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Agriculture

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**File Code:** 2580-2

**Date:** January 21, 2009

Lynn Terry  
Deputy Executive Officer  
California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812-2815

Dear Ms. Terry:

On November 12, 2008, the State of California submitted a draft implementation plan describing your proposal to improve air quality regional haze impacts at mandatory Class I areas across the state. We have appreciated the opportunity to work closely with the state of California through the initial evaluation, development, and now, subsequent review of the plan. Cooperative efforts such as these ensure that, together, we will continue to make progress toward the Clean Air Act's goal of natural visibility conditions at our Class I Wilderness Areas.

This letter acknowledges that the U.S. Department of Agriculture, U.S. Forest Service has received and conducted a substantive review of your proposed Regional Haze Plan in fulfillment of the requirements under federal regulations 40 CFR 51.308(i)(2). Please note, however, that only the U.S. Environmental Protection Agency (EPA) can make a final determination about the document's completeness, and therefore, only the EPA has the ability to approve the document. The Forest Service's participation in the State of California's administrative process does not waive any legal defenses or sovereignty rights it may have under the laws of the United States, including the Clean Air Act and its implementing regulations.

As outlined in a letter to you dated October 18, 2006, our review focused on eight basic content areas. The content areas reflect priorities for the U.S. Forest Service, and we have attached a few minor comments to this letter associated with these priorities. We look forward to your response required by 40 CFR 51.308(i)(3). For further information please contact Trent Procter at 559-784-1500, x1114 or Scott Copeland at (307) 332-9737.



Again, we appreciate the opportunity to work closely with the State of California. We particularly want to compliment your extremely talented and dedicated staff for their technical analyses and collaboration. We feel very confident that the final plan presents strategies that will protect these very special Class I Wilderness Areas.

Sincerely,

*/s/ Richard J. Cook (for)*  
RANDY MOORE  
Regional Forester

Enclosure

## Attachment

1. **We would like to emphasize our support and the importance of continued investigation of wildfire emissions in the natural conditions target.** The plan (Section 9.4) suggests that the magnitude of wildfire emissions is not appropriately considered as a part of the natural conditions goal. We agree that long term wildfire tracking will provide a solid foundation for improving the estimate of these emissions in the natural conditions estimate. We are committed to working with California and our Federal Land Manager partners in this effort.
2. **We would like to see the plan commit to more specific interstate coordination in smoke management.** We understand that the Western Regional Air Partnership (WRAP) provides a mechanism for coordination in a general way, but we are interested in seeing a commitment to participate and assist in facilitating some of the informal land management and air pollution control district working groups that are currently struggling with effective coordination near the border with Oregon and Nevada. Occasionally, conflicting forecasts and separate tracking systems between states are posing a challenge to efficient smoke management. Consider the development of an Oregon / California integrated smoke management area.
3. **We also suggest that the plan acknowledge point source contribution of NO<sub>3</sub> from Nevada to the Desolation, Mokelumne, and Hoover Wilderness Areas on the worst 20% visibility days.** This appears to be a winter phenomenon and is displayed in the WRAP TSS data.