

APPENDIX B

FEDERAL LAND MANAGER CONSULTATION

2025 REGIONAL HAZE PROGRESS REPORT

NON-RULE PROJECT NUMBER 2024-007-OTH-NR
SFR-122/2024-007-OTH-NR

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LIST OF ACRONYMS

BART	best available retrofit technology
BIBE1	Big Bend National Park (TX) monitor
BRIS1	Breton Wilderness Area (LA) monitor
BOAP1	Bosque del Apache (NM) monitor
CACR1	Caney Creek (AR) monitor
CENSARA	Central States Air Resources Agencies
CFR	Code of Federal Regulations
dv	deciview
EGU	electric generating unit
EPA	United States Environmental Protection Agency
FIP	Federal Implementation Plan
FLM	Federal Land Managers
GRSA1	Great Sand Dunes (CO) monitor
GUMO1	Guadalupe Mountain National Park (TX) monitor
HEGL1	Hercules-Glades (MO) monitor
IMPROVE	Interagency Monitoring of Protected Visual Environments
MING1	Mingo (MO) monitor
NEI	National Emissions Inventory
NO _x	nitrogen oxides
NPS	National Park Service
PM _{2.5}	particulate matter with aerodynamic diameters less than 2.5 microns
RPG	Reasonable Progress Goal
SACR1	Salt Creek (NM) monitor
SIP	State Implementation Plan
SO ₂	sulfur dioxide
TCEQ	Texas Commission on Environmental Quality
UPBU1	Upper Buffalo (AR) monitor
US	United States
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Services
WHIT1	White Mountain (NM) monitor
WHPE1	Wheeler Peak (NM) monitor
WIMO1	Wichita Mountains (OK) monitor

FEDERAL LAND MANAGER CONSULTATION

CONSULTATION PROCESS SUMMARY

Title 40 Code of Federal Regulations (CFR) §51.308(i) requires a state to consult with identified federal land managers (FLM) prior to the proposal of its 2025 regional haze progress report. FLMs were consulted in accordance with these requirements during development of Texas' 2025 Regional Haze Progress Report.

The FLM consultation period for this progress report opened on May 28, 2024, with a direct e-mail from TCEQ staff to staff from the National Parks Service (NPS), the U.S. Fish and Wildlife Services (USFWS), and the U.S. Forest Service (USFS). Texas' draft 2025 Regional Haze Progress Report was provided to the FLMs to provide them an opportunity to share their assessment of impairment of visibility and to make recommendations on the development and implementation of strategies to address visibility impairment, in accordance with 40 CFR §51.308(i)(2). FLM input was requested by the conclusion of the 60-day consultation period, July 29, 2024. The FLM staff who were contacted and/or participated in the consultation process are listed in Table 1: *FLM Contacts for 2025 Progress Report Consultation*. Documentation of the e-mail correspondence between TCEQ and FLMs during the consultation period is provided in Attachment A: *Consultation Correspondence with Federal Land Managers*.

Table 1: FLM Contacts for 2025 Progress Report Consultation

Federal Agency	Staff Contact(s)
National Park Service	Kirsten King, Melanie Peters, Don Shepherd, Lisa Devore, Michael Barna, Holly Salazer, Andrea Stacy, Debra Miller
U.S. Fish and Wildlife Services	Tim Allen
U.S. Forest Service	Melanie Pitrolo, Ghazal Majidi-Weese, Jacob Deal, Jeff Sorkin, Alexia Prosperi, Trent Wickman, Jeremy Ash

On July 9, 2024, TCEQ held a virtual consultation meeting with the FLMs to discuss the draft progress report, answer questions, and receive input from the FLMs. Staff from each FLM was in attendance. At the meeting, TCEQ staff presented a brief overview of regional haze requirements and the state's regional haze program history. TCEQ staff also presented on the state's draft 2025 Regional Haze Progress Report that was provided to the FLMs on May 28, 2024. During the meeting, FLM participants had several questions, which TCEQ answered either during the meeting or in subsequent e-mails. Documentation of the presentation along with a list of attendees and the questions received and answered are provided in Attachment B: *Federal Land Manager Consultation Meeting, July 9, 2024*. The presentation slides were sent to the TCEQ-FLM e-mail group on July 9, 2024, after the meeting.

FEDERAL LAND MANAGER INPUT RECEIVED

During the July 9, 2024, FLM consultation meeting, FLM participants did not share their assessment of impairment of visibility or make recommendations on the development and implementation of strategies to address visibility impairment, in accordance with 40 CFR §51.308(i)(2). No input was received on the draft progress report. During the 60-day FLM consultation period, NPS submitted a comment letter on the draft progress report. The comment letter is provided in Attachment C: *National Park Service Comments*. NPS noted that area source emissions may be underestimated and are of particular importance for Carlsbad Caverns and Guadalupe Mountains National Parks. NPS also suggested that TCEQ consider lower reporting thresholds for future rules to refine emissions inventories. No changes were made to the draft progress report in response to these comments.

ATTACHMENT A: CONSULTATION CORRESPONDENCE WITH FEDERAL LAND MANAGERS

Included in Attachment A:

- TCEQ e-mails to Federal Land Managers from April 9, 2024, through July 26, 2024.

Introduction and Reminder for Texas Regional Haze Progress Report

From Jamie Zech <jamie.zech@tceq.texas.gov>

Date Tue 09-Apr-24 1:39 PM

To 'andrea_stacy@nps.gov' <andrea_stacy@nps.gov>; 'david_pohlman@nps.gov' <david_pohlman@nps.gov>; 'debra_miller@nps.gov' <debra_miller@nps.gov>; 'don_shepherd@nps.gov' <don_shepherd@nps.gov>; 'kirsten_king@nps.gov' <kirsten_king@nps.gov>; 'melanie_peters@nps.gov' <melanie_peters@nps.gov>; 'mike_barna@nps.gov' <mike_barna@nps.gov>; Ghazal Majidi-Weese - FS, Asheville, NC
</o=ExchangeLabs/ou=Exchange Administrative Group
(FYDIBOHF23SPDLT)/cn=Recipients/cn=abe66be6d2ab4ec28a3b9e3c345e1283-ghazalmajid>; 'jacob.deal@usda.gov' <jacob.deal@usda.gov>; 'jeff.sorkin@usda.gov' <jeff.sorkin@usda.gov>; 'melanie.pitrolo@usda.gov' <melanie.pitrolo@usda.gov>; 'alexia.prosperi@usda.gov' <alexia.prosperi@usda.gov>; 'trent.wickman@usda.gov' <trent.wickman@usda.gov>; 'tim_allen@fws.gov' <tim_allen@fws.gov>

Cc Walker Williamson <walker.williamson@tceq.texas.gov>; Margaret Earnest <margaret.earnest@tceq.texas.gov>; John Minter <john.minter@tceq.texas.gov>; Amy Browning <amy.browning@tceq.texas.gov>

Greetings!

I may have participated in CenSARA regional haze calls with you already, but I would like to more formally introduce myself. I joined the Texas Commission on Environmental Quality's regional haze team in January, taking over for Walker Williamson who is now the Assistant Deputy Director for the Air Quality Division. I have been with TCEQ's Air Quality Division since 2009, helping develop SIP and rule projects and consulting with federal partners to ensure compliance with FCAA, §176(c) conformity requirements.

As you know through recent CenSARA calls, TCEQ is working on Texas' regional haze progress report for the second planning period. We expect to be ready to share the report with you for FLM comment May 28 through June 28, prior to public notice and solicitation of public comment. Please let me know by May 1, 2024, of any updates I should make to the FLM distribution list below.

National Park Service

andrea_stacy@nps.gov; david_pohlman@nps.gov; debra_miller@nps.gov; don_shepherd@nps.gov; kirsten_king@nps.gov; melanie_peters@nps.gov; mike_barna@nps.gov

U.S. Forest Service

ghazal.majidi-weese@usda.gov; jacob.deal@usda.gov; jeff.sorkin@usda.gov; melanie.pitrolo@usda.gov; alexia.prosperi@usda.gov; trent.wickman@usda.gov

U.S. Fish and Wildlife Service

tim_allen@fws.gov

I appreciate your help getting my list current, and I'm excited to work with you.

Best, Jamie



Jamie Zech, PhD (she/her) | Air Quality
Division
jamie.zech@tceq.texas.gov
512-239-3935 | 737-465-3010
PO Box 13087, Austin, TX 78711, MC 206

RE: Introduction and Reminder for Texas Regional Haze Progress Report

From Pitrolo, Melanie - FS, NC <melanie.pitrolo@usda.gov>

Date Thu 11-Apr-24 1:21 PM

To Jamie Zech <jamie.zech@tceq.texas.gov>

Hi Jamie – thanks for the update. Please add Jeremy Ash (Jeremy.ash@usda.gov) to your list of contacts with the Forest Service. I also was wondering who is the new contact for general conformity with TCEQ?

