

FLM Consultation

- Informal
 - RPO work
 - Discussion with State Staff
 - Discussion with EPA
- Formal
 - SIP Language (and supporting Material)
 - 60 Days BEFORE Public Hearing
 - State response to FLM comments

FWS / NPS Letter USFS Letters

- Highlight SIP Content Concerns
 - Baseline, Natural Condition, Uniform Rate
 - Emissions Inventory, BART
 - Area of Influence
 - Reasonable Progress Goals and LTS
 - Fire
 - Regional Consistency
 - Verification and Contingencies
 - Coordination and Consultation

Reasonable Progress SIP Tells a Story

- Point Source, Mobile, Fire, Ag, International contributions should all be addressed
- BART is a large focus, but future sources must also be address in the ten-year LTS

Uncontrollable Emissions

A scenic photograph of a rocky coastline. The foreground shows a calm body of water reflecting the sky. The middle ground features a steep, rocky cliffside with sparse green vegetation. The background is a clear, bright blue sky. The overall scene is peaceful and natural.

- International
 - Long Range Transport
 - International Shipping
- Federally Regulated Sources
 - Trains
 - Planes
- SIP should “request” EPA action if it sees major impacts from these sources

SIP “Contingencies”

- SIP must anticipate variations from predicted future conditions
- Five-year review step should address major deviations from the predicted emissions amounts or distribution

FLM Emphasis



- FLM community is relying on EPA to assure SIP commitments are enforceable
- FLM review will not be looking for “completeness” but at component content
- State should explain how it determined reasonable progress goals based on the technical data and statutory factors
- We encourage the state to take a broad look at the benefits of improving air quality when establishing RP goals



Coordinated Effort

- “Northern Class I Areas” assessment group is best consultation effort in the country
- Coordinated FLM review among the three agencies
 - Fire policy
 - Support for FLM field personnel