goals must provide improvement in visibility conditions on most impaired days and no degradation on clearest days. The plan will describes procedures for if a state's reasonable progress

goals are slower than the uniform rate of progress, and if a state's sources are reasonably anticipated to contribute to visibility impairments in another state's Class I Areas.

Next steps In developing the updated Regional Haze Plan, DEQ will conduct its technical analysis that will incorporate the requirements of analyzing ambient air quality data in the Class I areas, identifying sources, determining what control measures are necessary to make reasonable progress, and regional-scale modeling to set reasonable progress goals for 2028. As part of the analysis informing control measure recommendations, DEQ will contact specific stationary sources to conduct four-factor analyses.

DEQ will also develop a consultation plan for reaching out to affected entities and presenting the technical information and rulemaking timeframe to the following parties:

- Other states within 400km – Washington, California, Idaho, and Nevada
- Lane Regional Air Protection Agency
- Columbia River Gorge Commission
- Regulated entities
- Federal Land Managers
- Tribes
- The public

Key issues The key policy considerations that DEQ will bring to EQC in as part of the Regional Haze Plan update will be:

- Is Oregon making **reasonable progress** with respect to visibility in our Class I Areas and the Columbia River Gorge National Scenic Area?
- Do the control measures in the **long-term strategy** take reasonable measures to continue to improve visibility in Oregon's Class I Areas and the Columbia River Gorge in the next 10-year period through 2028?

EQC involvement DEQ will bring regular updates on this topic to the commission periodically. DEQ will bring a rulemaking item to EQC for a state implementation plan submission date of July 2021.

Supporting materials

- A. [Original 2009 RH Plan](#)
- B. [2017 RH Update](#)
- C. [EPA Guidance on Regional Haze State Implementation Plans for the Second Implementation Period](#)

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