Thanks,

Melanie



Melanie Pitrolo
Regional Air Program Manager

Forest Service
Southern Region

p: 470-882-9854
melanie.pitrolo@usda.gov

160 Zillicoa Street
Asheville, NC 28801

www.fs.fed.us



**Caring for the land and serving
people**

From: Jamie Zech <jamie.zech@tceq.texas.gov>

Sent: Tuesday, April 9, 2024 2:39 PM

To: 'andrea_stacy@nps.gov' <andrea_stacy@nps.gov>; 'david_pohlman@nps.gov' <david_pohlman@nps.gov>; 'debra_miller@nps.gov' <debra_miller@nps.gov>; 'don_shepherd@nps.gov' <don_shepherd@nps.gov>; 'kirsten_king@nps.gov' <kirsten_king@nps.gov>; 'melanie_peters@nps.gov' <melanie_peters@nps.gov>; 'mike_barna@nps.gov' <mike_barna@nps.gov>; Ghazal Majidi-Weese - FS, Asheville, NC <IMCEAEX_o=ExchangeLabs_ou=Exchange+20Administrative+20Group+20+28FYDIBOHF23SPDLT+29_cn=Recipients_cn=abe66be6d2ab4ec28a3b9e3c345e1283-ghazalmajid@namprd13.prod.outlook.com>; Deal, Jacob - FS, AL <jacob.deal@usda.gov>; Sorkin, Jeff - FS, CO <Jeffrey.Sorkin@usda.gov>; Pitrolo, Melanie - FS, NC <melanie.pitrolo@usda.gov>; Prosperi, Alexia - FS, WI <Alexia.Prospieri@usda.gov>; Wickman, Trent - FS, MN <trent.wickman@usda.gov>; 'tim_allen@fws.gov' <tim_allen@fws.gov>

Cc: Walker Williamson <walker.williamson@tceq.texas.gov>; Margaret Earnest <margaret.earnest@tceq.texas.gov>; John Minter <john.minter@tceq.texas.gov>; Amy Browning <amy.browning@tceq.texas.gov>

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tim_allen@fws.gov

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Best, Jamie



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Re: [EXTERNAL] Introduction and Reminder for Texas Regional Haze Progress Report

From Peters, Melanie <Melanie_Peters@nps.gov>

Date Tue 09-Apr-24 2:50 PM

To Jamie Zech <jamie.zech@tceq.texas.gov>

Cc Salazer, Holly <Holly_Salazer@nps.gov>; Devore, Lisa M <lisa_devore@nps.gov>

Hello Jamie,

Thank you for reaching out. For the NPS, please add Holly Salazer (holly_salazer@nps.gov) and Lisa Devore (lisa_devore@nps.gov) to your list and remove David Pohlman. Also, please plan for a minimum 60-day FLM consultation period for the progress report as well as any future SIP or SIP revision (RHR reference below). We look forward to working with you.

Best,
Melanie

(2) The State must provide the Federal Land Manager with an opportunity for consultation, in person at a point early enough in the State's policy analyses of its long-term strategy emission reduction obligation so that information and recommendations provided by the Federal Land Manager can meaningfully inform the State's decisions on the long-term strategy. The opportunity for consultation will be deemed to have been early enough if the consultation has taken place at least 120 days prior to holding any public hearing or other public comment opportunity on an implementation plan (or plan revision) for regional haze required by this subpart. The opportunity for consultation on an implementation plan (or plan revision) or **on a progress report** must be provided no less than 60 days prior to said public hearing or public comment opportunity. This consultation must include the opportunity for the affected Federal Land Managers to discuss their: (i) Assessment of impairment of visibility in any mandatory Class I Federal area; and (ii) Recommendations on the development and implementation of strategies to address visibility impairment.

[40 CFR 51.308(i)(2)]

--

Melanie V. Peters
NPS, Air Resources Division

Office: 303-969-2315
Cell: 720-644-7632



From: Jamie Zech <jamie.zech@tceq.texas.gov>

Sent: Tuesday, April 9, 2024 12:39 PM

To: Stacy, Andrea <Andrea_Stacy@nps.gov>; Pohlman, David C. <David_Pohlman@nps.gov>; Miller, Debra C <Debra_Miller@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>; Peters, Melanie <Melanie_Peters@nps.gov>; Barna, Michael <Mike_Barna@nps.gov>; Ghazal Majidi-Weese - FS, Asheville, NC <IMCEAEX-
_o=ExchangeLabs_ou=Exchange+20Administrative+20Group+20+28FYDIBOHF23SPDLT+29_cn=Recipients_cn=abe66be6d2ab4ec28a3b9e3c345e1283-ghazalmajidi@namprd13.prod.outlook.com>; Deal, Jacob - FS <jacob.deal@usda.gov>; Sorkin, Jeff- FS <Jeffrey.Sorkin@usda.gov>; 'melanie.pitrolo@usda.gov' <melanie.pitrolo@usda.gov>; Prosperi, Alexia - FS, WI <alexia.prosperi@usda.gov>; 'trent.wickman@usda.gov' <trent.wickman@usda.gov>; Allen, Tim <tim_allen@fws.gov>
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RE: [EXTERNAL] Introduction and Reminder for Texas Regional Haze Progress Report

From Miller, Debra C <Debra_Miller@nps.gov>

Date Tue 09-Apr-24 5:22 PM

To Jamie Zech <jamie.zech@tceq.texas.gov>

Cc Salazer, Holly <Holly_Salazer@nps.gov>; Stacy, Andrea <Andrea_Stacy@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; Peters, Melanie <Melanie_Peters@nps.gov>; Pohlman, David C. <David_Pohlman@nps.gov>; Devore, Lisa M <lisa_devore@nps.gov>

Jamie

For NPS regional haze contacts, you can remove David Pohlman, who covers our midwestern region, and add Lisa Devore (included here).

Thanks

Debbie

Debbie Miller

Environmental Protection Specialist

NPS Air Resources Division

12795 W. Alameda Parkway, Lakewood, CO 80228

debra_miller@nps.gov

303-987-6926

From: Jamie Zech <jamie.zech@tceq.texas.gov>

Sent: Tuesday, April 9, 2024 12:39 PM

To: Stacy, Andrea <Andrea_Stacy@nps.gov>; Pohlman, David C. <David_Pohlman@nps.gov>; Miller, Debra C <Debra_Miller@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>; Peters, Melanie <Melanie_Peters@nps.gov>; Barna, Michael <Mike_Barna@nps.gov>; Ghazal Majidi-Weese - FS, Asheville, NC <IMCEAEX-
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FLM Consultation for the 2025 Texas Regional Haze Progress Report

From Jamie Zech <jamie.zech@tceq.texas.gov>

Date Tue 28-May-24 11:19 AM

To 'jeremy.ash@usda.gov' <jeremy.ash@usda.gov>; 'melanie.pitrolo@usda.gov' <melanie.pitrolo@usda.gov>; Ghazal Majidi-Weese - FS, Asheville, NC </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=abe66be6d2ab4ec28a3b9e3c345e1283-ghazalmajid>; 'jacob.deal@usda.gov' <jacob.deal@usda.gov>; 'jeff.sorkin@usda.gov' <jeff.sorkin@usda.gov>; 'alexia.prosperi@usda.gov' <alexia.prosperi@usda.gov>; 'trent.wickman@usda.gov' <trent.wickman@usda.gov>; 'Allen, Tim' <tim_allen@fws.gov>; 'Stacy, Andrea' <Andrea_Stacy@nps.gov>; 'Shepherd, Don' <Don_Shepherd@nps.gov>; 'Peters, Melanie' <Melanie_Peters@nps.gov>; 'Devore, Lisa M' <lisa_devore@nps.gov>; 'Michael Barna mike_barna@nps.gov' <mike_barna@nps.gov>; 'kirsten_king@nps.gov' <kirsten_king@nps.gov>; 'debra_miller@nps.gov' <debra_miller@nps.gov>

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 1 attachments (719 KB)

Draft 24004OTH_2025_RH_Progress_Report_v8.1_FLM.pdf;

Dear Federal Land Managers,

The Texas Commission on Environmental Quality (TCEQ) is initiating a 60-day FLM consultation period concerning the attached draft 2025 Regional Haze Progress Report for the Second Planning Period. Please submit any FLM comments on the draft progress report by July 26, 2024 to Jamie.zech@tceq.texas.gov.

TCEQ is offering a virtual consultation meeting with FLMs concerning the draft report. Please use the linked Doodle Poll to let me know what potential meeting times work for you: <https://doodle.com/meeting/participate/id/elMVDJ5a>.

Please let me know if you have any questions or concerns, and we look forward to your input.

Best, Jamie



Jamie Zech, PhD (she/her) | Air Quality
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From Peters, Melanie <Melanie_Peters@nps.gov>

Date Tue 28-May-24 12:43 PM

To Jamie Zech <jamie.zech@tceq.texas.gov>

Cc Salazer, Holly <Holly_Salazer@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>; Miller, Debra C <Debra_Miller@nps.gov>; Stacy, Andrea <Andrea_Stacy@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; Devore, Lisa M <lisa_devore@nps.gov>

Thank you Jamie,
The NPS regional haze team has received this document and will begin our review.
Best,
Melanie

--
Melanie V. Peters
NPS, Air Resources Division

Office: 303-969-2315
Cell: 720-644-7632



From: Jamie Zech <jamie.zech@tceq.texas.gov>

Sent: Tuesday, May 28, 2024 10:19 AM

To: 'jeremy.ash@usda.gov' <jeremy.ash@usda.gov>; 'melanie.pitrolo@usda.gov' <melanie.pitrolo@usda.gov>; Ghazal Majidi-Weese - FS, Asheville, NC <IMCEAEX-_o=ExchangeLabs_ou=Exchange+20Administrative+20Group+20+28FYDIBOHF23SPDLT+29_cn=Recipients_cn=abe66be6d2ab4ec28a3b9e3c345e1283-ghazalmajid@namprd13.prod.outlook.com>; Deal, Jacob - FS <jacob.deal@usda.gov>; Sorkin, Jeff- FS <Jeffrey.Sorkin@usda.gov>; Prosperi, Alexia - FS, WI <alexia.prosperi@usda.gov>; Wickman, Trent - FS, MN <trent.wickman@usda.gov>; Allen, Tim <tim_allen@fws.gov>; Stacy, Andrea <Andrea_Stacy@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; Peters, Melanie <Melanie_Peters@nps.gov>; Devore, Lisa M <lisa_devore@nps.gov>; Barna, Michael <Mike_Barna@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>; Miller, Debra C <Debra_Miller@nps.gov>

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jamie.zech@tceq.texas.gov.

TCEQ is offering a virtual consultation meeting with FLMs concerning the draft report. Please use the linked Doodle Poll to let me know what potential meeting times work for you:

<https://doodle.com/meeting/participate/id/eIMVDJ5a>.

Please let me know if you have any questions or concerns, and we look forward to your input.

Best, Jamie



Jamie Zech, PhD (she/her) | Air Quality
Division

jamie.zech@tceq.texas.gov

512-239-3935 | 737-465-3010

PO Box 13087, Austin, TX 78711, MC 206

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Re: [EXTERNAL] FLM Consultation for the 2025 Texas Regional Haze Progress Report

From Peters, Melanie <Melanie_Peters@nps.gov>

Date Tue 04-Jun-24 6:43 PM

To Jamie Zech <jamie.zech@tceq.texas.gov>

Hi Jamie,

I just took the doodle poll for a consultation meeting time. If possible, could you offer some later dates/times for consideration? The NPS RH team is stretched pretty thin right now and meeting in June is quite dubious for us. Also, our Intermountain Region person is not available on Mondays. Thanks for considering and for starting the scheduling conversation.

Best,

Melanie

--

Melanie V. Peters
NPS, Air Resources Division

Office: 303-969-2315

Cell: 720-644-7632



From: Jamie Zech <jamie.zech@tceq.texas.gov>

Sent: Tuesday, May 28, 2024 10:19 AM

To: 'jeremy.ash@usda.gov' <jeremy.ash@usda.gov>; 'melanie.pitrolo@usda.gov' <melanie.pitrolo@usda.gov>; Ghazal Majidi-Weese - FS, Asheville, NC <IMCEAEX-o=ExchangeLabs_ou=Exchange+20Administrative+20Group+20+28FYDIBOHF23SPDLT+29_cn=Recipients_cn=abe66be6d2ab4ec28a3b9e3c345e1283-ghazalmajid@namprd13.prod.outlook.com>; Deal, Jacob - FS <jacob.deal@usda.gov>; Sorkin, Jeff- FS <Jeffrey.Sorkin@usda.gov>; Prosperi, Alexia - FS, WI <alexia.prosperi@usda.gov>; Wickman, Trent - FS, MN <trent.wickman@usda.gov>; Allen, Tim <tim_allen@fws.gov>; Stacy, Andrea <Andrea_Stacy@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; Peters, Melanie <Melanie_Peters@nps.gov>; Devore, Lisa M <lisa_devore@nps.gov>; Barna, Michael <Mike_Barna@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>; Miller, Debra C <Debra_Miller@nps.gov>

Cc: Walker Williamson <walker.williamson@tceq.texas.gov>; Margaret Earnest <margaret.earnest@tceq.texas.gov>; Jamie Zech <jamie.zech@tceq.texas.gov>; John Minter <john.minter@tceq.texas.gov>; Amy Browning <amy.browning@tceq.texas.gov>

Subject: [EXTERNAL] FLM Consultation for the 2025 Texas Regional Haze Progress Report

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Dear Federal Land Managers,

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Please submit any FLM comments on the draft progress report by July 26, 2024 to

Jamie.zech@tceq.texas.gov.

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RE: [EXTERNAL] FLM Consultation for the 2025 Texas Regional Haze Progress Report

From Jamie Zech <jamie.zech@tceq.texas.gov>
Date Wed 05-Jun-24 7:12 AM
To 'Peters, Melanie' <Melanie_Peters@nps.gov>

Hi Melanie,

Of course! I'll add some later dates to the Doodle and resend to everyone.

Thanks, Jamie

From: Peters, Melanie <Melanie_Peters@nps.gov>
Sent: Tuesday, June 4, 2024 6:43 PM
To: Jamie Zech <jamie.zech@tceq.texas.gov>
Subject: Re: [EXTERNAL] FLM Consultation for the 2025 Texas Regional Haze Progress Report

Hi Jamie,

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Sent: Tuesday, May 28, 2024 10:19 AM
To: 'jeremy.ash@usda.gov' <jeremy.ash@usda.gov>; 'melanie.pitrolo@usda.gov' <melanie.pitrolo@usda.gov>; Ghazal Majidi-Weese - FS, Asheville, NC <IMCEAEX-_o=ExchangeLabs_ou=Exchange+20Administrative+20Group+20+28FYDIBOHF23SPDLT+29_cn=Recipients_cn=abe66be6d2ab4ec28a3b9e3c345e1283-ghazalmajid@namprd13.prod.outlook.com>; Deal, Jacob - FS <jacob.deal@usda.gov>; Sorkin, Jeff- FS <Jeffrey.Sorkin@usda.gov>; Prosperi, Alexia - FS, WI <alexia.prosperi@usda.gov>; Wickman, Trent - FS, MN <trent.wickman@usda.gov>; Allen, Tim

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Subject: [EXTERNAL] FLM Consultation for the 2025 Texas Regional Haze Progress Report

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RE: FLM Consultation for the 2025 Texas Regional Haze Progress Report

From Jamie Zech <jamie.zech@tceq.texas.gov>

Date Fri 07-Jun-24 9:29 AM

To 'jeremy.ash@usda.gov' <jeremy.ash@usda.gov>; 'melanie.pitrolo@usda.gov' <melanie.pitrolo@usda.gov>; Ghazal Majidi-Weese - FS, Asheville, NC </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=abe66be6d2ab4ec28a3b9e3c345e1283-ghazalmajid>; 'jacob.deal@usda.gov' <jacob.deal@usda.gov>; 'jeff.sorkin@usda.gov' <jeff.sorkin@usda.gov>; 'alexia.prosperi@usda.gov' <alexia.prosperi@usda.gov>; 'trent.wickman@usda.gov' <trent.wickman@usda.gov>; 'Allen, Tim' <tim_allen@fws.gov>; 'Stacy, Andrea' <Andrea_Stacy@nps.gov>; 'Shepherd, Don' <Don_Shepherd@nps.gov>; 'Peters, Melanie' <Melanie_Peters@nps.gov>; 'Devore, Lisa M' <lisa_devore@nps.gov>; 'Michael Barna mike_barna@nps.gov' <mike_barna@nps.gov>; 'kirsten_king@nps.gov' <kirsten_king@nps.gov>; 'debra_miller@nps.gov' <debra_miller@nps.gov>

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Hi Everyone,

NPS requested some later meeting options, so I added additional dates to the Doodle Poll: <https://doodle.com/meeting/participate/id/elMVDJ5a>. This meeting is being offered to discuss TCEQ's draft regional haze progress report shared with you on May 28, 2024, and on which TCEQ is requesting FLM comments by July 26, 2024.

Thanks so much, and have a great weekend!

Best, Jamie



Jamie Zech, PhD (she/her) | Air Quality
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jamie.zech@tceq.texas.gov
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PO Box 13087, Austin, TX 78711, MC 206
[How is our customer service?](#)

From: Jamie Zech <jamie.zech@tceq.texas.gov>

Sent: Tuesday, May 28, 2024 11:20 AM

To: 'jeremy.ash@usda.gov' <jeremy.ash@usda.gov>; 'melanie.pitrolo@usda.gov' <melanie.pitrolo@usda.gov>; Ghazal Majidi-Weese - FS, Asheville, NC; 'jacob.deal@usda.gov' <jacob.deal@usda.gov>; 'jeff.sorkin@usda.gov' <jeff.sorkin@usda.gov>; 'alexia.prosperi@usda.gov' <alexia.prosperi@usda.gov>; 'trent.wickman@usda.gov' <trent.wickman@usda.gov>; 'Allen, Tim' <tim_allen@fws.gov>; 'Stacy, Andrea' <Andrea_Stacy@nps.gov>; 'Shepherd, Don' <Don_Shepherd@nps.gov>; 'Peters, Melanie' <Melanie_Peters@nps.gov>; 'Devore, Lisa M' <lisa_devore@nps.gov>; 'Michael Barna mike_barna@nps.gov' <mike_barna@nps.gov>; 'kirsten_king@nps.gov' <kirsten_king@nps.gov>; 'debra_miller@nps.gov' <debra_miller@nps.gov>

Cc: Walker Williamson <walker.williamson@tceq.texas.gov>; Margaret Earnest <margaret.earnest@tceq.texas.gov>; Jamie Zech <jamie.zech@tceq.texas.gov>; John Minter <john.minter@tceq.texas.gov>; Amy Browning <amy.browning@tceq.texas.gov>

Subject: FLM Consultation for the 2025 Texas Regional Haze Progress Report

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FLM Consultation Call on the 2025 Texas Regional Haze Progress Report

From Jamie Zech <jamie.zech@tceq.texas.gov>

Date Tue 09-Jul-24 3:21 PM

To 'jeremy.ash@usda.gov' <jeremy.ash@usda.gov>; 'melanie.pitrolo@usda.gov' <melanie.pitrolo@usda.gov>; 'jacob.deal@usda.gov' <jacob.deal@usda.gov>; 'jeff.sorkin@usda.gov' <jeff.sorkin@usda.gov>; 'alexia.prosperi@usda.gov' <alexia.prosperi@usda.gov>; 'trent.wickman@usda.gov' <trent.wickman@usda.gov>; 'Allen, Tim' <tim_allen@fws.gov>; 'Stacy, Andrea' <Andrea_Stacy@nps.gov>; 'Shepherd, Don' <Don_Shepherd@nps.gov>; 'Peters, Melanie' <Melanie_Peters@nps.gov>; 'Devore, Lisa M' <lisa_devore@nps.gov>; 'Michael Barna mike_barna@nps.gov' <mike_barna@nps.gov>; 'kirsten_king@nps.gov' <kirsten_king@nps.gov>; 'debra_miller@nps.gov' <debra_miller@nps.gov>; Sorkin, Jeff - FS, CO <Jeffrey.Sorkin@usda.gov>

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 1 attachments (905 KB)

Haze_ProgressReport_FLM_Consultation_Final_070924.pdf;

Hi Everyone,

Thanks so much for joining TCEQ today to go over the draft regional haze progress report for the second planning period. The presentation is attached for your reference, and we are formally accepting FLM consultation and comments through July 29, 2024. If you have written input, please email me by July 29 (jamie.zech@tceq.texas.gov).

The few questions we received at the call today will be answered as soon as possible. I'll include everyone so all will have access to the information we share during this consultation period.

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[How is our customer service?](#)

RE: FLM Consultation Call on the 2025 Texas Regional Haze Progress Report

From Jamie Zech <jamie.zech@tceq.texas.gov>

Date Fri 26-Jul-24 10:36 AM

To 'jeremy.ash@usda.gov' <jeremy.ash@usda.gov>; 'melanie.pitrolo@usda.gov' <melanie.pitrolo@usda.gov>; 'jacob.deal@usda.gov' <jacob.deal@usda.gov>; 'jeff.sorkin@usda.gov' <jeff.sorkin@usda.gov>; 'alexia.prosperi@usda.gov' <alexia.prosperi@usda.gov>; 'trent.wickman@usda.gov' <trent.wickman@usda.gov>; 'Allen, Tim' <tim_allen@fws.gov>; 'Stacy, Andrea' <Andrea_Stacy@nps.gov>; 'Shepherd, Don' <Don_Shepherd@nps.gov>; 'Peters, Melanie' <Melanie_Peters@nps.gov>; 'Devore, Lisa M' <lisa_devore@nps.gov>; 'Michael Barna mike_barna@nps.gov' <mike_barna@nps.gov>; 'kirsten_king@nps.gov' <kirsten_king@nps.gov>; 'debra_miller@nps.gov' <debra_miller@nps.gov>; Sorkin, Jeff - FS, CO <Jeffrey.Sorkin@usda.gov>

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Hi Everyone,

There were two questions that came up on the 7/9 FLM call that I wasn't able to answer at the time, both were from Melanie Peters. Please see the questions and responses below.

Question: Carlsbad Caverns currently uses the same IMPROVE monitor as Guadalupe Mountain's official monitor, and Melanie Peters asked why we're showing increased impairment at Carlsbad but not at Guadalupe Mountains. She is interested in taking a closer look at the data.

Response: Carlsbad Caverns and Guadalupe Mountains do use the same monitor, and the data provided in the draft report and the July 9 presentation are the same for both areas. The IMPROVE data can be found at <https://views.cira.colostate.edu/fed/>.

Question: Did TCEQ apply the endpoint adjustments to the 2028 URP, and which ones?

Answer: Yes, and all of them. The adjusted glidepaths can be found in our 2021 SIP documentation: [2021 Regional Haze State Implementation Plan \(SIP\) Revision for the Second Planning Period \(texas.gov\)](#), and the table of them is provided below.

Table 8-43: Visibility for Class I Areas on 20% Most Impaired Days and 20% Clearest Days

Class I Area (IMPROVE ID, State)	2014-2017 20% Clearest Days (dv)	Future Year (2028) 20% Clearest Days (dv)	2028 Adjusted Glidepath (dv)	Future Year (2028) 20% Most Impaired Days (dv)
Big Bend National Park (N.P.) (BIBE, TX)	5.2	4.9	14.4	14.2
Bosque del Apache Wilderness Area (W.A.) (BOAP, NM)	4.6	4.2	9.9	9.6
Breton Island W.A. (BRIS, LA)	11.8	11.3	19.8	18.3
Caney Creek W.A. (CACR, AR)	8.2	7.8	18.8	17.1
Great Sand Dunes W.A. (GRSA, CO)	2.9	2.6	8.2	7.3
Guadalupe Mountains N.P. (GUMO, TX)	4.5	4.1	12.8	12.2
Hercules-Glades W.A. (HEGL, MO)	9.8	9.1	19.6	17.4
Mingo W.A. (MINGO, MO)	11.2	10.6	20.2	18.6
Rocky Mountain N.P. (ROMO, CO)	1.3	1.1	9.2	7.3
Salt Creek W.A. (SACR, NM)	6.7	6.2	13.5	13.9
Upper Buffalo W.A. (UPBU, AR)	8.4	7.9	19.2	16.7
White Mountain W.A. (WHIT, NM)	2.6	2.2	10	9.5
Wheeler Peak W.A. (WHPE, NM)	0.3	0.1	6.5	5.3
Wichita Mountains W.A. (WIMO, OK)	8.4	7.7	17.4	16.7

Details of the glidepath adjustments can be found in the photochemical modeling appendix: [Appendix F: Photochemical Modeling for the 2021 Regional Haze State Implementation Plan Revision \(texas.gov\)](#).

Thanks, and please let me know if you have additional questions.

Best, Jamie

From: Jamie Zech <jamie.zech@tceq.texas.gov>

Sent: Tuesday, July 9, 2024 3:21 PM

To: 'jeremy.ash@usda.gov' <jeremy.ash@usda.gov>; 'melanie.pitrolo@usda.gov' <melanie.pitrolo@usda.gov>; 'jacob.deal@usda.gov' <jacob.deal@usda.gov>; 'jeff.sorkin@usda.gov' <jeff.sorkin@usda.gov>; 'alexia.prosperi@usda.gov' <alexia.prosperi@usda.gov>; 'trent.wickman@usda.gov' <trent.wickman@usda.gov>; 'Allen, Tim' <tim_allen@fws.gov>; 'Stacy, Andrea' <Andrea_Stacy@nps.gov>; 'Shepherd, Don' <Don_Shepherd@nps.gov>; 'Peters, Melanie' <Melanie_Peters@nps.gov>; 'Devore, Lisa M' <lisa_devore@nps.gov>; 'Michael Barna mike_barna@nps.gov' <mike_barna@nps.gov>; 'kirsten_king@nps.gov' <kirsten_king@nps.gov>; 'debra_miller@nps.gov' <debra_miller@nps.gov>; Sorkin, Jeff - FS, CO <Jeffrey.Sorkin@usda.gov>

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Re: [EXTERNAL] RE: FLM Consultation Call on the 2025 Texas Regional Haze Progress Report

From Peters, Melanie <Melanie_Peters@nps.gov>

Date Fri 26-Jul-24 4:30 PM

To Jamie Zech <jamie.zech@tceq.texas.gov>

Cc Devore, Lisa M <lisa_devore@nps.gov>

Thank you Jamie,

I see now that I misunderstood the difference between the tables in the presentation (impairment at TX areas separate from areas affected by TX emissions). Now I read them to say that you are observing the same level of increased impairment at both CAVE/GUMO which, while not what we are hoping to see, is consistent with using the same monitor to represent both.

Best,
Melanie

--

Melanie V. Peters
NPS, Air Resources Division

Office: 303-969-2315

Cell: 720-644-7632



From: Jamie Zech <jamie.zech@tceq.texas.gov>

Sent: Friday, July 26, 2024 9:36 AM

To: Ash, Jeremy - FS, NC <jeremy.ash@usda.gov>; 'melanie.pitrolo@usda.gov' <melanie.pitrolo@usda.gov>; Deal, Jacob - FS <jacob.deal@usda.gov>; Sorkin, Jeff- FS <Jeffrey.Sorkin@usda.gov>; Prosperi, Alexia - FS, WI <alexia.prosperi@usda.gov>; Wickman, Trent - FS, MN <trent.wickman@usda.gov>; Allen, Tim <tim_allen@fws.gov>; Stacy, Andrea <Andrea_Stacy@nps.gov>; Shepherd, Don <Don_Shepherd@nps.gov>; Peters, Melanie <Melanie_Peters@nps.gov>; Devore, Lisa M <lisa_devore@nps.gov>; Barna, Michael <Mike_Barna@nps.gov>; King, Kirsten L <kirsten_king@nps.gov>; Miller, Debra C <Debra_Miller@nps.gov>; Sorkin, Jeff- FS <Jeffrey.Sorkin@usda.gov>

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Upper Buffalo W.A. (UPBU, AR)	8.4	7.9	19.2	16.7
White Mountain W.A. (WHIT, NM)	2.6	2.2	10	9.5
Wheeler Peak W.A. (WHPE, NM)	0.3	0.1	6.5	5.3
Wichita Mountains W.A. (WIMO, OK)	8.4	7.7	17.4	16.7

Details of the glidepath adjustments can be found in the photochemical modeling appendix: [Appendix F: Photochemical Modeling for the 2021 Regional Haze State Implementation Plan Revision \(texas.gov\)](#).

Thanks, and please let me know if you have additional questions.

Best, Jamie

From: Jamie Zech <jamie.zech@tceq.texas.gov>

Sent: Tuesday, July 9, 2024 3:21 PM

To: 'jeremy.ash@usda.gov' <jeremy.ash@usda.gov>; 'melanie.pitrolo@usda.gov' <melanie.pitrolo@usda.gov>; 'jacob.deal@usda.gov' <jacob.deal@usda.gov>; 'jeff.sorkin@usda.gov' <jeff.sorkin@usda.gov>; 'alexia.prosperi@usda.gov' <alexia.prosperi@usda.gov>; 'trent.wickman@usda.gov' <trent.wickman@usda.gov>; 'Allen, Tim' <tim_allen@fws.gov>; 'Stacy, Andrea' <Andrea_Stacy@nps.gov>; 'Shepherd, Don'

<Don_Shepherd@nps.gov>; 'Peters, Melanie' <Melanie_Peters@nps.gov>; 'Devore, Lisa M' <lisa_devore@nps.gov>; 'Michael Barna mike_barna@nps.gov' <mike_barna@nps.gov>; 'kirsten_king@nps.gov' <kirsten_king@nps.gov>; 'debra_miller@nps.gov' <debra_miller@nps.gov>; Sorkin, Jeff - FS, CO <Jeffrey.Sorkin@usda.gov>

Cc: Walker Williamson <walker.williamson@tceq.texas.gov>; Margaret Earnest <margaret.earnest@tceq.texas.gov>; John Minter <john.minter@tceq.texas.gov>; Amy Browning <amy.browning@tceq.texas.gov>; Javier Galvan <Javier.Galvan@tceq.texas.gov>; Jocelyn Mellberg <jocelyn.mellberg@tceq.texas.gov>; Michael Ege <michael.ege@tceq.texas.gov>; Jill Dickey <jill.dickey@tceq.texas.gov>

Subject: FLM Consultation Call on the 2025 Texas Regional Haze Progress Report

Hi Everyone,

Thanks so much for joining TCEQ today to go over the draft regional haze progress report for the second planning period. The presentation is attached for your reference, and we are formally accepting FLM consultation and comments through July 29, 2024. If you have written input, please email me by July 29 (jamie.zech@tceq.texas.gov).

The few questions we received at the call today will be answered as soon as possible. I'll include everyone so all will have access to the information we share during this consultation period.

All the best, Jamie



Jamie Zech, PhD (she/her) | Air Quality
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ATTACHMENT B: FEDERAL LAND MANAGER CONSULTATION MEETING, JULY 9, 2024

The *Texas-Federal Land Managers Consultation* presentation provided in this section was used in a virtual consultation meeting with FLMs on July 9, 2024.

Included in Attachment B:

- TCEQ Presentation to Federal Land Managers
- Questions Received During Consultation Meeting
- Attendees at Meeting



2025 Regional Haze Progress Report for the Second Planning Period

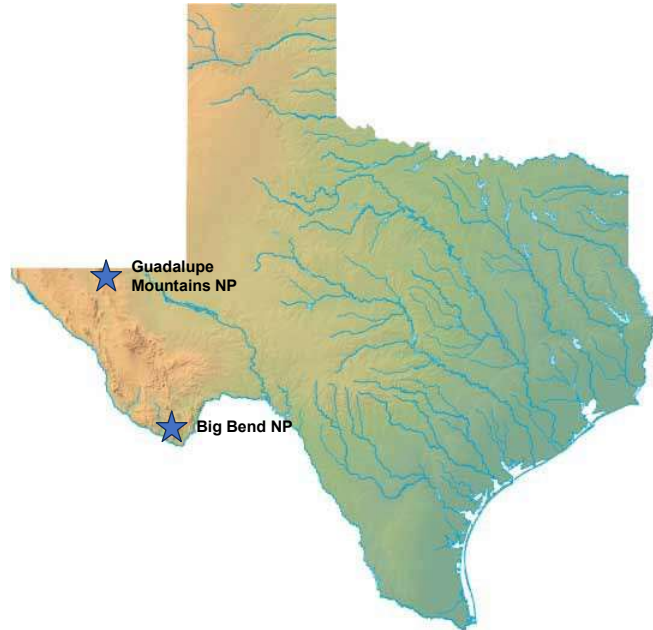
Federal Land Manager (FLM) Consultation, July 9, 2024

Presentation Topics

- Background
- Updates on Previous Texas Regional Haze Submissions
- 2025 Regional Haze Progress Report
 - Project schedule
 - Required elements and findings
- Next Steps

Background

- Federal Clean Air Act (FCAA), §169A requires the U.S. Environmental Protection Agency (EPA) to establish rules for states to develop plans to help bring federal Class I areas back to natural visibility conditions.
- Big Bend National Park and Guadalupe Mountains National Park are the Class I areas in Texas.



Background

- States are required to submit state implementation plan (SIP) revisions for each 10-year planning period.
 - First Planning Period: 2009 through 2018
 - Second Planning Period: 2019 through 2028
- At five-year intervals between SIP revisions, states are required to submit progress reports.

Previous Texas Regional Haze Submissions

First Planning Period

- Texas Commission on Environmental Quality (TCEQ or commission) adopted a regional haze SIP revision for the first planning period on February 25, 2009.
- EPA published final disapproval of SIP revision elements and issued a federal implementation plan (FIP) (reasonable progress FIP) on January 5, 2016.
- EPA published final disapproval of Texas' regional haze SIP regarding BART (BART FIP) on October 17, 2017.



First Planning Period FIP Updates

- EPA published a proposed reconsideration of its BART FIP to address sulfur dioxide (SO₂) and PM BART for Texas on May 4, 2023.
- EPA published a proposed disapproval and FIP addressing first planning period reasonable progress requirements on July 26, 2023, in response to the remanded 2016 reasonable progress FIP.



Previous Texas Regional Haze Submissions

Second Planning Period

- The commission adopted the 2021 Regional Haze SIP Revision for the Second Planning Period (2021 Plan) on June 30, 2021.
- EPA has not yet acted on the 2021 Plan but is under a consent decree deadline of September 30, 2024, to propose an action.

2025 Regional Haze Progress Report

- Report due to EPA by January 31, 2025, assessing the status of the reasonable progress goals adopted in the 2021 Plan.
- FLM consultation period from May 28, 2024 through July 29, 2024.
- Public comment period from August 2, 2024 through September 3, 2024.
- Consideration by the commission scheduled for December 18, 2024.

Progress Report Elements

- Must meet 40 CFR §51.308(g), (h), and (i) requirements.
 - 40 CFR §51.308(g): requirements for periodic reports describing progress towards reasonable progress goals
 - 40 CFR §51.308(h): determination of the adequacy of existing implementation plan
 - 40 CFR §51.308(i): FLM consultation requirements

Assessment of Control Measures

- All pollution control programs in the 2021 Plan are fully implemented.
- Updates since the 2021 Plan:
 - Nitrogen oxides (NO_x) rules for Wise County (30 Texas Administrative Code (TAC) Chapter 117)
 - TCEQ's Texas Emission Reduction Plan (TERP) program updates
 - Growth in energy efficiency and renewable energy programs
 - Check-in on planned electric generating unit (EGU) closures/conversions
 - Agreed order and SO₂ rules for Texas SO₂ nonattainment areas (30 TAC Chapter 112)
- Measures have or are expected to achieve emissions reductions to help meet the reasonable progress goals in the 2021 Plan.

Assessment of Visibility

- Current visibility conditions assessed for the most recent five-year period available, 2018 through 2022 (**current conditions**).
- Visibility metrics based on Interagency Monitoring of Protected Visual Environments (IMPROVE) program data accessed in February and March of 2024.
- Comparison between **current conditions** and **baseline conditions** (2000 through 2004).
- Comparison between **current conditions** and **conditions addressed in the 2021 Plan** (2014 through 2018).

Texas Class I Areas Visibility Assessment

Current vs Baseline for 20% Most Impaired Days

Class I Area	Baseline (dv) 2000 - 2004	Current (dv) 2018 - 2022	Difference
Big Bend National Park	15.57	13.19	-2.38
Guadalupe Mountains National Park	14.60	12.70	-1.90

Current vs Baseline for 20% Clearest Days

Class I Area	Baseline (dv) 2000 - 2004	Current (dv) 2018 - 2022	Difference
Big Bend National Park	5.78	5.38	-0.40
Guadalupe Mountains National Park	5.92	4.81	-1.11

Texas Class I Areas Visibility Assessment

Current vs 2021 Plan for 20% Most Impaired Days

Class I Area	2021 Plan (dv) 2014 - 2018	Current (dv) 2018 - 2022	Difference
Big Bend National Park	14.06	13.19	-0.87
Guadalupe Mountains National Park	12.64	12.70	0.06

Current vs 2021 Plan for 20% Clearest Days

Class I Area	2021 Plan (dv) 2014 - 2018	Current (dv) 2018 - 2022	Difference
Big Bend National Park	5.17	5.38	0.22
Guadalupe Mountains National Park	4.73	4.81	0.08

Texas Class I Areas Visibility Assessment

Current vs Reasonable Progress Goals for 20% Most Impaired Days

Class I Area	2028 Reasonable Progress Goals (dv)	Current (dv) 2018 - 2022
Big Bend National Park	14.4	13.2
Guadalupe Mountains National Park	12.8	12.7

Visibility Assessment for Class I Areas Impacted by Texas

Current vs Baseline for 20% Most Impaired Days

Class I Area	State	Baseline (dv) 2000 - 2004	Current (dv) 2018 - 2022	Difference
Caney Creek Wilderness Area	Arkansas	23.99	16.27	-7.72
Upper Buffalo Wilderness Area	Arkansas	24.21	16.40	-7.81
Great Sand Dunes Wilderness Area	Colorado	9.66	7.94	-1.72
Breton Wilderness Area	Louisiana	Unavailable	17.82	Unavailable
Hercules-Glades Wilderness Area	Missouri	25.17	17.36	-7.81
Mingo Wilderness Area	Missouri	26.28	18.95	-7.33
Bosque del Apache Wilderness Area	New Mexico	11.78	10.04	-1.74
Carlsbad Caverns National Park	New Mexico	14.60	12.70	-1.90
Salt Creek Wilderness Area	New Mexico	16.50	14.51	-1.99
Wheeler Peak Wilderness Area	New Mexico	7.34	5.50	-1.85
White Mountain Wilderness Area	New Mexico	11.31	9.56	-1.74
Wichita Mountains Wilderness Area	Oklahoma	22.15	16.86	-5.28



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Visibility Assessment for Class I Areas Impacted by Texas

Current vs Baseline for 20% Clearest Days

Class I Area	State	Baseline (dv) 2000 - 2004	Current (dv) 2018 - 2022	Difference
Caney Creek Wilderness Area	Arkansas	11.24	7.48	-3.76
Upper Buffalo Wilderness Area	Arkansas	11.71	7.98	-3.73
Great Sand Dunes Wilderness Area	Colorado	4.50	2.50	-2.00
Breton Wilderness Area	Louisiana	Unavailable	11.05	Unavailable
Hercules-Glades Wilderness Area	Missouri	12.84	8.85	-3.99
Mingo Wilderness Area	Missouri	14.37	10.25	-4.12
Bosque del Apache Wilderness Area	New Mexico	6.17	4.62	-1.55
Carlsbad Caverns National Park	New Mexico	5.92	4.81	-1.11
Salt Creek Wilderness Area	New Mexico	7.84	6.75	-1.09
Wheeler Peak Wilderness Area	New Mexico	0.31	0.19	-0.12
White Mountain Wilderness Area	New Mexico	3.55	2.70	-0.85
Wichita Mountains Wilderness Area	Oklahoma	9.78	8.69	-1.09



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Visibility Assessment for Class I Areas Impacted by Texas

Current vs 2021 Plan for 20% Most Impaired Days

Class I Area	State	2021 Plan (dv) 2014 - 2018	Current (dv) 2018 - 2022	Difference
Caney Creek Wilderness Area	Arkansas	18.29	16.27	-2.02
Upper Buffalo Wilderness Area	Arkansas	17.95	16.40	-1.55
Great Sand Dunes Wilderness Area	Colorado	8.02	7.94	-0.08
Breton Wilderness Area	Louisiana	18.98	17.82	-1.17
Hercules-Glades Wilderness Area	Missouri	18.72	17.36	-1.36
Mingo Wilderness Area	Missouri	20.13	18.95	-1.18
Bosque del Apache Wilderness Area	New Mexico	10.47	10.04	-0.43
Carlsbad Caverns National Park	New Mexico	12.64	12.70	0.06
Salt Creek Wilderness Area	New Mexico	14.97	14.51	-0.46
Wheeler Peak Wilderness Area	New Mexico	5.95	5.50	-0.45
White Mountain Wilderness Area	New Mexico	9.95	9.56	-0.39
Wichita Mountains Wilderness Area	Oklahoma	18.12	16.86	-1.26



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Visibility Assessment for Class I Areas Impacted by Texas

Current vs 2021 Plan for 20% Clearest Days

Class I Area	State	2021 Plan (dv) 2014 - 2018	Current (dv) 2018 - 2022	Difference
Caney Creek Wilderness Area	Arkansas	8.02	7.48	-0.54
Upper Buffalo Wilderness Area	Arkansas	8.20	7.98	-0.22
Great Sand Dunes Wilderness Area	Colorado	2.74	2.50	-0.24
Breton Wilderness Area	Louisiana	11.81	11.05	-0.75
Hercules-Glades Wilderness Area	Missouri	9.71	8.85	-0.86
Mingo Wilderness Area	Missouri	11.08	10.25	-0.83
Bosque del Apache Wilderness Area	New Mexico	4.59	4.62	0.03
Carlsbad Caverns National Park	New Mexico	4.73	4.81	0.08
Salt Creek Wilderness Area	New Mexico	6.62	6.75	0.13
Wheeler Peak Wilderness Area	New Mexico	0.31	0.19	-0.12
White Mountain Wilderness Area	New Mexico	2.54	2.70	0.16
Wichita Mountains Wilderness Area	Oklahoma	8.47	8.69	0.22



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Visibility Assessment for Class I Areas Impacted by Texas

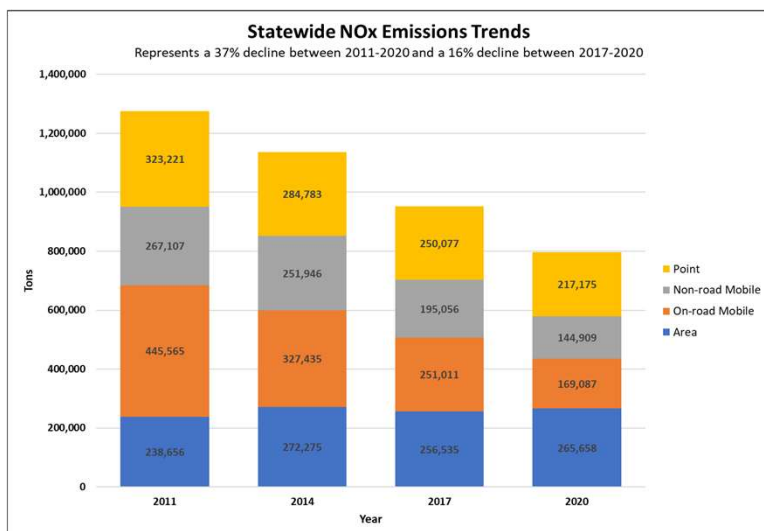
Current vs Reasonable Progress Goals for 20% Most Impaired Days

Class I Area	State	2028 Reasonable Progress Goals (dv)	Current (dv) 2018 - 2022
Caney Creek Wilderness Area	Arkansas	18.8	16.3
Upper Buffalo Wilderness Area	Arkansas	19.2	16.4
Great Sand Dunes Wilderness Area	Colorado	8.2	7.9
Breton Wilderness Area	Louisiana	19.8	17.8
Hercules-Glades Wilderness Area	Missouri	19.6	17.4
Mingo Wilderness Area	Missouri	20.2	19.0
Bosque del Apache Wilderness Area	New Mexico	9.9	10.0
Carlsbad Caverns National Park	New Mexico	12.8	12.7
Salt Creek Wilderness Area	New Mexico	13.5	14.5
Wheeler Peak Wilderness Area	New Mexico	6.5	5.5
White Mountain Wilderness Area	New Mexico	10.0	9.6
Wichita Mountains Wilderness Area	Oklahoma	17.4	16.9

Evaluation of Emissions

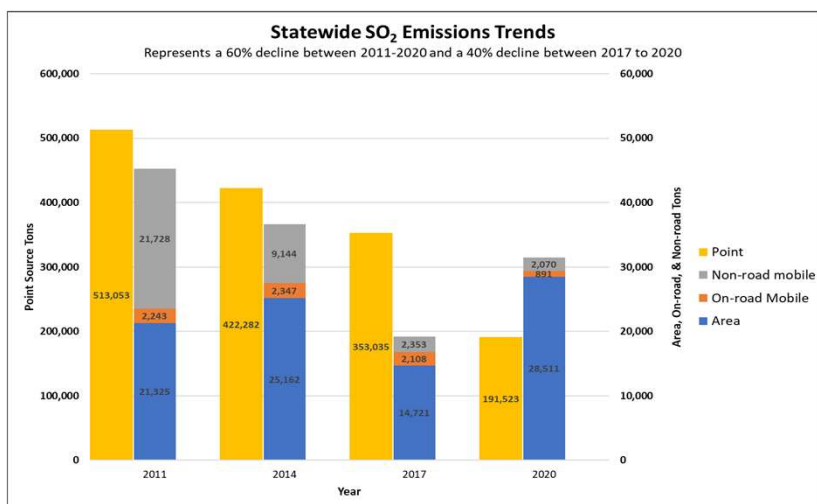
- Analyzed emissions for pollutants contributing to visibility impairment since the period assessed in the 2021 Plan.
- Evaluated changes in anthropogenic emissions that have occurred since the evaluation in the 2021 Plan.
- Report provides pollutant summaries for the previous four National Emissions Inventories (NEI): 2011, 2014, 2017, and 2020.
 - Ammonia (NH₃)
 - Carbon monoxide (CO)
 - NO_x
 - Coarse particulate matter (PM₁₀)
 - Fine particulate matter (PM_{2.5})
 - SO₂
 - Volatile organic compounds (VOC)

Evaluation of Emissions



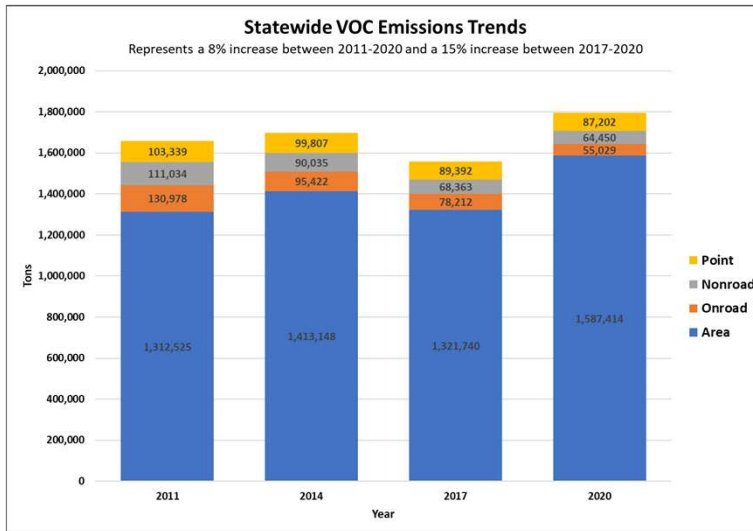
Source Category	NO _x Comparison 2017 vs 2020	NO _x Percent Change 2017 vs 2020
EGU Point	-26,723.66	-24.49%
Non-EGU Point	-6,178.53	-4.38%
Area	9,122.78	3.56%
Non-Road Mobile	-50,147.03	-25.71%
On-Road Mobile	-81,923.69	-32.64%
Total	-155,850.13	-16.36%

Evaluation of Emissions



Source Category	SO ₂ Comparison 2017 vs 2020	SO ₂ Percent Change 2017 vs 2020
EGU Point	-145,841.86	-52.84%
Non-EGU Point	-15,670.67	-20.35%
Area	13,789.78	93.67%
Non-Road Mobile	-283.27	-12.04%
On-Road Mobile	-1,216.16	-57.71%
Total	-149,222.18	-40.09%

Evaluation of Emissions



Source Category	VOC Comparison 2017 vs 2020	VOC Percent Change 2017 vs 2020
EGU Point	-125.68	-4.45%
Non-EGU Point	-2,064.55	-2.38%
Area	265,674.36	20.10%
Non-Road Mobile	-3,913.21	-5.72%
On-Road Mobile	-23,182.95	-29.64%
Total	236,387.97	15.18%

Evaluation of Emissions

- Significant decreases in NO_x, SO₂, and VOC from point sources.
 - Decreased electric generation from coal-fired EGUs (NO_x and SO₂)
 - Decreased emissions at oil-and-gas production and processing sites (NO_x)
 - Added controls, improved estimates, reduced activity, and plant shutdowns in the petroleum refining and natural gas liquids sectors (VOC)
- Increases in NO_x, SO₂, and VOC from area sources.
 - Increased storage tank and loading loss emissions (VOC)
 - Increased venting and flaring of wellhead gas (VOC and SO₂)
 - Increased industrial residual oil fuel combustion (SO₂)

Evaluation of Emissions

- Decreases in NO_x, SO₂, and VOC from non-road mobile sources.
 - Fleet turnover
 - Changes in gasoline and diesel sulfur content (ultra-low sulfur diesel)
- Decreases in NO_x, SO₂, and VOC from on-road mobile sources.
 - Federal Motor Vehicle Control Program, vehicle inspection and maintenance (I/M) program, federal reformulated gasoline program, Texas Low Emissions Diesel Program, ultra-low sulfur gasoline regulations, and ultra-low sulfur diesel regulations (NO_x and VOC)
 - Tier 3 Light-Duty vehicle emissions rule (SO₂)

Evaluation of Emissions

- 2021 Plan stated that primarily NO_x and SO₂ emissions affect visibility in Class I areas in Texas and surrounding states.
 - Overall, NO_x and SO₂ emissions declined significantly between 2011 and 2020 (16% and 40%, respectively).
 - VOC emissions increased by 15%.
- Though there is some year-to-year variability, there are no anthropogenic emissions increases in Texas that are unexpected or large enough that the changes would be expected to limit or impede visibility improvement.

Summary Assessment of 2021 Plan Elements

- Measures included in the 2021 Plan remain implemented, with continuing emissions reductions achieved.
- Visibility impairment is lower than baseline (2000 - 2004) for the 20% most impaired and 20% clearest days.
- Current haze indexes (2018 - 2022) for most of the Class I areas evaluated are lower than those reported in the 2021 Plan (2014 - 2018).
- Emissions of visibility impairing pollutants have, overall, continued to trend downward for Texas, including for NO_x and SO₂, the pollutants that primarily affect visibility in Class I areas in/impacted by Texas.

Next Steps

- Accepting FLM input through July 29, 2024.
- FLM comments to be compiled and included with the report for public comment (August 2, 2024 through September 3, 2024).
- Commission expected to consider report on December 18, 2024.
- Submission to EPA by January 31, 2025.



Air Quality Division

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Information Resources

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[TCEQ Regional Haze Information](https://www.tceq.texas.gov/airquality/sip/bart)

(<https://www.tceq.texas.gov/airquality/sip/bart>)

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(<https://public.govdelivery.com/accounts/TXTCEQ/subscriber/new?preferences=true#tab1>)

QUESTIONS RECEIVED DURING CONSULTATION MEETING

Question: FWS asked for clarification on whether the units shown in Slide 16 of the presentation, concerning the visibility assessment for Class I areas impacted by Texas, were in deciviews.

Answer: TCEQ confirmed that negative numbers showed improvement and units were in deciviews.

Question: NPS asked about TCEQ's reporting thresholds for stationary sources and asked for a link to point source EI website. NPS asked if Texas had any minor sources reporting.

Answer: TCEQ responded that the threshold does depend on the county where the stationary source is located because the major threshold definition changes depending on the level of nonattainment classification. The threshold increases from marginal to moderate to serious to severe. TCEQ provided the following links:

(https://www.tceq.texas.gov/downloads/air-quality/point-source/2023ei_reportingmap.pdf) and

(https://www.tceq.texas.gov/airquality/areasource/Sources_of_Air_Pollution.html#Area).

Question: NPS asked, why was increased impairment shown at Carlsbad Caverns but not at Guadalupe Mountains since both Class I areas used the same monitor. NPS wanted to take a closer look at the IMPROVE data.

Answer: The values are identical for Carlsbad Caverns and Guadalupe Mountains as shown in Tables 5 through 14 of the 2025 progress report. The IMPROVE data can be found at <https://views.cira.colostate.edu/fed/>. In a July 26, 2024, e-mail, TCEQ documented the response to this question as provided in Attachment A.

Question: NPS asked if TCEQ had any concerns about relying on the 2020 National Emissions Inventory data due to the influence of the pandemic.

Answer: TCEQ responded that Texas did not have reservations about using the 2020 data based on internal evaluations and those conducted outside showing that the pandemic did not seem to be as impactful as first thought. Texas considered 2020 data appropriate to use.

Question: NPS asked, did Texas apply the endpoint adjustments to the 2028 uniform rate of progress (URP), and which ones?

Answer: TCEQ provided a response to the FLMs via e-mail as documented in Attachment A. Yes, Texas applied adjustment to all areas analyzed. The adjusted glidepaths can be found in the 2021 SIP documentation in the 2021 Regional Haze State Implementation Plan (SIP) Revision for the Second Planning Period at (https://www.tceq.texas.gov/downloads/air-quality/sip/haze/revisions/2021rhsip_ado.pdf). Table 8-43 from the 2021 Plan copied below shows the adjusted values.

Table 8-1: Visibility for Class I Areas on 20% Most Impaired Days and 20% Clearest Days

Class I Area (IMPROVE ID, State)	2014-2017 20% Clearest Days (dv)	Future Year (2028) 20% Clearest Days (dv)	2028 Adjusted Glidepath (dv)	Future Year (2028) 20% Most Impaired Days (dv)
Big Bend National Park (N.P.) (BIBE, TX)	5.2	4.9	14.4	14.2
Bosque del Apache Wilderness Area (W.A.) (BOAP, NM)	4.6	4.2	9.9	9.6
Breton Island W.A. (BRIS, LA)	11.8	11.3	19.8	18.3
Caney Creek W.A. (CACR, AR)	8.2	7.8	18.8	17.1
Great Sand Dunes W.A. (GRSA, CO)	2.9	2.6	8.2	7.3
Guadalupe Mountains N.P. (GUMO, TX)	4.5	4.1	12.8	12.2
Hercules-Glades W.A. (HEGL, MO)	9.8	9.1	19.6	17.4
Mingo W.A. (MINGO, MO)	11.2	10.6	20.2	18.6
Rocky Mountain N.P. (ROMO, CO)	1.3	1.1	9.2	7.3
Salt Creek W.A. (SACR, NM)	6.7	6.2	13.5	13.9
Upper Buffalo W.A. (UPBU, AR)	8.4	7.9	19.2	16.7
White Mountain W.A. (WHIT, NM)	2.6	2.2	10	9.5
Wheeler Peak W.A. (WHPE, NM)	0.3	0.1	6.5	5.3
Wichita Mountains W.A. (WIMO, OK)	8.4	7.7	17.4	16.7

Details of the glidepath adjustments can be found in the photochemical modeling appendix, Appendix F: *Photochemical Modeling* for the 2021 Regional Haze State Implementation Plan Revision (<https://www.tceq.texas.gov/downloads/air-quality/sip/haze/revisions/2021rh-appendixf-ado.pdf>).

Attendance for Federal Land Manager Consultation Call on the 2025 Texas Regional Haze Progress Report

Attended participants: 13

Start time: 7/09/24, 12:32 PM

End time: 7/09/24, 1:48 PM

Virtual call through Microsoft Teams

TCEQ: Jamie Zech, John Minter, Margaret Earnest, Jill Dickey, Michael Ege

National Park Service: Kirsten King, Melanie Peters, Lisa Devore, Michael Barna, Holly Salazer

U.S. Fish and Wildlife Service: Tim Allen

U.S. Forest Service: Melanie Pitrolo, Jacob Deal

ATTACHMENT C: NATIONAL PARK SERVICE COMMENTS

From: [Devore, Lisa M](#)
To: [Jamie Zech](#); [Ash, Jeremy - FS, NC](#); ["melanie.pitrolo@usda.gov"](#); [Deal, Jacob - FS](#); [Sorkin, Jeff- FS](#); [Prosperi, Alexia - FS, WI](#); [Wickman, Trent - FS, MN](#); [Allen, Tim](#); [Stacy, Andrea](#); [Shepherd, Don](#); [Peters, Melanie](#); [Barna, Michael](#); [King, Kirsten L](#); [Miller, Debra C](#); [Sorkin, Jeff- FS](#); [Salazer, Holly](#)
Cc: [Walker Williamson](#); [Margaret Earnest](#); [John Minter](#); [Amy Browning](#); [Javier Galvan](#); [Jocelyn Mellberg](#); [Michael Ege](#); [Jill Dickey](#)
Subject: NPS Feedback on Texas RH Progress Report
Date: Thursday, July 25, 2024 4:40:14 PM

Jamie,

Thank you for the opportunity to review Texas' draft Regional Haze Progress Report. We appreciate the presentation and time along with the information provided. We will stay apprised of EPA's next steps on the submitted Regional Haze plan and found the submittal timelines helpful for the future. The NPS notes that area source emissions are particularly important for Carlsbad Caverns and Guadalupe Mountain National Parks, and may be underestimated. We encourage Texas to consider lower reporting thresholds for future rules to refine emission inventories. The NPS does not have other comments on the progress report.

Regards,

Lisa

Lisa Devore

National Park Service Intermountain Region (Regions 6, 7 & 8)

Air Quality Specialist

Lisa_devore@nps.gov

720.660.0108

[Air \(U.S. National Park Service\) \(nps.gov\)](#)

[IMR Air Resources \(sharepoint.com\)](#)

FEATURE: [National Parks in the History of Science: Visibility \(Video\) \(U.S. National Park Service\) \(nps.gov\)](#)